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Agenda

Planning and Transportation Policy Working Group Meeting

Date: Tuesday, 9 June 2026
Time 7.00 pm
Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT

Membership:

Councillors Mike Baldock, Monique Bonney, Hayden Brawn (Vice-Chair), Simon Clark, Charles Gibson (Chair), Kieran Golding, Alastair Gould, James Hunt, Peter MacDonald, Julien Speed and Mike Whiting.

Quorum = 3

Pages

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2. Apologies for Absence

3. Minutes

There are no minutes to consider.

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.	Designating Area of Special Control of Advertisements (ASCA)	5 - 82
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Issued on Monday, 1 June 2026

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

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Planning and Transportation Policy Working Group Meeting	
Meeting Date	9th June 2026
Report Title	Designating Area of Special Control of Advertisements (ASCA)
EMT Lead	Emma Wiggins - Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Jhilmil Kishore – Principal Heritage Officer
Classification	**Open**
Recommendations	1. To note the outcomes of the public consultation, which concluded on 26 May 2026, relating to the proposed designation of an Area of Special Control of Advertisements (ASCA). 2. To recommend to the Policy and Resources Committee that the amendments set out in this report are agreed, and that the updated ASCA document and associated guidelines are adopted for the purpose of designating the ASCA.

1 Purpose of Report and Executive Summary

1.1 The purpose of this report is to inform the Planning and Transportation Policy Working Group (PTPWG) of the outcomes of the public consultation on the proposed designation of a targeted Area of Special Control of Advertisements (ASCA) within Conservation Areas that contain a commercial centre. The consultation concluded on 26 May 2026.

1.2 Officers recommend that PTPWG endorse the recommended updates (incorporating and responding to the feedback received during the consultation) to the document and its associated guidelines, as set out in Appendix I, and recommend to the Policy and Resources Committee that the document be formally adopted for the purpose of designating the ASCA.

2 Background

1.1 Swale Borough Council currently does not have an ASCA. Since the adoption of the Heritage Strategy in 2020 and subsequent Action Plans whereby a number of Conservation Areas have been reviewed, it has been proposed that in order to better manage and maintain Swale's historic environment and heritage, a targeted ASCA can prove beneficial for Conservation Areas with a commercial centre. Any designation needs to be based on public consultation and must follow specific legal steps, including consideration of the order by the Secretary of State. Following an all members briefing in May 2024, it was agreed that a draft consultation document

be prepared for approval by the PTPWG and Policy and Resources Committee, before undertaking public consultation.

1.2 The Advertisement Regulations set out rules for the display of advertisements and place limits on the kind of advertisements which require formal permission from a Local Planning Authority. The Planning Acts enable a Local Planning Authority to designate an Area of Special Control of Advertisements (ASCA) where there are stricter controls on the type, size and height of advertisements. The legislation requires that an ASCA should only be designated where there is a need for special protection due to scenic, historic, architectural or cultural features; it should be reviewed every five years.

2.3 The proposal is to designate a targeted Area of Special Control of Advertisements (ASCA) that provides additional protection to High Streets within the existing Conservation Areas. It will be a matter for the Policy and Resources Committee to decide whether the draft updated document as presented in Appendix I is fit for purpose, but the PTPWG is requested to provide feedback as part of the process of reaching a decision.

2.4 The ASCA is proposed to be designated in the following Conservation Areas:

a. Cellar Hill & Greenstreet
b. Faversham Town
c. Milton Regis
d. Newington High Street
e. Queenborough
f. Sheerness Mile Town
g. Sheerness Royal Naval Dockyard and Bluetown, and
h. Sittingbourne

Out of the above mentioned 8 Conservation Areas, apart from Faversham Town and Queenborough the remaining 6 are on Historic England's Heritage at Risk register primarily because the historic significance of their high streets is vulnerable and deteriorating. Designating an ASCA in these Conservation Areas, would facilitate better management of their shopfronts and the historic significance of their high streets.

2.5 Designation of an ASCA allows greater control over the following:

- size of lettering/symbols on advertisements (0.3m maximum)
- the height of advertisements on facades (3.6m above ground level)
- the proportion of a frontage given over to advertisements (10% maximum)
- advertisements with internal or 'halo' illumination
- advertisements on hoardings around construction sites
- advertisements on telephone kiosks
- advertisements on captive balloons
- advertisements on flags

2.6 However, within a Conservation Area, advertisement types 4-8 listed above are already controlled and are not 'deemed consent': advertisement consent is required. Additional controls on lettering size, advertisement height above ground level and façade proportion (requiring consent for Nos 1-3 above) would additionally address the issue of badly proportioned glazing and fascia and help manage/maintain traditional shopfront scale and proportions.

3 Proposals

3.1 The recommendations are that members:

- To note the outcomes of the public consultation, which concluded on 26 May 2026, relating to the proposed designation of an Area of Special Control of Advertisements (ASCA).
- To recommend to the Policy and Resources Committee that the amendments set out in this report are agreed, and that the updated ASCA document and associated guidelines are adopted for the purpose of designating the ASCA.

4 Alternative Options Considered and Rejected

4.1 One option would be to not take the designating ASCA project any further. 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 Area and its wider setting moving forward. It would also go against recommendations within the adopted Heritage Strategy.

4.2 A second possible option would be to suspend the work on this designation until some point in the future. Whilst this option would reduce expended officer time, it could still lead to (a) the continued deterioration of the High Streets within Conservation Areas, (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 Conservation Areas with a commercial centre within the Borough.

4.3 Other options related to alternative boundaries/Conservation Areas/ National Landscapes and borough wide are detailed in the draft consultation document attached as Appendix I. The proposed extent and boundaries are considered an appropriate reflection of identified need and the resources available to implement and manage the designation.

4.4 A third option would be to disregard some elements, or all of the feedback received, in terms of the suggested boundary change(s). However, whilst it is considered that the consultation document (to support the designation of ASCA) 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 or be challenged at the final stage when the proposals are submitted to The Secretary of State for adoption.

5 Consultation Undertaken or Proposed

5.1 An eight -week public consultation was undertaken from 1st April 2026 to 26th May 2026..

5.2 The National Planning Guidance recommends that local trade and amenity organisations are consulted before an ASCA is made and submitted to the Secretary of State for consideration. The Council has a 'Statement of Community Involvement' (SCI) to guide consultation on planning matters.

This covers:
• Planning Policy documents (including the Local Plan and other Development Plan Documents (DPDs), Supplementary Planning Documents (SPDs) and other guidance)
• Neighbourhood Plans
• Planning Applications

Whilst the designation of ASCA is not specifically included in the SCI, the principles set out for consulting on other documents will guide the review.

A press notice to advertise the consultation is also required together with specific notifications to Parish & Town Councils, Councillors, and specific groups with an interest in the document. In this case these groups would include local amenity groups and the Campaign for the Protection of Rural England (CPRE), the local Chamber of Commerce and the Advertising Association.

5.3 The following parties were notified in writing of the review and were invited to comment on it:

- Parish & Town Councils- only to the ones where ASCA is proposed and the immediate neighbouring ones
- Councillors- ward councillors
- Residents and property owners within the proposed ASCA boundary of Conservation Areas - for Faversham and Sheerness Blue Town the ones within ASCA and residents touching the ASCA boundary. Entire CA for the rest - Newington High Street, Cellar Hill, Sheerness Mile town, Sittingbourne, Milton Regis and Queenborough.
- Local amenity groups - Newington History Group, Sittingbourne, Queenborough Society, Faversham Society, Sheppey Group
- Campaign for the Protection of Rural England (CPRE),
- The local Chamber of Commerce and
- The Advertising Association.
- KCC Highways and ecology
- Historic England

5.5 Hard copies of the consultation document were made available at relevant local libraries and the document was also available to view/download on-line via the Council's website for the duration of the public consultation period

5.6 A total of 19 consultation responses have been received. The officer response to this consultation feedback (as summarised) is attached as Appendix II.

Formal Consultation Summary: Proposed Designation of Areas of Special Control of Advertisements (ASCA)

5.7 Overview of Consultation

Public consultation was undertaken on the proposed designation of Areas of Special Control of Advertisements (ASCA) across eight Conservation Areas within Swale. A total of 19 representations were received from residents, businesses, elected members, CPRE and Queenborough Town Council.

The consultation generated strong overall support for the introduction of ASCA controls. Respondents consistently recognised the need to protect the character and amenity of historic high streets, reduce visual clutter, and address the proliferation of oversized, illuminated, or poor-quality signage.

Only one formal objection was received.

5.8 Summary of Supportive Responses

a. General Support for ASCA Designation

The majority of respondents expressed clear support for the proposals. Themes included:

- Protection of heritage character
  "I wholeheartedly agree with your proposed controls and locations."
  "Reasonable but meaningful constraints… are essential if we are to preserve the global attraction of our heritage."
- Concerns about illuminated and moving LED signage, particularly in food outlets and betting shops.
  "Large, illuminated screens with moving images… spoil the atmosphere of the street."
- Desire for improved enforcement
  "Maybe enforce existing laws first?"
  "My only concern is the council's ability to adequately enforce."
- Recognition of long-term decline and the need for intervention
  "So many wonderful buildings gone… I am all for preserving what is left."

b. Support from Elected Members and Town Council

- **Queenborough Town Council** supported designation and requested the ASCA boundary be aligned with the full Conservation Area.

- **Ward Members** expressed strong support, emphasising the need for tools to preserve high street character.

c. Requests for Additional Measures

Respondents suggested complementary actions, including:

- Curfews or time restrictions on illuminated signage.
- Use of empty shopfronts for community or local business advertising.
- Borough-wide action on illegal fly-posting and highway advertising.
- Stronger enforcement against non-compliant shopfronts in Conservation Areas.

5.9 Non-Supportive Responses

a. Formal Objection (Local Business, Milton Regis)

One representation raised a detailed objection to ASCA designation in Milton Regis, citing:

- **Socioeconomic challenges** and concerns that ASCA controls prioritise aesthetics over structural issues such as antisocial behaviour, vandalism, and long-term underinvestment.
- **Potential negative impact on business viability**, particularly for small independent retailers reliant on visibility and signage.
- **Risk of accelerating decline**, arguing that restrictions may deter new businesses and increase vacancy rates.
- **Preference for alternative approaches**, including targeted enforcement, grants for shopfront improvements, and public realm investment.

b. Minor Critical Comments (Not Formal Objections)

A small number of respondents questioned Council priorities or raised unrelated planning concerns. These did not oppose ASCA designation itself.

5.10 Requests for Boundary Amendments

- **Extension requests**: Queenborough Town Council and Cllr Whiting requested that the ASCA boundary be extended to cover the full Conservation Area.
- **Localised concerns**: Residents of Preston Street, Faversham, highlighted specific issues with illuminated betting shop screens and suggested the ASCA would help address these.
- **CPRE Kent position**: CPRE Kent supported the principle of designation and advised that ASCA boundaries should align with full Conservation Area boundaries, noting no areas should be excluded and questioning the rationale for limiting coverage to commercial frontages.

5.11 Officer Assessment

Having reviewed all representations, officers consider that:

- The strong majority support provides a clear mandate to proceed with ASCA designation.
- The issues raised in the single objection can be addressed through clarification of the purpose and effect of ASCA controls, which regulate advertisements but do not restrict business operation or prevent appropriate signage.
- ASCA designation will support regeneration, not hinder it, by improving visual amenity, reinforcing heritage value, and creating a more attractive environment for investment.
- Concerns about enforcement are acknowledged; however, ASCA designation provides additional statutory tools that strengthen the Council's ability to act proportionately and consistently.
- Requests for boundary extensions have been considered on an evidence-led basis, ensuring that ASCA coverage remains targeted, justified, and defensible.

5.12 Conclusion

The consultation demonstrates clear and consistent public, member, and stakeholder support for ASCA designation across the proposed areas. The single objection does not outweigh the substantial benefits identified, nor the strong alignment with national policy, local heritage objectives, and the Council's wider place-making strategy.

Officers therefore recommend that the Council proceeds with designation and extends the ASCA to encompass the full extent of the Conservation Areas at Cellar Hill & Greenstreet, Newington High Street, Queenborough and Milton Regis, in accordance with the accompanying Officer Response and Recommendations Table.

6 Implications

Issue	**Implications**
Corporate Plan	The proposed designation of an Area of Special Control of Advertisements would support the Economy priority from the Corporate Plan: *'To develop the borough's second Heritage Action Plan that reflects in-house and partnership capacity, to support and promote our outstanding assets.*
Financial, Resource and Property	Managing envisaged increase in advertisement consent applications due to ASCA designation, may have financial and resource implications for the council. The council can manage increased workload by combining process efficiencies, strategic staffing, improved applicant guidance, recovery of discretionary costs, and data-driven monitoring. Good communication and digitisation will significantly reduce the long-term resource burden.

	The current process of designating ASCA is being managed by the Heritage Officer using in-house resources with no additional funding.
Legal, Statutory and Procurement	Regulation 20(1) requires that every local planning authority shall from time to time consider whether any part or additional part of its area should be designated as an area of special control. Regulation 20(2) states that an area of special control shall be designated by an area of special control Order made by the local planning authority and approved by the Secretary of State, in accordance with the provisions of Schedule 5 of the Regulations. Para 141 of the NPPF states, *'The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts*.' The Town and Country Planning Act 1990 (Section 221(3)) sets out two criteria for the designation of an ASCA: that it is a rural area; or an area which appears to the Secretary of State to require special protection on grounds of amenity. The Town and Country Planning (Control of Advertisement) (England) Regulations set out the legal provisions relating to the review of ASCA's. Section 20 of the Regulations requires LPAs to review an ASCA at least every five years to see if it should be revoked or modified. Schedule 5 of the Regulations sets out the legal procedures for designating or modifying an ASCA.
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. Designating an ASCA is envisaged as a beneficial tool to better manage deteriorating historic significance of the Conservation Areas with a commercial centre (High Street) and further facilitate removal of a number of these Conservation Areas from Historic England's Heritage at Risk Register.

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 designating 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.

7 Appendices

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

- Appendix I: Public consultation document for Designating Area of Special Control of Advertisements (ASCA)
- Appendix II: Consultation response table
- Appendix III: Reasons for extending the ASCA designation to cover the entire Conservation Areas.

8 Background Papers

- A Heritage Strategy for Swale 2020-2032

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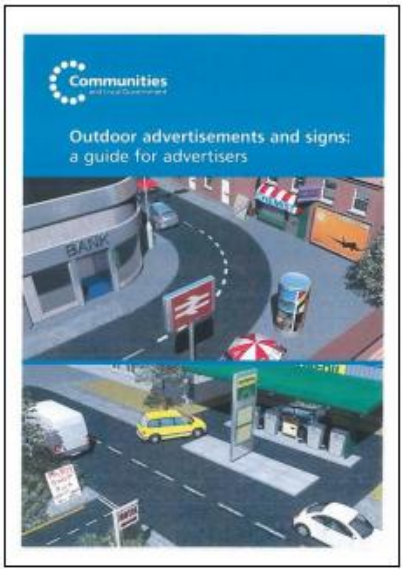
Planning Policy Consultation



Designating

Area of Special Control of Advertisements

Public Consultation

1st April 2026- 26th May 2026

Swale BOROUGH COUNCIL

Contents

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9. Sheerness Mile Town Conservation Area
10. Sheerness Royal Naval Dockyard and Bluetown Conservation Area, and
11. Sittingbourne Conservation Area
12. Key Questions
13. Consultation questions about the Proposed ASCA Designation

Foreword by Cllr Mike Baldock to be inserted here

1 Consultation Details

1.1 This consultation seeks your views on the proposed designation of an Area of Special Control of Advertisements (ASCA) within Swale. Following this consultation, we will consider all responses received. We will then decide whether to amend our proposals and either re-consult (if any changes are significant) or to designate the ASCA and submit it to the Secretary of State for consideration.

1.2 **What is an advertisement?**
The definition of an advertisement is included in the Town and Country Planning Act 1990 and means '*any word, letter, model, sign, placard, board, notice, awning, blind, device or representation, whether illuminated or not, in the nature of, and employed wholly or partly for the purposes of, advertisement, announcement or direction…*'. It does not include '*anything employed wholly as a memorial or as a railway signal or a placard or other object borne by an individual or an animal*'. In practice advertisements include a very wide range of devises such as posters; boards; fascia and projecting signs; directional signs; estate agents' boards; static balloons; flags; price displays; traffic signs and village name signs.

1.3 We would like to hear what you think about the changes we are planning to make. We have produced maps for each area where designation is proposed and supported these with specific questions, a full list of consultation questions is also provided at the end of the document.

General questions you might like to consider in your response include:

- Is the approach of designating the ASCA to 8 Conservation Areas with a commercial centre, correct?
- Should land within a National Landscape be in the ASCA?
- Are there any areas that should not be considered for inclusion in the ASCA?
- Are there any other areas that should be considered for inclusion in the ASCA?

The period for you to submit your comments runs for 8 weeks, from Wednesday 1st April 2026 to Tuesday 26th May 2026. Comments can be submitted via email to conservation@swale.gov.uk or by post to: Conservation, Swale House, East Street, Sittingbourne ME10 3HT

All comments must be received by 5pm on Friday 22nd May 2026 or they may not be considered. Please note that we usually upload comments to the website including the name of the person commenting, although personal details (signature, address, email and telephone number) are redacted. Where comments are received from an organisation or business, contact details will not usually be redacted. In some cases, for instance where comments are deemed to be offensive or confidential, comments may not be made public, or an officer summary may be uploaded instead.

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https://swale.gov.uk/footer/privacy

2 Summary

2.1 Areas of Special Control of Advertisement (ASCA) place additional controls on the display of adverts and should only be imposed in areas that need special protection due to their scenic, historic, architectural or cultural significance.

2.2 Outside of Areas of Special Advertisement Control, many advertisements can be displayed without the need to make an application to the Local Planning Authority: the need to make an application depends on factors such as the type and size of advert and location in which it will be displayed. Within an Area of Special Control of Advertisements (ASCA) there are stricter controls on the type, size and height of advertisements that may be displayed without making an application and some types of advertisement may not be displayed at all. ASCAs are designated for their special scenic, historical, architectural, or cultural features and should only apply to rural areas or other areas requiring special protection on the grounds of amenity.

Swale Borough Council currently does not have an ASCA. Since the adoption of the Heritage Strategy in 2020 and subsequent Action Plans wherein a number of Conservation Areas have been reviewed, it has been proposed that designating an ASCA within the commercial centre of 8 identified conservation areas of Swale would facilitate better management of their shopfronts and historic significance.

2.3 Businesses in urban areas, particularly town centres, should be able to rely on advertisements to support trade and activity, however, the historic town centres within Swale have deteriorated over the years and 6 out of 8 conservation areas that are part of this process are on Historic England's Heritage at Risk register.

3. Extent of Proposed ASCA

3.1 Which parts of Swale are proposed to be defined as Areas of Special Control of Advertisements?

The officer recommendation is that the ASCA covers those conservation areas that have a high street.

This would include the following Conservation Areas:

a. Cellar Hill & Greenstreet
b. Faversham Town
c. Milton Regis
d. Newington High Street
e. Queenborough
f. Sheerness Mile Town
g. Sheerness Royal Naval Dockyard and Bluetown, and
h. Sittingbourne

Out of the above mentioned 8 Conservation areas, apart from Faversham Town and Queenborough the remaining 6 are on Historic England's Heritage at Risk register primarily because the historic significance of their high streets is vulnerable and deteriorating. Designating an ASCA in these conservation areas, would facilitate better management of their shopfronts and the historic significance of their high streets.

Designation of an ASCA allows greater control over the following:

1. size of lettering/symbols on advertisements (0.3m maximum)
2. the height of advertisements on facades (3.6m above ground level)
3. the proportion of a frontage given over to advertisements (10% maximum)
4. advertisements with internal or 'halo' illumination
5. advertisements on hoardings around construction sites
6. advertisements on telephone kiosks
7. advertisements on captive balloons
8. advertisements on flags (Please see Key Questions)

However, within a conservation area, advertisement types 4-8 listed above are already controlled and are not 'deemed consent': advertisement consent is already required. Additional controls on lettering size, advertisement height above ground level and façade proportion (requiring consent for Nos 1-3 above) would additionally address the issue of badly proportioned glazing and fascia and help manage/maintain traditional shopfront scale and proportions.

Historic England in its publication on Conservation Areas at Risk counts, *'The impact of advertisements'* as one of the top ten threats facing conservation areas.

The following alternatives have also been considered:

Option 2- All Conservation Areas with a High Street and within the Kent Downs National Landscape

Option 3 - All Conservation Areas and all of the Kent Downs National Landscape

Reasoning: The Conservation Areas within the Kent Downs National Landscape are primarily residential, none of them have a high street. One of the main issues within the majority of these conservation areas is 'householder's alterations', therefore it is considered that an Article 4 direction or similar would provide a better tool for managing historic significance of these conservation areas, as compared to designating an ASCA within these areas. Similar reasoning could be applied to conservation areas without a high street. Additionally, provisions to display adverts with 'deemed' consent do not apply in a designated National Landscape. It is considered that an ASCA would not be advantageous since the majority of the more rigorous advertisement controls are already in place due to National Landscape status. Therefore, ASCA is not recommended for the National Landscape.

Option 4 - Entire Borough with Exclusions; following sites proposed to be excluded:

1. Built up area boundary (ST3) exclusive of Conservation Areas and Kent Downs National Landscape
2. Existing Committed Housing Locations A7
3. Housing Allocations ST4
4. Mixed Use Allocations ST4
5. Peel Ports area and MOJ (or similar restricted) sites.

Reasoning: The requirement for designating an Area of Special Control of Advertisement stems from the need to manage vulnerable and deteriorating historic high streets within Swale, especially the ones that are on Historic England's Heritage at Risk register. A borough wide ASCA designation with exclusions as set out above will not be a focused approach and has immense resource implications on enforcement and planning teams. Additionally, the Local Plan policies on which this would be founded are out of date, which is another rationale for not taking this approach.

3.2 Why does Swale need Area of Special Control of Advertisements?

Regulation 20(1) requires that every local planning authority shall from time to time consider whether any part or additional part of its area should be designated as an area of special control. Regulation 20(2) states that an area of special control shall be designated by an area of special control Order made by the local planning authority and approved by the Secretary of State, in accordance with the provisions of Schedule 5 of the Regulations.

Para 141 of the NPPF states, *'The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the*

planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.'

3.3 What is the process for designating the Area of Special Control of Advertisements?

3.31 The National Planning Guidance 7 states that 'before making an order and applying for approval from the Secretary of State, local planning authorities are expected to consult local trade and amenity organisations about the proposal'.

3.32 The Town and Country Planning (Control of Advertisement) (England) Regulations set out the legal provisions relating to the review of ASCA's.

3.33 Section 20 of the Regulations requires LPAs to review an ASCA at least every five years to see if it should be revoked or modified.

3.34 Schedule 5 of the Regulations sets out the legal procedures for designating or modifying an ASCA. In summary it requires that, as soon as possible after making an ASCA, the LPA submit it to the Secretary of State with a full statement of reasons. The order must then be advertised in the London Gazette and at least one local newspaper and if objections are made, the Secretary of State may require an inquiry or hearing before an Inspector. The Secretary of State may modify an order, in which case a further round of consultation and possibly formal hearings may be undertaken before an order is approved and a final notice included in the London Gazette and a local newspaper.

3.4 Which areas should be considered for exclusion from/inclusion in the ASCA?

3.41 Legislation and Government guidance.

The Town and Country Planning Act 1990 (Section 221(3)) sets out two criteria for the designation of an ASCA: that it is a rural area; or an area which appears to the Secretary of State to require special protection on grounds of amenity.

3.42 Area of Special Control of Advertisement (ASCA) in Kent

Within Kent, out of the 12 district and borough councils, the following four have designated Area of Special Control of Advertisement (ASCA):

- Dartford Borough Council,
- Dover District Council,
- Gravesham Borough Council, and
- Sevenoaks District Council

3.5 How will the designation be organised?

3.51 How are the designated areas identified?

Current proposals are based on a desk-based review of the ASCA focussing on the issues identified in this consultation document and the guiding principle set out above. Site visits have been undertaken as necessary to check the conclusions of the desk-based work and a report and maps produced to identify proposed designation of ASCA and any areas to be excluded. A final document based on the responses received during the public consultation will then be taken through the Council's approval process for confirmation before submitting to the Secretary of State for approval and designation.

3.52 Who will be consulted and how?

The National Planning Guidance recommends that local trade and amenity organisations are consulted before an ASCA is made and submitted to the Secretary of State for consideration. The Council has a 'Statement of Community Involvement'15 (SCI) to guide consultation on planning matters.

This covers:
• Planning Policy documents (including the Local Plan and other Development Plan Documents (DPD's), Supplementary Planning Documents (SPD's) and other guidance)
• Neighbourhood Plans
• Planning Applications

Whilst the designation of ASCA is not specifically included in the SCI, the principles set out for consulting on other documents will guide the review. A press notice to advertise the consultation is also required together with specific notifications to Parish & Town Councils, Councillors, and specific groups (including residents and property owners within the proposed ASCA boundary) with an interest in the document. In this case these groups would include local amenity groups and the Campaign for the Protection of Rural England (CPRE), the local Chamber of Commerce and the Advertising Association.

Conservation Areas proposed to be designated with ASCA

4 Cellar Hill and Greenstreet Conservation Area

Cellar Hill and Green Street Conservation Area was originally designated by Swale Borough Council on 22 November 2000. The conservation area was added to the Historic England Heritage at Risk Register in 2013. The register noted its condition as 'poor', its vulnerability as 'low' and its trend as 'deteriorating'. The Conservation Area has recently been reviewed and redesignated (July 2025) with extended boundaries that include a stretch of London Road.

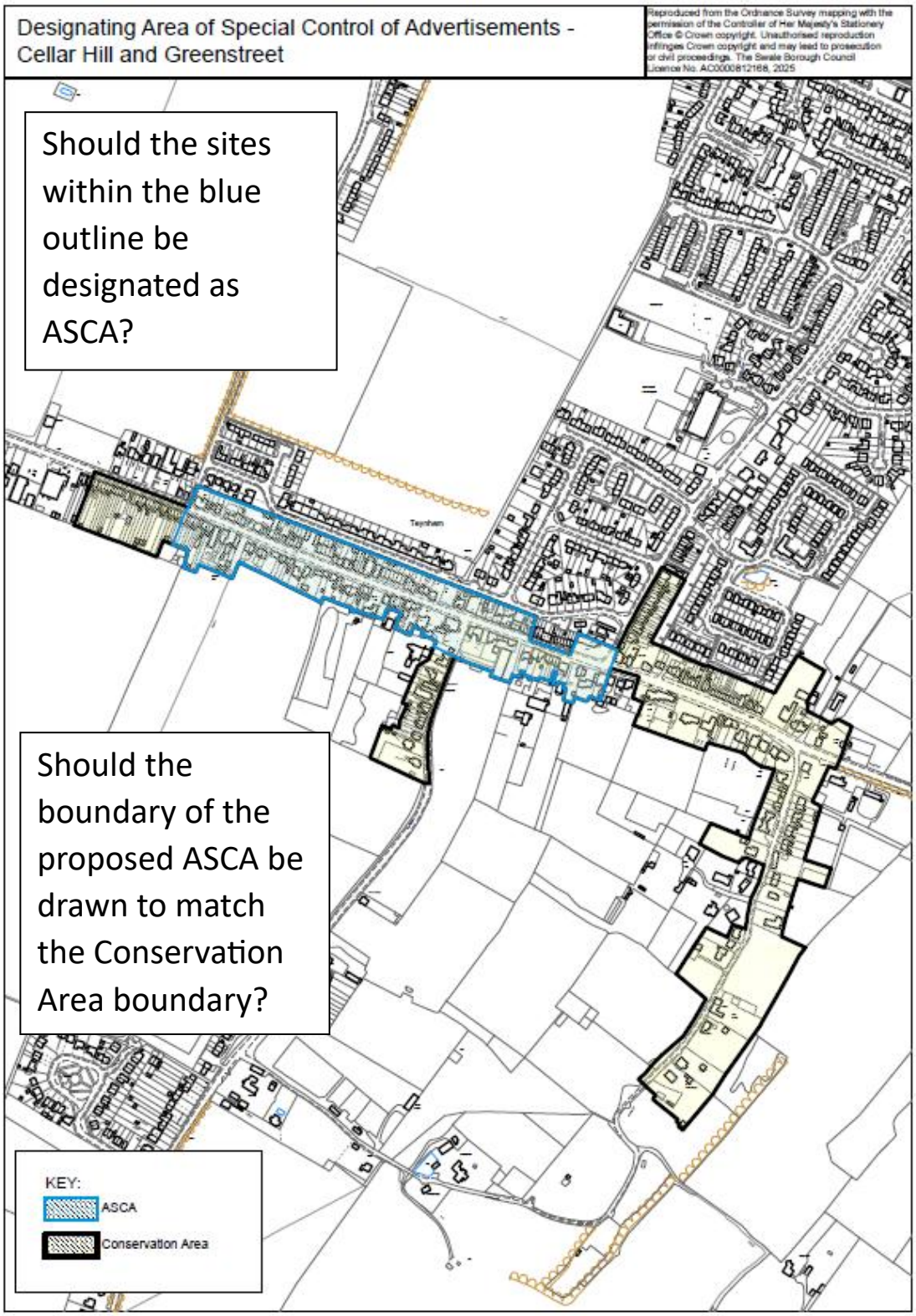
The risks that have been identified in the appraisal include:

- The loss of historic features through changes which are carried out as permitted development, particularly the loss of original windows and doors.
- The loss of historic features through unauthorised alterations carried out without the benefit of planning permission or listed building consent.
- The effect of the volume of traffic, traffic speeds and parking on the character of London Road.

It is proposed that a section of London Road which is within the new Conservation Area Boundary is designated as ASCA

Views of London Road in Cellar Hill & Greenstreet Conservation Area

Map CA 001 Key questions for Cellar Hill & Greenstreet Conservation Area



5 Faversham Town Conservation Area

Faversham Town Conservation Area was designated in 1971, and the boundary was reviewed in 2004. The Conservation Area was again reviewed and redesignated with extended boundaries in February 2024.Faversham is by far the biggest of three Conservation Areas in the Town Council's area, the others being 'Preston Next Faversham' and 'Ospringe'.

In 2007, an Article 4 Direction relating to the Faversham Conservation Area was made, providing controls over alterations (including painting of masonry and to means of enclosure), installation of satellite dishes, provision of hardstanding and extensions (including porches) where the elevation/area in question fronts a highway, waterway or an open space. This is currently in force.

The Conservation Area includes a concentration of listed buildings, historic townscape and other features spanning several centuries and including considerable survival of medieval Faversham. This, together with the Creek and other landscape features, creates an area of considerable significance, quality and distinctiveness.

Faversham is a port and market town and one of the main towns in Swale. The heritage significance of Faversham derives from its development from Saxon times to the present day, as a port settlement focussed on the Creek, with each phase of development evident in the town's plan and built form.

The Town Centre is focused on West Street, East Street, Market Street, Market Place, Court Street and Preston Street.

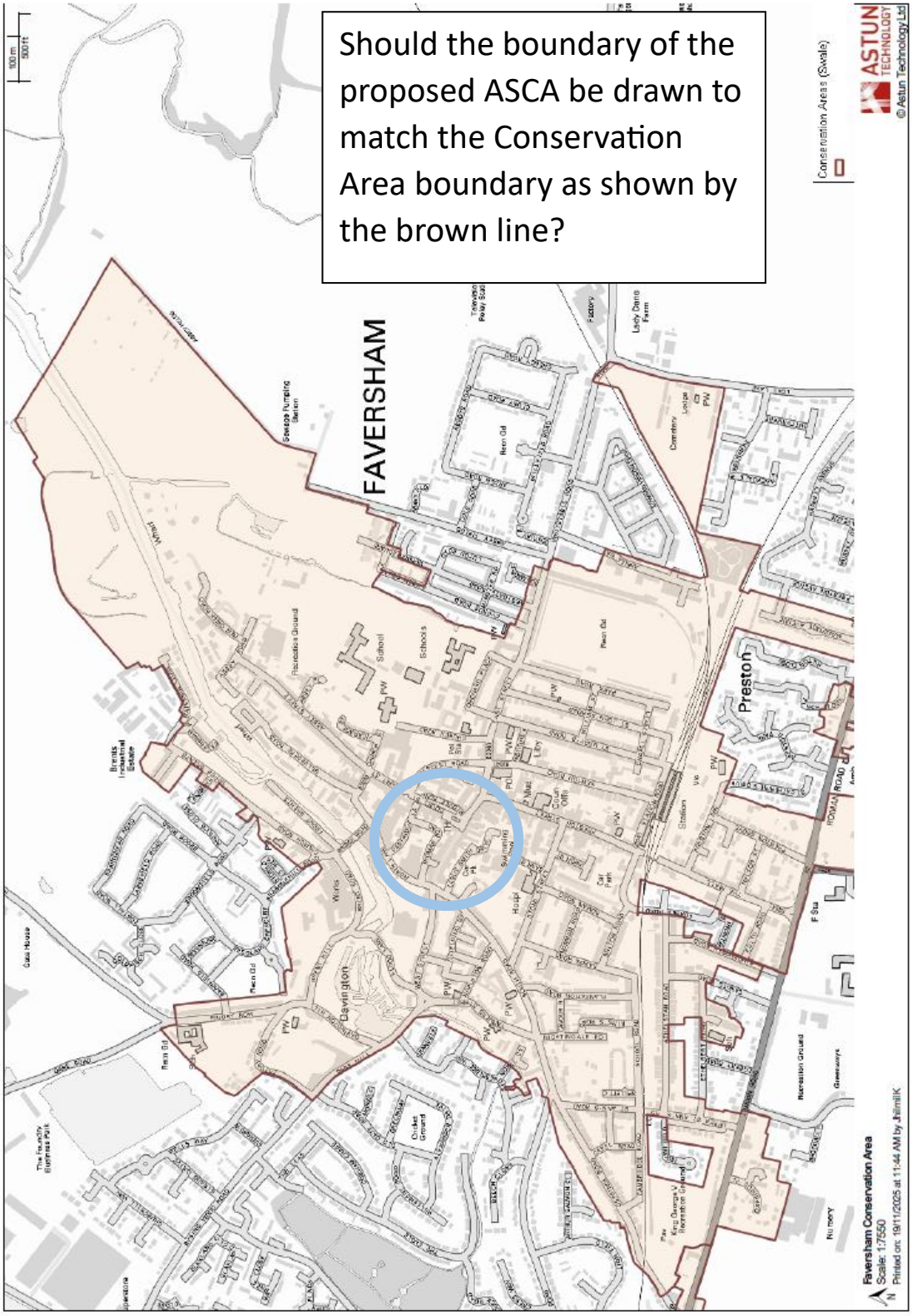
There are lots of surviving Georgian, Victorian and Edwardian shopfronts. These are mainly of timber construction, though some have masonry stallrisers. Shopfronts have a common formula of fascia, window(s) and door and stallriser, flanked by pilasters and capitals. They include symmetrical shopfronts, or side entrances, or dual entrances (one to the shop and one to the other parts of the premises. Earlier shopfronts tend to have smaller panes, whilst Victorian and later shopfronts have larger panes

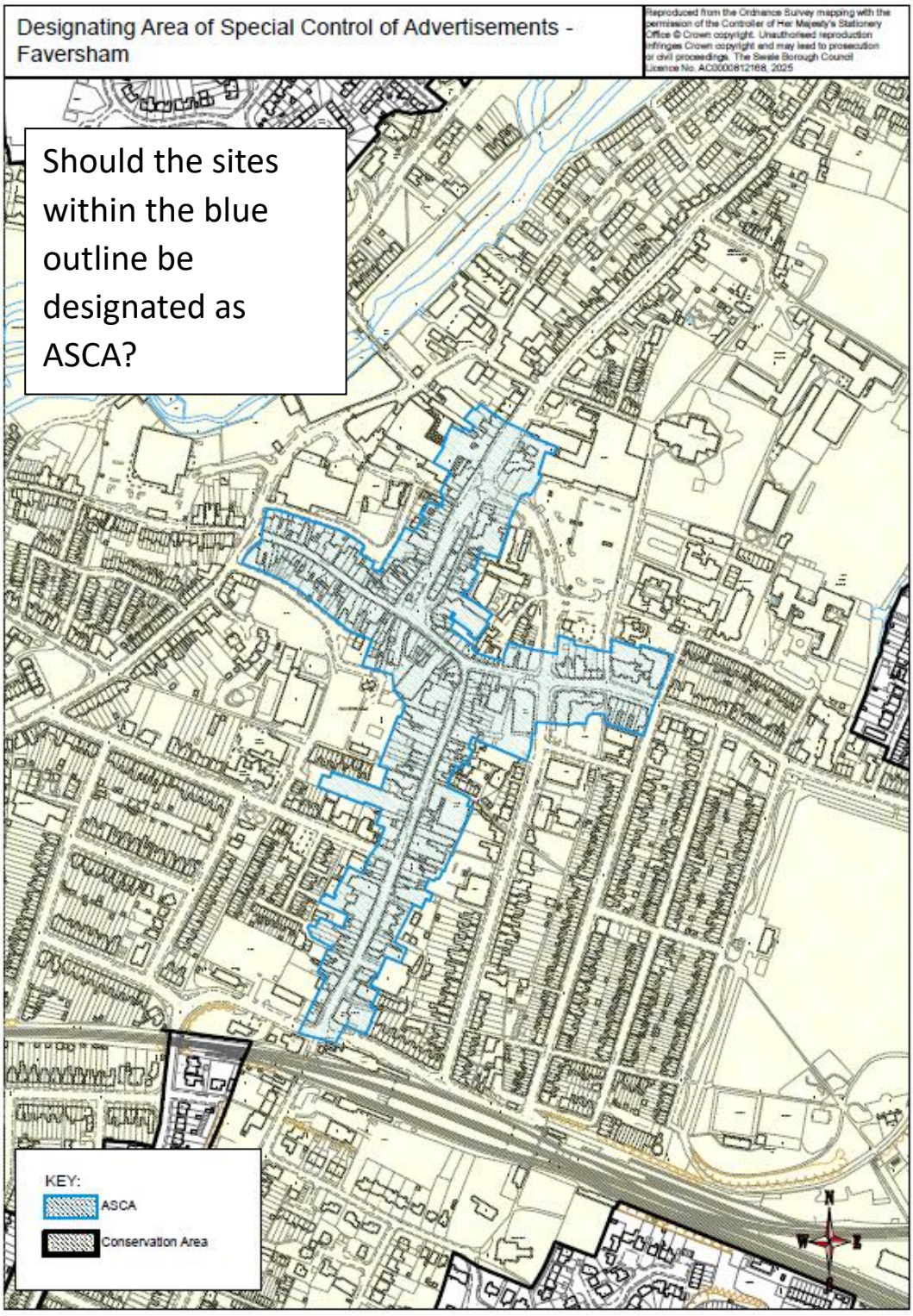
It is proposed that ASCA is designated only in the town centre that would focus on West Street, East Street, Market Street, Market Place, Court Street and Preston Street.

View of Market Street

View of Preston Street

Map CA 002 Key questions for Faversham Town Conservation Area




Designating Area of Special Control of Advertisements - Faversham
Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. The Swale Borough Council Licence No. AC0000812168, 2025
Should the sites within the blue outline be designated as ASCA?
KEY:
ASCA
Conservation Area
N
W
E

6 Milton Regis Conservation Area

Milton Regis Conservation Area was originally designated by Kent County Council in July 1977. Milton Regis is one of Kent's ancient settlements, the history of which is reflected in the composition and layout of its High Street. It includes one of the highest concentrations of listed buildings in the borough. The conservation area was reviewed and redesignated with amended/extended boundaries in February 2024.

The conservation area was included in Historic England's Heritage at Risk Register in 2016. Its condition was noted as 'poor', its vulnerability as 'medium' and its trend as 'deteriorating'.

Milton Regis has some particularly fine examples of period shopfronts, not all of which are currently used as such. They make a marked contribution to the special character of the town. All Milton's period shopfronts, whether in use or not, provide an important record of the town's retail history. They are architecturally as well as historically significant.

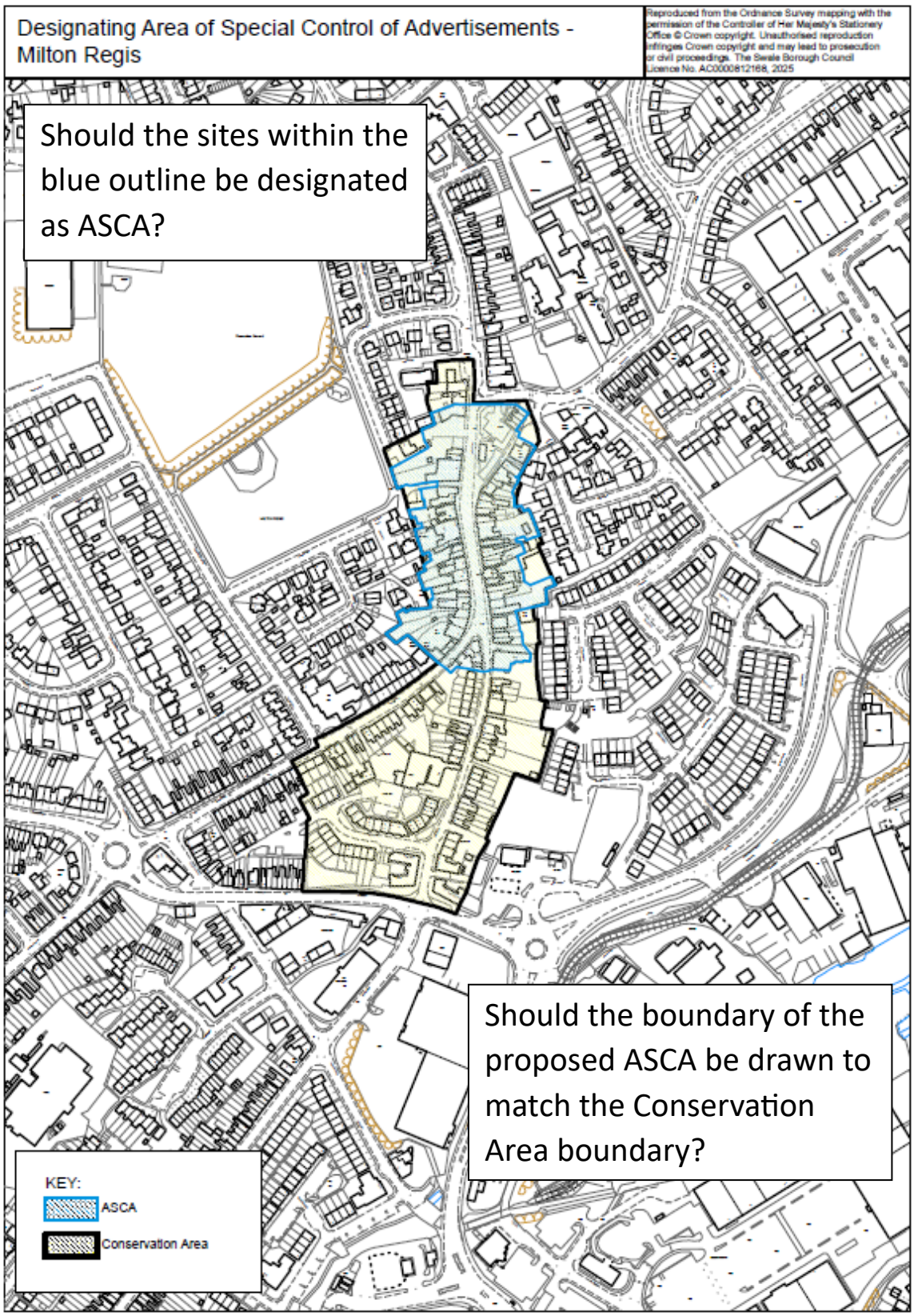
There are some good examples of traditional signage in the conservation area such as the wrought iron pub sign at 91 High Street. However, there are also many poorly designed or executed signs using inappropriate materials or oversized fascia boards which detract from the buildings and the conservation area. Advertising boards placed on the footway and banner signs attached to pedestrian railings do not do the area justice.

As part of the management plan of Milton Regis Conservation Area it is recommended that – *'Swale Borough Council has adopted supplementary planning guidance on the Design of Shopfronts, Signs and Advertisements. It provides good advice to those looking to advertise their shops or services. However, the appraisal has identified many examples of signs and advertisements which do not conform to the guidance, some appear to have been erected without the required advertisement consent or listed building consent.*

More proactive development management of new or replacement signs and of planning enforcement requiring the removal of unauthorised signs and advertisements by the local planning authority and the highway authority is recommended. Such active steps could achieve a considerable improvement. However, if additional controls are considered necessary then the council could consider the use of Areas of Special Advertisement control.'

View of Milton Regis High Street

Map CA 003 Key questions for Milton Regis Conservation Area



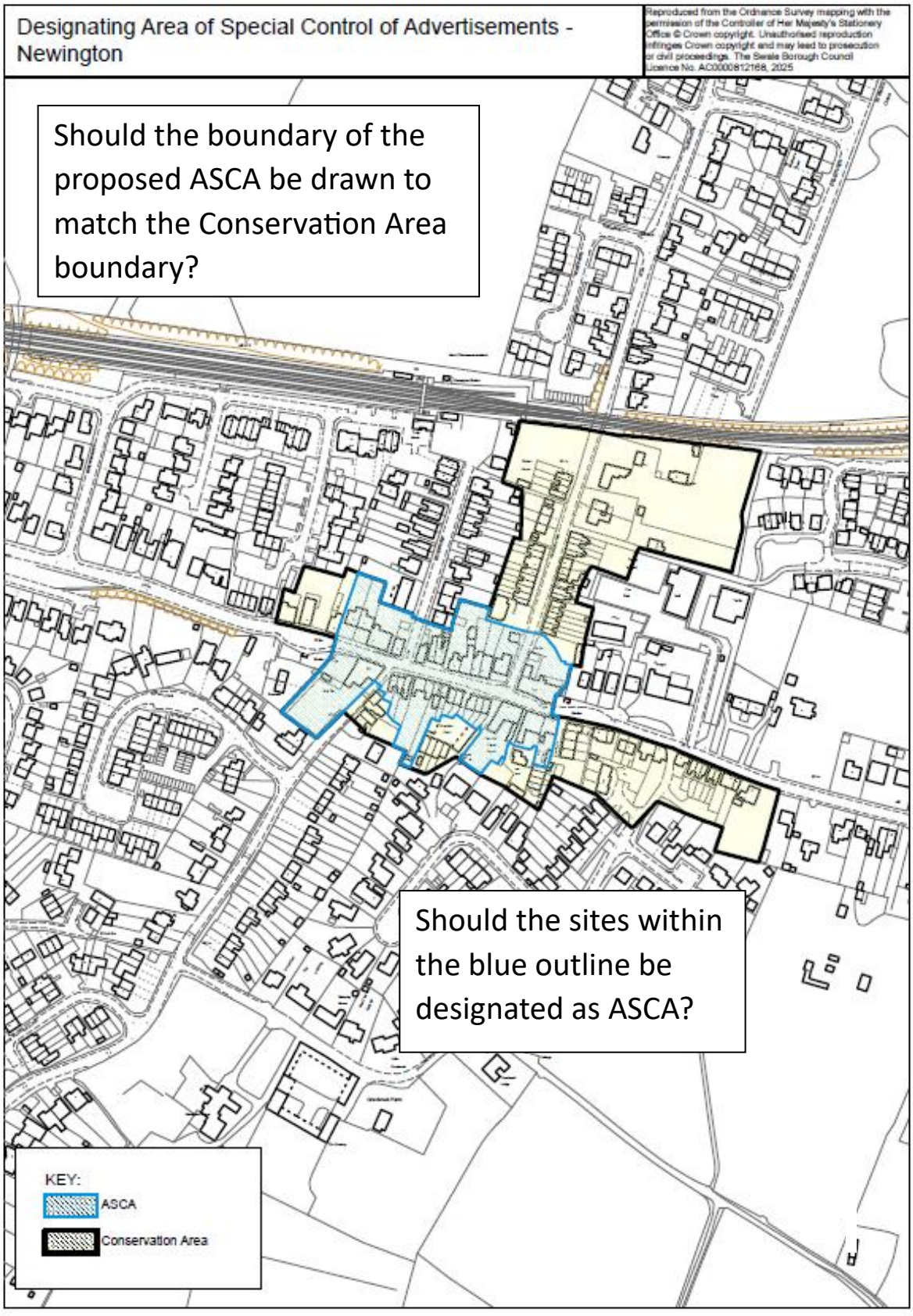
7 Newington High Street Conservation Area

Newington High Street was first designated a conservation area in September 1992. It has not been reviewed since its designation.

The conservation area is on Historic England's Heritage at Risk Register. Its condition is noted as 'poor', its vulnerability as 'high' and its trend as 'deteriorating' and has been classed under category C - No action/strategy identified or agreed (where trend is stable or improving).

View of Newington High Street

Map CA 004 Key questions for Newington High Street Conservation Area



8 Queenborough Conservation Area

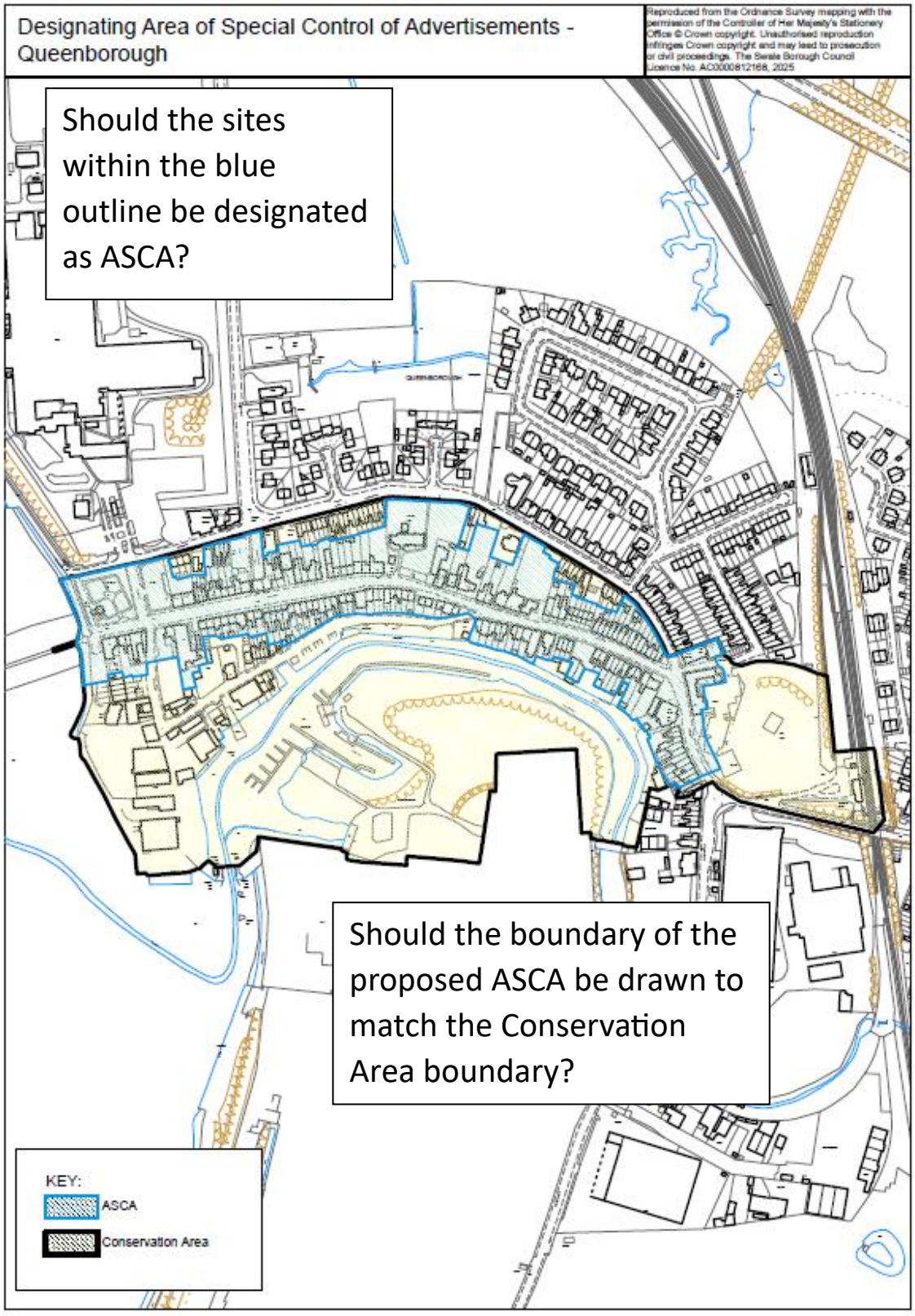
The Queenborough Conservation Area was first designated in November 1978 by Swale Borough Council. It has since been reviewed and redesignated with amended boundaries in March 2011.

Queenborough is a Medieval market town and port with a rich maritime history and distinctive character. Queenborough is historically significant as a planned and laid out port settlement, planted by Royal charter in 1368 between the west Swale and the Royal Castle. Although almost all the buildings of the early town have been successively replaced or rebuilt through the centuries, the Medieval plan form of the town remains clearly legible today.
Queenborough is a linear settlement. The High Street is the spine of the Town.

Within the conservation area there are a number of commercial frontages, including shopfronts and public houses, which make a positive contribution to the significance of the conservation area. It is important that these historic features are retained and maintained.

View of Railway Terrace

Map CA 005 Key questions for Queenborough Conservation Area



9 Sheerness Mile Town Conservation Area

The conservation area is on Historic England's Heritage at Risk Register. Its condition is noted as 'poor', its vulnerability as 'low' and its trend as 'deteriorating'.

Sheerness - Mile Town Conservation Area was first designated in June 1976. An appraisal document and minor boundary (judicious) changes were adopted in 2000. The Conservation Area has since been reviewed and redesignated with amended boundaries in 2024.

Key significance of the Conservation Area are:

- Historic Commercial Centre of Sheerness
- Unaltered Street patterns from the 19th Century
- Surviving examples of traditional shopfronts
- Surviving examples of use of traditional building materials

Sheerness Mile Town continues to function as the main commercial centre of the Isle of Sheppey despite its peripheral location and distance from Halfway and Minster, with the Conservation Area focused around the linear High Street and the Broadway that anchors its retail and service activity.

Mile Town Conservation Area comprises the historic core of Mile Town and takes in those areas of the town which functioned as its commercial and civic backbone from the early 19th century onwards. It is defined by the modern commercial area to the west and Victorian housing to the east. Despite recent commercial developments outside of this historic core, the High Street remains the commercial focus of the town and houses a bustling shopping area which includes some high-street chains but many more independent local retailers.

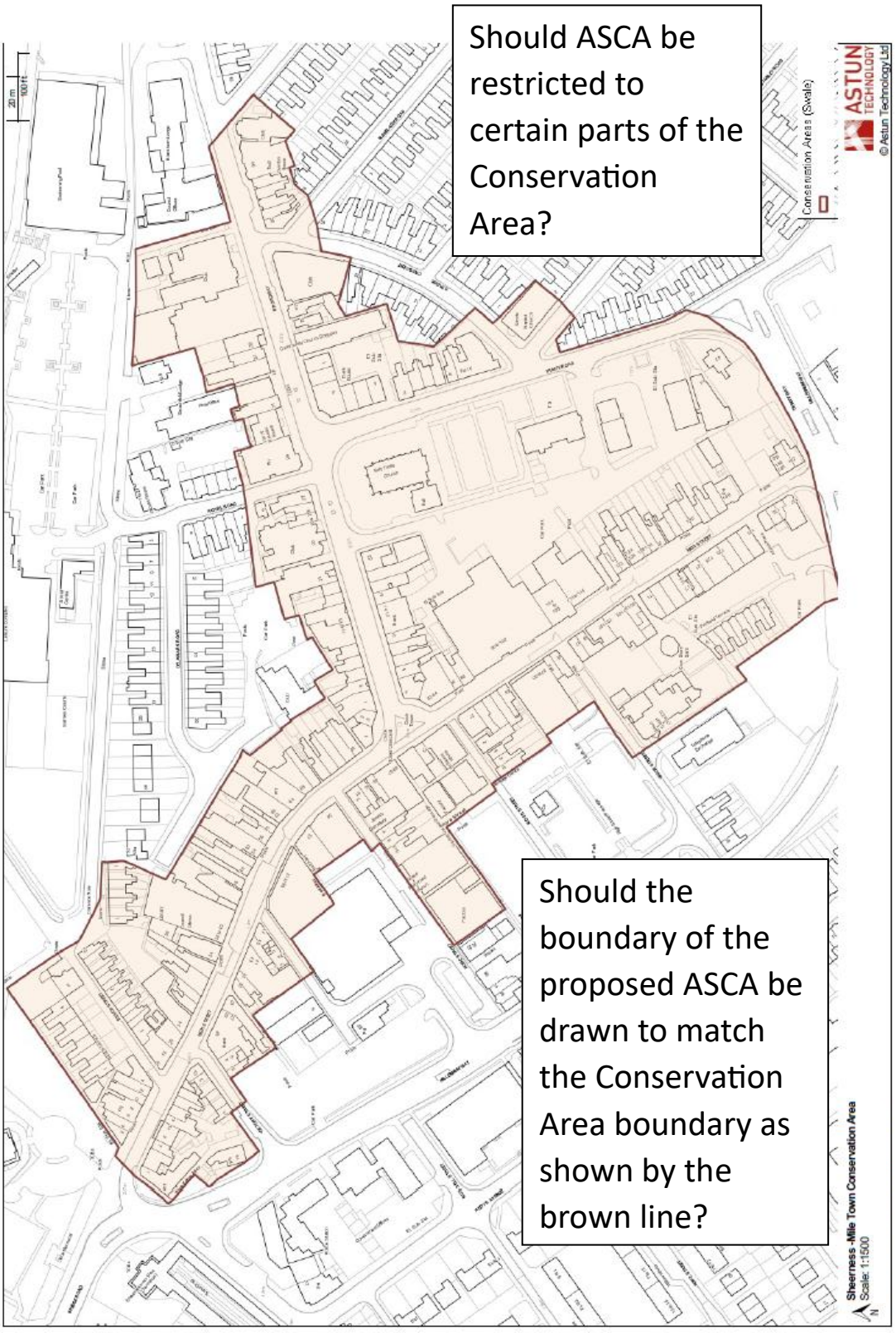
The Conservation Area reflects the extent of the centre of Mile Town by the mid-19th-century. By this date the High Street was entirely built up, mostly with properties combining commercial space at the street frontage with domestic accommodation, and The Broadway and adjacent structures had been built. The High Street contained several inns and one of the earliest co-operative societies. The majority of the High Street contains surviving historic buildings at the frontage but owing to the continued importance of the street and the need for renewal, these buildings vary considerably in date and construction. The upper High Street contains a relatively coherent group of early 19th century buildings at the street frontage, which include some use of weatherboarding. Despite their early date, none of these are listed. Buildings over the remaining part of the High Street contain a more mixed range of buildings but the street still feels tangibly historic.

Within the conservation area there are a number of commercial frontages, including shopfronts and public houses, which make positive contributions to the significance of the conservation area. It is important that these historic features are retained and maintained.

View of Broadway in Sheerness Mile Town

View of High Street in Sheerness Mile Town

Map CA 006 Key questions for Sheerness Mile Town Conservation Area



10 Sheerness Royal Naval Dockyard and Bluetown Conservation Area

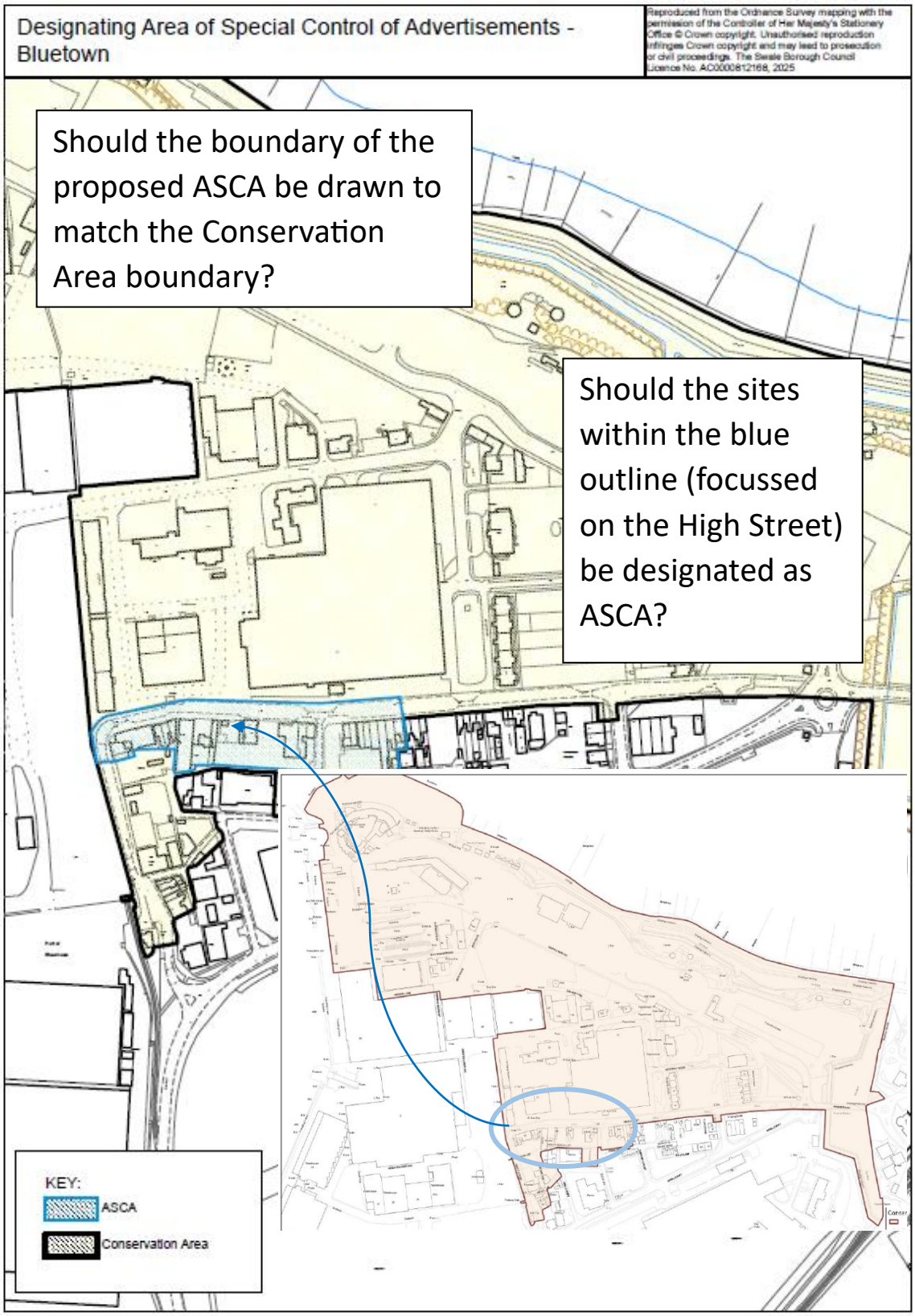
The conservation area is on Historic England's Heritage at Risk Register. Its condition is noted as 'very bad', its vulnerability as 'low' and its trend as 'deteriorating'.

The Sheerness Dockyard Conservation Area was first designated in July 1972, then reviewed in March 2011, wherein it was renamed Sheerness Royal Naval Dockyard and Bluetown Conservation Area.

The 19th century Blue town was characterised by shops with residential above along the High Street and West Street, together with a large number of public houses.

Views of High Street within Sheerness Blue town

Map CA 007 Key questions for Sheerness Royal Naval Dockyard and Bluetown Conservation Area



11 Sittingbourne Conservation Area

The conservation area is on Historic England's Heritage at Risk Register. Its condition is noted as 'very bad', its vulnerability as 'low' and its trend as 'deteriorating'.

The Sittingbourne Conservation Area was first designated in December 1969 by Kent County Council. A conservation area appraisal and management strategy for Sittingbourne Conservation Area as supplementary planning guidance to the Development Plan was adopted in March 2011. The Conservation Area was further reviewed and redesignated with amended boundaries in 2021.

The Sittingbourne Conservation Area forms the town's principal commercial centre, focused along the historic High Street as its primary axis of activity.

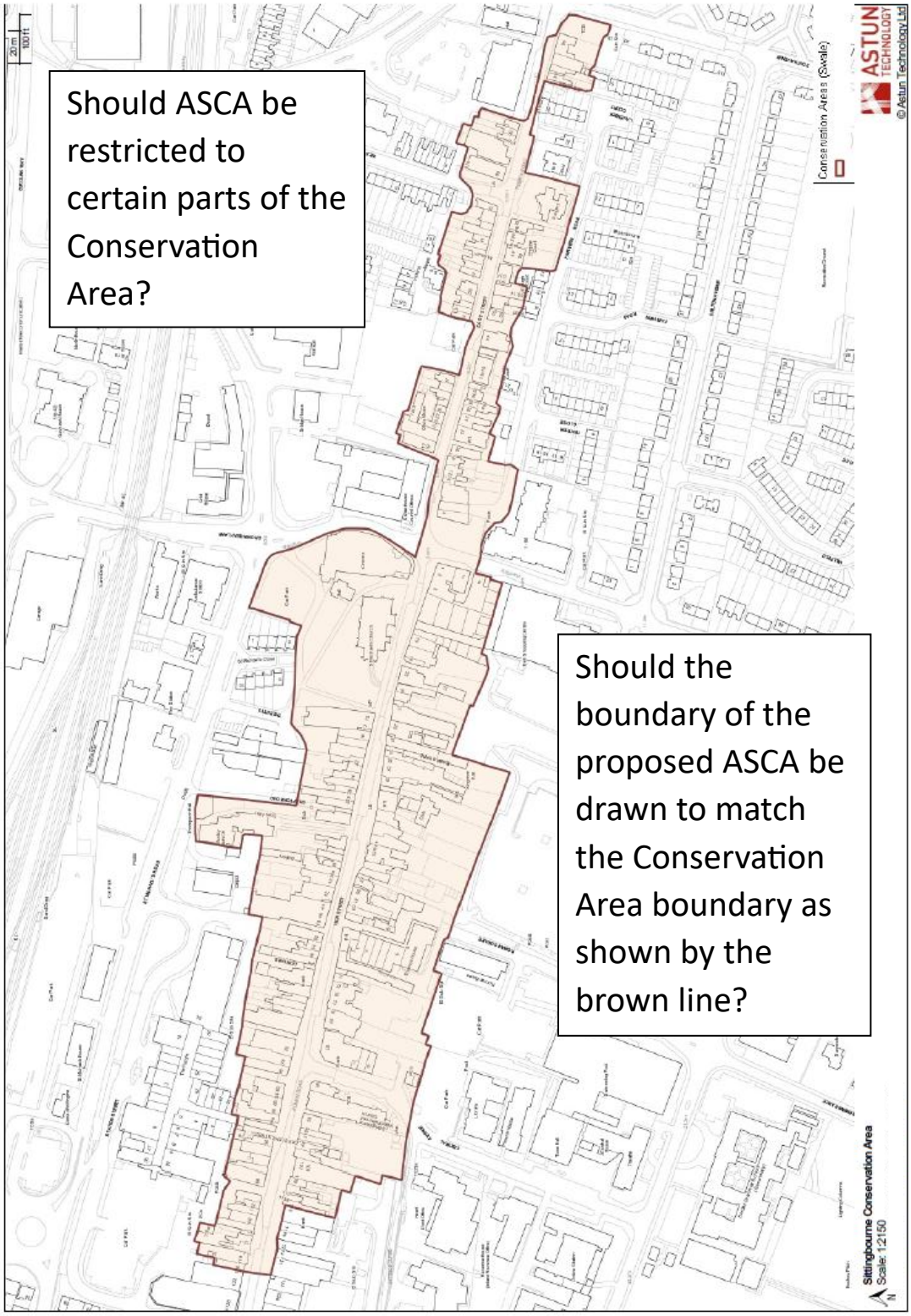
The significance and special interest of Sittingbourne Conservation Area can be summarised as follows:

- Roman Watling Street
- A linear High Street which follows the alignment of an early important Medieval route which later became known as Watling Street from the Roman period
- Important 18th century coaching stop enroute between London and Canterbury and the coast, the survival of coaching inns is of particular significance.
- Distinctive long and narrow burgage plots with some earlier buildings surviving - many behind later facades.
- A predominance of 18th and early 19th century development remaining, punctuated by two notable 20th century Art-Deco influenced buildings providing a strong and largely cohesive townscape
- 14th - 15th century St. Michael's Church, set within open grassed churchyard, is a local landmark to the east.
- Surviving historic alleyways from coaching inn days on both sides of the high street

View of Sittingbourne High Street

View of East Street

Map CA 008 Key questions for Sittingbourne Conservation Area



12 Key Questions

How are Advertisements Regulated?

12.1 What is an advertisement?
The definition of an advertisement is included in the Town and Country Planning Act 1990 and means 'any word, letter, model, sign, placard, board, notice, awning, blind, device or representation, whether illuminated or not, in the nature of, and employed wholly or partly for the purposes of, advertisement, announcement or direction…'. It does not include 'anything employed wholly as a memorial or as a railway signal or a placard or other object borne by an individual or an animal'. In practice advertisements include a very wide range of devises such as: posters; boards; fascia and projecting signs; directional signs; estate agents' boards; static balloons; flags; price displays; traffic signs and village name signs.

12.2 What legislation regulates the control of advertisements? The system for controlling the display of outdoor advertisements in England is set out in 'The Town and Country Planning (Control of Advertisements) (England) Regulations 2007'. A Government guide for advertisers provides a very useful explanation of the advertisement control system

12.3 Is advertisement control the same as planning permission?
The advertisement control system is very complex and detailed and is entirely separate from the processes that control the use and development of land through planning permissions and similar processes.

12.4 Who is responsible for the control of advertisements? The day-to-day operation of the advertisement control system is the responsibility of local planning authorities, but if consent for an advertisement is refused there is a right of appeal to the Secretary of State. However, many groups of advertisement are excluded from the planning authority's direct, and no permissions are needed for their display.

12.5 What are the different types of advertisement? There are three different groups of advertisement; those excluded from the planning authority's direct control; those granted 'deemed consent' provided the advertisement is within the rules set; and those for which the LPA's 'express approval' is always required (for which it is necessary to make a formal application to the LPA for advertisement consent).

There are some places in our cities and towns and many parts of the countryside in England which are especially vulnerable to the visual effects of outdoor advertisements.

All planning authorities have three special powers which enable them to achieve a stricter control over advertisements than they can achieve in the ordinary way. These powers are:

1. to define an Area of Special Control of Advertisements.
2. to remove from a particular site or a defined area the benefit of the deemed consent normally provided by the rules; and3. to require a particular advertisement, or the use of a site for displaying advertisements, to be discontinued

12.6 What is an Area of Special Control of Advertisements?

There are stricter controls on the size and type of advertisement that may be displayed in an ASCA than is the case outside of the ASCA. In any Area of Special Control of Advertisements only public notices, advertisements inside a building and advertisements for which there is deemed consent are permitted. In addition, the LPA may give specific consent to: notices about local events or activities; advance signs or directional signs which are 'reasonably required' in order to direct people to the place identified by the sign; an advertisement required for public safety reasons; and an advertisement in any of the deemed consent classes if it is considered reasonable for the normal limits on that class to be exceeded.

The Government's guide for advertisers advises that "An Area of Special Control of Advertisements is an area specifically defined by the planning authority because they consider that its *scenic, historical, architectural or cultural features are so significant that a stricter degree of advertisement control is justified in order to conserve visual amenity within that area*". The guide notes that in practice the extent of ASCA vary widely, with large parts of Devon being included whereas in York just the Cathedral precinct is designated as an ASCA. It also gives the example that 'moderately sized towns' may not be included. This suggests that it is reasonable to include smaller towns and villages in the ASCA and also urban areas that are of exceptional conservation value (such as York Cathedral precinct).

12.7 What are the implications of being within an Area of Special Control of Advertisements?

The main consequence for the display of advertisements in an ASCA is that there are stricter limits on permitted height and size of the advertisement than elsewhere. These limits are explained in relation to each class of deemed consent, but in some cases the granting of consent for certain adverts is prohibited. This means that, even if we wished to grant consent for some classes of illuminated advertisement, we would not be able to do so in an ASCA.

12.8 Are there additional restrictions in National Landscapes or Conservation Areas?

Yes, the provisions to display adverts with 'deemed' consent do not apply in these areas for the following classes of advertisement: illuminated advertisements on business premises; flags; hoardings; balloons; and advertisements on telephone kiosks. This means that applications for 'express' consent must be made so that the impact on the special characteristics of either the National Landscapes and/or Conservation Area can be considered.

12.9 What Government guidance applies to the definition of Areas of Special Control of Advertisements?

The National Planning Practice Guidance (NPPG) advises that it may be appropriate to designate an area of special control in locations where the local planning authority considers additional restrictions are necessary, such as in rural areas or other areas which appear to the Secretary of State to require special protection on the grounds of amenity.

12.10 Why are we consulting?

We are planning to designate ASCA change the areas where there are stricter rules on displaying advertisements and need to know whether you support these changes or are against them. Our review must be informed by public consultation and follow specific legal steps. Your views will be taken into account when we make a final decision on where the boundaries should be drawn. Once we have decided on the changes, we want to make we will need to submit our plans to the Government and, if there are concerns about what we want to do, there may be a 'Public Examination' (where an independent Inspector will advise the Secretary of State on whether the changes should go ahead).

Class 7: flag advertisements

Class 7 permits some flag advertisements. (This deemed consent has no effect upon any display of the national flag of any country – see number 8 on page 8). **Class 7(A)** permits an advertisement to be displayed as a flag, on one flagstaff, fixed upright on the roof of a building. There is no height limit for this consent, but the flag itself may only have on it the name, emblem, device or trademark of the company or person occupying the building, or refer to a specific event of a limited duration taking place in the building. So flags are not permitted to advertise products, unless they have the planning authority's specific consent.

Class 7(B) permits the display of advertising flags at housebuilding sites and where new houses remain available for sale, **except in a National Park, Area of Outstanding Natural Beauty, Conservation Area, the Broads or Area of Special Control of Advertisements.** The rules for Class 7(B) are:

- each flag must be on a single vertical flagstaff;
- a site where 10 houses or less are built may have one flag, 11 to 100 houses may have two flags, and over 100 houses may have three flags;
- the flagstaffs must not exceed 4.6 metres high;
- the flags must not exceed 2 square metres in area;
- the flags and flagstaffs must be removed at the end of one year after construction of the last house is completed.

There are special arrangements for sites being developed in phases or by more than one housebuilder. An example is shown in illustration 26.

Extract from '**Outdoor advertisements and signs:** a guide for advertisers

Published 2007 by Department for Communities and Local Government

Examples of the difference being in the ASCA makes.

Example 1
Businesses can generally display non-illuminated advertisements at their business premises without needing to apply for consent subject to a number of conditions, including that no character or symbol is more than 0.75 metres in height; this is reduced to 0.3 metres in an ASCA.

Example 2
One advertisement may be displayed (without needing to apply for consent) for no more than 10 days a year on a balloon not more than 60 metres above ground level, unless it is in an Area of Outstanding Natural Beauty, a conservation area or an ASCA.

Example 3
A non-illuminated advertisement can be displayed without the need to apply for consent on the forecourt of a business premises, but consent is required if it is more than 4.6 metres above ground level or 3.6 metres in an ASCA.

Example 4
Within an ASCA, consent cannot be granted for an illuminated advertisement that provides directions to other buildings or land in the locality.

Example 5
Temporary signs for a travelling circus or fair are often allowed without the need to apply for specific consent subject to a number of conditions, including that the advertisement should be no higher than 4.6 metres above ground level, but this is reduced to 3.6 metres in an ASCA.

Consultation Questions About the ASCA Proposal

These draw directly from the document's stated consultation aims:

Q1 Do you agree with the proposal to designate an ASCA in the eight Conservation Areas with commercial centres?

Q2 Should land within the Kent Downs National Landscape be included in the ASCA?

Q3 Are there any areas that should **not** be included in the ASCA?

Q4 Are there any additional areas that **should** be considered for inclusion?

Q5 Do you think stricter controls on lettering size, advertisement height, and shopfront coverage are appropriate for historic high streets?

Q6 Do you believe the proposed ASCA will help protect the character and appearance of Swale's historic high streets?

Questions About Policy, Process & Impact

Q7 Do you agree that additional advertisement controls are needed because several Conservation Areas are on Historic England's Heritage at Risk Register?
"6 out of 8 conservation areas… are on Historic England's Heritage at Risk register."

Q8 Do you think the proposed ASCA boundaries are drawn appropriately?

Q9 Do you support the Council's reasoning for not extending the ASCA to the entire borough or to all Conservation Areas?
The document explains why Options 2–4 were discounted.

Q10 How do you think the ASCA might affect local businesses, positively or negatively?

Q11 Do you feel the balance between protecting heritage and supporting commercial activity has been struck appropriately?
The document notes that "businesses in urban areas… should be able to rely on advertisements to support trade."

Q12 Are there specific types of advertisements you believe should be more tightly controlled within historic areas?

Area-Specific Questions

Each Conservation Area section in the document includes explicit consultation prompts.

Q13. Cellar Hill & Greenstreet Conservation Area

Q13.1 Should the ASCA boundary match the Conservation Area boundary?

Q13.2 Should the sites within the identified blue/purple areas be included in the ASCA?

Q14 Faversham Town Conservation Area

Q14.1 Should the ASCA boundary match the Conservation Area boundary?

Q14.2 Should the sites within the blue-outlined areas be designated as ASCA?

Q15 Milton Regis Conservation Area

Q15.1 Should the ASCA boundary match the Conservation Area boundary?

Q15.2 Should the blue-outlined sites be included in the ASCA?

Q16 Newington High Street Conservation Area

Q16.1 Should the ASCA boundary match the Conservation Area boundary?

Q16.2 Should the blue-outlined sites be designated as ASCA?

Q17 Queenborough Conservation Area

Q17.1 Should the ASCA boundary match the Conservation Area boundary?

Q17.2 Should the blue-outlined commercial frontages be included in the ASCA?

Q18 Sheerness Mile Town Conservation Area

Q18.1 Should the ASCA apply to the whole Conservation Area or only certain parts?

Q18.2 Should the boundary match the Conservation Area boundary?

Q19 Sheerness Royal Naval Dockyard & Bluetown Conservation Area

Q19.1 Should the ASCA boundary match the Conservation Area boundary?

Q19.2 Should the blue-outlined High Street areas be included?

Q20 Sittingbourne Conservation Area

Q20.1 Should the ASCA apply to the whole Conservation Area or only certain parts?

Q20.2 Should the ASCA boundary match the Conservation Area boundary?

Additional Questions

Q21 How important is the preservation of traditional shopfronts to you?
The document highlights "surviving examples of traditional shopfronts" as key significance.

Q22 Have you observed examples of inappropriate or harmful advertising in any of the proposed areas?

Q23 Do you think the proposed controls (e.g., 0.3m lettering, 3.6m height limit, 10% frontage) are reasonable?

Q24 Would you support increased enforcement against unauthorised advertisements?

APPENDIX I: TABLE OF REPRESENTATIONS, AND THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE CONSULTATION DOCUMENT IN RELATION TO THEM – FOR DESIGNATING ASCA.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
1.	Local Resident	Having received and read your letter regarding the proposal to designate areas of Swale as ASCA. I'd like to say I wholeheartedly agree with your proposed controls and locations. Additionally, I'd like to say as well as oversized advertising that is ugly, I find the cheap moving LED lettering display signage, that many food outlets have, to be extremely ugly and make the townscape look awful, especially in the evening. Please if there could be a curfew or other time restriction on this sort of signage I'd be very grateful. I hate how they dominate after sundown.	Support welcomed. ASCA will strengthen control over illuminated and moving digital signage. Curfews fall outside ASCA scope but may be considered through other policy mechanisms.	**No change**. Note for future policy consideration.
2	Local Resident	Despite having a sign company, I am in favour of regulating poorly designed and oversized signs. It would also to a nice to have – absentee landlord shop fronts – to be offered to decorate with local business advertising rather than unsightly empty units.	Support noted. Suggestion regarding empty units is outside ASCA scope but aligns with wider regeneration initiatives.	**No change**. Forward suggestion to Economic Development.
3	Ward Member	I am writing in support of the proposed ASCA in Queenborough. I would like to see the ASCA extend to the whole of the conservation area.	Support welcomed. Proposed boundary	**Change** the boundary of proposed ASCA to cover the

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
			focuses on areas of highest sensitivity. Extension to be implemented.	entire Conservation Area. See Appendix III for detailed assessment.
4	Local Resident	Preston Street is an attractive street, linking the station with the centre of town. It has small shops, cafes, pubs, takeaways and social spaces like the Alexander Centre, the Assembly rooms and the museum and Faversham society bookshop. It has 2 or 3 empty properties but is better than most high streets. It has a considerable footfall at weekends as people come down from the station to go shopping and visit cafes. Also, at events like the Easter Parade and the Hop Festival. Apart from rather too many A signs on the pavement the only real problem, as far as advertising is concerned is the 2 betting shops Coral and Jennings Bet. They both have large, illuminated screens with moving images which certainly transgress the proposed guidelines on the proportion of frontage allowable for advertising and illuminated and large format advertisements. They are intrusive and spoil the atmosphere of the street. Please find photos attached.	Concerns align with ASCA purpose. Digital screens of this scale unlikely to be acceptable under ASCA.	**No change**. Add to targeted enforcement review.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
5	Ward Member	I am fully supportive of all the areas listed for consultation being designated. The council needs as many tools as possible to preserve the character and setting of our high streets. Each conservation area very carefully details the aspects the council seeks to preserve, and already we can see many example of advertising and shop fronts that detract from the heritage appeal of our high streets. My only concern is the council's ability to adequately enforce.	Support noted. ASCA provides clearer statutory grounds for enforcement.	**No change**. Note for service planning.
6	Local resident	I live in Milton Regis and fully support the area coming under ASCA. There is a great need for additional control over the display of outdoor advertisements. Some shops in Milton Regis have garish and large areas of display on their windows and seeing as this a conservation area this	Support welcomed. ASCA strengthens enforcement tools.	**No change**. Refer to planning investigations

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		should never be allowed. Homeowners have to comply with conservation rules, yet it appears some businesses do not, as their windows are covered with painted signs. It brings down the whole area.		
7	Local resident	Reasonable but meaningful constraints on advertising displays are essential if we are to preserve the global attraction of our heritage. Anything other than this approach is short term and ultimately damaging. Having just returned from a visit to a Faversham sized town in the U.S., it struck me whilst there, how unrestricted advertising hoardings had robbed much of the town centre's appeal, leaving me feeling relieved that we don't - as yet- allow that here.	Support noted. Reinforces need for proactive advertisement control.	**No change**.
8	Local resident	I would like you to introduce tighter regulation and fines with regard to illegal fly posting and commercial advertising right across the Swale area. Not only within Town Centres but elsewhere. With special attention regarding illegal advertising and flags along public highways.	Outside ASCA scope but relevant to wider enforcement.	**No change**. Forward to Environmental Enforcement.
9	Queenborough Town Council	Queenborough Town Council response in relation to 'Map CA 005 Key questions for Queenborough Conservation Area' as part of the above consultation. At the Council meeting held on Tuesday 28th April, Town Councillors agreed for the sites within the blue outline to be designated as ASCA for any future new advertisement display.	Support welcomed. Existing lawful signage unaffected. Proposed boundary focuses on	**Change** the boundary of proposed ASCA to cover the entire Queenborough Conservation Area. See

Appendix I DESIGNATING ASCA. – REPRESENTATIONS, RESPONSE & RECOMMENDATIONS TABLE (Continued)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Advertisements already in place, should be allowed to remain as they are. Councillors agreed for the boundary of the proposed ASCA to be drawn to match the Conservation Area boundary for any future new advertisement display. Advertisements already in place, should be allowed to remain as they are, Advertisements already in place, will then not attract any further expense to businesses and organisations at this time, in adhering to the new control.	areas of highest sensitivity. Extension to be implemented	Appendix III for detailed assessment.
10	Local resident	This is a very good idea. Maybe enforce existing laws first? Milton Regis has the majority of historic buildings used as shops non-compliant, why is this allowed? What efforts have been made with enforcement?	Support noted. ASCA strengthens enforcement basis.	**No change**. Add to enforcement review.
11	Local resident	I express my support in all regarding to the conservation of the areas mentioned.	Support welcomed.	**No change**.
12	Local resident	Having lived in Sheerness for 46 years it saddens me that in this time the High Street and surrounds have deteriorated so badly with neglect apparent in many areas and a " don't care attitude " from some of the residents. There are efforts to improve but these are disjointed and somewhat random. I was born in Faversham and the contrast is stark, there the history and culture have been celebrated, appreciated and encouraged,	Support noted. ASCA will help improve visual amenity.	**No change**.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		resulting in a vibrant and pleasant town to visit… I have always wondered why the same has not happened in Sheerness, with a more sensitive and appropriate approach to the history and environment. So many wonderful buildings gone, never to return sadly so I am all for preserving what is left and preventing crass development with no link to the historic past….		
13	Local resident	As residents of Milton Regis and active members of Milton Regis Society we strongly endorse Swale Borough Councils move to designate a number of Areas of Special Control of Advertisements (ASCA) The need for this in our particular conservation area has been long overdue because of persistent and cynical abuse of rules applying to listed buildings and conservation areas. Shopkeepers from overseas have introduced garish plastic fascia boards with inappropriate signage on lovely old buildings whilst feigning ignorance and being obdurrant when asked to remove them by the authorities. Better protection would thus help officers with enforcement and provide greater overall clout when dealing with the many breaches that have despoiled this otherwise gem of a high street - including one of Kent's only two extant Court Halls.	Support welcomed. ASCA strengthens enforcement tools.	**No change**. Add to enforcement priority list.
14	Local resident	Many thanks for your letter of March 25th concerning the proposed Areas of Special Control of Advertisements. I would very much welcome any measures that enhance and protect the historic	Support noted.	**No change**.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		importance of Greenstreet (London Road, Teynham). The area is rich in history which is so often overlooked. Please do all you can to maintain and preserve its character.		
15	Local business	I write in response to the consultation on the proposed designation of an Area of Special Control of Advertisements (ASCA) across eight Conservation Areas, including Milton Regis. Having reviewed the consultation document and the implications of the proposed restrictions, I wish to register a formal objection to the introduction of an ASCA in this location. **1. The socio-economic context of Milton Regis makes the ASCA inappropriate and potentially harmful** Milton Regis is an area facing significant socio-economic challenges. Levels of deprivation, visible decline, and persistent anti-social behaviour, including vandalism, graffiti, and criminal damage, are well-documented issues affecting the High Street and surrounding neighbourhoods. These concerns are not abstract; they are daily realities for residents, businesses, and property owners. Introducing an ASCA in such a context risks prioritising aesthetic regulation over urgent, structural problems. The consultation document states that ASCAs are intended for areas requiring "special protection due to their scenic, historic, architectural or cultural significance." However, Milton Regis is not currently benefitting from such protection in practice due to the scale of	Concerns acknowledged. ASCA regulates scale/illuminatio n but does not prohibit signage. Evidence shows improved visual amenity supports economic vitality. Controls are proportionate and targeted. See end of this report for detailed response	**No change**.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		deprivation and neglect. Imposing additional restrictions on businesses, many of which are already struggling, does not address the root causes of decline and may, in fact, exacerbate them. **2. The proposed restrictions risk undermining business viability in an already fragile local economy** The proposed ASCA would introduce strict limits on: • Lettering size (maximum 0.3m) • Advertisement height (maximum 3.6m) • Proportion of frontage used for advertising (maximum 10%) • Certain illuminated or large-format signage These measures may be appropriate in affluent, well-maintained heritage centres. They are not appropriate in a deprived commercial area where businesses rely heavily on visibility, footfall, and the ability to differentiate themselves in a challenging retail environment. Small independent businesses—already contending with inflation, rising costs, reduced consumer spending, and the aftermath of the pandemic—depend on effective signage to survive. Restricting their ability to advertise risks: • Reduced visibility and competitiveness • Lower footfall • Increased vacancy rates • Further deterioration of the High Street		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		This is the opposite of what Milton Regis needs. **3. The proposal does not sufficiently consider the cumulative impact on regeneration efforts** The consultation document notes that "6 out of 8 conservation areas… are on Historic England's Heritage at Risk register." This is a symptom of long-term underinvestment, not excessive signage. Before imposing additional regulatory burdens, the Council should prioritise: • Tackling anti-social behaviour • Improving public realm maintenance • Addressing graffiti and vandalism • Supporting business retention and attraction • Investing in regeneration and community safety An ASCA does not address any of these issues. Instead, it risks creating a more hostile environment for businesses and investors at a time when the area urgently needs economic stimulus. **4. The ASCA may unintentionally accelerate decline rather than protect heritage** The intention behind the ASCA—to preserve historic character—is understandable. However, in areas like Milton Regis, the historic environment is already compromised by: • High vacancy rates • Poor building condition • Anti-social behaviour		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		• Lack of investment Restricting signage will not restore heritage value. On the contrary, it may: • Discourage new businesses from opening • Reduce the ability of existing businesses to attract customers • Increase the number of empty units • Lead to further deterioration of the streetscape A thriving, economically active High Street is the best protection for heritage assets. Over-regulation risks achieving the opposite. **5. The Council should consider alternative approaches that support both heritage and economic resilience** Rather than imposing an ASCA, the Council could pursue more balanced and constructive measures, such as: • Targeted enforcement against genuinely harmful or inappropriate signage • Incentives for heritage-sensitive shopfront improvements • Grants or support schemes for façade restoration • Public realm improvements • Partnership working with local businesses to develop voluntary design guidelines These approaches protect heritage without imposing disproportionate burdens on businesses in deprived areas.		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		For the reasons outlined above, I strongly object to the designation of an ASCA in Milton Regis. The proposal does not reflect the socio-economic realities of the area, risks harming already vulnerable businesses, and may undermine rather than enhance the long-term vitality and heritage value of the High Street. I respectfully request that Swale Borough Council reconsider the inclusion of Milton Regis in the proposed ASCA and instead prioritise measures that address the underlying causes of decline and support sustainable regeneration.		
16	Local resident	With respect, there are so many other things within Swale that need 'fixing' at the moment, the time &/or money could be far better used elsewhere in the Borough rather than wasting time on 'the height of lettering or symbols' etc. unless they are ridiculously large. Please put the time into helping residents & ensuring a better service before anything like the above!	Comment noted. ASCA supports wider regeneration and heritage objectives.	**No change**.
17	Local resident	Seriously you are worried about the display of outdoor advertisements when Swale Borough Council have completely ruined the Historic High Street by allowing HMO right in the middle of listed buildings. So where is the special protection for us due to the scenic, historic, architectural and cultural significance of The High Street, Queenborough. Just unbelievable that you have allowed this and you are worried about a few signs.	Comment noted. ASCA is separate from planning decisions relating to HMOs.	**No change**.
18	Local resident	Thank you for the opportunity to comment on your proposal on the designation of an Area of Special Control of Advertisements	Support for the ASCA is noted. The concerns	**No change**

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		(ASCA) with Swale. My following comments are in respect of the Cellar Hill and Greenstreet Conservation area. In answer to your question, I wholeheartedly support that the area within the blue line should be designated as an ASCA. This aligns with the concerns brought to our attention during our consultations on the Lynsted Parish Design Statement. In particular the following sections: (Page ii) General principles 17. Signage. Given the rural and historic character of the area, the introduction of poster hoardings should be avoided, whilst other advertisements should be appropriate to their surroundings and avoid a proliferation of signs and repetition of information. Internally illuminated signs should not be permitted. Professionally hand-painted wooden signage is to be encouraged. External spot lighting may be considered where this can be provided unobtrusively. (Page 25 – Annex 2) Community Action Plan - The Community with Lynsted Parish Council and Swale Borough Council 4. Swale Borough Council to be encouraged to develop policies for Areas of Special Control of Advertisements (ASCAs) with a general presumption against advertising and a complete ban on advertising hoardings, balloon advertising and certain illuminated advertisements in the Parish of Lynsted. (Page 25 – Annex 2) Highways and Paths 43. Street furniture should always tie in with the adjacent buildings and spaces in order to emphasise its essentially rural nature. Modern intrusions such as concrete bollards, metal-panelled	raised about intrusive, illuminated and pavement-based advertising align with the Design Statement and reinforce the need for tighter control to protect amenity and pedestrian safety. The issues raised are consistent with the aims of the ASCA and reinforce the need to manage visual clutter, protect amenity, and safeguard pedestrian safety. Concerns regarding illumination, pavement	

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		fences and illuminated advertising on bus-shelters should be avoided. Good examples include use of cast iron bollards and 'traditional' forms of street lighting using cast iron designs. The brick bus-shelter in Kingsdown is an example of traditional design and materials preferable to steel and plastic. In addition, since the publication of the Design Statement, we have seen an increase in pavement signage as illustrated in your consultation document: In addition to this being unsightly, it is also a dangerous obstruction of the pavement. With parking on the pavement and the addition of these signs, vulnerable pedestrians (wheelchairs and buggies) are forced into the road to continue along the road. We have also seen an increase in illuminated shop signage that stays on all night and is disturbing to those living opposite. In recent years we have found areas along Greenstreet where songbirds now sing all night because of excess lighting.	obstruction and impacts on character have been taken into account in forming final recommendations.	
19	CPRE Kent	**Designating Area of Special Control of Advertisements** CPRE Kent's Historic Buildings Committee is pleased to respond to your consultation of April 2026. Broadly, we welcome any initiative that preserves or enhances the significance of Conservation Areas and on behalf of CPRE Kent more generally preserves or enhances designated National Landscapes. We make the following responses to the questions included at the end of the consultation document. **Q1 Do you agree with the proposal to designate an ASCA in the eight Conservation Areas with commercial centres?** Yes	Support for ASCA designation is welcomed. Comments on the rigidity of dimensional controls and the importance of contextual, materials-led assessment are	**Change** the boundary of proposed ASCA to cover the entire Conservation Area. Cellar Hill & Greenstreet, Milton Regis, Newington High Street and

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Q2 Should land within the Kent Downs National Landscape be included in the ASCA? Not in addition to the conservation areas. We accept that there are already sufficient controls on advertising in National Landscapes as mentioned in your document. **Q3 Are there any areas that should not be included in the ASCA?** None in the areas you are proposing. **Q4 Are there any additional areas that should be considered for inclusion?** We comment on this below. **Q5 Do you think stricter controls on lettering size, advertisement height, and shopfront coverage are appropriate for historic high streets?** We would suggest the proposed controls are too rigid. It is not just a question of lettering size, height and coverage. What matters is whether the proposed signage is appropriate in the location. This example in York, in a Conservation Area, is entirely in keeping with the building it adorns, for example (courtesy Google streetview).	noted. The suggestion to align ASCA boundaries with full Conservation Areas is acknowledged; in several areas (Cellar Hill, Milton Regis, Newington High Street, Queenborough) the option of extending the ASCA to the entire CA will be reviewed for consistency and clarity. Concerns regarding national chain branding, reflective materials, and the need for proportionate	Queenborough See Appendix III for detailed assessment

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		  A more likely application could be for a logo that exceeds the proposed 300mm height but is still in keeping with the building and nearby buildings. This could be acceptable. On the other hand, blatantly modern materials for a facia such as bright shiny plastics could harm a historic building or streetscene even if meeting the proposed dimension rules. **Q6 Do you believe the proposed ASCA will help protect the character and appearance of Swale's historic high streets?** Yes, subject to our previous response.	enforcement are recognised. Temporary community advertisements will not be unintentionally restricted. (Detailed response included at the end of this report)	

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Q7 Do you agree that additional advertisement controls are needed because several Conservation Areas are on Historic England's Heritage at Risk Register? Yes, but not only because of that. **Q8 Do you think the proposed ASCA boundaries are drawn appropriately?** It is not clear to us why you would not designate the whole conservation area, and indeed, all conservation areas. Would an advertisement which exceeds the proposed maximum dimensions be acceptable in, say, a front garden? Would residents away from the commercial areas object to being in a ASCA? We doubt it. What would happen if a dwelling outside the ASCA had a change of use to include commercial? Would the ASCA boundary be revised? **Q9 Do you support the Council's reasoning for not extending the ASCA to the entire borough or to all Conservation Areas?** We agree that designating the whole borough is not the best approach, but for the reasons above, would prefer the ASCA boundaries to match the CA boundaries. **Q10 How do you think the ASCA might affect local businesses, positively or negatively?** On the positive side, preserving the historic character of a commercial area should attract footfall if all owners/occupants comply. It's not clear whether existing signage which currently does not meet the proposed rules will be subject to enforcement and		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		with what timescale for compliance. Money spent on changing signage might actually be better spent on the general repairs necessary to lift these areas into a lower heritage at risk category. A heavy-handed approach to enforcement might be counter-productive. Your Example 5 is encouraging. We would not wish to see rules imposed that proscribe temporary advertisements for village fairs, open gardens and the like. **Q11 Do you feel the balance between protecting heritage and supporting commercial activity has been struck appropriately?** If you accept our comments on Q5 and Q10, then we can't see any reason why businesses would be disadvantaged by having to comply with ASCA rules, other than the initial cost and perhaps ongoing maintenance for less durable but more appropriate materials. **Q12 Are there specific types of advertisements you believe should be more tightly controlled within historic areas?** See our response to Q5. **Area-Specific Questions** We have nothing to add on the specifics of each area. **Q21 How important is the preservation of traditional shopfronts to you?**		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Very important. Typically, they are fundamental to the character of a conservation area. **Q22 Have you observed examples of inappropriate or harmful advertising in any of the proposed areas?** Shopfronts put up by national chains are typically the most likely to harm the character of a historic environment. **Q23 Do you think the proposed controls (e.g., 0.3m lettering, 3.6m height limit, 10% frontage) are reasonable?** As mentioned above, 300mm might be too restrictive. We are also unconvinced about the need for a height limit. Here is another example from York, albeit on a building big enough to take it, which is not objectionable. On the other hand, 10% sounds like quite a lot. Doubtless you will be able to test what that might look like. 		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Q24 Would you support increased enforcement against unauthorised advertisements? Yes, of course. We trust these responses help you in coming to a conclusion on these ASCAs - both their extent and the conditions that would apply.		

Summary of the Council's Response to Item no 15

Why an ASCA is being proposed

An ASCA does not ban advertising or prevent businesses from having signs. It simply places stricter limits on very large, brightly lit, or visually intrusive advertisements in Conservation Areas. These controls are already used in many historic towns across the country.

The aim is to:

- protect the character of historic areas
- reduce visual clutter
- support a more attractive and welcoming High Street
- give the Council clearer powers to deal with harmful signage

These measures sit alongside wider regeneration work—not instead of it.

Response to the concerns

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation

1. Local challenges in Milton Regis

We recognise the real issues affecting Milton Regis, including antisocial behaviour, and building condition.

However, the fact that the area faces challenges does not mean its historic character is unimportant. Improving the appearance of the High Street is part of helping the area recover, not a distraction from it.

2. Impact on businesses

The ASCA does **not** stop businesses from advertising. Reasonable, well-designed signage will continue to be allowed.

The controls focus on:

- very large signs
- oversized lettering
- brightly illuminated or moving digital screens
- signage that covers most of a shopfront

Evidence from other towns shows that high-quality, consistent signage actually helps businesses by improving the look and feel of the High Street and encouraging footfall.

3. Regeneration and investment

We agree that Milton Regis needs investment in public spaces, safety, and business support.

The ASCA is one tool among many. It helps ensure that improvements to the High Street are not undermined by poor-quality or visually harmful signage.

4. Risk of decline

There is no evidence that limiting oversized or intrusive signage harms business activity. In fact, cluttered or inconsistent signage can make an area feel neglected and discourage visitors.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation

A cleaner, more attractive streetscape supports:

- confidence in the area
- investment
- business viability
- community pride

5. Alternative suggestions

Your suggestions—such as grants, shopfront improvements, and voluntary guidelines—are helpful and align with the Council's wider regeneration work. These approaches can sit alongside ASCA designation rather than replace it.

Overall position

After reviewing the objection, the Council considers that:

- ASCA designation is proportionate and justified
- It will not prevent businesses from advertising
- It will help improve the appearance and confidence of the High Street
- It supports, rather than conflicts with, regeneration efforts

For these reasons, the Council is recommending no change to the proposed ASCA for Milton Regis. (See response to Consultation Item 19, wherein, it is recommended to extend ASCA designation to cover the entire Milton Regis Conservation Area)

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation

Officer Response to CPRE Kent (Historic Buildings Committee) – Item 19 of Consultation response table

1. Overview of Representation

CPRE Kent submitted a detailed response supporting the principle of introducing ASCAs within Swale's historic commercial centres. Their representation emphasises the importance of preserving the character of Conservation Areas and designated landscapes, while also highlighting the need for flexibility in applying advertisement controls. Key points raised include:

- Support for ASCA designation within the eight Conservation Areas with commercial centres.
- Agreement that additional controls within the Kent Downs National Landscape are unnecessary due to existing protections.
- Concern that ASCA boundaries do not align with full Conservation Area boundaries, with questions about consistency, future changes of use, and resident expectations.
- Reservations about the rigidity of proposed dimensional limits (300mm lettering, 3.6m height, 10% frontage), arguing that contextual appropriateness and materials are more important than fixed measurements.
- Emphasis on the potential harm caused by modern, reflective materials and standardised national chain branding.
- Support for proportionate enforcement and a request that temporary community advertisements (e.g., village fairs, open gardens) are not inadvertently restricted.
- Strong support for the preservation of traditional shopfronts.

These points are supported by direct statements in the representation, including:

"We would suggest the proposed controls are too rigid… What matters is whether the proposed signage is appropriate in the location."
"It is not clear to us why you would not designate the whole conservation area…"

2. Officer Assessment

2.1 Support for ASCA Designation

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation

The Council welcomes CPRE Kent's support for the introduction of ASCAs in the eight Conservation Areas with commercial centres. Their endorsement reinforces the view that additional advertisement controls can play a meaningful role in enhancing the character and appearance of historic high streets and addressing issues identified in areas on the Heritage at Risk Register.

2.2 ASCA Boundaries and the Case for Full Conservation Area Coverage

CPRE Kent questions why the proposed ASCA boundaries do not extend to the full extent of each Conservation Area. This issue has also been raised in other representations, particularly in Cellar Hill & Greenstreet, Milton Regis, Newington High Street, and Queenborough.

The Council's initial approach focused on commercial frontages where advertisement pressure is greatest. However, the representation highlights several important considerations:

- Potential inconsistencies if commercial uses emerge outside the ASCA boundary.
- The likelihood that residents would not object to inclusion within an ASCA.
- The risk of creating a two-tier system of control within a single Conservation Area.

Given these points, the Council considers it appropriate to extend the ASCA designation to cover the *entire* Conservation Area in the four locations listed above. Including the full Conservation Area ensures that character sensitivity, existing advertisement patterns and the benefits of a consistent and easily understood approach are fully addressed.

2.3 Dimensional Controls and Flexibility

CPRE Kent expresses concern that the proposed dimensional limits may be overly rigid. Their examples illustrate that:

- Larger lettering or logos may be acceptable where proportionate to the host building.
- Materials and design quality often have a greater impact on character than size alone.
- Strict numerical limits may inadvertently permit harmful modern materials while restricting appropriate traditional signage.

The Council recognises the importance of providing clarity for applicants and enforcement teams, but also acknowledges the need for design-led judgement. As a result, the dimensional standards will be reviewed to ensure they:

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation

- Provide clear expectations;
- Allow flexibility where justified by context;
- Support high-quality, traditional, and proportionate signage.

2.4 Materials, National Chain Branding, and Visual Harm

The representation highlights the potential harm caused by bright plastics, reflective finishes, and standardised national chain branding. These concerns align closely with the Council's objectives. The ASCA guidance will therefore emphasise:

- The use of traditional or sympathetic materials;
- Avoidance of overly modern, glossy, or illuminated finishes;
- The need for national operators to adapt branding to historic contexts.

2.5 Enforcement and Temporary Community Advertising

CPRE Kent supports increased enforcement but cautions against a heavy-handed approach, particularly where existing signage may not comply with new standards. They also request that temporary community advertisements remain permissible.

The Council agrees that:

- Enforcement should be proportionate and targeted at harmful displays;
- Transitional arrangements may be appropriate;
- Temporary community-based advertisements (e.g., village fairs, open gardens) should not be unintentionally restricted.

These principles will be reflected in the final ASCA guidance and enforcement approach.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation

3. Conclusion

CPRE Kent's representation provides constructive and well-reasoned feedback that aligns with the Council's aims of protecting historic character while supporting viable commercial activity. Their comments on boundary alignment, flexibility in dimensional controls, material quality and proportionate enforcement will inform the refinement of the ASCA proposals.

In light of the issues raised, the Council considers it appropriate to extend the ASCA designation to cover the *entire* Conservation Areas at Cellar Hill & Greenstreet, Milton Regis, Newington High Street and Queenborough. Extending the designation across the full Conservation Area in these locations ensures that character sensitivity, existing advertisement patterns and the benefits of a consistent and easily understood approach are fully addressed.

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APPENDIX III – Reasons for Extending the ASCA to Cover the Entire Conservation Areas

A. Queenborough Conservation Area

1. The Conservation Area has a unified historic character

Queenborough is a coherent, legible historic settlement, with its medieval street pattern, quayside setting, and distinctive townscape forming a single, interrelated heritage environment. Applying ASCA controls only to selected streets risks creating inconsistent protection across an area whose significance derives from its overall character, not isolated pockets.

- Extending the ASCA ensures consistent treatment of all historic frontages.
- It avoids a “patchwork” approach that could undermine the Conservation Area’s integrity.
- It aligns with the principle of preserving or enhancing the whole designated area, not just its most sensitive parts.

2. Advertisement pressure is not confined to the proposed boundary

While the highest concentration of signage may be in the commercial core, advertisement creep can occur anywhere within a Conservation Area. Without full coverage:

- Businesses may relocate intrusive signage to unprotected streets.
- Visual clutter may migrate to quieter areas, harming residential amenity.
- Enforcement becomes more difficult and less defensible.

A full-area ASCA provides clarity, consistency, and enforceability.

3. The Conservation Area includes multiple character zones that all contribute to significance

Queenborough’s significance is derived from a combination of:

- its medieval street layout
- maritime and industrial heritage
- historic residential terraces
- landmark civic and ecclesiastical buildings
- the relationship between the High Street, waterfront, and side streets

Each of these contributes to the overall sense of place. Restricting ASCA controls to only part of the area risks undervaluing secondary streets that are essential to the town’s historic identity.

4. Full coverage strengthens enforcement and reduces ambiguity

A partial ASCA boundary creates grey areas where officers must justify why some streets are controlled and others are not. This can lead to:

- inconsistent decision-making
- increased appeals
- reduced ability to tackle harmful signage

APPENDIX III – Reasons for Extending the ASCA to Cover the Entire Conservation Areas

A full-area ASCA provides a clear, unambiguous framework, making enforcement more efficient and defensible.

5. Queenborough Town Council and local Members support full coverage

Local democratic support is a material consideration. Queenborough Town Council and ward Members have expressed a clear preference for:

- full Conservation Area coverage, and
- ensuring that existing lawful signage is unaffected

This demonstrates strong community and Member alignment with a full-area approach.

6. Heritage-led regeneration benefits from consistent visual standards

Queenborough is undergoing incremental regeneration, and the town's historic character is a key asset. A full-area ASCA:

- supports heritage-led regeneration
- improves the visual quality of the whole town
- strengthens the town's identity as a historic maritime settlement
- creates a more attractive environment for visitors and investment

This is consistent with national policy encouraging place-making and high-quality design.

7. A full-area ASCA is proportionate and reasonable

ASCA designation does not prohibit signage. It simply ensures that advertisements:

- are well-designed
- are not overly dominant
- respect the historic environment

Given the modest scale of Queenborough and the sensitivity of its townscape, full coverage is proportionate, justified, and aligned with the purpose of the designation.

B. Cellar Hill and Greenstreet Conservation Area

1. The Conservation Area has a unified historic character

Cellar Hill and Greenstreet is a compact, linear historic settlement with strong vernacular character, traditional building forms and a distinctive hillside approach. Its significance derives from the whole streetscape, not only the limited commercial elements.
Applying ASCA controls only to selected frontages would create inconsistent protection within an area whose character is fundamentally cohesive.

2. Advertisement pressure is not confined to the commercial core

Although Cellar Hill has limited commercial activity, CPRE's consultation response highlights the risk of signage appearing in "a front garden" or on buildings outside a designated ASCA (CPRE, Q8).
Full coverage prevents signage creep into quieter residential areas and ensures clarity for applicants and officers.

3. All character zones contribute to significance

The CA includes historic cottages, boundary walls, traditional materials and the distinctive rising topography. These elements collectively define its character.
Restricting controls to a small area would undervalue the contribution of residential frontages and transitional spaces.

4. Full coverage strengthens enforcement

A partial ASCA boundary would be difficult to justify in an area with such limited commercial differentiation. Full coverage provides a simple, defensible enforcement position.

5. Consultation responses support full coverage

CPRE Kent explicitly stated that “none” of the proposed areas should be excluded (CPRE, Q3) and that ASCA boundaries should match CA boundaries (CPRE, Q9).

6. Heritage-led regeneration benefits

Cellar Hill’s character is a key asset. Consistent visual standards support incremental enhancement and reinforce the area’s historic identity.

7. A proportionate and reasonable approach

Given the small scale of the CA and the sensitivity of its townscape, full ASCA coverage is proportionate and aligned with the purpose of the designation.

C. Milton Regis Conservation Area

1. The Conservation Area has a unified historic character

Milton Regis is one of Swale’s oldest settlements, with a medieval core, historic street pattern and a mix of residential and commercial buildings. Its significance derives from the interrelationship of all streets, not only the High Street.
Partial designation would create a patchwork of protection inconsistent with the CA’s holistic character.

2. Advertisement pressure is not confined to the proposed boundary

Milton Regis has experienced issues with modern signage and illuminated displays, as highlighted in consultation responses. CPRE questioned why the whole CA would not be designated, noting that residents “away from the commercial areas” are unlikely to object (CPRE, Q8).
Full coverage prevents signage displacement and strengthens control.

3. Multiple character zones contribute to significance

The CA includes medieval lanes, historic terraces, landmark buildings and transitional streets. All contribute to the settlement’s identity and require consistent protection.

4. Full coverage strengthens enforcement

A partial boundary would be difficult to defend in an area with complex historic layering. Full coverage ensures clarity for applicants and officers.

5. Consultation responses support full coverage

CPRE Kent's position that ASCA boundaries should match CA boundaries directly supports full coverage in Milton Regis.

6. Heritage-led regeneration benefits

Milton Regis has areas of vulnerability and heritage-at-risk pressures. Consistent visual standards support regeneration and reinforce the historic core.

7. A proportionate and reasonable approach

ASCA designation ensures signage respects the historic environment without prohibiting commercial activity.

D. Newington High Street Conservation Area

1. The Conservation Area has a unified historic character

Newington High Street is a cohesive historic streetscape defined by consistent building lines, traditional materials and a strong linear form. Its character is shaped by the **whole length of the High Street and its immediate approaches**, not only the commercial frontages. Partial designation would undermine the CA's integrity.

2. Advertisement pressure is not confined to the commercial core

Newington has a mix of commercial and residential uses, and signage creep into quieter frontages is a realistic risk. CPRE's comments on the illogicality of excluding parts of a CA apply directly here.

3. All character zones contribute to significance

The CA includes traditional shopfronts, residential terraces, landmark buildings and transitional spaces. Each contributes to the area's sense of place.
Restricting controls to a subset of streets would undervalue these contributions.

4. Full coverage strengthens enforcement

A clear, unambiguous ASCA boundary aligned with the CA boundary is easier to defend and reduces the risk of inconsistent decisions.

5. Consultation responses support full coverage

CPRE Kent stated that ASCA boundaries should match CA boundaries and that no areas should be excluded.

6. Heritage-led regeneration benefits

Newington High Street's character is a key asset. Consistent visual standards support placemaking, investment and incremental enhancement.

7. A proportionate and reasonable approach

Given the modest scale of the CA and the sensitivity of its townscape, full ASCA coverage is proportionate and justified.

Planning and Transportation Policy Working Group	
Meeting Date	9th June 2026
Report Title	Whole Plan Viability Assessment Update Note 2026
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 note the Whole Plan Viability Assessment Update Note 2026 and to provide any comments members have on the document and its findings.

1. Introduction

1.1 The purpose of this report is to set out the findings of the Whole Plan Viability Assessment Update Note 2026 (Appendix I). The assessment is in draft and is being presented to members for their information and for the opportunity to provide comments early in the process.

1.2 The findings of this assessment set out that whilst viability within the borough has become more challenging due to increased build costs (including Government building standards and stagnated house sales values) the policy objectives of the Local Plan including affordable housing remain achievable.

2. Background

2.1 A Whole Plan Viability Assessment (WPVA) was prepared in 2024 to inform the financial achievability of the draft policy objectives of the Local Plan and to inform the deliverability of sites within the Council's Housing & Economic Land Availability Assessment. As part of ensuring that the Local Plan's policy objectives and allocated sites remain deliverable a Whole Plan Viability Assessment (WPVA) Update Note 2026 has been produced (Appendix I).

2.2 This WPVA 2026 update note has considered:

- recent changes in national policy and guidance
- policy changes in the Council's emerging Local Plan; and,
- changes to the main inputs to the Viability Assessment (costs and values) and how that may impact viability.

2.3 The impacts of these changes are reflected through updated sets of viability appraisals that can be found within the assessments appendices. The Regulation 18 development management policies consulted upon in January of this year and their implications on viability are set out in chapter 6 of the assessment and relevant responses to the consultation and viability considerations for this assessment are set out in chapter 7.

2.4 Chapter 9 provides a concise summary including the findings and conclusions for the assessment. The adjustments made to policy costs as a result of the fresh appraisal are set out in paragraph 9.6 of the assessment. In summary the assessment states that viability has worsened since 2024, with the Residual Values being less. In terms of costs, the main changes are the BCIS[1] based build cost increase, the increase in circulation space assumptions for flatted development, and the application of the Building Safety Levy[2].

2.5 Whilst viability has worsened, given the overall context of changes in the market, the changes in national policy and the updating of the draft Local Plan, the results of the assessment are broadly similar to those presented in the WPVA 2024. This means the Council can continue to rely on the viability evidence from the WPVA 2024 and can continue with the Local Plan's policy objectives un changed as recommended in that assessment. This includes seeking 30% affordable homes on greenfield sites and 10% affordable homes on brownfield sites. In addition, the affordable housing mix has been amended through this assessment to reflect changes in national policy with the removal of the First Homes[3] requirement and to align with the findings of the Housing Market Assessment (HMA) Update 2026.

2.6 The Local Plan policy objectives with the amended affordable housing mix is:

A. Affordable Housing: Greenfield Sites 30%.

Brownfield Sites 10% (threshold 10 units)

Potential Strategic Sites 25%

Affordable housing mix in line with the requirements for:

30% Affordable Home Ownership (as Shared Ownership),

30% Social Rent, and

[1] Building Cost Information Service (BCIS) is a leading provider of independent cost data to the UK built environment for construction, insurance and life cycle costing.

[2] The Building Safety Levy applies to new residential buildings and purpose-built student accommodation (PBSA) in England, as part of the regulatory framework established by the Building Safety Act 2022. Its primary goal is to fund remediation of safety defects, including cladding issues, across residential buildings. The levy is not limited to high-risk buildings; it applies broadly to qualifying developments

[3] First homes offered discount rates for market homes to first time buyers as part of the overall affordable housing contribution.

40% Affordable Rent.

B. Design: 95% Part M4(2) Accessible and Adaptable and 5% Part M4(3) Wheelchair Accessible. Zero Carbon, Water Efficiency, 20% Biodiversity Net Gain.

C. Developer Contributions: Birdwise payments on all sites and open space payments on brownfield sites, plus allowance of £10,000 per unit on typologies and £25,000 per unit on the potential Strategic Sites.

3. Recommendations

3.1 To note the Whole Plan Viability Assessment Update Note 2026 and to provide any comments members have on the document and its findings.

4. Alternative Options Considered and Rejected

4.1 The matters in this report concern informing members on the development of the Local Plan evidence base.

4.2 Members could choose not to note the Whole Plan Viability Assessment Update Note 2026. However, choosing this option should be rejected as the evidence will provide a robust and updated position for policy drafting and the Local Plan examination in public.

5. Consultation Undertaken or Proposed

5.1 No formal consultation has been undertaken on the Whole Plan Viability Assessment Update Note 2026 as it forms part of the evidence base of the Local Plan Review. The Regulation 19 Local Plan will be subject to a period of formal consultation at which point comments will be invited on the Plan, its policies and the supporting evidence base.

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	No implications identified at this stage
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	The Whole Plan Viability Assessment update note 2026 sets out that the Local Plans innovate policies on climate change are achievable. The policies include: • Sustainable design and adaptation principles, • Net zero operational carbon in new build residential development, • Net zero operational carbon in new build non-domestic development, • Embodied carbon and waste and • Renewable energy development and infrastructure.
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 current Local Plan timetable expects the Local Plan to be submitted for its Examination in Public and to be adopted before local government reorganisation is expected to be complete.

7. Appendices

Appendix I: Whole Plan Viability Assessment Update Note 2026

8. Background Documents

8.1 Whole Plan Viability Assessment 2024

2024_Whole_Plan_Viability_Assessment.pdf

Whole Plan Viability Assessment

2026 Update Note

May 2026

Planning & Development

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HDH Planning & Development Ltd (HDH) has prepared this 2026 Update Note (as an update to the *Swale Borough Council Whole Plan Viability Assessment* (HDH, May 2024)), for the sole use of Swale Borough Council in accordance with the instructions under which the services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this report or any other services provided. This Update Note may not be relied upon by any other party without the prior and express written agreement of HDH Planning & Development Ltd.

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1. Introduction

1.1 HDH Planning & Development Ltd, produced the *Swale Borough Council Whole Plan Viability Assessment* (HDH, May 2024). The 2024 WPVA built on (and replaced) the Council's existing viability work. This 2026 Update Note considered how changes in national policy, in the emerging Local Plan, and changes to and in the main inputs to the Viability Assessment (costs and values) may impact on viability.

1.2 Firstly, changes to national policy are considered, then changes in house prices and build costs, before the emerging Local Plan is reviewed. This Update Note should be read as an annex to *Swale Borough Council Whole Plan Viability Assessment* (HDH, May 2024).

1.3 As set out towards the end of this note, a further set of appraisals has been run that reflect the various updates and changes made.

2. Changes in National Policy

2.1 Since the 2024 WPVA was completed, numerous changes and potential changes to national policy have been announced. Some changes are as a result of the change in Government following the 2024 General Election, and others are carried forward from the wider updating of national policy.

National Planning Policy Framework

2.2 The 2024 WPVA was carried out in line with the then current NPPF. Since then, the National Planning Policy Framework (NPPF) has been updated.

2.3 The extant NPPF was published in December 2024 (and was further updated in February 2025[1]). This NPPF made some significant changes to the planning system, particularly to the way the overall requirement for housing is assessed (the Standard Method), however, it did not change the place of viability testing in the plan-making process, and the detail beyond that is largely unchanged.

2.4 In December 2025, the Government published a further Draft NPPF[2] for consultation. The Draft NPPF is comprehensive re-write of the national planning policy, making a number of significant changes to the planning system, including the new national decision-making policies. It is proposed that these national decision-making policies are '*read alongside the policies in the development plan*' and are a material consideration when determining planning applications.

2.5 For the purpose of this Update Note, the Draft NPPF carries forward the requirements to carry out a plan-wide viability assessment, and to ensure that the new Local Plan will deliver, making it clear that allocations for development must be viable:

> *2. For plans that allocate specific sites for development the assessment should be undertaken with reference to national guidance and include:*
>
> *a. A thorough site identification process to identify a sufficient range and quantity of potential sites;*
>
> *b An assessment of the availability, suitability and achievability (including likely viability) of those sites;*
>
> *c. An assessment of the amount of development those sites have the potential to accommodate and the potential timescales over which development could be delivered16; and*
>
> *d. The identification of the most appropriate sites for development taking into account the emerging vision and spatial strategy of the plan and the information above.*

2.6 The Draft NPPF also includes proposals to move or duplicate some of the text currently in the PPG, that relates to viability, into the body of the NPPF, thus giving it more weight. Annex B

[1] The December 2024 version of the National Planning Policy Framework was amended in February 2025 to correct cross-references from footnotes 7 and 8, and amend to the end of the first sentence of paragraph 155 to make its intent clear.

[2] National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK

of the explanatory document sets out the reasoning behind the proposed changes in the Draft NPPF, headed '*Viability: Standardised inputs in viability assessment*' says:

> *Standardised inputs to viability assessments provide a consistent framework for evaluating development proposals and ensure both authorities and developers have greater certainty in the viability assessment process.*
>
> *The government is therefore proposing moving the current Planning Practice Guidance sub-section on 'Standardised inputs to viability assessment' into an annex to the draft Framework, and updating where needed, to support the proposed policies PM12, DM5 and GB8 above, subject to views received. The remainder of the existing viability PPG would remain in guidance. The proposed updates seek to support greater consistency, upfront clarity for all interested parties, and reduce the need for negotiation at the decision-making stage. At the same time, the proposals seek to ensure the system remains sufficiently responsive to different development types and risk profiles, to ensure development can proceed.*

2.7 The consultation also sought views on changes in relation to growth testing, developer's returns and benchmark land values. The methodology used in this update note is consistent with the extant December 2024 NPPF, however appropriate regard is had to the Draft NPPF.

2.8 Paragraph 35 of the NPPF says that plans should set out what development is expected to provide, and that the requirement should not be so high as to undermine the delivery of the plan. This requirement is unchanged.

The Golden Rules

2.9 The extant NPPF includes various sections (Paragraphs 67, 68, 155, 156 and 157) concerning releasing land from the Green Belt. Such releases are subject to the Golden Rules which require that the affordable housing contribution, on such releases, to be 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. The SBC area does not include areas of Green Belt, so these rules do not apply here.

Planning Practice Guidance

2.10 The December 2025 consultation on the Draft NPPF asks a number of questions in relation to viability, including views on changes in relation to growth testing, developer's returns and benchmark land values. It does not propose new wording. It will be necessary to keep these under review.

Viability and plan making

2.11 The viability sections of the PPG (Chapter 10) were rewritten in 2018, and subsequently further updated. The changes provide clarity and confirm best practice, rather than prescribe a new approach or methodology. Having said this, the underlying emphasis of viability testing was unchanged.

2.12 The overall requirement was updated in December 2025:

How should plan makers set policy requirements for contributions from development?

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). This should include the minimum proportion of Social Rent homes required.

These policy requirements should be informed by evidence of infrastructure and affordable housing need, including the need for those who require Social Rent, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, Social Rent and other types of affordable housing requirements should be expressed as a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.

PPG 10-001-20251216

2.13 The 2024 WPVA took a proportionate approach, building on the Council's existing evidence, and considers all the local and national policies that will apply to new development.

The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. … Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.

PPG 10-002-20251216

2.14 Whilst the wording was updated, the overall requirement remains similar. The emerging policy options that were under consideration by the Council were be tested individually and cumulatively, to ensure that when taken together, that they are set at an appropriate level.

It is the responsibility of land owners, site promoters and developers to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions.

PPG 10-002-20251216

2.15 The Council will continue to engage with the promoters of the key sites in the Plan.

Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.

PPG 10-003-20180724

2.16 The 2024 WPVA was based on typologies[3] that were developed by having regard to the potential sites that are most likely to be included in the emerging Plan. 13 potential strategic sites were also modelled, so as to inform a decision (when taken with wider evidence) as to whether or not they were to be included in the final iteration of the Local Plan. These potential strategic sites were modelled based on information provided by the Council, and the refined two preferred sites are now retested, based on the latest information in this Update Note.

> *Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.*
>
> *It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. It is important for developers and other parties buying (or interested in buying) land to have regard to the total cumulative cost of all relevant policies when agreeing a price for the land. Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.*
>
> *PPG 10-006-20190509*

2.17 Consultation formed part of the preparation of the 2024 WPVA, and the comments made through the Regulation 18 consultation are reviewed below.

Viability and decision taking

2.18 As mentioned above, the December 2025 consultation on the Draft NPPF includes proposals to move or duplicate sections of the text currently in the PPG that relate to viability, into the body of the NPPF, thus giving it more weight.

Standardised inputs to viability assessment

2.19 Several sections have been updated, although the 2024 WPVA remains consistent with the changes. The PPG sets out how land values should be considered, confirming the use of the Existing Use Value Plus (EUV+) approach.

> *To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy*

[3] The PPG provides further detail at 10-004-20190509:

A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.

In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan.

requirements. Landowners and site purchasers should consider policy requirements when agreeing land transactions. This approach is often called 'existing use value plus' (EUV+).

PPG 10-014-20190509

2.20 The PPG goes on to set out:

Benchmark land value should:

- *be based upon existing use value*
- *allow for a premium to landowners (including equity resulting from those building their own homes)*
- *reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees*

Viability assessments should be undertaken using benchmark land values derived in accordance with this guidance. Existing use value should be informed by market evidence of current uses, costs and values. Market evidence can also be used as a cross-check of benchmark land value but should not be used in place of benchmark land value. There may be a divergence between benchmark land values and market evidence; and plan makers should be aware that this could be due to different assumptions and methodologies used by individual developers, site promoters and landowners.

This evidence should be based on developments which are fully compliant with emerging or up to date plan policies, including affordable housing requirements at the relevant levels set out in the plan. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.

In plan making, the landowner premium should be tested and balanced against emerging policies. In decision making, the cost implications of all relevant policy requirements, including planning obligations and, where relevant, any Community Infrastructure Levy (CIL) charge should be taken into account.

PPG 10-015-20190509

2.21 The December 2025 consultation on the Draft NPPF asks a number of questions in relation to deriving the BLV. The approach adopted in this Update Note is to start with the EUV. The 'plus' element is informed by the price paid for policy compliant schemes to ensure an appropriate landowners' premium.

Existing use value (EUV) is the first component of calculating benchmark land value. EUV is the value of the land in its existing use. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the type of site and development types. EUV can be established in collaboration between plan makers, developers and landowners by assessing the value of the specific site or type of site using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield (excluding any hope value for development).

Sources of data can include (but are not limited to): land registry records of transactions; real estate licensed software packages; real estate market reports; real estate research; estate agent websites; property auction results; valuation office agency data; public sector estate/property teams' locally held evidence.

PPG 10-016-20190509

2.22 The methodology used in the 2024 WPVA followed this approach to establish the EUV. This approach was carried into this update.

Community Infrastructure Levy Regulations and Guidance

2.23 The Council has not adopted CIL. The CIL Regulations are broad so, in any event, it is necessary to have regard to them. The CIL Regulations have not been updated since 2020 so CIL Regulation 122 remains as being of particular importance. This sets out that payments requested under the s106 regime must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Wider Changes Impacting on Viability

2.24 The Draft NPPF includes proposals to move or duplicate some of the text currently in the PPG, that relates to viability, into the body of the NPPF, thus giving it more weight. The consultation then seeks views on changes in relation to growth testing, developer's returns and benchmark land values. It will be necessary to keep this under review.

2.25 There have been several changes at a national level over the last few years that are timely to mention.

Accessible and Adaptable Standards

2.26 In July 2022, the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes[4]. At that time the Government said that it intended to mandate M4(2) (Category 2: Accessible and Adaptable dwellings) requirement in Building Regulations as a minimum standard for most new homes. This was reflected in the appraisals in the 2024 WPVA.

2.27 In the Draft NPPF, under policy *HO5: Meeting the needs of different groups*, the Government proposed the following text:

> *In relation to accessible housing, setting out the proportion of new housing that should be delivered to requirement M4(2) and M4(3) of the Building Regulations. M4(2) requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards.*

2.28 The requirement tested in the 2024 WPVA was for 95% M4(2) housing and 5% (M4)3 housing, so is consistent in this regard.

Environmental Standards

2.29 In the spring of 2024, the Government carried out a consultation on how national standards may be changed as part of the move to Zero Carbon. The Department of Levelling up, Communities and Housing published revisions to Conservation of Fuel and Power, Approved

[4] Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK (www.gov.uk)

Document L of the Building Regulations as a 'stepping stone' on the pathway to Zero Carbon homes that sets the target of an interim 31% reduction in CO_2 emissions over 2013 standards for dwellings. This is assumed to apply to all new homes in this assessment.

2.30 In 2023 the then Housing Minister made a Written Parliamentary Statement[5] which set out the Government's position in this regard. Whilst this did does not preclude the introduction of policies that go beyond national standards, this does suggest that such policies will need to be well justified and subject to greater scrutiny.

2.31 Under the Draft NPPF, the Government consulted on the following text:

> ***Plan-making policies***
>
> ***CC1: Planning for climate change***
>
> *1 Development plans should take a proactive approach to mitigating climate change and supporting the transition to net zero30. They should also take a proactive approach to adapting to climate change, taking into account the implications of extreme weather and long-term climate trends including overheating, wildfires, drought, flood risk, coastal change, water supply, biodiversity and landscapes. They should do this by:*
>
> *a. Proposing development patterns through their spatial strategy and allocations which:*
>
> *i. can help contribute to radical reductions in greenhouse gas emissions (which can be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions and their mitigation); and*
>
> *ii. avoid increased vulnerability and improve resilience to the effects of climate change (including through providing for necessary infrastructure improvements and the future relocation of homes and other uses where public safety would be at risk, for example as a consequence of coastal change);*
>
> *b. Addressing any specific risks from climate change in their proposed allocations for development, and necessary adaptations, both of which should be considered for the anticipated lifetime of the development;*
>
> *c. Setting local water efficiency standards for new development where these are justified in accordance with policy PM13; and*
>
> *d. Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1.*
>
> ***National decision-making policies***
>
> ***CC2: Mitigation of climate change***
>
> *1. In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:*
>
> *a. Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4;*
>
> *b. Support good access to facilities to limit the need to travel, whether through the development's location, through development densities which improve*

[5] Written statements - Written questions, answers and statements - UK Parliament

catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities;

c. Use design approaches which conserve energy and other resources in accordance with policy DP3(1)(c);

d. Take advantage of opportunities to re-use existing structures and materials, including by re-using non-contaminated excavated soil and hardcore within the site;

e. Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy;

f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and

g. Not increase the extraction of fossil fuels unless it is in accordance with policy M5.

2. Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

2.32 The Draft NPPF consultation also says (on page 16):

> ***6 Streamlining local standards.*** *We want to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those specific issues where local variation is justified. We also want to limit duplication of matters which are covered by the Building Regulations – other than where there is the existing ability to use 'optional technical standards'.*

2.33 The Draft NPPF consultation, in Policy *PM13: Setting standards* says:

1. Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking, and where this will provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. Such standards should:

a. Be justified, drawing upon relevant evidence of local characteristics and needs, while utilising or adapting relevant national standards where it is appropriate to do so (such as in relation to green infrastructure). Evidence in support of standards should be proportionate, in accordance with policy PM8, especially where relevant national standards already exist;

b. Not cover matters which are already addressed by Building Regulations, other than in relation to:

i. accessibility standards, for which local standards in relation to requirement M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in line with policy HO5; or

ii. water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress.

c. Not cover matters relating to the construction or internal layout of buildings unless they are to implement the nationally described space standard.

2.34 The Draft NPPF consultation, in Policy *PM13: Setting standards*, says:

> *In addition, the policy proposes preventing standards which cover matters already addressed by building regulations, with the exception of the established national technical standards for accessibility and water efficiency. In relation to water efficiency, the policy recognises that some areas may need to set a tighter standard than the existing optional requirement, due to the pressure on water supplies. This reflects relevant parts of the Written Ministerial Statement made on 19 December 2023 titled The Next Stage in Our Long-Term Plan for Housing Update. The Department for Environment, Food and Rural Affairs ongoing consultation on revising water efficiency standards will not affect this policy.*
>
> *Beyond these areas, the policy identifies specific areas where local standards should not be set. This includes matters relating to the construction or internal layout of buildings (other than the nationally described space standard), which the government considers are matters best left to the market to determine.*
>
> *The policy as drafted would limit local standards for energy efficiency, as we are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. If this specific restriction were to be taken forward following consultation, we intend to use secondary legislation to commence section 43 of the Deregulation Act 2015 to amend the Planning & Energy Act 2008 to make clear that local plans should not set higher energy efficiency standards for residential development. The draft Framework policy would also replace the policy contained in the 2023 Written Ministerial Statement titled Planning – Local Energy Efficiency Standards Update.*

2.35 The Government announced in March 2026 that it will be implementing the Future Homes Standard and Future Building Standard through Building Regulations in March 2027[6].

2.36 The draft Local Plan policy exceeds current national standards and the Future Homes Standard. The policy is included, based on information provided by the Council's climate change consultants (Bioregional), in the appraisals at the end of this Update Note.

Biodiversity Net Gain

2.37 The Environment Act received Royal Assent in November 2021 and mandates that new developments must deliver an overall increase in biodiversity. The PPG was updated in 2024[7] in this regard. The requirement is that developers ensure habitats for wildlife are enhanced relative to pre-development state. Developers must assess the type of habitat and its condition before submitting plans and then demonstrate how they are improving biodiversity.

2.38 Green improvements on-site are preferred (and expected), but in the circumstances where they are not possible, developers will need to pay a levy for habitat creation or improvement elsewhere. The mandatory BNG requirement was introduced for most major developments from February 2024, and for small sites/minor development from April 2024.

> *The definition of a minor development for the purposes of BNG is development that is not major development and includes:*
>
> - *residential development where the number of dwellings is between 1 and 9 on a site of an area 1 hectare or less, or if the number of dwellings is unknown, the site area is less than 0.5 hectares.*

[6] FHBS_Circular.pdf

[7] Biodiversity net gain - GOV.UK (www.gov.uk)

- *commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare.*
- *development that is not the winning and working of minerals or the use of land for mineral-working deposits.*
- *development that is not waste development.*

2.39 In May 2025 the Government undertook a consultation[8] on the implementation of BNG. This would introduce a '*new medium development threshold for sites between 10 and 49 homes, up to 1.0 ha in size'*. Alternatively, consideration was given to exempting all minor developments. Bearing in mind that this was a consultation, the outcome of which is not yet known, it is assumed the BNG requirements remain as per the extant NPPF and PPG.

2.40 The Draft NPPF consultation in Policy *N1: Identifying environmental opportunities and safeguards*, says:

> *Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Any such requirements should not extend to categories of development which are exempt from statutory biodiversity net gain.*

2.41 Pending publication of revised standards, the national requirements are unchanged (although, as set out later, the SBC will be seeking 20% BNG rather than 10% BNG).

Fire Safety Standards

2.42 The Government published the outcome in March 2024 in the updated Building Regulations[9]. The guidance makes second staircases mandatory in all new residential buildings over 18m (about 6 storeys) in England from September 2026. The modelling in the further appraisals set out at the end of this note reflect this.

Levelling-up and Regeneration Act

2.43 The *Levelling-up and Regeneration* Act become law in 2023. Many of the measures in the Act will be implemented, in due course, through secondary legislation and / or regulations. The provisions within the Act will have a significant impact on the overall plan-making process, but they do not alter the place of viability in the current Local Plan process.

2.44 The *Levelling-up and Regeneration Act* includes reference to a new national Infrastructure Levy. The Government has announced that this will not be taken forward.

Planning Application Fees

2.45 Planning fees increase each year. The updated amounts are applied[10] in the appraisals set out at the end of this note.

[8] Improving the implementation of biodiversity net gain for minor, medium and brownfield development - GOV.UK

[9] Amendments to the Approved Documents - Approved Document B: Fire safety volumes 1 and 2 (publishing.service.gov.uk)

[10] Planning fees: annual indexation from 1 April 2026

Building Safety Levy

2.46 The Building Safety Levy (BSL) was announced in February 2021 to pay for the remediation of building safety defects as part of the response to the Grenfell Tower fire. In March 2025, the Government announced that the Levy will be introduced in Autumn 2026. In Swale, the Levy, if introduced as per the consultation, would be £15.86 per sqm for brownfield land and £31.72 per sqm for greenfield land[11] and would apply to major development.

2.47 The BSL was not included in the 2024 WPVA. It is included in the appraisals at the end of this note.

Viability Guidance

2.48 Neither the NPPF nor the PPG set out step-by-step technical guidance, although the updated PPG includes guidance in a number of specific areas. The earlier viability work drew on the *Viability Testing in Local Plans – Advice for planning practitioners* (LGA/HBF – Sir John Harman) June 2012[12] (known as the Harman Guidance[13]), and followed the relevant RICS guidance being the *Financial viability in planning: conduct and reporting RICS professional statement, England* (1st Edition, May 2019) and A*ssessing viability in planning under the National Planning Policy Framework 2019 for England, GUIDANCE NOTE* (RICS, 1st edition, March 2021).

2.49 No further relevant guidance has been published.

Affordable Housing

2.50 Paragraph 65 of the extant NPPF sets out national thresholds for the provision of affordable housing. These are unchanged since 2024:

> *Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.*

2.51 Two requirements of earlier national policy have been dropped. Under Footnote 31 of the NPPF, the requirements for 25% for the affordable housing to be First Home no longer applies. The requirement for 10% of all homes to be Affordable Home Ownership (as per paragraph 66 of the 2023 NPPF[14]) no longer applies.

2.52 The Council has updated its draft policy in this regard, to seek a tenure mix that aligns more closely with its identified need. This also takes into account the greater emphasis for Social

[11] Building Safety Levy: Technical consultation response - GOV.UK

[12] Viability Testing in Local Plans has been endorsed by the Local Government Association and forms the basis of advice given by the, MHCLG funded, Planning Advisory Service (PAS).

[13] viability-testing-local-p-42b.pdf

[14] [ARCHIVED CONTENT]

Rent as per paragraphs 64 and 71 of the NPPF. This change is reflected in the appraisals set out at the end of this Note.

3. Changes in House Prices

Market Housing

3.1 The residential value assumptions in the 2024 WPVA were researched and gathered in April 2024. Since then, house prices have changed. There are a range of data sources that can be referenced; however the Land Registry is the most complete.

Table 3.1 Change in Average House Prices

	Swale	Kent	England & Wales
2024-04	£282,577	£334,282	£272,735
2026-02	£289,812	£345,239	£284,720
Change	£7,235	£10,957	£11,985
	2.6%	3.3%	4.4%

Source: Land Registry (May 2026)

3.2 This data shows that average prices have increased a little in Swale, however, they have increased a little more in Kent and across England and Wales. This data can be disaggregated and newbuild sales separated out.

Table 3.2 Change in Average Newbuild House Prices – Swale

	Newbuild	**Existing**
2024-04	£442,021	£276,601
2025-12	£485,059	£284,540
Change	£43,038	£7,939
	9.7%	2.9%

Source: Land Registry (May 2026)

3.3 The Land Registry's latest data suggests that the average newbuild sale price in the Borough has increased by about 10% since the 2024 WPVA was completed.

3.4 The 2024 WPVA included data on newbuild price paid data sourced from Landmark (Tables 4.4 and 4.5 and Figure 4.7). In this note, similar data from Landstack is analysed, the price paid data from the Land Registry is married with the floor areas sourced from the EPC Register, for newbuild sales since the start of 2023. As set out in Table 4.4 of the 2024 WPVA, there is little data from the most recent years. The updated data has limited data from 2025 and 2026.

Table 3.3 Newbuild Price Paid Data by Year – Swale BC 2023 - 2026

	Bungalow	Detached	Flats	Semi-detached	Terraced	**All**
Count						
2023	2	85	9	81	31	208
2024	5	127	20	118	29	299
2025	4	85	0	42	19	150
2026	0	0	0	0	0	0
All	**11**	**297**	**29**	**241**	**79**	**657**
Average of Price Paid £						
2023	£327,500	£498,905	£194,722	£342,612	£343,321	£400,043
2024	£412,000	£490,497	£192,375	£334,162	£344,620	£393,397
2025	£417,500	£504,985		£344,896	£350,576	£438,269
2026						
All	**£398,636**	**£497,050**	**£193,103**	**£338,873**	**£345,543**	**£405,746**
Average of £ per sqm						
2023	£4,658	£4,283	£3,354	£4,095	£3,641	£4,083
2024	£5,328	£4,113	£3,302	£3,869	£3,511	£3,967
2025	£5,768	£4,191		£4,193	£3,536	£4,158
2026						
All	**£5,366**	**£4,184**	**£3,343**	**£3,998**	**£3,570**	**£4,049**

Source: Landstack (May 2026)

3.5 The data above compares with that presented in Table 4.5 of the 2024 WPVA. And suggests that average houseprices have increased marginally, but when considered on a £ per sqm basis are unchanged

Table 3.4 Change in Newbuild Price Paid Data – Swale BC

	2022 to 2024	2023 to 2026	Change	
Bungalow		£398,636	£398,636	
Detached	£472,858	£497,050	£24,192	5.12%
Flats	£180,628	£193,103	£12,475	6.91%
Semi-detached	£355,826	£338,873	-£16,953	-4.76%
Terraced	£341,659	£345,543	£3,884	1.14%
All	£397,747	£405,746	£7,999	2.01%
Bungalow		£5,366	£5,366	
Detached	£4,222	£4,184	-£38	-0.89%
Flats	£3,030	£3,343	£313	10.32%
Semi-detached	£4,181	£3,998	-£183	-4.38%
Terraced	£3,697	£3,570	-£127	-3.43%
All	£4,051	£4,049	-£2	-0.05%

Source: Landstack (May 2026)

3.6 The above data can be disaggregated and is presented in **Appendix 1**. The data compares with that presented in Appendix 6 of the 2024 WPVA.

3.7 A survey of newbuild asking prices was carried out in February 2023. This was refreshed in December 2023 and April 2024.

a. In February 2023, there were 60 new homes being advertised for sale in the Council area. The analysis of these showed that asking prices for newbuild homes started at £162,500 and went up to £775,000. The average was about £429,000 (£4,221 per sqm).

b. In December 2023, there were 94 new homes being advertised for sale in the Council area. The analysis of these showed that asking prices for newbuild homes started at £1162,500 and went up to £950,000. The average was about £407,000 (£4,097 per sqm).

c. In April 2024, there were 128 new homes being advertised for sale in the Council area. The analysis of these shows that asking prices for newbuild homes start at £270,000 and go up to over £1,200,000. The average was about £460,000 (£4,274 per sqm).

3.8 The survey data was further refreshed in 2026, when there were 107 newbuild homes being advertised for sale. The research is presented in **Appendix 2** and summarised below:

Table 3.5 Survey of Newbuild Asking Prices – April 2026.

		Detached	Flat	Semi-detached	Terraced
Aile Homes					
Monarch Place	£	£608,333		£475,000	£462,500
	£/sqm	£4,588		£4,398	£4,302
Barratt					
Cherry Meadow@Applegate Park	£				£348,328
	£/sqm				£4,820
Crest Nicholson					
Crown Meadows	£	£610,625			
	£/sqm	£4,355			
DWH					
Mulberry Rise @Applegate Park	£	£452,995		£378,995	
	£/sqm	£3,992		£3,509	
Fernham Homes					
Love Lane	£	£707,250		£427,500	
	£/sqm	£4,706		£4,294	
Jones Homes					
Shurland Park	£			£335,882	
	£/sqm			£4,369	
Kayleigh Stevens					
Callum Park	£	£1,138,500			
	£/sqm	£3,760			
Matthews Homes					
Blake Gardens	£	£411,667			
	£/sqm	£3,477			
Pentland Homes					
Grovehurst gate	£	£525,000		£384,000	£315,000
	£/sqm	£4,614		£4,278	£4,500
Persimmon					
Moores Quarter	£				£391,333
	£/sqm				£3,824
Ovinia Chase	£	£388,639		£368,225	
	£/sqm	£4,575		£4,216	
Redrow					
Amber Fields	£	£530,000			
	£/sqm	£3,985			
Preston Fields	£	£696,667		£410,000	£370,000
	£/sqm	£4,564		£4,556	£3,217
Regent Quay	£	£575,000			
	£/sqm	£4,259			
Riverdale Developments					
Scholars Place	£			£384,950	
	£/sqm			£3,883	
Rosechurch Homes					
Edgelake	£	£450,000		£454,500	
	£/sqm	£4,167		£3,987	
Swale Borough	£	**£573,957**		**£369,590**	**£376,726**
	£/sqm	**£4,285**		**£4,262**	**£4,250**

Source: Market Survey (April 2026) (The blanks indicate where no asking price and or GIA is available.

3.9 In 2024 the average newbuild asking price was about £460,000 (£4,274 per sqm). The updated research shows that asking prices for newbuild homes start at £275,000 and go up

to over £1,395,000. The average is now about 3% higher at about £473,300 and on a floor area basis is unchanged at £4,953 per sqm.

Affordable Housing Values

3.10 The derivation of the value assumptions for affordable housing was set out from paragraph 4.54 of the 2024 WPVA.

3.11 In the 2024 WPVA, the assumptions were that Social Rent would have a value of £1,300 per sqm of market value (para 4.59), and Affordable Rent would have a value of £2,400 per sqm of market value (para 4.65). It was also assumed that Affordable Home Ownership units would have a value of 70% market value (para 4.70).

3.12 The assessment of values has been updated using the same method, however the yield assumption has been increased to 5%. The calculations are set out in **Appendix 3**.

3.13 An updated value of £1,400 per sqm is derived for Social Rent, and the Affordable Rent assumption is unchanged.

The Wider Housing Market

3.14 The development identified in the new Local Plan will be built out over many years and across development cycles. It is useful to consider how values may change in the future. There is a degree of uncertainty in the housing market as reported by the RICS. The April 2026 RICS UK Residential Market Survey[15] said:

> ***Higher mortgage rates continue to dampen buyer demand***
>
> - *Sales market activity indicators remain firmly negative*
> - *Headline house prices continue to see moderate downward pressure*
> - *Forward-looking sentiment points to a subdued picture over the months ahead*
>
> *The April 2026 RICS Residential Market Survey results continue to reflect a challenging global macroeconomic backdrop, with the associated rise in interest rate expectations weighing on buyer demand. Moreover, near-term sentiment indicators suggest that these subdued conditions are set to persist over the coming months, while the outlook for the year ahead has softened noticeably.*
>
> *From an aggregate perspective, the new buyer enquiries series registered a net balance of -34% in April. While this is marginally less downbeat than the -40% reading recorded last month, it still points to weak market momentum, with almost all regions of the UK experiencing a noticeable softening in demand.*
>
> *At the same time, the agreed sales indicator posted a net balance of -36% in the latest survey (compared with -35% previously), signalling that a firmly downward trend remains in place. Looking ahead, the near-term sales expectations balance of -32% suggests that the current muted conditions are likely to persist over the coming months. At the twelve-month horizon, sales expectations have edged into marginally negative territory (net balance of -6%), with this metric weakening progressively over each of the past three months.*
>
> *With regard to supply, the new instructions indicator recorded a broadly flat net balance of -3% in April (compared with -6% previously), suggesting that the flow of new listings coming onto*

[15] UK Residential Market Survey

the sales market was largely stagnant over the month. However, the new appraisals measure (which asks respondents to compare activity with the same period twelve months earlier) posted a net balance of -16%, down from zero last month. As such, this points to a potential slowdown in the pipeline of new instructions going forward.

At the headline level, the house price indicator recorded a net balance of -34%, marking a further deterioration from the -25% reading seen last month. Regional results point to a growing divergence between the North and South, with more pronounced downward pressure on prices evident in London, the South East, East Anglia and the South West. By contrast, the North West and the North of England continue to post marginally positive readings for the time being. Meanwhile, house prices are still rising across Scotland and Northern Ireland.

Returning to the aggregate level, near-term house price expectations remain negative, with a net balance of -38%, although this is less weak than the -45% reading recorded last month. Looking ahead over a twelve-month horizon, a net balance of +5% of contributors now expects prices to rise, albeit only marginally. That said, this represents the flattest reading for this series since late 2023. When broken down by region, London, the South East and East Anglia all now show moderately negative house price expectations for the year ahead (on a net balance basis).

Across the rental market, tenant demand edged higher, with a net balance of +14% of respondents reporting an increase (from the seasonally adjusted quarterly lettings dataset). Meanwhile, the landlord instructions measure remained negative, albeit slightly less so than last quarter, registering a net balance of -17% (compared with -24% previously). Looking ahead, a net balance of +25% of contributors anticipates rental prices rising, broadly in line with the average reading seen over the past year.

3.15 HM Treasury brings together some of the forecasts in its regular *Forecasts for the UK economy: a comparison of independent forecasts* report.

Table 3.6 Consolidated House Price Forecasts

Table 2 - 2026: Growth in prices and monetary indicators (% change)

Forecasters and dates of forecasts			CPI (Q4 on Q4 year ago, %)	RPI (Q4 on Q4 year ago, %)	Average earnings (Q4 on Q4 year ago, %)	Sterling index (Jan 2005=100)	Official Bank rate (level in Q4, %)	Nominal GDP	House price inflation (Q4 on Q4 year ago, %)
City forecasters									
Barclays Capital	April	*	3.2	4.6	-	-	3.75	-	-
Berenberg	March		2.5	-	2.8	-	3.00	-	-
Bloomberg Economics	Dec		2.1	-	-	-	3.50	-	-
Capital Economics	April	*	4.6	5.9	2.3	81.1	3.75	3.3	1.5
Deutsche Bank	April	*	3.4	4.6	-	-	3.75	-	-
HSBC	April	*	2.7	4.6	3.6	85.4	3.75	-	2.0
JP Morgan	April	*	3.7	-	-	-	4.00	3.4	-
KPMG	March		3.1	-	-	-	3.50	-	-
Natwest Markets	April	*	3.8	4.6	3.2	-	3.75	3.6	-
Nomura	March		2.5	3.1	3.0	-	3.25	-	-
Pantheon	Jan		2.7	2.9	4.0	-	3.50	-	2.0
UBS	April	*	3.7	4.2	3.1	-	3.50	3.8	-
Non-City forecasters									
British Chambers of Commerce	April	*	2.7	-	3.9	-	3.75	-	-
Beacon Economic Forecasting	April	*	2.9	3.5	3.7	83.7	4.00	4.6	1.2
CBI	Dec		2.4	2.6	2.8	-	3.50	3.9	-
CEBR	March		2.0	3.0	3.1	85.0	3.25	-	4.5
Experian Economics	April	*	3.7	4.3	3.0	-	3.75	-	0.1
Heteronomics	April	*	3.9	4.6	3.6	85.4	3.75	-	2.0
ICAEW	Jan		2.1	-	-	-	3.25	-	-
ITEM Club	Feb		2.3	-	-	-	3.5	-	2.8
Liverpool Macro Research	Jan		2.3	3.1	3.5	84.2	3.25	-	-
NIESR	Feb		2.2	3.3	3.7	-	3.25	-	-0.2
Oxford Economics	April	*	4.5	5.4	4.3	81.7	3.75	3.0	0.7
OECD	March	*	4.0	-	-	-	-	-	-
IMF	April	*	3.2	-	-	-	-	-	-
Average of forecasts received in the last 3 months (excludes OBR, IMF and OECD forecasts)									
Independent			3.2	4.3	3.3	83.7	3.6	3.6	1.6
Received this month (marked *)			3.6	4.6	3.4	83.5	3.8	3.6	1.3
City			3.3	4.5	3.0	83.2	3.6	3.5	1.8
Range of forecasts received in the last 3 months (excludes OBR, IMF and OECD forecasts)									
Highest			4.6	5.9	4.3	85.4	4.00	4.6	4.5
Lowest			2.0	3.0	2.3	81.1	3.00	3.0	-0.2
Median			3.1	4.6	3.2	84.4	3.75	3.5	1.5
OBR	**Mar**		**1.9**	**2.9**	**3.1**	**84.6**	**3.31**	**3.3**	**2.7**

Source: Forecasts for the UK economy: a comparison of independent forecasts No 465 (HM Treasury, April 2026).

3.16 Property agents Savills are forecasting the following changes in house prices, suggesting continued growth:

Table 3.7 Savills Property Price Forecasts

	2026	2027	2028	2029	2030	5 Years to Sept 2030
Mainstream UK	2.0%	4.0%	5.0%	5.5%	4.0%	22.2%
Prime Regional	1.5%	3.0%	4.0%	4.5%	3.5%	17.6%
Prime Wider South	1.5%	3.0%	4.0%	4.5%	3.5%	17.6%
South East	1.0%	3.0%	4.0%	4.5%	3.5%	17.0%
UK Rents	2.0%	2.0%	2.5%	2.5%	2.5%	12.0%

Source: Savills [16]

3.17 In this context is relevant to note that the Nationwide Building Society reported in April 2026[17]:

House price growth remained resilient in April

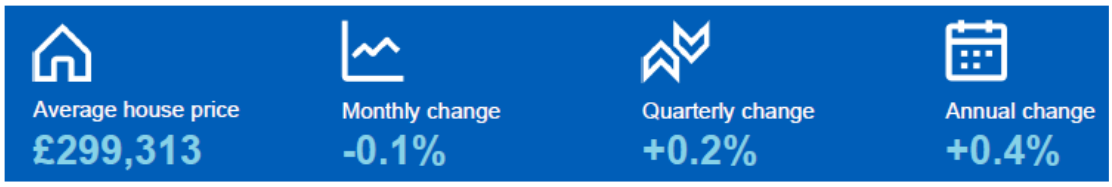
- *UK annual house price growth picked up to 3.0% in April, from 2.2% in March*
- *House prices were up 0.4% month on month*

Headlines	Apr-26	Mar-26
Monthly Index*	554.8	552.7
Monthly Change*	0.40%	0.90%
Annual Change	3.00%	2.20%
Average Price (not seasonally adjusted)	£278,880	£277,186

** Seasonally adjusted figure (note that monthly % changes are revised when seasonal adjustment factors are re-estimated)*

3.18 Nationwide produces regional figures on a quarterly basis. This data suggests, for the Outer South East, an annual -0.7% change in Q1 2026 and an annual 0.1% change from the previous quarter.

3.19 Halifax Building Society reported a slightly different situation in May 2026[18]:



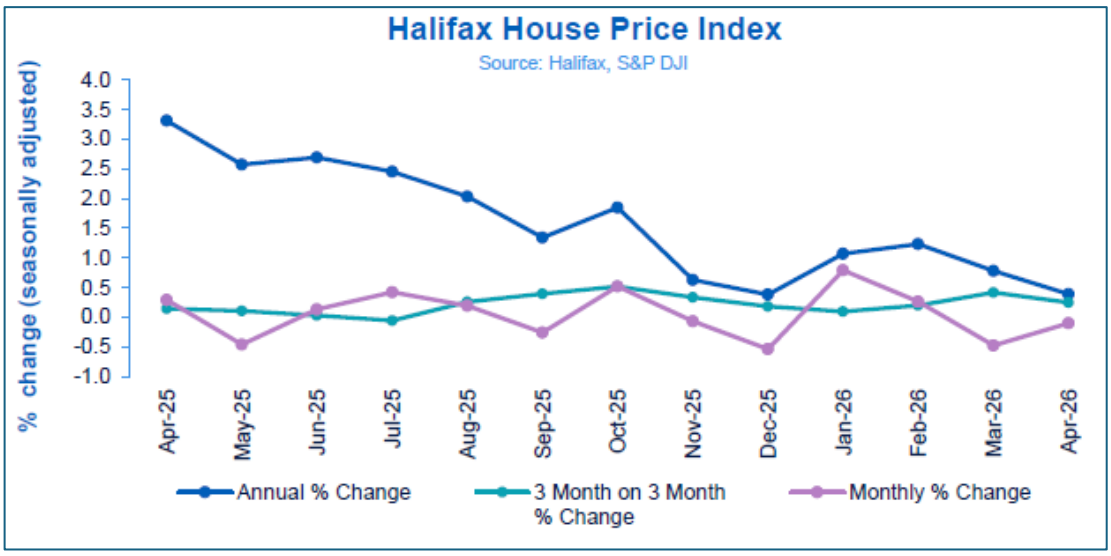
House prices remained broadly stable in April

- ***House prices edged down -0.1% in April, following a -0.5% fall in March***
- *Average property price now £299,313, compared with £299,609 in March*
- *Annual growth slowed to +0.4%, from +0.8% in March*
- *Northern Ireland continues to record the strongest annual growth at +7.6%*

[16] Savills UK | Residential Property Market Forecasts

[17] Nationwide HPI News - Reports

[18] Halifax UK | House Price Index | Media Centre



3.20 Whilst there is clearly uncertainty in the market, a degree of house price growth is anticipated.

3.21 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in values has been carried out.

4. Changes in Development Costs

4.1 The build costs in the 2024 WPVA, as suggested in the PPG, were derived from the BCIS data. The cost figure for Swale for 'Estate Housing – Generally' was £1,517 per sqm at that time (April 2024). The equivalent figure now (May 2026) has increased to £1,575 per sqm. This data suggests that the cost of construction has increased by about 3.8% since the 2024 WPVA was undertaken.

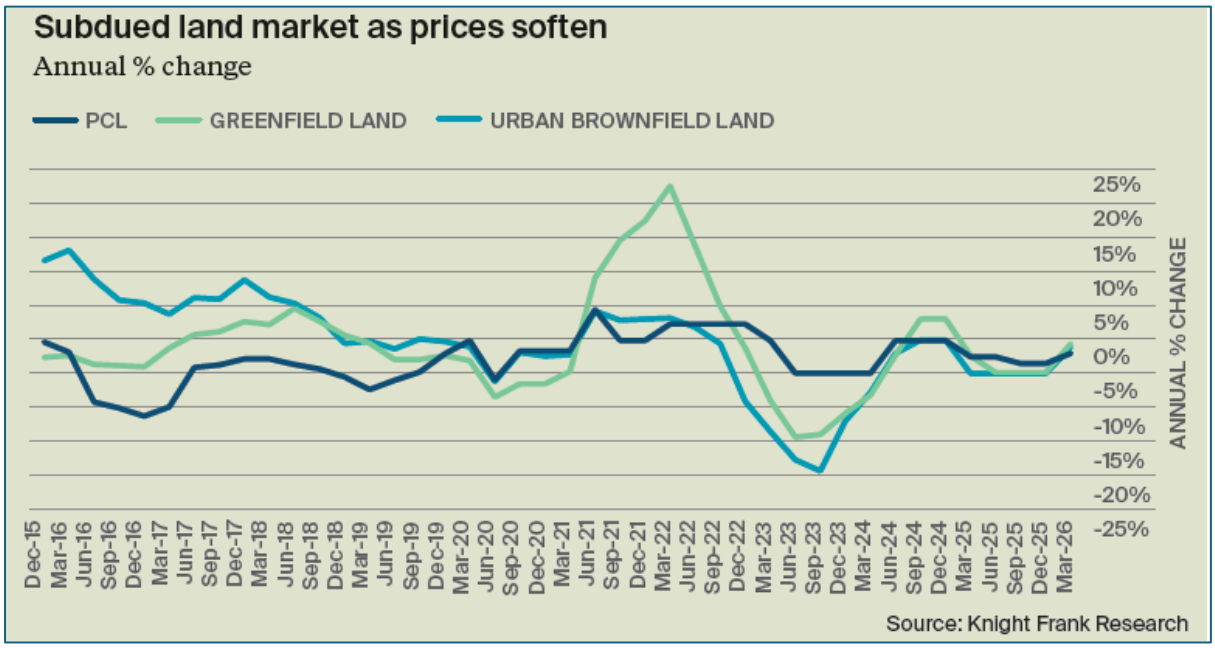
4.2 There has been much coverage in the press around build cost inflation. The BCIS is predicting that going forward, the General Build Cost Index will increase by about 2.1% over the next year (from May 2026 – 497.7 to May 2026 – 507.8) and by about 7.1% over the next three years. (from May 2026 – 497.7 to May 2029 – 532.8).

4.3 The final section of this Update Note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in (BCIS based) build costs has been carried out.

5. Changes in Land Value

5.1 It is timely to review how the value of development land has changed over the last few years. There are several sources of relevant information. *Development Land Index* (Knight Frank Q1 2026 – being the most recently published) suggests that land prices may have fallen over the last few years.

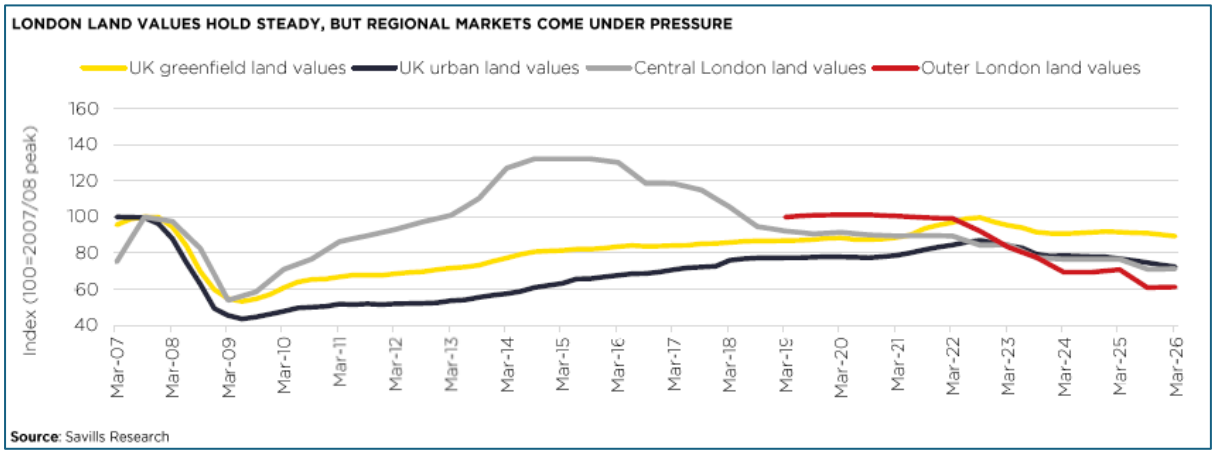
Knight Frank Development Land Index



Source: *Development Land Index (*Knight Frank Q1 2026)

5.2 A similar picture is given by Savills in its *Market in Minutes, Residential Development Land* (Savills Q1 2026).

Savills Indexed Residential Development Land Index (Index to 100 at 2007/2008 peak)



Source: Market in Minutes, Residential Development Land (Savills Q4 2025)

5.3 The above data suggests that the value of development land is broadly unchanged.

6. Changing Policy Requirements

6.1 In discussion with the Council, the following policy obligations were suggested in the 2024 WPVA – although it was stressed that the plan-making process was ongoing, so this needed to be kept under review, and in any event there was to be the normal political balance when prioritising and setting Local Plan policies.

a.	Affordable Housing	Greenfield Sites	30%.
		Brownfield Sites	10% (threshold 10)
		Potential Strategic Sites	25%
		Affordable housing mix in line with the requirements for 10% AHO and 25% of affordable homes to be First Homes (30% discount) and the balance of AHO as shared ownership. The balance as Affordable Rent.	
b.	Design	95% Part M4(2) Accessible and Adaptable and 5% Part M4(3) Wheelchair Accessible.	
		Zero Carbon, 110LPPPD Water Efficiency, 20% Biodiversity Net Gain.	
c.	Developer Contributions	Birdwise payments on all sites and open space payments on brownfield sites, plus allowance of £10,000 per unit on typologies and £25,000 per unit on the potential strategic sites.	

6.2 This was caveated as follows (paragraph 12.97):

> *If the Council were to follow this advice it would be necessary to be cautious in relying on brownfield sites in the five-year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This may influence the selection of sites for allocation, although a small proportion of the possible allocations are brownfield sites.*

6.3 The 2024 WPVA included a review of national policy requirements, including anticipated changes. The policies of in the emerging *Local Plan Review 2021, Pre-Submission Document (Regulation 19)* February 2021 were reviewed and tested with various alternative options (particularly in relation to climate change and developer contributions) as discussed with the Council. The 2024 WPVA then informed the Local Plan were reviewed in Chapter 8 of the report and informed the *Swale Borough Council Local Plan Review (Regulation 18) January 2026* that was then subject to formal consultation.

6.4 The Council has now further refined the Local Plan and selected the preferred strategic sites. The policy changes are considered below.

Local Plan Polices

6.5 The policies of in the emerging Local Plan were reviewed in Chapter 8 of the report and informed the Regulation 18 Consultation that ended in February 2026. Several refinements / clarifications have been made which are highlighted below:

Strategic Policies

6.6 The draft Strategi Policies include the following:

- Policy ST1 Delivering Sustainable Development in Swale
- Policy ST2 Swale Settlement Strategy
- Policy ST3 Climate Change
- Policy ST4 Development Needs for the Borough
- Policy ST5 Building a Strong, Competitive Economy
- Policy ST6 Delivering a wide Choice of High-quality Homes
- Policy ST7 Good Design and Placemaking
- Policy ST8 Health and Wellbeing
- Policy ST9 Planning for Infrastructure
- Policy ST10 Promoting Sustainable Transport and Active Travel
- Policy ST11 Protecting and Enhancing the Natural Environment
- Policy ST12 Conserving and Enhancing the Historic Environment

6.7 These are general policies, which, on the whole do not include specific requirements – the specifics being sought and specified through the Development Management Polices as set out below. There is one notable exception.

Accessible and Adaptable Standard

6.8 Policy ST6 includes the requirement for *'… dwellings that meet minimum space standards M4(2) on 95% of all dwellings and the accessible standards M4(3) on the remaining 5% of dwellings*'. This is not elaborated on under the Development Management Polices.

6.9 This requirement was included in the 2024 WPVA. The cost of a wheelchair accessible dwelling, based on the Wheelchair Housing Design Guide for a 3 bed house, is taken to be £25,136 per dwelling[19]. The cost of a wheelchair adaptable dwelling, based on the Wheelchair Housing Design Guide for a 3 bed house, is taken to be £10,111 per dwelling[20]. The cost of Category 2 is taken to be £521[21]. These costs have been indexed to £37,700 per dwelling, £15,170 per dwelling and £780 per dwelling respectively.

6.10 This requirement is reflected in the updated appraisals towards the end of this note.

[19] Paragraph 152 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[20] Paragraph 153 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[21] Paragraph 157 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

Development Management Policies - General Development Criteria

Policy G1 General Development Criteria

6.11 This policy includes a new requirement that development proposals must be '*accompanied by a statement to demonstrate the degree to which it accords with the TCPA Healthy Homes Principles*'. Whilst this is a new requirement it does not introduce standards over and above Building Regulations or those covered elsewhere in the WPVA. No additional cost is attributed to this requirement.

Development Management Policies - Good Design

Policy GD1 Local Design Principles

6.12 This is a broad policy that is general in nature. It does not introduce standards over and above those and above Building Regulations or those covered elsewhere in the WPVA, except in relation to Nationally Described Space Standards which are mandated.

6.13 Whilst NDSS were not a requirement in the previous iteration of the Local Plan, these were assumed to apply in the 2024 WPVA (paragraph 8.22).

Policy GD2 Alterations & Extensions

6.14 This is a development management policy that does not impact on the delivery of the Local Plan.

Policy GD3 Shop fronts, signs & advertisements

6.15 This is a development management policy that does not impact on the delivery of the Local Plan.

Development Management Policies - Housing

Policy H1 Affordable Housing

6.16 This policy has been updated to seek 10% rather than 20% affordable housing on brownfield sites:

> *Residential development proposals will be required to make affordable housing provision as follows:*
>
> *i. on sites of 10 or more dwellings on previously developed land, 10% of the total dwellings will be in the form of affordable housing; and*
>
> *ii. on sites of 10 or more on greenfield land, 30% of the total dwellings will be in the form of affordable housing.*

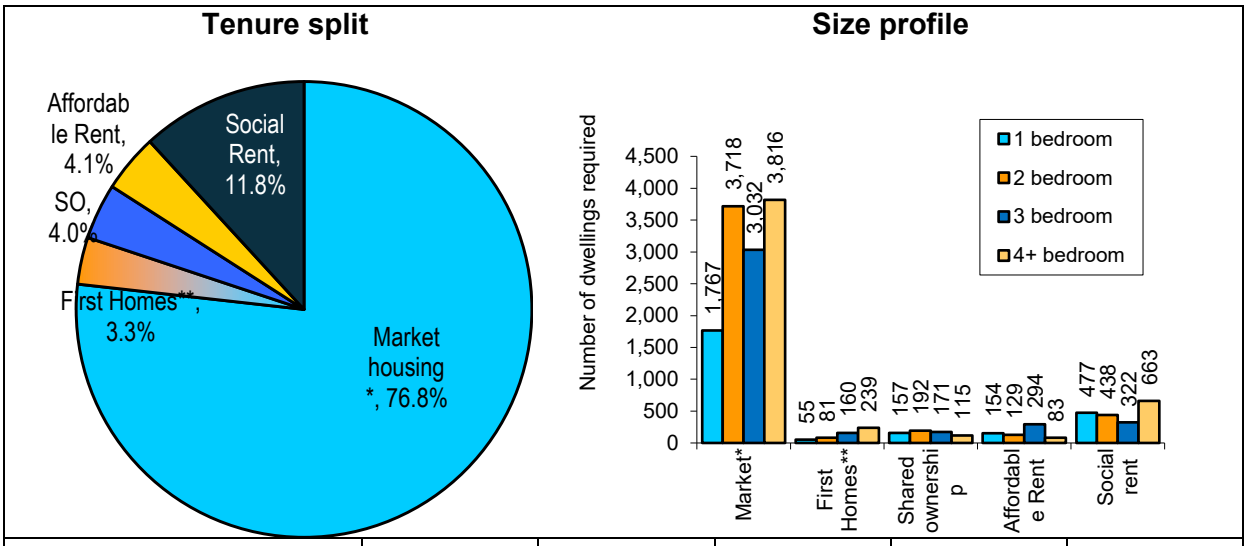
6.17 The policy does not specify a particular tenure mix, rather seeking:

> *The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent, shared ownership affordable units and affordable home ownership tenures in line with the identified needs of the area.*

6.18 In the 2024 WPVA, an affordable housing mix of 10% AHO and 25% of affordable homes to be First Homes (30% discount) and the balance of AHO as shared ownership. The balance as Affordable Rent.

6.19 Bearing in mind the dropping of the requirements for 10% AHO and First Homes the mix has been updated. The *Swale Local Housing Market Assessment Update* (HDH, May 2026) is being finalised. This includes the following mix:

Figure 8.1 Requirement for all new housing in Swale over the plan-period



New housing required 2025 to 2040	By Tenure	1 bed	2 bed	3 bed	4 bed
Market housing*	**12,334**	1,767	3,718	3,032	3,816
	76.8%	14.33%	30.14%	24.58%	30.94%
First Homes	**535**	55	81	160	239
	3.3%	10.28%	15.14%	29.91%	44.67%
Shared Ownership (SO)	**636**	157	192	171	115
	4.0%	24.69%	30.19%	26.89%	18.08%
Affordable Rent	**661**	154	129	294	83
	4.1%	23.30%	19.52%	44.48%	12.56%
Social Rent	**1,900**	477	438	322	663
	11.8%	25.11%	23.05%	16.95%	34.89%
Total	**16,065**	2,610	4,558	3,980	4,917
	100.0%	16.25%	28.37%	24.77%	30.61%

*Market housing includes both owner-occupied and private rented These figures represent the distribution of housing that should be delivered. Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

6.20 In discussion with the Council, the tenure mix has been updated to 30% Affordable Home Ownership, 30% Social Rent, 40% Affordable Rent. This change is reflected in the updated appraisals towards the end of this note. The unit size mix is also updated to reflect the updated analysis.

Policy H2 Small and medium sites for housing development

6.21 This policy has as a number of specific requirements (e.g. to provide 20% BNG) however these are covered elsewhere, under specific policies so it does not introduce standards over and above Building Regulations or those covered elsewhere in the WPVA. No additional costs are attributed to these requirements.

Policy H3 Rural exception and community-led housing development

6.22 This is an enabling policy that does not impact on the delivery of the Local Plan.

Policy H4 Self-build and custom build

6.23 Self-build and custom build were considered in the 2024 WPVA (paragraph 10.53), however, at that time, the Council was not planning to introduce such a requirement. This new policy seeks:

> *Sites of 20 or more homes will provide at least 5% serviced plots for sale to self-builders. In rural areas and settlements as defined via a Proposals Map, which will be available in later stages of the Local Plan, the threshold for providing self- build will be 10 homes and the percentage of provision should be rounded up to the nearest unit.*

6.24 The impact of this new policy is considered towards the end of this note.

Policy H5 Park Homes

6.25 This is a development management policy that does not impact on the delivery of the Local Plan.

Policy H6 Gypsy, Traveller & Travelling Showpeople Accommodation

6.26 This is an enabling and development management policy that does not impact on viability.

Policy H7 Dwellings for rural workers

6.27 This is an enabling and development management policy that does not impact on viability.

Policy H8 Extensions to, & the replacement of, dwellings in the countryside

6.28 This is an enabling and development management policy that does not impact on viability.

Policy H9 Extending the garden of a dwelling in the countryside

6.29 This is a development management policy that does not impact on viability.

Development Management Policies - Economic Development

Policy E1 Loss of employment floorspace & land

6.30 This is a development management policy that does not impact on the delivery of the Local Plan.

Policy E2 The Rural Economy

6.31 This is an enabling and development management policy that does not impact on viability. Whilst it does include some specific requirements, these are covered under other policies considered elsewhere.

Policy E3 Proposals for Main Town Centre Uses

6.32 This is an enabling and development management policy that does not impact on viability.

Policy E4 New Holiday Parks or extensions to existing parks & the occupancy of holiday parks

6.33 This is an enabling and development management policy that does not impact on viability. Whilst it does include some specific requirements, these are covered under other policies considered elsewhere.

Development Management Policies - Infrastructure

Policy INF1 Managing transport demand & impact

6.34 This is a critical policy in relation to the delivery of development. It includes a requirement for a Transport Statement or Transport Assessment. It goes on to set out the detail of what is required. The preparation of a Transport Statement or Transport Assessment is a normal requirement and would be covered in the general allowances for fees. This was considered in the 2024 WPVA (paragraph 8.77).

6.35 It is assumed that any mitigation requirements are covered under the payments set out under the wider s106 assumptions.

6.36 The policy goes on to seek 'broadband / connected communities infrastructure'. This became a requirement of Part R of Building Regulations[22] in 2022 so is a national requirement that does not add to the normal cost of development.

Policy INF2 Vehicle parking

6.37 It is understood that the Council has taken the requirement for carparking into account when establishing the potential capacity of the allocations in the draft Local Plan, to there is no impact on development viability.

[22] New build connectivity: information for developers - GOV.UK

6.38 Much of the policy relates to EV charging with is a requirement of Part S of Building Regulations[23]. This is a national requirement that does not add to the normal cost of development over and above the costs included under the climate change policies below.

Policy INF3 Open space, sport and recreation provision

6.39 The requirements for openspace are unchanged.

Policy INF4 Local Green Spaces

6.40 This is a development management policy that does not impact on the delivery of the Local Plan.

Development Management Policies - Climate Change, Pollution & The Water Environment

Policy C1 Sustainable design and adaptation principles

6.41 This is a non-specific policy that amongst other things requires that '*all new developments must minimise their carbon footprint and energy impact through sustainable design and construction practices*'. It is assumed that compliance with Policy C2 below is sufficient to be policy compliant in this regard.

6.42 The policy requires several specific reports including (eg Climate, Energy and Waste Statement; Evidence of following TCPA's Healthy Homes Principles; Compliance with a cooling hierarchy; Overheating Assessment (major development only); elsewhere, several further reports are sought (e.g. Emissions Mitigation Assessment (also known as a Damage Cost Calculation); Arboriculture Survey: etc.).

6.43 Initially, in the 2024 WPVA (paragraph 7.24), for residential and non-residential development, professional fees were assumed to amount to 8% of build costs to include cost of preparing the planning application and land promotion. Separate, additional, allowances were made for planning fees, acquisition, sales and fees. This assumption was subsequently increased, as a result of the technical consultation, to 10%. The reporting requirements go well beyond the norm.

6.44 The policy goes on to require that water conservation and storage measures should also be integrated into designs. This is a general policy and interventions could very from the provision of a water butt, to rainwater harvesting. The cost of rainwater harvesting was tested in the 2024 WPVA (paragraph 8.117) but at that that stage was not carried forward into the suggested policy mix.

6.45 There are few published costs for rainwater harvesting, although figures of £2,000 to £3,000 are sometimes quoted. The provision of rainwater harvesting requires the capture of rainfall.

[23] Infrastructure for charging electric vehicles: Approved Document S - GOV.UK

This is normally done through an underground tank. A second cold water system is then installed. As this is not at 'mains' pressure, this normally utilises a pump and pressure cylinder.

6.46 The requirements of this policy is assumed to be met through the provision of a water butt or similar low cost solution. A £50 per unit cost is now reflected in the updated appraisals towards the end of this note.

Policy C2 Net zero operational carbon in new build residential development

6.47 This is a detailed policy that seeks new development to be to a net zero operational standard.

6.48 Moving beyond national standards was considered in the 2024 WPVA. Since then the Government has confirmed that the Future Homes Standard will be mandated through Building Regulations in March 2027.

6.49 In the 2024 WPVA, the cost of Zero Carbon was assumed to add 8% to the costs of residential construction and this was taken to be the base assumption. In line with advice from the Council's consultants, Bioregional, this assumptions has been updated to plus 6% for houses and plus 5% for flats. In addition, 0.7% is allowed to recognise that the BCIS costs do not yet fully reflect the costs of the 2021 changes to Part L of Building Regulations.

6.50 The policy is expressed using non-standard metrics (i.e. rather than Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP) as referred to in the 2023 Ministerial Statement), requires reference to Microgeneration Certification Scheme, smart energy systems and post-occupancy evaluation. The professional fees assumption has been increased by 1% to 11% of the build cost (see also Policy C1 above) in this regard.

Policy C3 Net zero operational carbon in new build non-domestic development

6.51 The costs of the policy requirements were considered in the 2024 WPVA.

Policy C4 Embodied carbon and waste

6.52 The costs of embodied carbon policies were not considered in the 2024 WPVA. The Council's climate change consultants (Bioregional) have advised with regard to the costs of such policies.

6.53 The policy to limits embodied carbon to 600 kgCO2e/m^2 GIA. This requirement broadly aligns with typical net zero design.

Table 6.1 Embodied Carbon by Architype

Variant	Part L 2021	Net zero operational energy (NZE)	NZE with reduced embodied carbon specification 1	NZE with reduced embodied carbon specification 2	Best practice retrofit
Houses	599	606	223	237	142
Low rise flats	412	492	224	362	95
Retail	331	340	164	245	74
Primary school	419	514	292	358	138
Offices	500	543	231	428	80
Warehouse	374	415	261	377	114

Source: SO & VoWH Joint Local Plan: Net Zero Carbon Study (Bioregional, December 2023)

6.54 The bulk of this policy concerns reporting rather than making changes to the project design. The costs of reporting are assumed to be within the uplifted fee assumption set out above.

Policy C5 Renewable energy development and infrastructure

6.55 This is an enabling and development management policy that does not impact on viability.

Policy C6 Coastal Change Management

6.56 This is development management policy that does not impact on viability.

Policy C7 Implementing the Medway Estuary & Swale Coastal Risk Management Strategy

6.57 Birdwise and open space requirements were considered in the 2024 WPVA. The policy has been widened somewhat, with mitigation rates now including:

Flood Zone 2 and 3 zone rate: *£500/dwelling*

£20/sq m for all other buildings up to a cap of £10,000 at which point it reduces to £4/sq m for every further square meter

and/or

Isle of Sheppey rate: *£100/dwelling*

£4/sqm for all other buildings up to a cap of £2,000 at which point it reduces to £2/sq m for every further square meter

Sites on the Isle of Sheppey, within flood zone 2 or 3 will be required to pay both rates.

6.58 It is important to note that only and 9 out of 47 of the residential allocations and 5 out of 18 potential non-residential allocations- are within Flood Zones 2 and 3. For the purpose of this assessment, these payments are assumed to be within the wider infrastructure and mitigation cost assumptions.

Policy C8 Flood risk

6.59 This is a development management policy that seeks to direct development away from flood risk areas. It does not impact directly on viability.

Policy C9 Sustainable Drainage

6.60 The requirements for SUDS were considered in the 2024 WPVA. The assumptions are unchanged and are reflected in the updated appraisals towards the end of this note.

Policy C10 Water quality and Water Resources

6.61 This is a development management policy that does not impact directly on viability, except with regard to water usage setting out a requirement for a minimum water efficiency of 100 litres per person per. This was not a considered in the 2024 WPVA.

6.62 *Water Ready – A report to inform HM Government's roadmap for water efficient new homes* (Future Homes Hub, April 2024)[24], sets out the following costs:

a. 100 LPPPD £350 per dwelling.

b. 90 LPPPD £2,000 per dwelling.

6.63 The requirement for a minimum water efficiency of 100 litres per person per (at £350 per unit) are now reflected in the updated appraisals towards the end of this note.

Policy C11 Air Quality

6.64 This is a development management policy that does not impact directly on viability.

Policy C12 Pollution & Land Instability

6.65 This is a development management policy that does not impact directly on viability

Development Management Policies - Biodiversity and Landscapes

Policy B1 Biodiversity & geodiversity conservation & BNG 134

6.66 The policy seeks 20% BNG (rather than the 10% required nationally). This was considered in the 2024 WPVA (paragraph 8.97).

6.67 The assumptions are unchanged and are reflected in the updated appraisals towards the end of this note.

[24] Water Ready A report to inform HM Government-s roadmap for water efficient new homes.pdf (cdn-website.com)

Policy B2 Conserving & enhancing valued landscapes; Policy B3 Kent Downs National Landscape Management Plan; Policy B4 The separation of settlements – Important Local Countryside Gaps; Policy B5 Woodland, orchards, trees and hedgerows; Policy B6 Agricultural land; Policy B7 The Coast; Policy B8 Rural Lanes; Policy B9 The keeping & grazing of horses

6.68 These development management policies do not impact directly on viability.

Development Management Policies - Historic Environment

Policy HE1 Development involving Listed Buildings; Policy HE2 Development affecting a Conservation Area; Policy HE3 Parks & gardens; Policy HE4 Non-designated Heritage Assets; Policy HE5 Archaeology

6.69 These development management policies do not impact directly on viability.

Implementation & Monitoring

6.70 This part of the draft plan does not impact directly on viability.

7. Regulation 18 Responses

7.1 The comments made through the formal Regulation 18 consultation have been reviewed. Many of the comments made that mentioned viability or concerned the need to consider viability, or the need to update the 2024 WPVA, rather than make comments about the specifics of the 2024 WPVA. Only those comments that specifically concern the 2024 WPVA are reviewed below.

Richard Butler for Vistry

7.2 Questioned whether all key issues have been taken into consideration. This Update Note considers the cumulative impact of the polices in the draft Local Plan, together with national policy.

7.3 The assumption with regard to the costs of strategic infrastructure and mitigation are based on the most recent information available from the Council.

NHS property Services Ltd

7.4 Further consideration should be given to developer contributions. The assumptions used in this Update Note are based on the most up to date information – however sensitivity testing has been carried out.

Cameron Chapman of DHA Planning for Malro Homes

7.5 Commented as follows:

> *We are concerned that viability on Sheppey remains a very significant concern and ask that an appropriate viability assessment is undertaken.*

7.6 Whilst this is noted, no viability specific comments were made. The Isle of Sheppey is treated as a distinct sub-area within the 2024 WPVA and in this Update Note.

7.7 Concern was raised on connection with TCPA Healthy Homes Principles (HHP) and the provision of M4(2) and M4(3) dwellings. These requirements are considered in Chapter 2 and Chapter 6 above. The draft Local Plan does not seek the provision of M4(2) and M4(3) dwellings, however 40% M4(2) is included as per the Draft NPPF.

7.8 Concern is raised over the requirements for 20% BNG and the potential impact on the delivery of affordable housing. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

D Lawrence of DHA Planning for Sheppey Gateway Ltd

7.9 Concern was raised on connection with TCPA Healthy Homes Principles (HHP) and the provision of M4(2) and M4(3) dwellings. These requirements are considered in Chapter 2 and

Chapter 6 above. The draft Local Plan does not seek the provision of M4(2) and M4(3) dwellings, however 40% M4(2) is included as per the Draft NPPF.

7.10 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

G Filmer of DHA Planning for Fernham Homes

7.11 Concern was raised on connection with TCPA Healthy Homes Principles (HHP) and the provision of M4(2) and M4(3) dwellings. These requirements are considered in Chapter 2 and Chapter 6 above. The draft Local Plan does not seek the provision of M4(2) and M4(3) dwellings, however 40% M4(2) is included as per the Draft NPPF.

7.12 The importance of flexibility within the affordable housing tenure mix was raised. This is noted and is tested in the appraisals at the end of this Update Note.

7.13 Concern was raised about 'being required to provide extensive evidence'. The fees assumption in this Update is 11% which is well above the more widely used assumption of 8%.

7.14 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.15 Concern is expressed over the requirement for the water use standards of 100 LPPPD. As set out in Chapter 6 above, this was not considered in the 2024 WPVA. This requirement is now tested.

7.16 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

CPRE Kent

7.17 It is highlighted that the requirements for affordable housing in Faversham is less than the 35% in the adopted neighbourhood plan. More affordable housing for rent should be sought. The policy is informed by the viability evidence, which is updated in this regard in the Update Note.

Peter Court of Petter Court Associates for various clients

7.18 Whilst the 10% affordable housing requirements on brownfield sites is supported, it is suggested that the 30% on greenfield sites may be over-optimistic. This is informed by the viability evidence, which has been updated in this regard.

Faversham Community Land Trust

7.19 A range of comments are made with regard the affordable housing, including the difference between Affordable Rent and Social Rent.

7.20 The Council has updated the affordable housing mix, including an element of Social Rent. This Update Note considers the impact of this.

Five Parishes Opposition Group

7.21 It is suggested that the affordable housing requirements of 30% is too low. This is informed by the viability evidence, which has been updated in this regard in this Update Note.

The Planning Bureau for McCarthy Stone

THIS IS A LONG AND DETAILED REP THAT WE HAVE NOT BEEN THROUGH POINT BY POINT.

7.22 It is suggested that separate affordable housing targets should be set for specialist older peoples housing.

7.23 The Council does not consider this to be proportionate as the PPG (paragraph 10-008-20190509) specifically anticipates that viability will be considered for 'housing for older people' at the development management stage.

CHECK IF APPENDIX 18 OF THE 2024 WPVA IS MISSING – SBC SUGGEST NOT…

7.24 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Charles Glover-Short of Southern Housing

7.25 The importance of viability testing is highlighted. The 2024 WPVA tested the cumulative impact of the Council's emerging policies. The analysis is refreshed in this Update Note.

7.26 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.27 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Bashford for Quinn Estates

7.28 It is suggested that the viability evidence is out of date – in part because it does not reflect the Council's approach to s106 contributions. This Update Note refreshes the 2024 WPVA. It includes sensitivity testing of developer contributions.

7.29 They also noted that the 2024 WPVA does note to consider all the policies on the Draft Plan. This is agreed, as set out in Chapter 6 above the new requirements are now tested – see Chapter 6 above.

7.30 The affordable housing requirement should be 25% rather than 30%. The viability evidence is refreshed in this Update Note.

7.31 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.32 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

E Bonthron of Esquire Developments and Kent SME Network

7.33 A combination of an increase in construction costs, inflation rates, landowner expectations, BNG credit costs, as well as uncompetitive offers from Registered Providers impacts on viability.

7.34 This is agreed. The 2024 WPVA tested the cumulative impact of the Council's emerging policies. The analysis is refreshed in this Update Note.

7.35 Payments in lieu of onside provision of affordable housing should be quantified. This was not included in the 2024 WPVA, but is included at the end of this Update Note.

7.36 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.37 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.38 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

David Churchill of Carter Jonas for Shaptor Capital

7.39 Suggest 30% affordable housing is not supported by the 2024 WPVA. This comment makes reference to the strategic sites, most of which are not being carried forward into the new Local Plan. This is informed by the viability evidence, which has been updated in this regard in this Update Note.

7.40 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.41 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Sarah Muteham for Boughton under Blean Parish Council

7.42 The flat rate of 30% affordable housing is challenged. This is informed by the viability evidence, which has been updated in this regard in this Update Note.

M Behrendt of the Home Builders Federation

7.43 It is suggested that 30% affordable housing may be challenging on some greenfield sites – particularly on some allocations.. No technical evidence was submitted to support this. It is through that this comment makes reference to the strategic sites, most of which are not being carried forward into the new Local Plan.

7.44 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update

7.45 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.46 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Sally Furminger of Lichfields for Taylor Wimpey

7.47 It is suggested that the 2024 WPVA should be updated to include all the policies in the draft Local Plan. This Update Note refreshes the 2024 WPVA. The Draft Local Plan includes polices that were not in the earlier iterations. As set out in Chapter 6 above the new requirements are now tested – see Chapter 6 above.

7.48 The requirements that go above national standards will impact on viability. This is agreed and these are subject to viability testing in this Update Note.

7.49 The housing mix should be updated in the viability evidence. This is agreed and these are subject to viability testing in this Update Note.

7.50 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.51 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.52 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

P Atkin of Pegasus for Prudential Assurance Co. Ltd

7.53 It was suggested that the affordable housing requirements may be challenging. No technical evidence was submitted to support this. The viability evidence is refreshed in the Update Note.

7.54 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.55 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Sarah Moakes

7.56 The current multi-tiered policy should be maintained. The draft policy is informed by the viability evidence, which has been updated in this regard in this Update Note.

R England of WSP for Homes England

7.57 They note:

> *Whole Plan Viability Assessment (2023) assumes the large brownfield typology in the Isle of Sheppey is viable at 10% affordable housing, based on minimum developer contributions (Figure 10.10b) and 5% based on maximum developer contributions (Figure 10.10c).*
>
> *This is based on standardised abnormal costs and does not account for site specific inputs for strategic infrastructure and mitigation associated with bringing forward the Q&R site. Given the extent of early infrastructure investment, enabling works undertaken by Homes England and associated costs we recommend that a site specific policy criterion is included, based on an up*

to figure of 10% affordable housing provision; subject to viability testing, to ensure the site is viable and deliverable.

7.58 No site-specific details were provided.

7.59 The viability testing the 2024 WPVA and this Update Note is based on typologies (as per paragraph 10-012-20180724 of the PPG), although the South East of Faversham and West of Bobbing Village are tested individually. It is necessary to make high level assumptions in a plan-wide viability assessment.

Ian Warner of Tetlow King for Palm Developments

7.60 It is noted that the costs of development have changed. This is agreed and these are subject to viability testing in this Update Note.

7.61 It is suggested that the consideration of specialist Older Peoples Housing is too narrow. Whilst this is noted, the assessment has been informed by the representations made and a review of market evidence as per the PPG. Further, as the PPG (paragraph 10-008-20190509) specifically anticipates that viability will be considered for 'housing for older people' at the development management stage, the approach taken is proportionate.

7.62 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.63 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.64 Concern is expressed over the requirement for the water use standards of 100 LPPPD. As set out in Chapter 6 above, this was not considered in the 2024 WPVA. This requirement is now tested.

T Whipps of LRM Planning for W.T. Lamb Holdings Ltd

7.65 It is suggested that setting the affordable housing requirements by the predominant land use (ie greenfield or brownfield) is overly simplistic and a more nuanced approach should be taken. Whilst this is noted, most of the allocations are either greenfield or brownfield rather than being mixed use. The approach taken is considered proportionate.

7.66 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.67 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.68 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

A Payne of DHA Planning for Cantium Land

7.69 They say '*… the application of 20% BNG to small and medium sites has the potential to make the delivery of site unviable particularly as it may be difficult to incorporate a 20% BNG onsite…*'.

7.70 It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Emily Comber of Croudace Homes

7.71 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.72 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.73 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Georgina Wise of Gladman Developments

7.74 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Ivy Planning for AC Goatham & Sons Ltd

7.75 Concern is raised over the requirements for 20% BNG and the potential impact on the delivery of affordable housing. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

John Collins of DHA Planning for a landowner in Doddington.

7.76 Concern is raised over the requirements for 20% BNG, particularly on Sheerness and in the context of delivering affordable housing. It is understood that the requirements for 20% BNG

has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Matt Porter of DHA Planning for Frognal Properties Ltd

7.77 Concern is raised over the requirements for 20% BNG, particularly on small and medium sites. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

A Day of DHA Planning for Pentland Homes

7.78 Concern is raised over the requirements for 20% BNG. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.79 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.80 Concern is expressed over the requirement for the water use standards of 100 LPPPD. As set out in Chapter 6 above, this was not considered in the 2024 WPVA. This requirement is now tested.

A Payne of DHA Planning for EH Nicholls Ltd

7.81 Concern is raised over the requirements for 20% BNG, particularly on small and medium sites. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Kent County Council

7.82 Kent County Council made wide ranging comments concerning the provision of infrastructure and for the need to appropriate mitigation. The modelling in this Update is as agreed with SBC and set out in Chapter 6 above.

7.83 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

L Sinden of DHA Planning for Persimmon Homes

7.84 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.85 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Dunkirk Parish Council

7.86 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Mollie Lay of Finn's

7.87 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.88 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Maidstone Borough Council

7.89 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.90 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

C Leckie of Savills for the owners of Land at Old Ferry Road, Iwade

7.91 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.92 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

GHA Barnes of Shepherd Neame

7.93 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Rachel Harrison for Peel Land and Peel Ports

7.94 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Iceni Projects for Owners of Lamberhurst Farm

7.95 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

8. Strategic Sites

8.1 At the time of the 2024 WPVA, the Council had not formally identified the Strategic Sites. 13 possible options were tested:

Table 8.1 2024 Potential Strategic Sites –

		Units	Area Ha
South and West of Iwade (Site B)	Iwade	1,381	65.760
West of Bobbing village	Bobbing	4,173	198.720
Land at Stickfast Lane	Bobbing	2,411	114.820
Fax Farm	Dunkirk	1,201	57.210
Winterbourne Fields	Dunkirk	1,742	82.960
SE Faversham	Faversham SE	2,745	130.720
East of Faversham Expansion	Faversham E	2,665	126.890
Iwade - Solar Farm	Iwade	2,873	136.790
Rushenden South	IoS Sheerness	3,130	149.040
South East Sittingbourne	Sittingbourne SE	16,814	800.690
Land at South-West Minster	IoS Minster-on-Sea	2,235	106.430
Ashford Road, North Street	Faversham S	6,490	309.040
Between A2 Bapchild and Northern Relief Road	Bapchild	1,925	91.680

Source: SBC (April 2024)

8.2 Of these, two are being taken into the new Local Plan and are modelled in this Update Note. Both the sites are well progressed through the development management process:

South East Faversham SHELAA/114

8.3 This site is subject to a Resolution to Grant. The scheme is for 2,500 homes (approximately 40% affordable homes). The application includes a detailed planning application of for 261 homes with 92 affordable housing units, 54,000sqm of employment space (including 3,021sqm local retail centre), the remaining 51,000sqm – likely to be 15% local centres retail, 85% warehouse.

8.4 Based on the committee report the costs of strategic infrastructure and mitigation of just under £44,000,000 plus the provision of a 3FE primary school (with nursery). The cost of the 3FE primary school is estimated at £16,000,000 (based on 690 places at £22,890 per place[25]). A total cost strategic infrastructure and mitigation of about £24,000 per unit is assumed.

[25] *National School Delivery Cost Benchmarking Primary, Secondary & SEN Schools (A national cost benchmarking study undertaken by Hampshire County Council in conjunction with East Riding of Yorkshire Council and the Department for Education* (June 2025)

Land west of existing Bobbing Village SHELAA/012

8.5 An outline application as been submitted. A decision on the scheme has been deferred, but is anticipated shortly. The application is for. all matters reserved except for means of access, for a mixed use development comprising up to 2,500 dwellings, a 5.21 ha commercial employment zone including doctors' surgery, a 4.35 ha sports hub (and sports pitches), 3FE primary school, community facilities, local retail provision, public open space, children's play areas and associated parking, servicing, utilities, footpath and cycle links, drainage, ground and other infrastructure.

8.6 The committee report sets out the costs of strategic infrastructure and mitigation of just under £58,000,000. This is about £23,300 per unit.

9. Findings and Conclusions

9.1 HDH Planning & Development Ltd produced the 2024 WPVA. The study was commissioned to support the development of the Local Plan. The report was undertaken in line with the requirements set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

9.2 Since the earlier evidence was collected, the costs and the values, being the main inputs into a viability assessment, have changed and several changes have been made to national policy. The Council has also refined some of the policies in the draft Local Plan. This note considers how these changes may impact on viability.

9.3 The costs of construction has increased since the 2024 WPVA was undertaken, however the value of newbuild housing is largely unchanged. The Land Registry's latest data suggests that the average newbuild sale price has increased by about 9.7% over the last 2 years in the Council area. However analysis of the price paid data suggests that the price of newbuild homes is largely unchanged, as does the analysis of newbuild asking prices.

9.4 The BCIS suggests that build costs have increased by 3.8% since 2024, being more than the increase in values, suggesting, all other things being equal, that viability has worsened since 2024.

9.5 House price forecasts and build costs forecasts suggest that, going forward, house prices are likely to increase at a broadly similar rate to that of build costs.

Updated Policy-on Appraisals

9.6 Paragraphs 10.47 to 10.49 of the 2024 WPVA considered the impact of changes in costs and values on the preferred set of policies, based on further appraisals that were summarised in Appendix 17 of that report. This analysis is now repeated. As set out in the preceding chapters above, there have been a number of changes to national policy and to the draft Local Plan since the 2024 WPVA was completed. The following adjustments are made in the fresh appraisals:

a) The value of housing is unchanged, however an updated value of £1,400 per sqm is used for Social Rent (the Affordable Rent assumption is unchanged).

b) The construction costs are increased to the latest BCIS costs.

c) The affordable housing mix has been updated, in discussion with the Council, to 30% Affordable Home Ownership (as Shared Ownership), 30% Social Rent, and 40% Affordable Rent.

d) The unit size mix is also updated to reflect the Council's updated Housing Market Assessment. (The requirements for 95% of units to be to the M4(2) Accessible and Adaptable standard and the remaining 5% of dwellings to be to M4(3) Wheelchair Adaptable standard is carried forward unchanged).

e) The common areas in flatted development have been increased to allow for second staircases.

f) The Net Zero cost assumption has been updated to the BCIS costs plus 6.7% to the costs of construction of houses and to the BCIS plus 5.7% to the costs of flats. The professional fees are increased by 1% to allow for the use of the non-standard reporting and further supporting reports (e.g. with regard to embodied carbon).

g) The requirements for some rainwater harvesting (£50 per unit) are included to allow for water butts.

h) The requirement for a minimum water efficiency of 100 litres per person per (£350 per unit) are included.

i) The modelling of the Strategic Sites has been updated as per Table 8.2 above, including the updated estimates of strategic infrastructure taken from the committee reports.

j) For the typologies, an all-inclusive s106 cost for strategic infrastructure and mitigation of £11,000 per unit to include Medway Estuary & Swale Coastal Risk Management Strategy, but additional allowances are made for Birdwise (£324 per unit) and Open space (£593 per unit) is assumed. This is unchanged.

k) The Building Safety Levy has been added at £15.86 per sqm for brownfield land and £31.72 per sqm for greenfield land and would apply to major development.

l) The updated national planning application fees are applied.

9.7 The updated appraisal results are summarised in **Appendix 4** below. These results are directly comparable with those included in Appendix 17 of the 2024 WPVA.

9.8 As the provision of affordable housing is one of the main policy costs, additionally, a further set of appraisals is run with the overall policy requirements as per the Local Plan (30% on greenfield and 10% on brownfield), where the tenure mix includes 30% AHO, but the Social Rent / Affordable Rent is varied. The results are summarised in **Appendix 5** below

9.9 The results are broadly similar to those in 2024.

a) Most greenfield typologies derive a Residual Value that is in excess of the Benchmark land Value, indicating that such development is likely to be viable.

b) As in 2024 not all the brownfield typologies generate a Residual Value that is in excess of the BLV, suggesting that brownfield sites are unlikely to be viable. Having said this, the analysis in Appendix 5 shows that adjusting the affordable housing tenure mix, to reduce the proportion of Social Rent and increase the proportion of Affordable Rent has a significant impact on the Residual Value and is a way to improve viability without reducing the overall affordable housing requirements. The Council should be flexible in the tenure mix of affordable housing sought (the tenure mix is not specified in the Draft policy.

c) The flatted typologies are unlikely to be viable across the Borough, in each case deriving a Residual Value that is not only below the BLV, but negative. The Council does not rely on flatted development within its housing trajectory to deliver housing.

d) Neither of the Strategic Sites derive a Residual Value that is more than the BLV. This is often the case with high level modelling in plan-wide viability testing. As set in the 2024 WPVA, the delivery of any large site is challenging. Both of the sites are well progressed through the development management process, and the Council anticipates that broadly policy compliant schemes will be approved shortly.

The Strategic Sites are modelled on the basis that a site is acquired by the developer in a single tranche at the start of the project. Such a scenario is relatively unlikely on very large sites, where the site is typically purchased in phases. Such an approach benefits the developer in terms of cashflow and this will have a material impact on viability.

It is recommended that that the Council continues to engage with the owners of Strategic Sites in line with the advice set out in the Harman Guidance.

9.10 Based on the above results, and comments, the Council can continue to confident that the development in the Local Plan will be deliverable, and that 2024 WPVA, subject to this Update Note, can be relied on. In the 2024 WPVA it was advised that the Council should be cautious in relying on brownfield sites in the housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This advice remains.

Commuted Sums and Payments in Lieu of Affordable Housing

9.11 Through the Regulation 18 Consultation, it was suggested that commuted sums in lieu of on-site provision of affordable housing should be quantified. SBC's preference is for affordable housing to be delivered on-site. This approach is in line with Paragraph 64 of the NPPF that says:

> *Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:*
>
> *a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
>
> *b) the agreed approach contributes to the objective of creating mixed and balanced communities.*

9.12 Some councils set out guidance as to how a commuted sum would be calculated so as to provide transparency, and to avoid the undue delays that might arise during s106 negotiations if details of a payment had to be developed from first principles on each occasion. The following analysis provides a basis for calculating the commuted sum.

9.13 An approach to the calculation is based on the difference in the Residual Value of the development site with and without affordable housing, so is the cost of the contribution that the developer would have made if an on-site affordable contribution were delivered.

9.14 The calculation works as follows:

- Estimate the value of the site with 100% market housing.
- Estimate the Residual Value of the site with the target level (10% / 30%) of affordable housing.

9.15 The difference between (a) and (b) is the reduction in site value due to the affordable housing policy contribution. This is set out in **Appendix 6**.

9.16 Taking the appraisal for Site 15, in the Sittingbourne and West SBC area as an example. The Residual Value when subject to30% affordable housing is £446,252 and without affordable housing it is £1,151,784. The difference is £705,503 (£1,151,784 – £446,252). £705,503 divided by 90 affordable units (30% of 30) is £78,392 per unit (£705,531 ÷ 9).

9.17 The calculated contributions across the typologies vary, but the average is about £78,500 per affordable unit not provided on-site.

9.18 Paragraph 64 of the NPPF is clear that off-site provision or financial contribution in lieu is allowed where it *'can be robustly justified'*. On this basis, the above calculations provide a sound basis for determining a commuted sum figure. There are two alternatives open to the Council. The first is to work to a published standard commuted sum payment. If SBC were to take this option, a £78,500 payment per affordable unit not delivered on-site would be appropriate.

9.19 This opportunity is taken to highlight a weakness in the approach set out above. It is assumed that the scheme with and without affordable housing is the same scheme in terms of housing mix, type and form. As set out in Chapter 6 above, the housing mix to meet local need varies across the tenures. This nuance is not reflected in the approach set out above.

9.20 The Council is currently preparing a new Local Plan. This document will be long lived and is likely to be in place across several economic cycles. It is therefore suggested that separate guidance is prepared setting out the amount of the payment, and to allow a simple review should viability change.

9.21 Alternatively, the Council may prefer to calculate the commuted sum scheme-by-scheme as it does now. This has the advantage of being an up-to-date figure, but the disadvantage of a lack of clarity for developers. The methodology used is to assess the Open Market Value of the units that would be affordable units, and then deduct from that the amount that a housing association would pay for those units as affordable units – the difference being the commuted sum.

Self and Custom Build

9.22 At the time of the 2024 the Council was not planning to introduce a self and custom build policy. The draft Local Plan now includes a requirement that on 'sites of 20 or more homes will provide at least 5% serviced plots for sale to self-builders. In rural areas and settlements as defined via a Proposals Map, which will be available in later stages of the Local Plan, the threshold for providing self- build will be 10 homes and the percentage of provision should be rounded up to the nearest unit.

9.23 If a developer is to sell a plot as a serviced self-build plot, they would not receive the profit from building the unit, they would however receive the price for the plot. If they were to provide the plot as a custom-build plot (i.e. where the developer designs and builds to the buyer's design and specifications) they would receive a payment for the land, the costs of construction and the price paid would incorporate the developer's return. The impact on viability is therefore the balance between the profit foregone and the receipt for the serviced plot. The developer's return per market house is generally in the £60,000 to £75,000 range.

9.24 There are a few serviced development sites being publicly marketed in the area at the time of this report. Having made enquiries with local agents, the general consensus is that reasonably sized, and well serviced, single plots are likely to fetch in excess £100,000 in the current market, although the price for larger plots, with land for gardens and appropriate for larger family homes are likely to achieve a price that is significantly more.

9.25 The modelling in this viability update is based on at least 30 units per net ha with allowance for open space. On this basis, a self-build plot is likely to be about 0.03ha or so. A conservative plot price of £100,000 would lead to a land value of over £3,000,000/ha. This is substantially above the BLV and allows scope for the services to be laid on to the plot or plots. It is also well above the developer's return that would be forgone from developing the unit.

9.26 Based on the above analysis it is unlikely that a requirement for self-build plots will adversely impact on viability.

Conclusion

9.27 Based on the analysis in this Update Note, the Council can continue to confident that the development in the Local Plan will be deliverable, and that 2024 WPVA, subject to this Update Note, can be relied on. In the 2024 WPVA it was advised that the Council should be cautious in relying on brownfield sites in the housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This advice remains.

Appendix 1 – Newbuild Price Paid Data by Ward

2023 to 2026

Count of price	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	1		1
Bobbing, Iwade and Lower Halstow		98	98
Borden and Grove Park		54	54
Boughton and Courtenay		2	2
Chalkwell	18	70	88
Hartlip, Newington and Upchurch		1	1
Milton Regis	2	18	20
Murston		24	24
Priory		86	86
Queenborough and Halfway	8	71	79
Sheppey Central		75	75
St Ann's		8	8
The Meads		63	63
Watling		45	45
West Downs		13	13
Grand Total	**29**	**628**	**657**

Average of price	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£162,000		£162,000
Bobbing, Iwade and Lower Halstow		£437,058	£437,058
Borden and Grove Park		£502,796	£502,796
Boughton and Courtenay		£937,500	£937,500
Chalkwell	£189,306	£453,602	£399,541
Hartlip, Newington and Upchurch		£342,500	£342,500
Milton Regis	£134,500	£312,117	£294,356
Murston		£374,917	£374,917
Priory		£446,814	£446,814
Queenborough and Halfway	£220,188	£292,407	£285,093
Sheppey Central		£340,335	£340,335
St Ann's		£459,370	£459,370
The Meads		£453,976	£453,976
Watling		£450,084	£450,084
West Downs		£397,327	£397,327
Grand Total	**£193,103**	**£415,565**	**£405,746**

Average of £ per sqm	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£2,946		£2,946
Bobbing, Iwade and Lower Halstow		£4,353	£4,353
Borden and Grove Park		£4,008	£4,008
Boughton and Courtenay		£3,182	£3,182
Chalkwell		£3,953	£3,953
Hartlip, Newington and Upchurch		£3,683	£3,683
Milton Regis		£3,494	£3,494
Murston		£3,966	£3,966
Priory		£4,527	£4,527
Queenborough and Halfway	£3,392	£3,840	£3,790
Sheppey Central		£3,582	£3,582
St Ann's		£3,829	£3,829
The Meads		£4,091	£4,091
Watling		£4,127	£4,127
West Downs		£4,148	£4,148
Grand Total	**£3,343**	**£4,059**	**£4,049**

2023

Count of price	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	1		1
Bobbing, Iwade and Lower Halstow		10	10
Borden and Grove Park		8	8
Boughton and Courtenay		2	2
Chalkwell		23	23
Hartlip, Newington and Upchurch		1	1
Milton Regis	2	18	20
Murston		9	9
Priory		30	30
Queenborough and Halfway	6	33	39
Sheppey Central		9	9
St Ann's		5	5
The Meads		29	29
Watling		10	10
West Downs		12	12
Grand Total	**9**	**199**	**208**

Average of price	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£162,000		£162,000
Bobbing, Iwade and Lower Halstow		£468,600	£468,600
Borden and Grove Park		£508,496	£508,496
Boughton and Courtenay		£937,500	£937,500
Chalkwell		£465,365	£465,365
Hartlip, Newington and Upchurch		£342,500	£342,500
Milton Regis	£134,500	£312,117	£294,356
Murston		£402,167	£402,167
Priory		£434,633	£434,633
Queenborough and Halfway	£220,250	£304,433	£291,482
Sheppey Central		£361,972	£361,972
St Ann's		£463,995	£463,995
The Meads		£449,858	£449,858
Watling		£381,600	£381,600
West Downs		£418,250	£418,250
Grand Total	**£194,722**	**£409,329**	**£400,043**

Average of £ per sqm	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£2,946		£2,946
Bobbing, Iwade and Lower Halstow		£4,241	£4,241
Borden and Grove Park		£4,225	£4,225
Boughton and Courtenay		£3,182	£3,182
Chalkwell		£4,075	£4,075
Hartlip, Newington and Upchurch		£3,683	£3,683
Milton Regis		£3,494	£3,494
Murston		£4,111	£4,111
Priory		£4,835	£4,835
Queenborough and Halfway	£3,423	£4,037	£3,942
Sheppey Central		£3,443	£3,443
St Ann's		£3,854	£3,854
The Meads		£4,067	£4,067
Watling		£3,825	£3,825
West Downs		£4,348	£4,348
Grand Total	**£3,354**	**£4,109**	**£4,083**

2024

Count of price	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow		63	63
Borden and Grove Park		41	41
Chalkwell	18	26	44
Murston		9	9
Priory		31	31
Queenborough and Halfway	2	25	27
Sheppey Central		46	46
St Ann's		3	3
The Meads		23	23
Watling		11	11
West Downs		1	1
Grand Total	**20**	**279**	**299**

Average of price	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow		£426,159	£426,159
Borden and Grove Park		£497,635	£497,635
Chalkwell	£189,306	£434,000	£333,898
Murston		£362,944	£362,944
Priory		£459,556	£459,556
Queenborough and Halfway	£220,000	£277,205	£272,968
Sheppey Central		£334,946	£334,946
St Ann's		£451,662	£451,662
The Meads		£437,239	£437,239
Watling		£348,638	£348,638
West Downs		£146,250	£146,250
Grand Total	**£192,375**	**£407,807**	**£393,397**

Average of £ per sqm	Column Labels		
Row Labels	**Flat**	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow		£4,326	£4,326
Borden and Grove Park		£3,930	£3,930
Chalkwell		£3,865	£3,865
Murston		£3,848	£3,848
Priory		£4,370	£4,370
Queenborough and Halfway	£3,302	£3,559	£3,539
Sheppey Central		£3,618	£3,618
St Ann's		£3,788	£3,788
The Meads		£4,042	£4,042
Watling		£3,809	£3,809
West Downs		£1,741	£1,741
Grand Total	**£3,302**	**£3,971**	**£3,967**

2025

Count of price	Column Labels	
Row Labels	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow	25	25
Borden and Grove Park	5	5
Chalkwell	21	21
Murston	6	6
Priory	25	25
Queenborough and Halfway	13	13
Sheppey Central	20	20
The Meads	11	11
Watling	24	24
Grand Total	**150**	**150**

Average of price	Column Labels	
Row Labels	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow	£451,907	£451,907
Borden and Grove Park	£535,995	£535,995
Chalkwell	£464,988	£464,988
Murston	£352,000	£352,000
Priory	£445,630	£445,630
Queenborough and Halfway	£291,111	£291,111
Sheppey Central	£342,993	£342,993
The Meads	£499,830	£499,830
Watling	£525,115	£525,115
Grand Total	**£438,269**	**£438,269**

Average of £ per sqm	Column Labels	
Row Labels	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow	£4,465	£4,465
Borden and Grove Park	£4,292	£4,292
Chalkwell	£3,930	£3,930
Murston	£3,926	£3,926
Priory	£4,352	£4,352
Queenborough and Halfway	£3,877	£3,877
Sheppey Central	£3,563	£3,563
The Meads	£4,256	£4,256
Watling	£4,399	£4,399
Grand Total	**£4,158**	**£4,158**

2026

NO DATA FOR 2026

Appendix 2 – Newbuild Asking Prices, May 2026

Name	Development	Address	Postcode	Name	No. Beds	D F SD T	sqm	Price	£/m2
Redrow	Regent Quay	Sittingbourne	ME10 3HH	Harrogate	4	D	135	£575,000	£4,259
Redrow	Preston Fields	Faversham	ME13 8LY	Stamford	3	T	115	£370,000	£3,217
Redrow	Preston Fields	Faversham	ME13 8LY	Hampstead	5	D	160	£745,000	£4,656
Redrow	Preston Fields	Faversham	ME13 8LY	Balmoral	4	D	173	£760,000	£4,393
Redrow	Preston Fields	Faversham	ME13 8LY	Shaftesbury	4	D	126	£585,000	£4,643
Redrow	Preston Fields	Faversham	ME13 8LY	Letchworth	3	S	90	£410,000	£4,556
Redrow	Heritage Fields	Sittingbourne	ME10 1YN						
Redrow	Amber Fields	Sittingbourne	ME10 2DD	Oxford	4	D	133	£540,000	£4,060
Redrow	Amber Fields	Sittingbourne	ME10 2DD	Oxford LS	3	D	133	£520,000	£3,910
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Kennett	3	S	108	£377,995	£3,500
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Kennett	3	S	108	£379,995	£3,518
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Hadley	3	D	88	£414,995	£4,716
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Bayswater	4	D	130	£470,995	£3,623
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Bayswater	4	D	130	£472,995	£3,638
Persimmon	Moores Quarter	Sittingbourne	ME10 3JN	Ashdown	3	T	101	£395,000	£3,911
Persimmon	Moores Quarter	Sittingbourne	ME10 3JN	Ashdown	3	T	101	£380,000	£3,762
Persimmon	Moores Quarter	Sittingbourne	ME10 3JN	Whinfell	4	T	105	£399,000	£3,800
Persimmon	Burley Place	Sittingbourne	ME10 2DD						
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Kennett	4	S	108	£389,950	£3,611
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£355,000	£4,551
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Sherwood	3	D	79	£375,000	£4,747
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£385,000	£4,425
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£385,000	£4,425
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Addlebrough	2	S		£298,950	
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£345,000	£4,423
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£350,000	£4,487
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£355,000	£4,551
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Sherwood	3	D	79	£383,950	£4,860
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Sherwood	3	D	79	£383,950	£4,860
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£389,950	£4,482
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£389,950	£4,482
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£390,000	£4,483
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Knebworth	4	D	94	£414,950	£4,414
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Kennett	4	S	108	£425,950	£3,944
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Kennett	4	S	108	£425,950	£3,944
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY		2	S	70	£275,000	£3,929

Jones Homes	Shurland Park	Minster on Sea	ME12 3LY		2	S	70	£275,000	£3,929
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Marton	2	S	63	£295,000	£4,683
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Thornton	3	S	70	£335,000	£4,786
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Birch	3	S	82	£350,000	£4,268
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Birch	3	S	82	£350,000	£4,268
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Shurland	3	S	85	£350,000	£4,118
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Shurland	3	S	85	£350,000	£4,118
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Shurland	3	S	85	£350,000	£4,118
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Thurnham	4	D	128	£575,000	£4,492
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Bridge	3	D	106	£525,000	£4,953
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Lenham	4	D	111	£500,000	£4,505
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Lenham	4	D	111	£500,000	£4,505
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Hadlow	3	S	96	£450,000	£4,688
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Throwley	3	S	88	£370,000	£4,205
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Throwley	3	S	88	£375,000	£4,261
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Throwley	3	S	88	£375,000	£4,261
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Alkham	3	S	88	£350,000	£3,977
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Barham	2	T	70	£315,000	£4,500
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Barham	2	T	70	£315,000	£4,500
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Chilham	4	D	128		
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Hollingbourne	4	D	123		
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Palmarsh	3	D	95		
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Sarre	4	D	122		
Barratt	Cherry Meadow@Applegate Park	Sittingbourne	ME9 8BT	Ellerton	3	T	70	£339,995	£4,857
Barratt	Cherry Meadow@Applegate Park	Sittingbourne	ME9 8BT	Ellerton	3	T	70	£344,995	£4,929
Barratt	Cherry Meadow@Applegate Park	Sittingbourne	ME9 8BT	Moresby	3	T	77	£359,995	£4,675
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Seaton	3	D	97	£440,000	£4,536
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Seaton	3	D	97	£440,000	£4,536
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Dorking	4	D	141	£600,000	£4,255
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Buckingham	5	D	141	£650,000	£4,610
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£685,000	£4,202
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£685,000	£4,202
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£685,000	£4,202
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£700,000	£4,294

Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Holly	3	D	103	£350,000	£3,398
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Holly	3	D	103	£350,000	£3,398
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Hazel	3	D	107	£395,000	£3,692
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Chestnut	4	D	145	£475,000	£3,276
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Beech	4	D	122	£450,000	£3,689
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Elm	4	D	132	£450,000	£3,409
Riverdale Developments	Scholars Place	Iwade	ME9 8TG		3	S		£369,950	
Riverdale Developments	Scholars Place	Iwade	ME9 8TG	Locke	3	S	103	£399,950	£3,883
Riverdale Developments	Scholars Place	Iwade	ME9 8TG	Austen	4		112	£450,000	£4,018
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Eastwell	3	S	109	£400,000	£3,670
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Fairfield	3	S	89	£430,000	£4,831
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Eastwell	3	S	109	£435,000	£3,991
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Wisley	3	S	95	£445,000	£4,684
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Heaversham	4	D	127	£599,000	£4,717
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Sheldwich	4	D	134	£625,000	£4,664
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Shepherdswell	5	D	172	£785,000	£4,564
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Applehurst	4	D	168	£820,000	£4,881
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Rosemoor	3	D	108	£450,000	£4,167
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Rosemoor	3	D	108	£450,000	£4,167
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Rosemoor	3	D	108	£450,000	£4,167
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Molineux	3	S	114	£454,500	£3,987
Aile Homes	Monarch Place	Newington	ME9 7GJ	Fulham	3	T	105	£450,000	£4,286
Aile Homes	Monarch Place	Newington	ME9 7GJ	Hammersmith	3	T	110	£475,000	£4,318
Aile Homes	Monarch Place	Newington	ME9 7GJ	Wandsworth	3	S	108	£475,000	£4,398
Aile Homes	Monarch Place	Newington	ME9 7GJ	Westminster	3	D	112	£500,000	£4,464
Aile Homes	Monarch Place	Newington	ME9 7GJ	Chelsea	4	D	120	£550,000	£4,583
Aile Homes	Monarch Place	Newington	ME9 7GJ	Chelsea	4	D	120	£575,000	£4,792
Aile Homes	Monarch Place	Newington	ME9 7GJ	Chelsea	4	D	120	£575,000	£4,792
Aile Homes	Monarch Place	Newington	ME9 7GJ	Kensington	4	D	147	£675,000	£4,592
Aile Homes	Monarch Place	Newington	ME9 7GJ	Belgravia	5	D	180	£775,000	£4,306
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		6	D	415	£1,395,000	£3,361
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		5	D	357	£1,235,000	£3,459
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		5	D	336	£1,125,000	£3,348
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		4	D	164	£799,000	£4,872

Appendix 3 – Derivation of Affordable Housing Value Assumptions – April 2026

Social Rent

General needs (social rent)
Average weekly rent (£ per week) and unit counts by unit size for Swale - large PRPs

Unit Size	£ per week				
	Net rent	Formula rent	Service charge^	Gross rent^	Unit count
Non-self-contained	-	-	-	-	-
Bedsit	£94.04	£93.04	£7.71	£101.75	30
1 Bedroom	£102.48	£101.20	£12.23	£112.42	1,559
2 Bedroom	£118.31	£117.33	£8.08	£122.21	2,084
3 Bedroom	£131.40	£130.21	£5.77	£132.65	2,735
4 Bedroom	£147.62	£147.02	£5.55	£149.78	167
5 Bedroom	£159.50	£157.51	£7.65	£162.90	9
6+ Bedroom	£164.87	£169.51	£3.76	£166.12	3
All self-contained	£120.71	£119.56	£9.33	£124.91	6,587
All stock sizes	**£120.71**	**£119.56**	**£9.33**	**£124.91**	**6,587**

Owned stock. Large PRPs only - unweighted. Excludes Affordable Rent and intermediate rent, but includes other units with an exception under the Rent Policy Statement. Stock outside England is excluded.
Source: SDR 2025

Source: Table 9, SDR 2025 – Data Tool[26]

Affordable Rent

Affordable Rent general needs
Average weekly gross rent (£ per week) and unit counts by unit size for Swale

Unit Size	£ per week	
	Gross rent	Unit count
Non-self-contained	-	-
Bedsit	£112.13	2
1 Bedroom	£133.39	273
2 Bedroom	£164.64	659
3 Bedroom	£186.82	576
4 Bedroom	£266.21	76
5 Bedroom	£234.33	2
6+ Bedroom	-	-
All self-contained	£172.20	1,588
All stock sizes	**£172.20**	**1,588**

Owned stock. All PRPs owning Affordable Rent units - unweighted. Stock outside England is excluded.
Source: SDR 2025

Source: Table 1, SDR 2025 – Data Tool[27]

[26] Private registered provider social housing stock and rents in England 2024 to 2025 - GOV.UK

[27] Private registered provider social housing stock and rents in England 2024 to 2025 - GOV.UK

BRMA LHA Caps - £ per week

	Canterbury BRMA	Maidstone BRMA	Medway & Swale BRMA
Shared Accommodation	£97.81	£102.37	£94.36
One Bedroom	£155.34	£172.60	£155.34
Two Bedrooms	£205.97	£208.27	£195.62
Three Bedrooms	£253.15	£276.16	£216.33
Four Bedrooms	£302.63	£356.71	£299.18

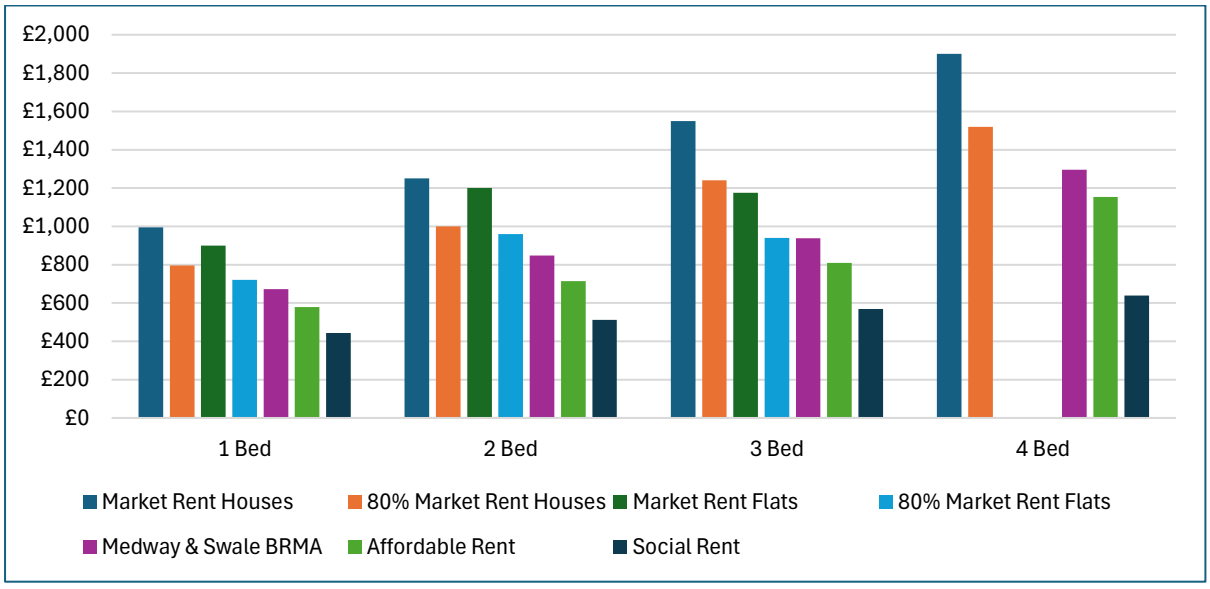
Source: VOA (May 2026)

Average Rents - March-2026 - £ per month

1 Bed	£772
2 Bed	£1,020
3 Bed	£1,232
4 Bed	£1,846
Detached	£1,567
Semidetached	£1,232
Terraced	£1,140
Flat maisonette	£861

Source: ONS (April 2026) Price Index of Private Rents, UK: monthly price statistics - Office for National Statistics

Rents by Tenure – £/Month



Source: Market Survey, SDR and VOA (May 2026)

Capitalisation of Social Rents

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Rent (£/month)	£444	£513	£569	£640
Rent (£/annum)	£5,329	£6,152	£6,833	£7,676
Net Rent	£4,263	£4,922	£5,466	£6,141
Value	£85,263	£98,434	£109,325	£122,820
sqm	50	70	84	97
£ per sqm	£1,705	£1,406	£1,301	£1,266

Source: HDH (May 2026)

Capitalisation of Affordable Rents

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Rent (£/month)	£673	£848	£937	£1,296
Rent (£/annum)	£8,078	£10,172	£11,249	£15,557
Net Rent	£6,462	£8,138	£8,999	£12,446
Value	£129,243	£162,756	£179,987	£248,918
sqm	50	70	84	97
£ per sqm	£2,585	£2,325	£2,143	£2,566

Source: HDH (May 2026)

Appendix 4 – Sensitivity Testing Based on Full Policy Requirements

Isle of Sheppey

			EUV	BLV	Residual Value (£ per gross ha)													
			Value Change		-10%	-5%	0%	+5%	+10%	+15%	+20%							
			BCIS Change									-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	IoS	1,100,000	1,320,000	341,302	713,126	1,076,941	1,440,756	1,804,572	2,168,387	2,531,339	1,675,729	1,376,335	1,076,941	777,547	472,607	162,348	-156,405
Site 2	Brown 90	IoS	1,100,000	1,320,000	163,458	583,678	1,003,899	1,424,119	1,844,339	2,264,560	2,684,780	1,716,991	1,360,445	1,003,899	647,353	290,806	-73,576	-447,686
Site 3	Brown 30	IoS	1,100,000	1,320,000	270,345	1,250,692	2,214,810	3,178,929	4,143,048	5,107,166	6,071,285	3,857,450	3,036,130	2,214,810	1,393,491	567,500	-291,767	-1,153,546
Site 4	Brown 15	IoS	1,100,000	1,320,000	183,680	768,327	1,332,396	1,894,634	2,456,872	3,019,110	3,581,348	2,287,439	1,809,918	1,332,396	854,874	361,459	-139,586	-640,631
Site 5	Brown 9	IoS	1,100,000	1,320,000	484,829	1,017,461	1,534,313	2,048,526	2,562,740	3,076,953	3,591,167	2,357,613	1,945,963	1,534,313	1,122,663	699,416	268,134	-163,794
Site 6	Brown 6	IoS	1,100,000	1,320,000	480,866	1,030,068	1,569,237	2,095,964	2,619,946	3,143,928	3,667,910	2,412,040	1,992,011	1,569,237	1,137,034	699,014	258,294	-182,427
Site 7	Central 60	IoS	1,100,000	1,320,000	4,129	498,492	985,162	1,471,832	1,958,502	2,445,171	2,931,841	1,826,838	1,406,000	985,162	564,324	141,848	-299,290	-745,252
Site 8	Central 24	IoS	1,100,000	1,320,000	-67,047	437,664	923,020	1,406,621	1,890,221	2,373,822	2,857,422	1,763,701	1,343,360	923,020	502,680	65,706	-375,341	-823,768
Site 9	Central 9	IoS	1,100,000	1,320,000	887,857	1,551,422	2,197,435	2,840,202	3,482,969	4,125,736	4,768,503	3,187,002	2,692,219	2,197,435	1,702,652	1,194,569	679,246	160,089
Site 10	Brown 90 HD Flats	IoS	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545	-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	IoS	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571	-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	IoS	25,000	325,000	54,710	250,991	446,659	637,300	827,942	1,018,583	1,209,224	801,924	624,292	446,659	263,706	80,141	-109,618	-311,148
Site 13	Large Green 400 HD	IoS	25,000	325,000	134,689	384,835	632,057	875,012	1,117,968	1,360,923	1,603,878	1,079,306	855,682	632,057	403,887	172,794	-61,896	-312,708
Site 14	Green 150	IoS	25,000	325,000	-111,578	118,442	341,613	564,783	787,954	1,011,125	1,234,296	773,576	557,594	341,613	125,631	-96,492	-323,343	-558,042
Site 15	Green 30	IoS	25,000	325,000	-103,110	131,377	357,002	580,694	804,386	1,028,078	1,251,770	786,836	571,919	357,002	140,406	-84,695	-310,199	-543,750
Site 16	Green 12	IoS	75,000	375,000	-450,206	-118,292	210,922	536,946	853,184	1,166,943	1,480,701	849,951	535,282	210,922	-116,596	-445,358	-784,610	-1,123,862
Site 17	Green 6	IoS	75,000	375,000	-26,949	398,698	822,908	1,240,330	1,646,266	2,051,929	2,457,593	1,514,655	1,172,617	822,908	467,745	111,145	-245,455	-606,640

Sittingbourne and West Swale BC

			EUV	BLV	Residual Value (£ per gross ha)													
			Value Change		-10%	-5%	0%	+5%	+10%	+15%	+20%							
			BCIS Change										-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	Sittingbourne West	1,100,000	1,320,000	510,462	885,938	1,258,849	1,631,759	2,004,670	2,377,580	2,745,849		1,857,637	1,558,243	1,258,849	959,455	660,061	350,304	40,044
Site 2	Brown 90	Sittingbourne West	1,100,000	1,320,000	352,557	783,283	1,214,009	1,644,735	2,075,461	2,506,186	2,936,912		1,927,101	1,570,555	1,214,009	857,463	500,916	144,370	-227,226
Site 3	Brown 30	Sittingbourne West	1,100,000	1,320,000	720,052	1,708,648	2,696,870	3,685,091	4,673,313	5,661,535	6,649,756		4,339,509	3,518,189	2,696,870	1,875,550	1,054,230	214,039	-647,739
Site 4	Brown 15	Sittingbourne West	1,100,000	1,320,000	449,150	1,037,221	1,613,515	2,189,809	2,766,103	3,342,397	3,918,691		2,568,558	2,091,037	1,613,515	1,135,993	653,403	155,381	-345,664
Site 5	Brown 9	Sittingbourne West	1,100,000	1,320,000	726,446	1,264,351	1,791,420	2,318,489	2,845,557	3,372,626	3,899,695		2,614,719	2,203,069	1,791,420	1,379,770	963,976	537,906	105,978
Site 6	Brown 6	Sittingbourne West	1,100,000	1,320,000	728,273	1,286,173	1,833,973	2,371,054	2,908,136	3,445,217	3,982,299		2,674,031	2,254,002	1,833,973	1,406,619	973,911	533,191	92,470
Site 7	Central 60	Sittingbourne West	1,100,000	1,320,000	230,824	729,660	1,228,497	1,727,333	2,226,170	2,725,007	3,223,843		2,070,172	1,649,335	1,228,497	807,659	386,821	-43,968	-485,537
Site 8	Central 24	Sittingbourne West	1,100,000	1,320,000	161,293	669,130	1,164,820	1,660,511	2,156,202	2,651,892	3,147,583		2,005,501	1,585,161	1,164,820	744,480	319,042	-121,629	-562,676
Site 9	Central 9	Sittingbourne West	1,100,000	1,320,000	1,187,653	1,859,983	2,518,819	3,177,655	3,836,491	4,495,327	5,154,163		3,508,386	3,013,602	2,518,819	2,024,035	1,525,268	1,016,143	497,304
Site 10	Brown 90 HD Flats	Sittingbourne West	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545		-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	Sittingbourne West	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571		-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	Sittingbourne West	25,000	325,000	54,710	250,991	446,659	637,300	827,942	1,018,583	1,209,224		801,924	624,292	446,659	263,706	80,141	-109,618	-311,148
Site 13	Large Green 400 HD	Sittingbourne West	25,000	325,000	134,689	384,835	632,057	875,012	1,117,968	1,360,923	1,603,878		1,079,306	855,682	632,057	403,887	172,794	-61,896	-312,708
Site 14	Green 150	Sittingbourne West	25,000	325,000	-111,578	118,442	341,613	564,783	787,954	1,011,125	1,234,296		773,576	557,594	341,613	125,631	-96,492	-323,343	-558,042
Site 15	Green 30	Sittingbourne West	25,000	325,000	-103,110	131,377	357,002	580,694	804,386	1,028,078	1,251,770		786,836	571,919	357,002	140,406	-84,695	-310,199	-543,750
Site 16	Green 12	Sittingbourne West	75,000	375,000	-450,206	-118,292	210,922	536,946	853,184	1,166,943	1,480,701		849,951	535,282	210,922	-116,596	-445,358	-784,610	-1,123,862
Site 17	Green 6	Sittingbourne West	75,000	375,000	-26,949	398,698	822,908	1,240,330	1,646,266	2,051,929	2,457,593		1,514,655	1,172,617	822,908	467,745	111,145	-245,455	-606,640
Site 19	West of Bobbing Village	Bobbing	25,000	250,000	-166,714	-7,304	138,530	280,681	420,930	560,640	697,905		406,080	273,255	138,530	690	-149,405	-307,719	-481,847

Sittingbourne and East Swale BC

			EUV	BLV	Residual Value (£ per gross ha)													
			Value Change		-10%	-5%	0%	+5%	+10%	+15%	+20%							
			BCIS Change										-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	Sittingbourne East	1,100,000	1,320,000	510,462	885,938	1,258,849	1,631,759	2,004,670	2,377,580	2,745,849		1,857,637	1,558,243	1,258,849	959,455	660,061	350,304	40,044
Site 2	Brown 90	Sittingbourne East	1,100,000	1,320,000	352,557	783,283	1,214,009	1,644,735	2,075,461	2,506,186	2,936,912		1,927,101	1,570,555	1,214,009	857,463	500,916	144,370	-227,226
Site 3	Brown 30	Sittingbourne East	1,100,000	1,320,000	720,052	1,708,648	2,696,870	3,685,091	4,673,313	5,661,535	6,649,756		4,339,509	3,518,189	2,696,870	1,875,550	1,054,230	214,039	-647,739
Site 4	Brown 15	Sittingbourne East	1,100,000	1,320,000	449,150	1,037,221	1,613,515	2,189,809	2,766,103	3,342,397	3,918,691		2,568,558	2,091,037	1,613,515	1,135,993	653,403	155,381	-345,664
Site 5	Brown 9	Sittingbourne East	1,100,000	1,320,000	726,446	1,264,351	1,791,420	2,318,489	2,845,557	3,372,626	3,899,695		2,614,719	2,203,069	1,791,420	1,379,770	963,976	537,906	105,978
Site 6	Brown 6	Sittingbourne East	1,100,000	1,320,000	728,273	1,286,173	1,833,973	2,371,054	2,908,136	3,445,217	3,982,299		2,674,031	2,254,002	1,833,973	1,406,619	973,911	533,191	92,470
Site 7	Central 60	Sittingbourne East	1,100,000	1,320,000	230,824	729,660	1,228,497	1,727,333	2,226,170	2,725,007	3,223,843		2,070,172	1,649,335	1,228,497	807,659	386,821	-43,968	-485,537
Site 8	Central 24	Sittingbourne East	1,100,000	1,320,000	161,293	669,130	1,164,820	1,660,511	2,156,202	2,651,892	3,147,583		2,005,501	1,585,161	1,164,820	744,480	319,042	-121,629	-562,676
Site 9	Central 9	Sittingbourne East	1,100,000	1,320,000	1,187,653	1,859,983	2,518,819	3,177,655	3,836,491	4,495,327	5,154,163		3,508,386	3,013,602	2,518,819	2,024,035	1,525,268	1,016,143	497,304
Site 10	Brown 90 HD Flats	Sittingbourne East	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545		-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	Sittingbourne East	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571		-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	Sittingbourne East	25,000	325,000	253,444	459,766	661,131	862,495	1,063,860	1,265,225	1,466,589		1,016,395	838,763	661,131	483,498	300,957	117,392	-69,976
Site 13	Large Green 400 HD	Sittingbourne East	25,000	325,000	387,962	648,760	905,382	1,162,003	1,418,625	1,675,247	1,931,868		1,352,631	1,129,006	905,382	681,757	454,207	223,114	-9,097
Site 14	Green 150	Sittingbourne East	25,000	325,000	121,231	356,956	592,680	828,404	1,064,128	1,299,853	1,535,577		1,024,644	808,662	592,680	376,698	160,716	-59,678	-286,299
Site 15	Green 30	Sittingbourne East	25,000	325,000	134,254	372,381	608,655	844,930	1,081,205	1,317,479	1,553,754		1,038,489	823,572	608,655	393,739	178,208	-46,149	-271,653
Site 16	Green 12	Sittingbourne East	75,000	375,000	-114,177	233,556	577,302	910,053	1,241,461	1,572,868	1,904,275		1,202,929	890,787	577,302	253,770	-73,748	-401,266	-739,477
Site 17	Green 6	Sittingbourne East	75,000	375,000	404,019	851,606	1,291,310	1,719,792	2,148,274	2,576,756	3,005,238		1,971,027	1,631,168	1,291,310	942,799	589,998	233,398	-123,202

Faversham and Adjacent

			EUV	BLV	Residual Value (£ per gross ha)													
			Value Change		-10%	-5%	0%	+5%	+10%	+15%	+20%		-10%	-5%	0%	+5%	+10%	+15%	+20%
			BCIS Change																
Site 1	Large Brown 300	Faversham	1,100,000	1,320,000	676,745	1,058,750	1,440,756	1,822,762	2,204,768	2,584,967	2,960,360		2,039,545	1,740,150	1,440,756	1,141,362	841,968	538,260	228,000
Site 2	Brown 90	Faversham	1,100,000	1,320,000	541,656	982,888	1,424,119	1,865,350	2,306,582	2,747,813	3,189,045		2,137,212	1,780,665	1,424,119	1,067,573	711,027	354,480	-6,765
Site 3	Brown 30	Faversham	1,100,000	1,320,000	1,154,280	2,166,604	3,178,929	4,191,254	5,203,578	6,215,903	7,228,227		4,821,568	4,000,249	3,178,929	2,357,609	1,536,290	714,438	-141,933
Site 4	Brown 15	Faversham	1,100,000	1,320,000	710,473	1,304,284	1,894,634	2,484,984	3,075,334	3,665,684	4,256,034		2,849,677	2,372,156	1,894,634	1,417,112	939,591	450,348	-50,697
Site 5	Brown 9	Faversham	1,100,000	1,320,000	964,550	1,508,602	2,048,526	2,588,451	3,128,375	3,668,299	4,208,223		2,871,826	2,460,176	2,048,526	1,636,877	1,225,227	804,953	375,750
Site 6	Brown 6	Faversham	1,100,000	1,320,000	975,681	1,542,279	2,095,964	2,646,145	3,196,326	3,746,507	4,296,688		2,936,022	2,515,993	2,095,964	1,675,935	1,244,000	808,087	367,367
Site 7	Central 60	Faversham	1,100,000	1,320,000	449,825	960,829	1,471,832	1,982,835	2,493,838	3,004,842	3,515,845		2,313,507	1,892,670	1,471,832	1,050,994	630,156	209,319	-230,215
Site 8	Central 24	Faversham	1,100,000	1,320,000	387,902	898,840	1,406,621	1,914,401	2,422,182	2,929,963	3,437,743		2,247,301	1,826,961	1,406,621	986,280	565,940	132,082	-308,965
Site 9	Central 9	Faversham	1,100,000	1,320,000	1,485,282	2,165,297	2,840,202	3,515,107	4,190,012	4,864,918	5,539,823		3,829,769	3,334,986	2,840,202	2,345,418	1,850,635	1,346,842	834,519
Site 10	Brown 90 HD Flats	Faversham	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545		-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	Faversham	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571		-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	Faversham	25,000	325,000	319,689	527,682	732,621	937,560	1,142,499	1,347,439	1,552,378		1,087,886	910,253	732,621	554,989	374,562	190,997	7,255
Site 13	Large Green 400 HD	Faversham	25,000	325,000	472,386	735,313	996,490	1,257,667	1,518,844	1,780,021	2,041,198		1,443,740	1,220,115	996,490	772,865	548,012	316,918	85,825
Site 14	Green 150	Faversham	25,000	325,000	196,552	436,460	676,369	916,278	1,156,186	1,396,095	1,636,004		1,108,333	892,351	676,369	460,387	244,405	28,064	-198,487
Site 15	Green 30	Faversham	25,000	325,000	211,602	452,071	692,540	933,009	1,173,478	1,413,947	1,654,415		1,122,374	907,457	692,540	477,623	262,706	41,868	-183,636
Site 16	Green 12	Faversham	75,000	375,000	-3,067	350,838	696,305	1,033,596	1,370,886	1,708,176	2,045,466		1,320,589	1,008,447	696,305	377,183	49,708	-277,810	-611,348
Site 17	Green 6	Faversham	75,000	375,000	547,674	1,000,312	1,443,434	1,879,522	2,315,610	2,751,699	3,187,787		2,123,150	1,783,292	1,443,434	1,099,332	749,615	393,015	36,415
Site 18	South East Faversham	Faversham	25,000	250,000	-464,951	-272,444	-106,922	48,879	195,839	339,186	481,904		203,171	52,899	-106,922	-276,561	-465,431	-700,673	-944,557

Appendix 5 – Varied Affordable Housing Tenure Mix

Isle of Sheppey

			EUV	BLV	Residual Value (£ per gross ha)								
			Affordable Housing		10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
		Affordable Home Ownership			30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	IoS	1,100,000	1,320,000	1,007,854	1,025,126	1,042,398	1,059,669	1,068,305	1,076,941	1,094,213	1,111,485	1,128,757
Site 2	Brown 90	IoS	1,100,000	1,320,000	922,538	942,878	963,218	983,558	993,729	1,003,899	1,024,239	1,044,579	1,064,920
Site 3	Brown 30	IoS	1,100,000	1,320,000	2,054,083	2,094,265	2,134,447	2,174,628	2,194,719	2,214,810	2,254,992	2,295,174	2,335,356
Site 4	Brown 15	IoS	1,100,000	1,320,000	1,221,288	1,249,065	1,276,842	1,304,619	1,318,507	1,332,396	1,360,173	1,387,950	1,415,727
Site 5	Brown 9	IoS	1,100,000	1,320,000	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313
Site 6	Brown 6	IoS	1,100,000	1,320,000	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237
Site 7	Central 60	IoS	1,100,000	1,320,000	910,330	929,038	947,746	966,454	975,808	985,162	1,003,870	1,022,578	1,041,286
Site 8	Central 24	IoS	1,100,000	1,320,000	853,157	870,622	888,088	905,554	914,287	923,020	940,486	957,952	975,418
Site 9	Central 9	IoS	1,100,000	1,320,000	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435
Site 10	Brown 90 HD Flats	IoS	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	IoS	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	IoS	25,000	325,000	303,337	339,321	375,304	411,287	429,279	446,659	481,406	516,153	550,901
Site 13	Large Green 400 HD	IoS	25,000	325,000	446,749	493,807	540,865	586,612	609,334	632,057	677,502	722,947	768,393
Site 14	Green 150	IoS	25,000	325,000	179,904	220,331	260,758	301,185	321,399	341,613	382,040	422,467	462,894
Site 15	Green 30	IoS	25,000	325,000	203,558	241,919	280,280	318,641	337,821	357,002	395,363	433,724	472,085
Site 16	Green 12	IoS	75,000	375,000	46,452	87,570	128,687	169,805	190,363	210,922	252,040	293,157	334,275
Site 17	Green 6	IoS	75,000	375,000	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908

Sittingbourne and West Swale BC

			EUV	BLV	Residual Value (£ per gross ha)								
			Affordable Housing		10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
		Affordable Home Ownership			30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	Sittingbourne Wes	1,100,000	1,320,000	1,189,762	1,207,034	1,224,305	1,241,577	1,250,213	1,258,849	1,276,121	1,293,392	1,310,664
Site 2	Brown 90	Sittingbourne Wes	1,100,000	1,320,000	1,132,648	1,152,988	1,173,328	1,193,669	1,203,839	1,214,009	1,234,349	1,254,689	1,275,030
Site 3	Brown 30	Sittingbourne Wes	1,100,000	1,320,000	2,536,142	2,576,324	2,616,506	2,656,688	2,676,779	2,696,870	2,737,051	2,777,233	2,817,415
Site 4	Brown 15	Sittingbourne Wes	1,100,000	1,320,000	1,502,407	1,530,184	1,557,961	1,585,738	1,599,626	1,613,515	1,641,292	1,669,069	1,696,846
Site 5	Brown 9	Sittingbourne Wes	1,100,000	1,320,000	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420
Site 6	Brown 6	Sittingbourne Wes	1,100,000	1,320,000	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973
Site 7	Central 60	Sittingbourne Wes	1,100,000	1,320,000	1,153,665	1,172,373	1,191,081	1,209,789	1,219,143	1,228,497	1,247,205	1,265,913	1,284,621
Site 8	Central 24	Sittingbourne Wes	1,100,000	1,320,000	1,094,957	1,112,423	1,129,889	1,147,355	1,156,087	1,164,820	1,182,286	1,199,752	1,217,218
Site 9	Central 9	Sittingbourne Wes	1,100,000	1,320,000	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819
Site 10	Brown 90 HD Flats	Sittingbourne Wes	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	Sittingbourne Wes	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	Sittingbourne Wes	25,000	325,000	303,337	339,321	375,304	411,287	429,279	446,659	481,406	516,153	550,901
Site 13	Large Green 400 HD	Sittingbourne Wes	25,000	325,000	446,749	493,807	540,865	586,612	609,334	632,057	677,502	722,947	768,393
Site 14	Green 150	Sittingbourne Wes	25,000	325,000	179,904	220,331	260,758	301,185	321,399	341,613	382,040	422,467	462,894
Site 15	Green 30	Sittingbourne Wes	25,000	325,000	203,558	241,919	280,280	318,641	337,821	357,002	395,363	433,724	472,085
Site 16	Green 12	Sittingbourne Wes	75,000	375,000	46,452	87,570	128,687	169,805	190,363	210,922	252,040	293,157	334,275
Site 17	Green 6	Sittingbourne Wes	75,000	375,000	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908
Site 19	West of Bobbing Village	Bobbing	25,000	250,000	39,780	64,467	89,155	113,842	126,186	138,530	163,217	187,905	211,941

Sittingbourne and East Swale BC

			EUV	BLV	Residual Value (£ per gross ha)								
			Affordable Housing		10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
		Affordable Home Ownership			30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	Sittingbourne East	1,100,000	1,320,000	1,189,762	1,207,034	1,224,305	1,241,577	1,250,213	1,258,849	1,276,121	1,293,392	1,310,664
Site 2	Brown 90	Sittingbourne East	1,100,000	1,320,000	1,132,648	1,152,988	1,173,328	1,193,669	1,203,839	1,214,009	1,234,349	1,254,689	1,275,030
Site 3	Brown 30	Sittingbourne East	1,100,000	1,320,000	2,536,142	2,576,324	2,616,506	2,656,688	2,676,779	2,696,870	2,737,051	2,777,233	2,817,415
Site 4	Brown 15	Sittingbourne East	1,100,000	1,320,000	1,502,407	1,530,184	1,557,961	1,585,738	1,599,626	1,613,515	1,641,292	1,669,069	1,696,846
Site 5	Brown 9	Sittingbourne East	1,100,000	1,320,000	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420
Site 6	Brown 6	Sittingbourne East	1,100,000	1,320,000	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973
Site 7	Central 60	Sittingbourne East	1,100,000	1,320,000	1,153,665	1,172,373	1,191,081	1,209,789	1,219,143	1,228,497	1,247,205	1,265,913	1,284,621
Site 8	Central 24	Sittingbourne East	1,100,000	1,320,000	1,094,957	1,112,423	1,129,889	1,147,355	1,156,087	1,164,820	1,182,286	1,199,752	1,217,218
Site 9	Central 9	Sittingbourne East	1,100,000	1,320,000	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819
Site 10	Brown 90 HD Flats	Sittingbourne East	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	Sittingbourne East	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	Sittingbourne East	25,000	325,000	522,142	556,889	591,636	626,383	643,757	661,131	695,878	730,625	765,372
Site 13	Large Green 400 HD	Sittingbourne East	25,000	325,000	723,601	769,046	814,491	859,936	882,659	905,382	950,827	996,272	1,041,718
Site 14	Green 150	Sittingbourne East	25,000	325,000	430,971	471,398	511,825	552,253	572,466	592,680	633,107	673,534	713,962
Site 15	Green 30	Sittingbourne East	25,000	325,000	455,211	493,572	531,933	570,294	589,475	608,655	647,016	685,378	723,739
Site 16	Green 12	Sittingbourne East	75,000	375,000	416,011	456,333	496,656	536,979	557,141	577,302	617,625	657,020	696,207
Site 17	Green 6	Sittingbourne East	75,000	375,000	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310

Faversham and Adjacent

			EUV	BLV	Residual Value (£ per gross ha)								
			Affordable Housing		10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
		Affordable Home Ownership			30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	Faversham	1,100,000	1,320,000	1,371,669	1,388,941	1,406,213	1,423,485	1,432,121	1,440,756	1,458,028	1,475,300	1,492,572
Site 2	Brown 90	Faversham	1,100,000	1,320,000	1,342,758	1,363,098	1,383,439	1,403,779	1,413,949	1,424,119	1,444,459	1,464,800	1,485,140
Site 3	Brown 30	Faversham	1,100,000	1,320,000	3,018,202	3,058,383	3,098,565	3,138,747	3,158,838	3,178,929	3,219,111	3,259,293	3,299,474
Site 4	Brown 15	Faversham	1,100,000	1,320,000	1,783,526	1,811,303	1,839,080	1,866,857	1,880,745	1,894,634	1,922,411	1,950,188	1,977,965
Site 5	Brown 9	Faversham	1,100,000	1,320,000	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526
Site 6	Brown 6	Faversham	1,100,000	1,320,000	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964
Site 7	Central 60	Faversham	1,100,000	1,320,000	1,397,000	1,415,708	1,434,416	1,453,124	1,462,478	1,471,832	1,490,540	1,509,248	1,527,956
Site 8	Central 24	Faversham	1,100,000	1,320,000	1,336,757	1,354,223	1,371,689	1,389,155	1,397,888	1,406,621	1,424,087	1,441,552	1,459,018
Site 9	Central 9	Faversham	1,100,000	1,320,000	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202
Site 10	Brown 90 HD Flats	Faversham	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	Faversham	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	Faversham	25,000	325,000	593,633	628,380	663,127	697,874	715,247	732,621	767,368	802,115	836,862
Site 13	Large Green 400 HD	Faversham	25,000	325,000	814,709	860,154	905,599	951,045	973,767	996,490	1,041,935	1,087,381	1,132,826
Site 14	Green 150	Faversham	25,000	325,000	514,660	555,087	595,514	635,942	656,155	676,369	716,796	757,223	797,651
Site 15	Green 30	Faversham	25,000	325,000	539,096	577,457	615,818	654,179	673,359	692,540	730,901	769,262	807,623
Site 16	Green 12	Faversham	75,000	375,000	537,080	577,403	617,726	657,118	676,712	696,305	735,492	774,679	813,867
Site 17	Green 6	Faversham	75,000	375,000	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434
Site 18	South East Faversham	Faversham	25,000	250,000	-228,457	-197,286	-166,278	-136,600	-121,761	-106,922	-77,245	-47,567	-18,500

Appendix 6 - Commuted Sums Calculation

Isle of Sheppey

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	IoS	Brown	PDL	300	30	11,587,494	9,230,925	2,356,570	78,552
Site 2	Brown 90	IoS	Brown	PDL	90	9	2,960,546	2,258,772	701,774	77,975
Site 3	Brown 30	IoS	Brown	PDL	30	3	993,550	755,049	238,501	79,500
Site 4	Brown 15	IoS	Brown	PDL	15	1.5	517,003	399,719	117,284	78,189
Site 5	Brown 9	IoS	Brown	PDL	9	0.9	345,220	345,220	0	0
Site 6	Brown 6	IoS	Brown	PDL	6	0.6	235,386	235,386	0	0
Site 7	Central 60	IoS	Brown	PDL	60	6	1,721,360	1,231,453	489,908	81,651
Site 8	Central 24	IoS	Brown	PDL	24	2.4	649,017	461,510	187,507	78,128
Site 9	Central 9	IoS	Brown	PDL	9	0.9	329,615	329,615	0	0
Site 10	Brown 90 HD Flats	IoS	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	IoS	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	IoS	Green	Agricultural	400	120	17,896,129	8,507,797	9,388,332	78,236
Site 13	Large Green 400 HD	IoS	Green	Agricultural	400	120	18,067,696	9,029,384	9,038,312	75,319
Site 14	Green 150	IoS	Green	Agricultural	150	45	5,584,817	2,091,506	3,493,311	77,629
Site 15	Green 30	IoS	Green	Agricultural	30	9	1,151,784	446,252	705,531	78,392
Site 16	Green 12	IoS	Green	Paddock	12	3.6	375,426	84,369	291,057	80,849
Site 17	Green 6	IoS	Green	Paddock	6	1.8	164,582	164,582	0	0

Sittingbourne and West Swale BC

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	Sittingbourne Wes	Brown	PDL	300	30	13,285,785	10,790,133	2,495,653	83,188
Site 2	Brown 90	Sittingbourne Wes	Brown	PDL	90	9	3,475,229	2,731,520	743,709	82,634
Site 3	Brown 30	Sittingbourne Wes	Brown	PDL	30	3	1,172,307	919,387	252,919	84,306
Site 4	Brown 15	Sittingbourne Wes	Brown	PDL	15	1.5	608,905	484,054	124,851	83,234
Site 5	Brown 9	Sittingbourne Wes	Brown	PDL	9	0.9	403,069	403,069	0	0
Site 6	Brown 6	Sittingbourne Wes	Brown	PDL	6	0.6	275,096	275,096	0	0
Site 7	Central 60	Sittingbourne Wes	Brown	PDL	60	6	2,053,231	1,535,621	517,610	86,268
Site 8	Central 24	Sittingbourne Wes	Brown	PDL	24	2.4	781,122	582,410	198,712	82,797
Site 9	Central 9	Sittingbourne Wes	Brown	PDL	9	0.9	377,823	377,823	0	0
Site 10	Brown 90 HD Flats	Sittingbourne Wes	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	Sittingbourne Wes	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	Sittingbourne Wes	Green	Agricultural	400	120	17,896,129	8,507,797	9,388,332	78,236
Site 13	Large Green 400 HD	Sittingbourne Wes	Green	Agricultural	400	120	18,067,696	9,029,384	9,038,312	75,319
Site 14	Green 150	Sittingbourne Wes	Green	Agricultural	150	45	5,584,817	2,091,506	3,493,311	77,629
Site 15	Green 30	Sittingbourne Wes	Green	Agricultural	30	9	1,151,784	446,252	705,531	78,392
Site 16	Green 12	Sittingbourne Wes	Green	Paddock	12	3.6	375,426	84,369	291,057	80,849
Site 17	Green 6	Sittingbourne Wes	Green	Paddock	6	1.8	164,582	164,582	0	0

Sittingbourne and East Swale BC

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	Sittingbourne East	Brown	PDL	300	30	13,285,785	10,790,133	2,495,653	83,188
Site 2	Brown 90	Sittingbourne East	Brown	PDL	90	9	3,475,229	2,731,520	743,709	82,634
Site 3	Brown 30	Sittingbourne East	Brown	PDL	30	3	1,172,307	919,387	252,919	84,306
Site 4	Brown 15	Sittingbourne East	Brown	PDL	15	1.5	608,905	484,054	124,851	83,234
Site 5	Brown 9	Sittingbourne East	Brown	PDL	9	0.9	403,069	403,069	0	0
Site 6	Brown 6	Sittingbourne East	Brown	PDL	6	0.6	275,096	275,096	0	0
Site 7	Central 60	Sittingbourne East	Brown	PDL	60	6	2,053,231	1,535,621	517,610	86,268
Site 8	Central 24	Sittingbourne East	Brown	PDL	24	2.4	781,122	582,410	198,712	82,797
Site 9	Central 9	Sittingbourne East	Brown	PDL	9	0.9	377,823	377,823	0	0
Site 10	Brown 90 HD Flats	Sittingbourne East	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	Sittingbourne East	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	Sittingbourne East	Green	Agricultural	400	120	23,282,578	12,592,963	10,689,615	89,080
Site 13	Large Green 400 HD	Sittingbourne East	Green	Agricultural	400	120	23,205,136	12,934,024	10,271,112	85,593
Site 14	Green 150	Sittingbourne East	Green	Agricultural	150	45	7,616,382	3,628,652	3,987,730	88,616
Site 15	Green 30	Sittingbourne East	Green	Agricultural	30	9	1,569,763	760,819	808,944	89,883
Site 16	Green 12	Sittingbourne East	Green	Paddock	12	3.6	564,527	230,921	333,606	92,668
Site 17	Green 6	Sittingbourne East	Green	Paddock	6	1.8	258,262	258,262	0	0

Faversham and Adjacent

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	Faversham	Brown	PDL	300	30	14,984,076	12,349,340	2,634,736	87,825
Site 2	Brown 90	Faversham	Brown	PDL	90	9	3,989,911	3,204,268	785,643	87,294
Site 3	Brown 30	Faversham	Brown	PDL	30	3	1,351,064	1,083,726	267,338	89,113
Site 4	Brown 15	Faversham	Brown	PDL	15	1.5	700,807	568,390	132,417	88,278
Site 5	Brown 9	Faversham	Brown	PDL	9	0.9	460,918	460,918	0	0
Site 6	Brown 6	Faversham	Brown	PDL	6	0.6	314,395	314,395	0	0
Site 7	Central 60	Faversham	Brown	PDL	60	6	2,385,101	1,839,790	545,312	90,885
Site 8	Central 24	Faversham	Brown	PDL	24	2.4	913,228	703,310	209,918	87,466
Site 9	Central 9	Faversham	Brown	PDL	9	0.9	426,030	426,030	0	0
Site 10	Brown 90 HD Flats	Faversham	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	Faversham	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	Faversham	Green	Agricultural	400	120	25,078,061	13,954,685	11,123,376	92,695
Site 13	Large Green 400 HD	Faversham	Green	Agricultural	400	120	24,917,616	14,235,571	10,682,046	89,017
Site 14	Green 150	Faversham	Green	Agricultural	150	45	8,293,570	4,141,034	4,152,536	92,279
Site 15	Green 30	Faversham	Green	Agricultural	30	9	1,709,090	865,675	843,415	93,713
Site 16	Green 12	Faversham	Green	Paddock	12	3.6	627,561	278,522	349,039	96,955
Site 17	Green 6	Faversham	Green	Paddock	6	1.8	288,687	288,687	0	0

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Planning & Development

Planning and Transportation Policy Working Group	
Meeting Date	9th June 2026
Report Title	Landscape Sensitivity Assessment – non strategic sites 2026
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 note the Landscape Sensitivity Assessment – non strategic sites 2026 and to provide any comments members have on the document and its findings.

1. Introduction

1.1 The purpose of this report is to set out the approach to and summary findings of the Landscape Sensitivity Assessment – non strategic sites 2026 (Appendix I). The assessment is in draft and is being presented to members for their information and for the opportunity to provide comments early in the process[1].

1.2 The findings of this assessment will go on to inform landscape policy criteria for non strategic site allocations where it has been deemed there are likely impacts on the wider landscape.

2. Background

2.1 The aim of the assessment is to ascertain the generic suitability of selected sites in landscape and visual terms to accommodate development in principal, and to determine any site-specific constraints and opportunities for mitigation and enhancement. The assessment does not propose specific landscape enhancements in relation to development proposals.

2.2 The assessment draws on both existing studies carried out by the consultants on behalf of the Council and the Natural England guidance on Landscape Sensitivity.[2] The assessment usefully sets out that the Natural England guidance describes landscape sensitivity, within the context of spatial planning and land management, as:

[1] The document is a 1st draft and may contain minor typos and matters for completion.

[2] An approach to landscape sensitivity assessment – to inform spatial planning and land management' (Natural England, 2019)

"a measure of the resilience, or robustness, of a landscape to withstand specified change… without undue negative effects on the landscape and visual baseline and their value".

2.3 The assessment focuses on 21 sites that have been considered by officers to have landscape impacts from those selected for allocation in the Local Plan by Full Council on 1 April 2026. Details of the sites and their overall typical sensitivities from the assessment can be found at table 1 after paragraph 2.8 of this report. One site Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY has been assessed for both housing and employment on its southern parcel with housing only for its northern parcel, this addresses the physical constraints of the site layout. Land East of Faversham expansion has been assessed both for housing, employment and mixed uses so that all considerations for the site have been assessed with the employment assessment specific for the site's proposed allocation within the Local Plan.

2.3 To assess the sensitivity of potential development of the 21 sites, generic forms of development that will likely come forward within the borough have been produced in the assessment. However, it should be considered that in practice each development application will be considered on its own merit. Details on the approach to typologies are set out in detail in chapter 1 of the assessment. The typologies are:

- Residential development and associated infrastructure;
- Employment development and associated infrastructure; and,
- Mixed-use development and associated infrastructure.

2.4 Chapter 1 goes on to set out that the assessment uses a range of sensitivity indicators as a basis for a qualitative assessment of landscape sensitivity for each site. The sensitivity indicators in the assessment are drawn from the Natural England guidance and the consultants' experience of landscape sensitivity and the precedent of previous sensitivity studies undertaken in Swale. The indicators are:

- Physical character (including landform, scale and field pattern)
- Natural character
- Historic landscape character and time depth
- Character of the settlement and its relationship with the landscape (including coalescence)
- Visual prominence, skyline and views
- Perceptual and scenic qualities (including access and recreation)

2.5 For each of the 21 sites assessed the result are presented with the following information provided:

- A brief description of the site location and existing landscape / land cover.
- A map of the site and surrounds (on an aerial base) showing the location.
- A map of the site and surrounds (on a 1:25,000 OS base) showing the designations used in the study.
- A description of the key characteristics of the relevant Landscape Character Area, taken from the Landscape Character Assessment.
- Two representative photos.
- An analysis of landscape and visual sensitivity under subheadings for each of the indicators listed above. A judgement on the level of sensitivity on a 5-point scale for each indicator.
- A summary of overall sensitivity, with any identified clear and sizable variations in sensitivity.
- A summary of the potential effects the development typology could have on the site.
- A summary of the potential for mitigation and enhancement.
- An illustrated map of the site and surrounds indicating key constraints and opportunities, summarising the information within the assessment[3].

2.5 Chapter 3 of the assessment then provides development guidance principles for landscape matters and the detailed assessments of the 21 sites are set out within Appendix A of the assessment. For ease of reference the sites summary table from chapter 2 of the assessment is set out below after paragraph 2.8.

2.7 There are limitations to the assessment. Landscape sensitivity of the sites has been set out using typologies of likely development whilst the exact location, layout, design or mitigation proposed is not known as these will be matters for planning applications. Therefore, the findings of the assessment should not be interpretated as definitive but provide a steer for site allocation policy criteria in the Regulation 19 Local Plan and that further work maybe required as part of a planning application.

2.8 From table 1 below it can be determined that of the 21 sites officers had landscape concerns about only Land at Long Field, Chaffes Lane and Land East of Faversham expansion for employment have a moderate to high sensitivity. Through drafting of the Local Plan and consideration of the potential mitigation and enhancement criteria set out in the assessment most landscape and visual effects can be avoided or minimised.

[3] As an initial draft document an illustrated map is provided for Lion field the first site in the study. Once the matters for the illustrated maps is agreed alongside all feedback on this draft then maps will be produced for all the sites.

Table 1: Assessed sites summary (Table 3.1 Landscape Sensitivity Assessment – non strategic sites 2026 p.23)

Reference	Site location	Development typology	Sensitivity
SHELAA/393	Land at Lion Field	Housing	Moderate
SHELAA/381	Syndale Park, London Road, Faversham, Kent, ME13 0RH	Housing	Moderate
SHELAA/402	Hollybush Farm Caravan Park, Oak Lane, Minster-on- Sea, ME12 3QR	Housing	Moderate
SHELAA/408	Estuary View, Bell Farm Lane, Minster-on-Sea, ME12 4JA	Housing	Low-Moderate
SHELAA/412	Golden Leas Holiday Park, Bell Farm Lane, Minster-on-Sea, ME12 4JA	Housing	Low-Moderate
CFS2024/126 (south of railway line)	Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY	Housing	Low-Moderate
CFS2024/126 (south of railway line)	Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY	Employment	Low-Moderate
SHELAA/368 (north of railway line)	Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY	Housing	Moderate
SHELAA/277	Barrow Green Farm, Barrow Green	Housing	Low-Moderate
SHELAA/206	Land at Norton Ash Garden Centre	Housing	Moderate
SHELAA/119	Land west of Lower Hartlip Road/Munn's Lane	Housing	Moderate
SHELAA/324	Home Farm, Breach Lane, Lower Halstow, ME9 7DB	Housing	Low-Moderate
SHELAA/310	Land adjacent to Oak Lane - Chaffes Lane (Site B)	Housing	Low-Moderate
SHELAA/306	Land at Forge Lane, Upchurch	Housing	Moderate

Reference	Site location	Development typology	Sensitivity
SHELAA/308	Land south of Forge Lane and Holywell Primary School and East of Chaffes Lane	Housing	Moderate
SHELAA/312	Land off Chaffes Lane	Housing	Moderate
SHELAA/319	Land at Long Field, Chaffes Lane	Housing	Moderate-High
CFS50	Land East of Faversham expansion	Housing	Moderate
CFS50	Land East of Faversham expansion	Employment	Moderate-High
CFS50	Land East of Faversham expansion	Mixed	Moderate
CFS2024/129	Smeed Dean Works, Eurolink Industrial Estate, Castle Road	Employment	Moderate
CFS2024/188	Land north of Keycol Hill (Yellow/Blue parcel)	Employment	Moderate
LPR247 0 (R15)	Lamberhurst Farm,Yorkletts - proposed southern expansion	Employment	Low-Moderate
CFS5 (R8)	Waterham Industrial Estate - expansion east	Employment	Low-Moderate

3. Recommendations

3.1 To note the Landscape Sensitivity Assessment – non strategic sites 2026 and to provide any comments members have on the document and its findings.

4. Alternative Options Considered and Rejected

4.1 The matters in this report concern informing members on the development of the Local Plan evidence base.

4.2 Members could choose not to note the Landscape Sensitivity Assessment – non strategic sites 2026. However, choosing this option should be rejected as the evidence will provide a robust and updated position for policy drafting and the Local Plan examination in public.

5. Consultation Undertaken or Proposed

5.1 No formal consultation has been undertaken on the Landscape Sensitivity Assessment – non strategic sites 2026 as it forms part of the evidence base of the Local Plan Review. The Regulation 19 Local Plan will be subject to a period of formal consultation at which point comments will be invited on the Plan, its policies and the supporting evidence base.

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	No implications identified at this stage
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	This evidence will help to minimise and mitigate impacts on landscapes from proposed allocations within the Local Plan.

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 current Local Plan timetable expects the Local Plan to be submitted for its Examination in Public and to be adopted before local government reorganisation is expected to be complete.

7. Appendices

Appendix I: Landscape Sensitivity Assessment – non strategic sites 2026

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Landscape Sensitivity Assessment

Non-strategic sites

Swale Borough Council

Draft report
Prepared by LUC
May 2026

Version	Status	Prepared	Checked	Approved	Date
1	Draft methodology and pilot	A Knight	K Davies	K Davies	17.04.26
2	Full draft report	A Knight T Parwani V Dawes	A Knight J Ginty	K Davies	22.05.26
3					

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Chapter 1
Introduction

Purpose and scope

1.1 The Local Plan Review for Swale Borough Council (SBC) will set out the planning framework for the borough area for the period to 2042, including allocating land for housing, employment and other uses.

1.2 To inform preparation of the Local Plan Review, SBC require updated landscape evidence. LUC has been commissioned to prepare an assessment of selected non-strategic sites where there are likely landscape sensitivity issues in the borough as part of this update.

1.3 The study is not a detailed Landscape and Visual Impact Assessment (LVIA) of the effects of specific development proposals. The aim of the assessment is to ascertain the generic suitability of selected sites in landscape and visual terms to accommodate development in principle, and to determine any site-specific constraints and opportunities for mitigation and enhancement. It does not propose specific enhancements in relation to development proposals, which are likely to require more detailed analysis to establish viability. The landscape assessment does not on its own establish the suitability of any of these sites for allocation but provides SBC with landscape information to help site selection and/or site mitigation.

1.4 The analysis considers 21 sites provided by SBC as shown on **Figure 1.1** and summarised below in **Table 1.1.**

1.5 The assessment draws on existing landscape evidence including the Landscape Character Assessment, previous sensitivity assessments, the assessment of potential Local Landscape Designations and the assessment of Important Local Countryside Gaps. The Swale Landscape Character and Biodiversity Appraisal **[See reference 1]** have been referred to in the assessments. An overview of the Landscape Character Area (LCAs) is provided on **Figure 1.2**.

Table 1.1: Assessed sites

Reference	Site location
SHELAA/393	Land at Lion Field

Reference	Site location
SHELAA/381	Syndale Park, London Road, Faversham, Kent, ME13 0RH
SHELAA/402	Hollybush Farm Caravan Park, Oak Lane, Minster-on- Sea, ME12 3QR
SHELAA/408	Estuary View, Bell Farm Lane, Minster-on-Sea, ME12 4JA
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SHELAA/277	Barrow Green Farm, Barrow Green
SHELAA/206	Land at Norton Ash Garden Centre
SHELAA/119	Land west of Lower Hartlip Road/Munn's Lane
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SHELAA/308	Land south of Forge Lane and Holywell Primary School and East of Chaffes Lane
SHELAA/312	Land off Chaffes Lane
SHELAA/319	Land at Long Field, Chaffes Lane
CFS50	Land East of Faversham expansion
CFS2024/129	Smeed Dean Works, Eurolink Industrial Estate, Castle Road
CFS2024/188	Land north of Keycol Hill (Yellow/Blue parcel)
LPR247 0 (R15)	Lamberhurst Farm,Yorkletts - proposed southern expansion

Reference	Site location
CFS5 (R8)	Waterham Industrial Estate - expansion east

Figure 1.1: Location of assessment sites

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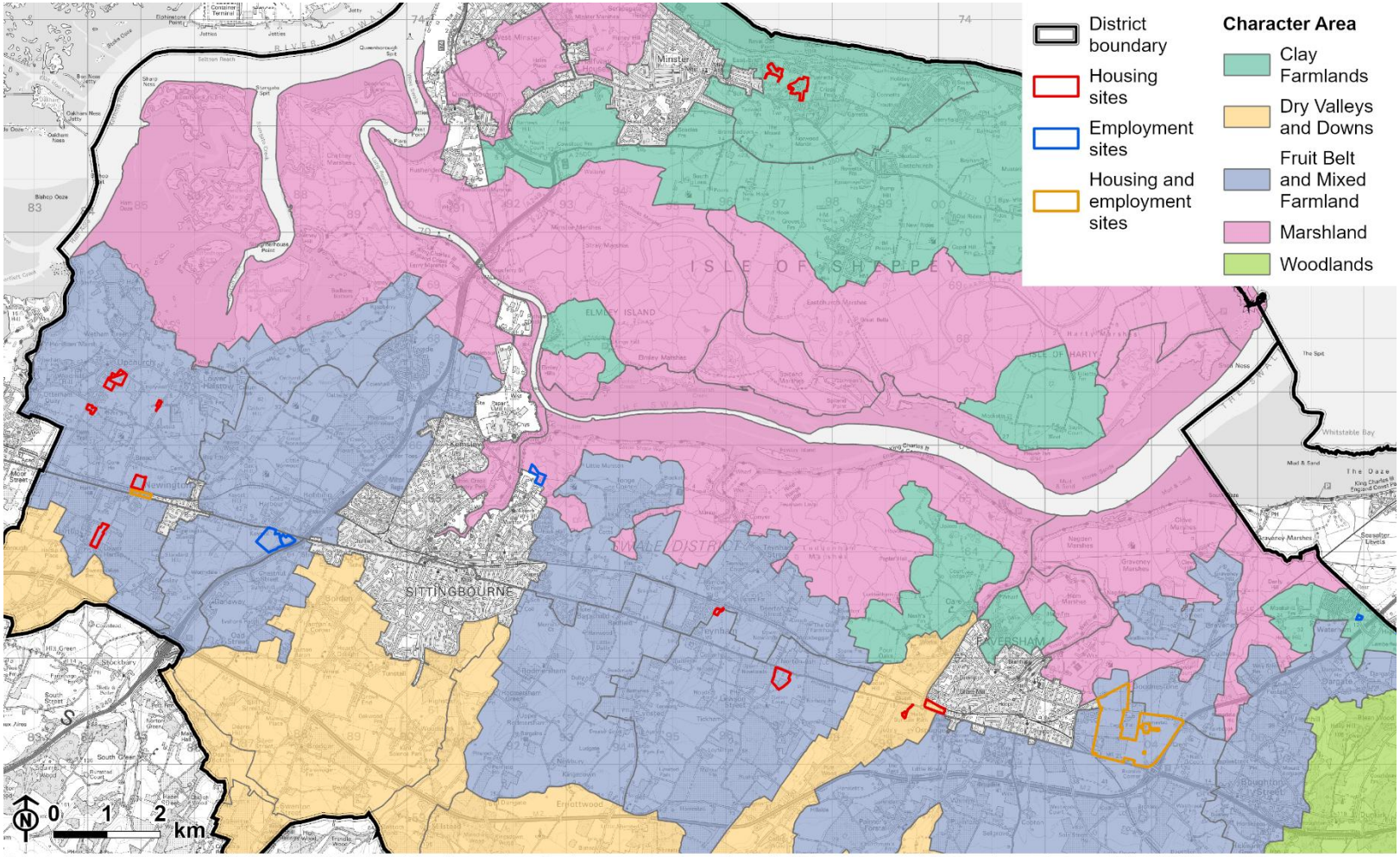
Figure 1.2: Landscape character context



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Assessment methodology

1.6 This assessment draws on Natural England guidance on Landscape Sensitivity Assessment **[See reference** 2**]**. The guidance describes landscape sensitivity, within the context of spatial planning and land management, as:

> "a measure of the resilience, or robustness, of a landscape to withstand specified change… without undue negative effects on the landscape and visual baseline and their value".

1.7 It is a term applied to landscape character (which includes landscape and townscape) and the associated visual resource, combining judgements of their susceptibility to the specific development type, together with the value(s) related to the landscape and visual resource.

1.8 Landscapes within the sites have been assessed, however a list of 'absolute constraints' to development was agreed with SBC and have been excluded from this assessment:

- Swale Flood Zone 3 (representing the highest level of flood risk);
- Statutory national and international ecological designations including Ramsar sites, Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI); and
- Local Green Spaces, sports and playing fields.

Development typologies

1.9 The assessment considers sensitivity to housing and employment development in three different typologies:

- Residential development and associated infrastructure.
- Employment development and associated infrastructure.
- Mixed-use development and associated infrastructure.

1.10 The development typologies represent the generic forms of development most likely to come forward within the borough. In practice, each development application will be considered on its own merit. Individual developments may deviate from the general typologies outlined below. The development types relate to the form of building rather than the quantity of development.

Residential development typology

- Housing developments up to circa 2 hectares in area, including typical dwellings of 2/3 storeys with gardens, at a net density range of 40-60 dwellings per hectare (dph).

Figure 1.3: Typical recent residential development on Hill Farm View at Keycol.

Employment development typology

- Large block warehouse-type buildings, up to circa 2 hectares in area, and typically two storeys high. These could be stand-alone buildings or located within a larger complex of similar warehouses.

Figure 1.4: Typical commercial / industrial units on Mill Way, Sittingbourne.

Mixed-use development typology

- 2-3 storey houses at approximately 30-40 dph, along with small-scale commercial development and community facilities e.g. employment hubs, schools, local centres.

Figure 1.5: Typical mixed-use development at xx

Assessment indicators

1.11 Landscape sensitivity assessment requires judgements on both landscape susceptibility (how vulnerable the landscape is to change from the type of development being assessed, which in this case is built development) and landscape value (consensus about importance, which can be recognised through designation as well as through indicators of value).

1.12 The assessment uses a range of sensitivity indicators as a basis for a qualitative assessment of landscape sensitivity for each potential development site. These are drawn from the Natural England guidance **[See reference** 3**]**, LUC's extensive experience of landscape sensitivity and the precedent of previous sensitivity studies undertaken in Swale. The indicators are:

- Physical character (including landform, scale and field pattern)
- Natural character
- Historic landscape character and time depth
- Character of the settlement and its relationship with the landscape (including coalescence)

- Visual prominence, skyline and views
- Perceptual and scenic qualities (including access and recreation)

1.13 The section below provides descriptors of each of the different indicators for landscape sensitivity and sets out some examples for a 5-point scale sensitivity scoring. As with the overall sensitivity score, these range from High to Low, with examples provided for high, moderate and low scores.

Physical character (including landform, scale and field pattern)

1.14 This considers the shape and scale of the landform, landscape pattern and landscape elements in relation to the scale of potential development. Smooth, gently undulating or flat landforms are likely to be less sensitive to development than a landscape with a more dramatic landform, distinct landform features such as hillocks or scarps, or incised valleys with prominent slopes.

1.15 The indicator considers how developments fit with the scale of the landform (understanding the scale of the development proposed is important when applying this indicator). Larger scale, simple landforms are likely to be less sensitive to larger scale developments than smaller scale, enclosed landforms (where large-scale developments could appear out of scale with the underlying landform). Conversely, smaller developments may be able to be screened within enclosed landforms, therefore reducing landscape sensitivity. Existing small-scale features in the landscape in the form of existing buildings or trees can also influence the scale of development that can be accommodated in the landscape.

Table 1.2: Physical character (including landform, scale and field pattern) sensitivity assessment

Sensitivity	Example
High	The landscape has a dramatic landform or distinct landform features that contribute positively to landscape character; the area has a high density of small-scale landscape features and is overlain by a small-scale field pattern.
Moderate-High	-
Moderate	The landscape has an undulating landform and some distinct landform features; it is overlain by a mixture of

Sensitivity	Example
	small-scale and larger scale field patterns and a moderate density of small-scale landscape features.
Low-Moderate	-
Low	The landscape has smooth, gently undulating or featureless landform with uniform large-scale landscape pattern and low density of overlying landscape features.

Natural character

1.16 This indicator considers the 'naturalistic' qualities of the landscape in terms of coverage of semi-natural habitats and valued natural features (e.g. trees, hedgerows) which could be vulnerable to loss from development. Assessment parcels with frequent natural features (including large areas of nationally or internationally designated habitats) result in increased sensitivity to development, while landscapes with limited natural features (including intensively farmed areas or areas with high levels of existing development) will be less sensitive. Relevant natural heritage designations include Sites of Special Scientific Interest (SSSI), Ancient Woodland, Ramsar, Special Areas of Conservation (SAC), National Nature Reserves (NNR) Local Nature Reserves (LNR) and Local Wildlife Sites (LWS).

Table 1.3: Natural character sensitivity assessment

Sensitivity	Example
High	A landscape with a strong variety in land cover, and /or semi-natural land cover (some designated for their nature conservation interest) with a frequent occurrence of valued natural features.
Moderate-High	-
Moderate	There are some areas of valued semi-natural habitats and features found in the landscape, whilst other areas are intensively farmed or developed.
Low-Moderate	-

Sensitivity	Example
Low	A landscape with uniform land cover, such as intensively farmed arable farmland, or developed with little semi-natural habitat coverage and few valued natural features.

Historic landscape character and time depth

1.17 This considers the extent to which the landscape has 'time-depth' (a sense of being an historic landscape) and/or the presence of heritage assets that are important to landscape character (i.e. Registered Park and Garden, and buildings/structures, visible archaeological remains or other features designated for their historical significance, such as ridge and furrow, or noted in the landscape character assessment).

1.18 Landscapes with small-scale, more irregular field patterns of historic origin are likely to be more sensitive to the introduction of modern development than landscapes with large, regular scale field patterns of modern origin because of the risk of losing characteristic landscape patterns.

Table 1.4: Historic landscape character and time depth sensitivity assessment

Sensitivity	Example
High	A landscape with a high density of historic features important to the character of the area and great time depth (i.e. piecemeal enclosure with irregular boundaries, ridge and furrow).
Moderate-High	-
Moderate	A landscape with some visible historic features of importance to character, and a variety of time depths.
Low-Moderate	-
Low	A landscape with relatively few historic features important to the character of the area and little time depth (i.e. large intensively farmed fields).

Character of the settlement and relationship with the landscape

1.19 This considers the overall settlement form and character of the existing settlement and considers whether development in the landscape would be in accordance with the general pattern and form of current development and relationship with the existing settlement edge. It includes an understanding of the landscape pattern associated with settlement edges (where relevant), for example if it is well integrated by woodland cover or open and exposed to form a 'hard edge' to the adjoining landscape.

1.20 This indicator also considers the extent to which the landscape contributes to the identity and distinctiveness of settlements, by way of its character and/or scenic quality, for example by providing a backdrop, or playing an important part in views from a settlement. These considerations have greater weight when the settlement edge is historic or distinctive (for example if it forms part of a designated Conservation Area or its setting). This also considers the extent to which the area contributes to a perceived gap between settlements (the loss of which would increase coalescence).

Table 1.5: Character of the settlement and relationship with the landscape sensitivity assessment

Sensitivity	Example
High	The area provides an attractive backdrop to the settlement, plays an important part in views from the settlement, or forms an important part in the perception of a gap between settlements. Development in the assessment area would have a poor relationship with the existing settlement form/pattern and would adversely affect an existing settlement edge (which may be historic or distinctive).
Moderate-High	-
Moderate	The area provides some contribution as a backdrop to the settlement, or plays some part in views from the settlement, or plays a role in the perception of a gap between settlements. Development in the assessment area may be slightly at

Sensitivity	Example
	odds with the settlement form/ pattern and may adversely affect the existing edge to some extent.
Low-Moderate	-
Low	The area does not contribute positively to the backdrop of the settlement or play a separation role. Development in the assessment area would have a good relationship with the existing settlement form/ pattern and could provide the opportunity to improve an existing settlement edge.

Visual prominence, skyline and views

1.21 This considers the visual prominence of the site, reflecting the extent of openness or enclosure in the landscape (due to landform or land cover), and the degree of intervisibility with the surrounding landscape (i.e. the extent to which potential development would be visible).

1.22 Visually prominent landscapes are likely to be more sensitive to development than those which are not so visually prominent. Landscapes which are visually prominent and intervisible with adjacent landscapes (both urban and rural) are likely to be more sensitive to development than those which are more hidden or less widely visible.

1.23 It also considers the skyline character of the site including whether it forms a visually distinctive skyline or an important undeveloped skyline. Prominent and distinctive and/or undeveloped skylines, or skylines with important landmark features, are likely to be more sensitive to development because new buildings/structures may detract from these skylines as features in the landscape. Important landmark features on the skyline might include historic features or monuments.

Table 1.6: Visual prominence, skyline and views sensitivity assessment

Sensitivity	Example
High	The area is open and/or has a high degree of visibility from surrounding landscapes, and/or the area forms a

Sensitivity	Example
	visually distinctive skyline or an important undeveloped skyline.
Moderate-High	-
Moderate	The area is semi-enclosed or has some enclosed and some open areas. It is likely to have some intervisibility with surrounding landscapes and may have some visually distinctive or undeveloped skylines within the area.
Low-Moderate	-
Low	The area is enclosed/visually contained and/or has a low degree of visibility from surrounding landscapes and the area does not form a visually distinctive or important undeveloped skyline.

Perceptual and scenic qualities (including access and recreation)

1.24 This considers qualities such as the rural character of the landscape (traditional land uses with few modern human influences), scenic qualities, sense of remoteness, and the extent of public access via Public Rights of Way (PRoW) and/or Open Access Land.

1.25 Landscapes that are relatively remote or tranquil (due to freedom from human activity and disturbance and having a perceived naturalness or a traditional rural feel with few modern human influences) tend to increase levels of sensitivity to development compared to landscapes that contain signs of modern development. High scenic value also adds to sensitivity in relation to this indicator. This is because development will introduce new and uncharacteristic features which may detract from scenic value or remoteness/naturalness.

1.26 Landscapes nationally designated for their natural beauty (i.e. within the Kent Downs National Landscape) will be highly sensitive, particularly where development threatens the landscape's 'special qualities'.

Table 1.7: Perceptual and scenic qualities (including access and recreation) sensitivity assessment

Sensitivity	Example
High	A highly rural landscape, lacking strong intrusive elements. A landscape of high scenic value and a high perceived degree of rural character and naturalness. Extensive public access via PRoWs/open access land. The site may be in the setting of, or have intervisibility with, the Kent Downs National Landscape.
Moderate-High	-
Moderate	A landscape with some sense of rural character, but with some modern elements and human influences. Some PRoW/small, isolated areas of open access land.
Low-Moderate	-
Low	The area is significantly influenced by development/ human activity, where new development would not be out of character. Low or no public access.

Making judgements on levels of landscape sensitivity

1.27 For each assessment parcel, a commentary is provided against each sensitivity indicator and a score determined (as detailed above). This judgement relates to a generic sensitivity of each aspect of the landscape to the principle of built development. The commentary provided for each sensitivity indicator then informs the subsequent judgement on the overall landscape sensitivity of the assessment parcel to the specific development type (residential, commercial or mixed-use as described in **Table 2.2**). A five-point scale from 'low' to 'high' landscape sensitivity is used to define levels of landscape sensitivity for both of these judgements, as shown in **Table 2.7**.

Table 1.8: Visual prominence, skyline and views sensitivity assessment

Sensitivity	Example
High	The key characteristics and qualities of the landscape are highly sensitive to change. It is unlikely to be able to accommodate the proposed change without significant character change/adverse effects.
Moderate-High	The key characteristics and qualities of the landscape are sensitive to change. There may be very limited situations/locations where the relevant change can be accommodated.
Moderate	Some of the key characteristics and qualities of the landscape are sensitive to change. It may have some potential to accommodate the relevant change in defined locations.
Low-Moderate	Few of the key characteristics and qualities of the landscape are sensitive to change. They are resilient and have some potential to accommodate the change proposed.
Low	The key characteristics and qualities of the landscape are robust and are either unlikely to be subject to change or are not sensitive to the change proposed.

1.28 The five defined levels of landscape sensitivity form stages on a continuum, rather than clearly separated categories. Any given landscape may or may not fit neatly into one category, and an element of professional judgement is required.

1.29 As with all assessments based upon data and information which is to a greater or lesser extent subjective, some caution is required in its interpretation. This is to avoid the suggestion that certain landscape features or qualities can automatically be associated with certain sensitivities – the reality is that an assessment of a landscape's sensitivity to development is the result of a complex interplay of often unequally weighted variables (or 'indicators').

1.30 There may be one indicator that has a strong influence on landscape sensitivity in a particular assessment parcel which increases the overall landscape sensitivity score. In addition, it may be that a proportionally small area of the assessment parcel may raise the sensitivity of the entire assessment parcel. There may also be indicators that produce conflicting scores. For example, a small-scale landscape with historic field patterns may be considered as high sensitivity for 'Historic character and time-depth' but may also afford greater screening of development from topography and a dense network of hedgerows, and therefore score as low sensitivity for visual prominence, skyline and views.

1.31 The judgement of overall landscape sensitivity is therefore based on transparent professional analysis, rather than a mechanical process of addition. All indicators are taken into account in the context of their importance to the landscape character and quality of the assessment parcel.

Limitations of the study

1.32 This study provides an assessment of the landscape sensitivity of the different sites to residential, employment or mixed-use development, without knowing the exact location, layout, design or mitigation proposed. It therefore should not be interpreted as a definitive statement on the suitability of a certain location for a particular development. It is commensurate with the level of detail associated with a Local Plan. It is not a replacement for detailed studies for specific siting, and design and all developments will need to be assessed on their individual merits.

1.33 It is also worth noting that the LSA considers the following:

- The natural character of the landscape but not specific ecological issues in relation to species or habitats.
- The historic and cultural character of the landscape but not specific cultural heritage/archaeological issues associated with individual designated heritage assets and their settings.
- The visual character of the landscape but not visual amenity issues associated with specific receptors, such as the overall quality, experience and nature of public views from specific locations such as promoted viewpoints, or of private views and outlook available to occupants of residential properties.

1.34 These are all issues that will need to be taken into account at later stages in the planning process for those sites that are allocated in the Local Plan. The impacts will need to be reported at the time when individual proposals are put forward at the planning application stage. These can be addressed through planning applications

and Environmental Impact Assessment (EIA) process including more detailed landscape and visual impact assessments (LVIAs) or landscape and visual impact appraisals (LVAs), if appropriate.

Presentation of results

1.35 For each site the following information is provided:

- A brief description of the site location and existing landscape / land cover.
- A map of the site and surrounds (on an aerial base) showing the location.
- A map of the site and surrounds (on a 1:25,000 OS base) showing the designations noted above.
- A description of the key characteristics of the relevant Landscape Character Area, taken from the Landscape Character Assessment.
- Two representative photos.
- An analysis of landscape and visual sensitivity under subheadings for each of the indicators listed above. A judgement on the level of sensitivity on a 5-point scale for each indicator.
- A summary of overall sensitivity, with any identified clear and sizable variations in sensitivity.
- A summary of the potential effects the development typology could have on the site.
- A summary of the potential for mitigation and enhancement.
- An illustrated map of the site and surrounds indicating key constraints and opportunities, summarising the information within the assessment.

Chapter 2
Summary of findings

2.1 Table 3.1 provides a summary of the typical sensitivity of each site to both residential development and employment development. The detailed assessments are presented in **Appendix A** which also outlines any variations in sensitivity.

Table 2.1: Assessed sites

Reference	Site location	Development typology	Sensitivity
SHELAA/393	Land at Lion Field	Housing	Moderate
SHELAA/381	Syndale Park, London Road, Faversham, Kent, ME13 0RH	Housing	Moderate
SHELAA/402	Hollybush Farm Caravan Park, Oak Lane, Minster-on-Sea, ME12 3QR	Housing	Moderate
SHELAA/408	Estuary View, Bell Farm Lane, Minster-on-Sea, ME12 4JA	Housing	Low-Moderate
SHELAA/412	Golden Leas Holiday Park, Bell Farm Lane, Minster-on-Sea, ME12 4JA	Housing	Low-Moderate
CFS2024/126 (south of railway line)	Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY	Housing	Low-Moderate
CFS2024/126 (south of railway line)	Amethyst Horticulture, Land at Newington	Employment	Low-Moderate

Reference	Site location	Development typology	Sensitivity
	Nurseries, London Road, Newington, ME9 7NY		
SHELAA/368 (north of railway line)	Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY	Housing	Moderate
SHELAA/277	Barrow Green Farm, Barrow Green	Housing	Low-Moderate
SHELAA/206	Land at Norton Ash Garden Centre	Housing	Moderate
SHELAA/119	Land west of Lower Hartlip Road/Munn's Lane	Housing	Moderate
SHELAA/324	Home Farm, Breach Lane, Lower Halstow, ME9 7DB	Housing	Low-Moderate
SHELAA/310	Land adjacent to Oak Lane - Chaffes Lane (Site B)	Housing	Low-Moderate
SHELAA/306	Land at Forge Lane, Upchurch	Housing	Moderate
SHELAA/308	Land south of Forge Lane and Holywell Primary School and East of Chaffes Lane	Housing	Moderate
SHELAA/312	Land off Chaffes Lane	Housing	Moderate

Reference	Site location	Development typology	Sensitivity
SHELAA/319	Land at Long Field, Chaffes Lane	Housing	Moderate-High
CFS50	Land East of Faversham expansion	Housing	Moderate
CFS50	Land East of Faversham expansion	Employment	Moderate-High
CFS50	Land East of Faversham expansion	Mixed	Moderate
CFS2024/129	Smeed Dean Works, Eurolink Industrial Estate, Castle Road	Employment	Moderate
CFS2024/188	Land north of Keycol Hill (Yellow/Blue parcel)	Employment	Moderate
LPR247 0 (R15)	Lamberhurst Farm,Yorkletts - proposed southern expansion	Employment	Low-Moderate
CFS5 (R8)	Waterham Industrial Estate - expansion east	Employment	Low-Moderate

Chapter 3
Development guidance principles

3.1 In addition to the guidelines set out in the Swale Landscape and Biodiversity Character Assessment, all types of development should aim to:

- Be sensitively sited and designed with scale, form, detailing, and materials to be in-keeping with existing settlement form and vernacular, and to avoid being overly visually intrusive.
- Be sited carefully to relate to the existing settlement pattern, retaining the individual identity of settlements and avoiding the perception of piecemeal development along roads and/or a sense of merging with other settlements.
- Promote the use of traditional materials and signage features, particularly in proximity to more historic parts of settlements such as conservation areas, and in order to limit urbanising effects along roads.
- Retain tree / vegetation cover that is essential to the character of an area and consider opportunities for new planting using locally appropriate species, to help integrate new development within the landscape.
- Ensure new landscape components are in character with the locality, form part of a coherent green infrastructure network and provide ecosystem services. The latter could include increasing pollinating insects, providing water storage, preventing soil erosion, enhancing water quality and enhancing sense of place.
- Enhance internationally, nationally and locally important habitats and species through appropriate landscape management.
- Encourage sustainable and multi-purpose woodlands and promote traditional woodland management techniques with local landowners.
- Maintain, manage and expand priority habitats (including broadleaf woodland and species rich grassland) and hedgerow networks, aiming to link existing and new habitats to help minimise impacts on, and provide net gains for, biodiversity in the borough.
- Preserve areas of historic field patterns and parkland as well as historic features and landscape elements that enhance their settings.
- Manage and enhance recreational resources to provide public enjoyment, while protecting areas of high ecological importance and appropriately siting any associated features (such as car parks and picnic areas) to avoid impacting the rural character of public footpath/bridleways which cross the area.

3.2 In addition, employment development (whether stand alone or as part of a mixed-use development) should aim to:

- Ensure changes in level are sympathetic to existing contours, avoiding excessive cut and fill and the creation of unnatural landform or features where possible. Where unavoidable, changes in level should be able to accommodate appropriate landscape treatment to enhance the local character and biodiversity.
- Ensure that, where required for security purposes, fencing is integrated with any proposed landscape treatments, avoiding proximity to publicly accessible areas such as roads and recreational resources.
- Avoid unnecessary security and operational lighting wherever possible, ensuring that light spill is minimised, and suitable direction cut-off lighting is used, ensuring that sensitive habitats and species are not affected, along with other nearby land uses.

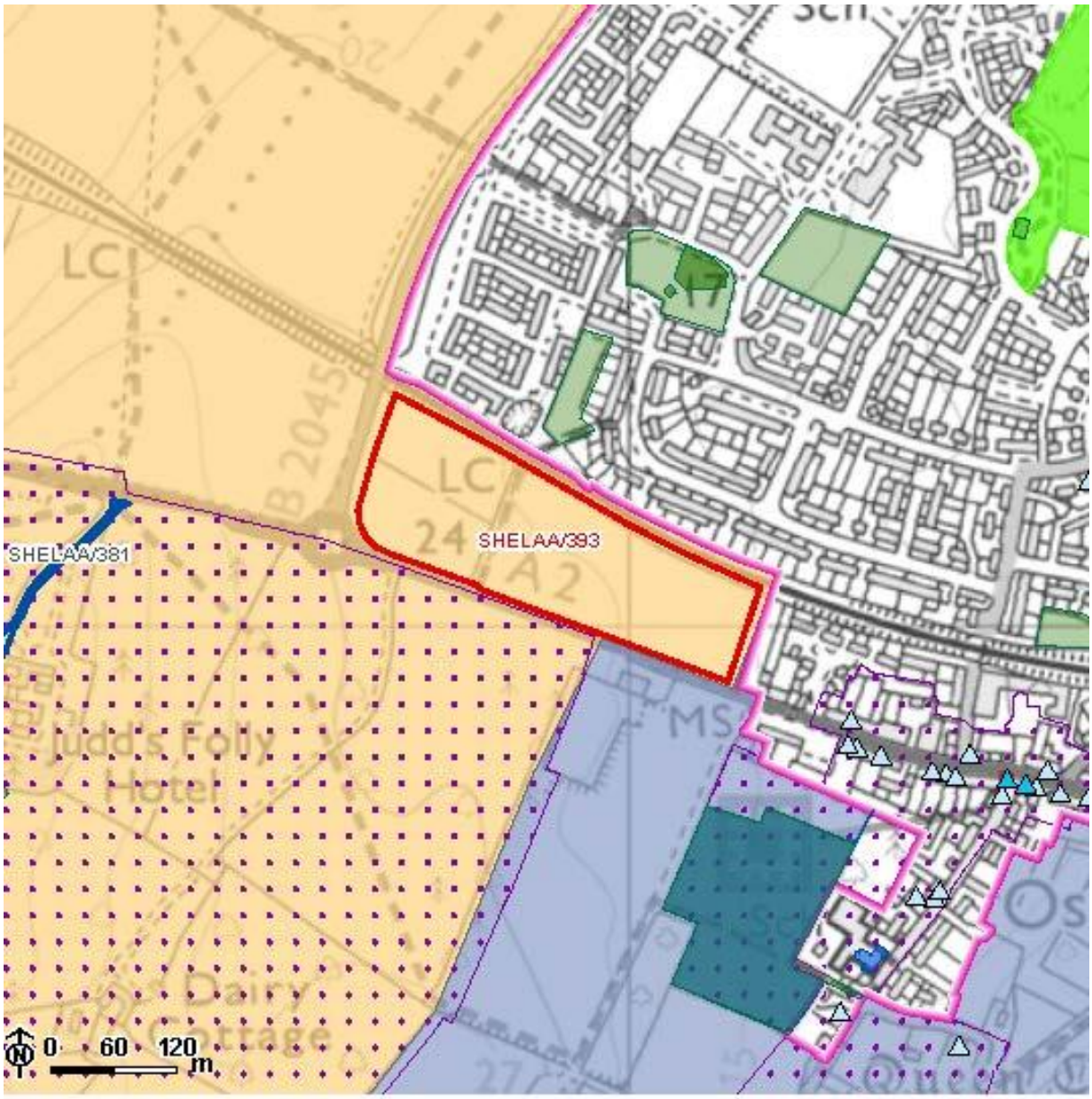
Appendix A
Detailed site assessments

SHELAA/393 Land at Lion Field

Figure A.1: Location and context map

Created by LUC - 15034_Swale_LSA/15034_001_Site_Location_A4P 14/04/2026
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor

Figure A.2: Site constraints



Created by LUC - 15034_Swale_LSA/15034_002_Site_Constraints_A4P 16/04/2026
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor

Location and description

The site lies to the south-west of Faversham. The site consists of three small fields, two smaller grassed fields in the west and a large field in arable use to the east.

Landscape character

A.1 The site lies wholly in LCA 36 Doddington and Newnham Dry Valleys. The key characteristics of the LCA are:

- Gently sloping landscape through which cut numerous dramatic dry chalk valleys.
- Geology of chalk and clay-with-flints.
- Upper slopes of enclosed rolling farmland.
- Extensive mature oak and ash woodlands also coppice sweet chestnut and hazel woodlands used for timber production.
- Mixed land use of small to medium scale orchards and large-scale arable fields.
- Settlement is widespread and small-scale with many traditional vernacular building styles.
- Properties date from the 16th to 20th centuries.
- Transportation routes include M2, A2, railway line and many narrow lanes.
- Historic parklands, including archaeological interest at Syndale Park.

Figure A.3: South-east corner of the site from the A2 London Road

Figure A.4: Public right of way within the site looking to Austin Mews.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat, lying around 20 metres AOD, rising very gently to the west.
- The medium scale field pattern has been subdivided in the east, close to the B2045.
- Small scale landscape features include hedgerows on the south-western boundary on the A2, and vegetation and hedgerows in the west of the site.

Physical character sensitivity	**Low-Moderate**

Natural character

- The larger eastern field is in arable use, while the smaller western fields are unused grassland.
- There are no recorded priority habitats. However low-lying hedgerows with occasional hedgerow trees along the A2, a wide vegetated field boundary on the eastern edge, and mature trees, newly planted trees and hedgerows in the west, including an alder shelterbelt, provides semi-natural habitat coverage.

Natural character sensitivity	**Low-Moderate**

Historic landscape character and time depth

- There are no recorded historic features within the site. The site has been in long-term agricultural use, although historic mapping indicates it was previously partly in orchard use. Although the fields have been subdivided, the site retains some semblance of the medium-scale historic field pattern.
- The Syndale Conservation Area lies south of the A2, adjacent to the south-west of the site. There is clear intervisibility with the parkland at Syndale, within the conservation area. The Conservation Area in the village of Ospringe lies approximately 100m to the east, however due to intervening housing there is a

limited relationship between the site and the conservation area. The A2 along the southern boundary follows the route of the Roman Watling Street.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the west of Ospringe and south of Faversham. It forms part of the rural approach and backdrop to Faversham and Ospringe from the west. Development of the site would extend settlement along the A2 and alter the rural approach. If the site is developed, the rural approach to Faversham/Ospringe would be retained by the open Syndale Park parkland to the south of the A2.
- Although Faversham and Ospringe have now coalesced, Ospringe retains a distinct village identity, as set out in the Conservation Area Appraisal.
- Development of the site would further extend development along the A2, resulting in continuous development from the B2045 to new development east of Love Lane. However, this has already occurred to the north of the railway line and therefore would be in accordance with the general pattern and form of Faversham.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is relatively open, with no or low hedgerows along the A2 allowing views into the site from the road and fields within the Syndale parkland to the south. There are glimpsed views south to the tower of St Peter and St Paul's, Ospringe, and in the west the distant woodland of the Blean can be seen on the horizon.

- Views from the west are restricted by mature vegetation along the B2045, although there are some glimpsed views from the elevated railway bridge. Limited vegetation along the northern boundary of the site allows views from the railway line and views into the site from Austin Mews to the north of the railway. Views from the east are restricted by mature vegetation on the eastern boundary.
- The site is relatively flat with an undeveloped skyline, which does not form a prominent feature in the wider landscape.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- A public right of way crosses the west of the site and provides access across the railway line into Faversham. The public right of way is partially enclosed by trees and shelterbelts, although there are some open views across the site.
- The site retains some sense of rural character however, proximity to the A2 provides a constant source of traffic noise. There are views towards Austin Mews to the north, and trains travelling along the railway line. The garage on the A2 opposite the site also detracts from the rural character.
- The A2 is unlit, however light pollution from Faversham and Ospringe impact the experience of dark night skies within the site.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

- The access along the public right of way, intervisibility with the Syndale parkland Conservation Area to the south, mature vegetation on the eastern and western boundary and the rural approach the site provides to Faversham and Ospringe increase sensitivity to housing development.

- The limited natural and cultural heritage features, generally flat topography and proximity to the A2 and development within Faversham and Ospringe reduce sensitivity to housing development.
- It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

Potential effects on landscape character and features

A.2 Residential development on the site could:

- Result in the loss of the existing medium-scale field pattern and agricultural land use.
- Result in the loss of low-lying hedgerows and occasional hedgerow trees along the A2, the wide vegetated field boundary on the eastern edge, hedgerows which subdivide the western fields and newly planted trees within the western fields.
- Block the intervisibility with, and rural backdrop to, the parkland, part of Syndale Conservation Area, to the south-west.
- Detract from the rural approach to Ospringe experienced along the A2.
- Alter and/or block views into the site from Austin Mews to the north.
- Alter the experience and views of people using the public right of way through the site.

Potential for mitigation and enhancement

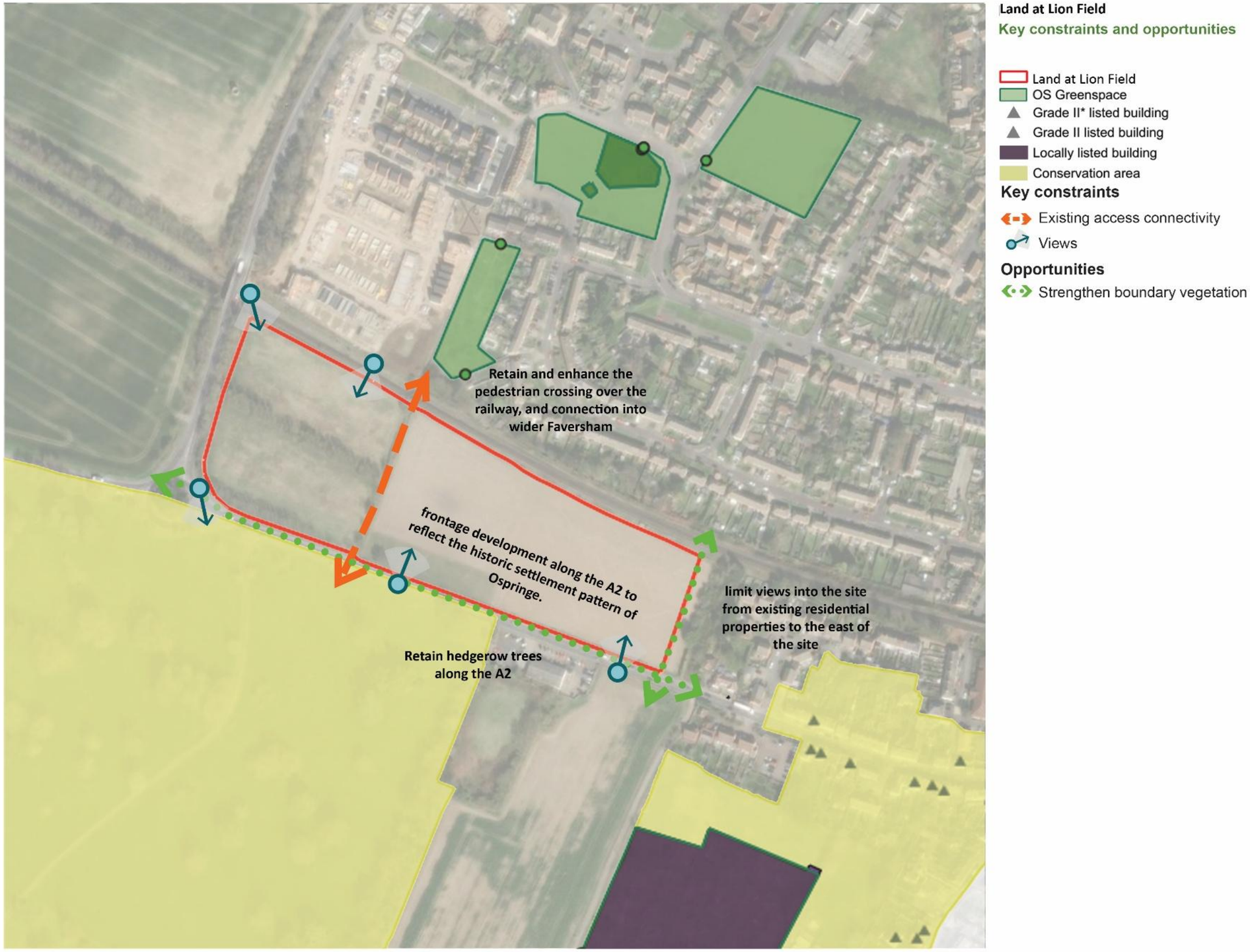
A.3 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- The mature wide vegetated field boundary on the eastern edge should be retained, protected and enhanced to limit views into the site from existing residential properties to the east of the site.

- The newly planted trees and existing shelterbelts in the south-western field should retained to provide a biodiversity area, and to reduce the visibility of new development from the Syndale parkland to the south. Where possible, post and wire fencing should be replaced with hedgerows.
- Retain and enhance the pedestrian crossing over the railway, and connection into wider Faversham. Development should be set back from the public right of way which crosses the site, to retain a rural character and experience for people using the route. Any new hedgerows should be in character with the locality, using native species where possible.
- Retain glimpsed views south to the Ospringe church tower, and east towards the Blean woodland.
- Ensure building heights in the south closer to the A2 reflect the heights of the adjacent settlement edge in Ospringe to the east. Taller development, reflecting Austin Mews to the north, could be positioned in the north-west and along the railway line.
- Consider frontage development along the A2 in the east of the site to reflect the historic settlement pattern of Ospringe. Use materials which reflect the brick-built town houses and cottages, some of which are painted, within Ospringe.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 4**]** and use dark sky-friendly lighting.

A summary map indicating the key constraints and opportunities is shown on **Figure A.5** below

Figure A.5: Opportunities and constraints

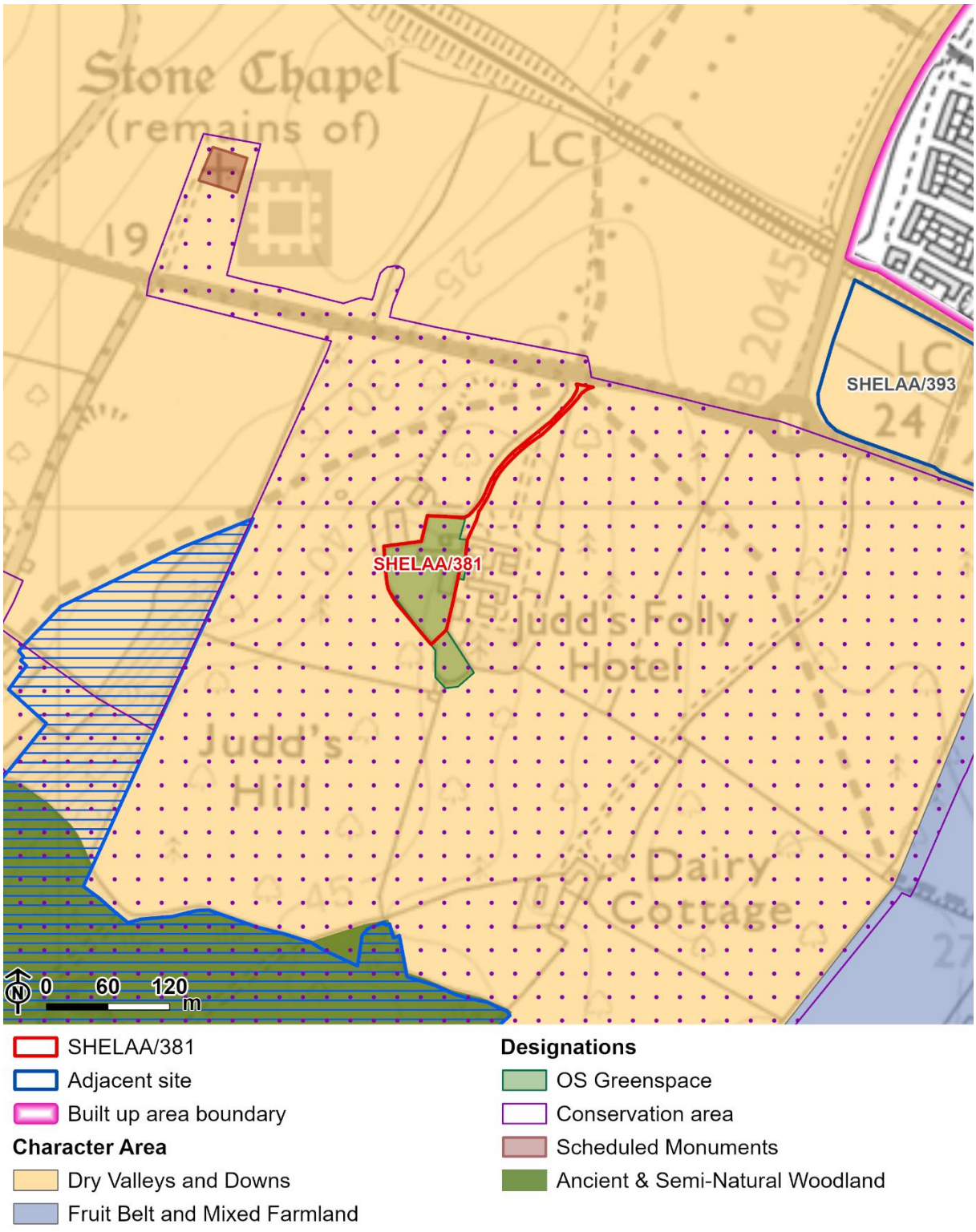


SHELAA/381 Syndale Park, London Road, Faversham, Kent, ME13 0RH

Figure A.6: Location and context map

Created by LUC - 15034_Swale_LSA/15034_001_Site_Location_housing_A4P 05/05/2026
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.7: Site constraints



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Location and description

The site lies to the south-west of Faversham, south of the A2 London Road. It comprises the Syndale Sports and Leisure Centre, associated buildings, car parking, amenity grassland and a small, grassed field to the south-west.

Landscape character

A.4 The site lies wholly in LCA 36 Doddington and Newnham Dry Valleys. The key characteristics of the LCA are:

- Gently sloping landscape through which cut numerous dramatic dry chalk valleys.
- Geology of chalk and clay-with-flints.
- Upper slopes of enclosed rolling farmland.
- Extensive mature oak and ash woodlands also coppice sweet chestnut and hazel woodlands used for timber production.
- Mixed land use of small to medium scale orchards and large-scale arable fields.
- Settlement is widespread and small-scale with many traditional vernacular building styles.
- Properties date from the 16th to 20th centuries.
- Transportation routes include M2, A2, railway line and many narrow lanes.
- Historic parklands, including archaeological interest at Syndale Park.

Figure A.8: View looking east at existing buildings on site from western boundary.

Figure A.9: View looking west from the site across parkland towards public right of way.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site gently rises from the A2 at 35 metres AOD to 45 metres AOD at the top of Judd's Hill to the south-west.
- The small-scale site is largely developed, an access road runs south-west off the A2 London Road, buildings and car parking occupy the north of the site and amenity grassland covers the south of the site. The presence of small-scale landscape feature on the site is limited.

Physical character sensitivity	Low-Moderate

Natural character

- The south of the site is covered by amenity grassland. Naturalistic features in the north of the site are limited due to the long-term leisure and sports use.
- There are no priority habitats recorded within the site.

Natural character sensitivity	Low

Historic landscape character and time depth

- The site lies within the Syndale Conservation Area and forms part of the historic Syndale Park landscape. The crest of Judd's Hill was the site of Syndale House, a 17th century neo-Palladian country house. The house was destroyed by fire in 1961 and replaced by the American-style Syndale Park Motel that still stands behind the mid-19th century stable yard. The roof boxes and skyline features of the stable are noted in the conservation area appraisal alongside on-site Roman remains as significant.
- The Ospringe Conservation Area lies approximately 600 metres to the east, but the relationship is limited due to distance and intervening development.

Historic landscape character and time depth sensitivity	**Moderate-High**

Character of the settlement and relationship with the landscape

- Development of the site would extend built form south of the A2 London Road.
- The site forms part of the rural approach to Ospringe and Faversham from the west along the A2. Built development would reduce the rural character of this approach, changing the nature of development on a site that sits on the transition between settlement and countryside. Open land to the south of the A2 would continue to provide a rural backdrop to the settlements.
- Existing buildings associated with the leisure centre and Judds Folly Hotel enclose the northern and eastern boundaries, but the open southern and western edges contribute to the wider rural setting and the historic landscape of Syndale Park.
- Development could weaken the legibility of the historic parkland setting and reduce the sense of arrival when approaching Faversham and Ospringe from the west.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is visible from PRoW's to the east and west that run through the Syndale Parkland. Limited boundary vegetation and elevated topography increase visibility from surrounding farmland.
- Views from the A2 to the north are screened by roadside vegetation and the setback nature of the site.
- The skyline is topographically elevated with distinctive skyline features associated with the mid-19th century stable yard buildings. The openness of the southern and western edges increases susceptibility to visual change.

- Views from the east are restricted by buildings associated with Judds Folly Hotel, while views from the west remain open due to limited vegetation. Dispersed mature trees in the parkland to the west limit views of the site from Faversham Road to the west.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access to the site, beyond current access to the leisure centre. Public rights of way run through Syndale Park to the north-east and north-west from the A2 London Road.
- The site retains some rural character along the open southern and western edges, although proximity to the A2 introduces constant traffic noise and activity.
- The A2 is unlit, however light pollution from Faversham and Ospringe impacts the experience of dark skies on site.
- The presence of leisure and sports facilities reduces perceptual sensitivity within the site, but it still contributes to the rural approach and the wider scenic qualities of the historic Syndale landscape.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.5 The location within the Syndale Conservation Area and the historic Syndale Park landscape, existing historic buildings, raised topography, open southern and western edges, and contribution to the rural approach to Ospringe and Faversham, increase the sites sensitivity to residential development.

A.6 The lack of natural features and habitat areas alongside the modern motel complex reduce the sites sensitivity to housing development.

A.7 It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

Potential effects on landscape character and features

A.8 Residential development on the site could:

- Result in the loss of amenity grassland and remaining open elements of the historic Syndale Park landscape.
- Lead to the removal or alteration of boundary vegetation along the open southern and western edges.
- Erode the rural approach to Ospringe and Faversham experienced along the A2 London Road.
- Affect the character and historic significance of the Syndale Conservation Area, which the site lies within.
- Change existing skyline features and open views to the south and west.
- Change the experience of users accessing the PRoW's through Syndale Part to the west and east and approaching the site from the access road and the A2.
- Introduce lighting and activity that could reduce the perceived rural qualities of the surrounding landscape.

Potential for mitigation and enhancement

A.9 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Soften the southern and western boundaries with selected specimen tree planting utilising management strategies in keeping with the surrounding Syndale Parkland to reduce visibility and reinforce the rural edge.
- Maintain open space at the crest of Judd's Hill in the south of the site to preserve elements of the historic parkland character.

- Ensure development is set back from the A2 to maintain the rural approach to Ospringe.
- Reinforce vegetation along the access track to soften views into the site.
- The height of development, use of materials and building forms that reflect the traditional vernacular associated with the Syndale Conservation Area. Maintain open views to the roofline features of the stable buildings.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 5**]** and use dark sky-friendly lighting.

A.10 A summary map indicating the key constraints and opportunities is shown on **Figure A.10** below.

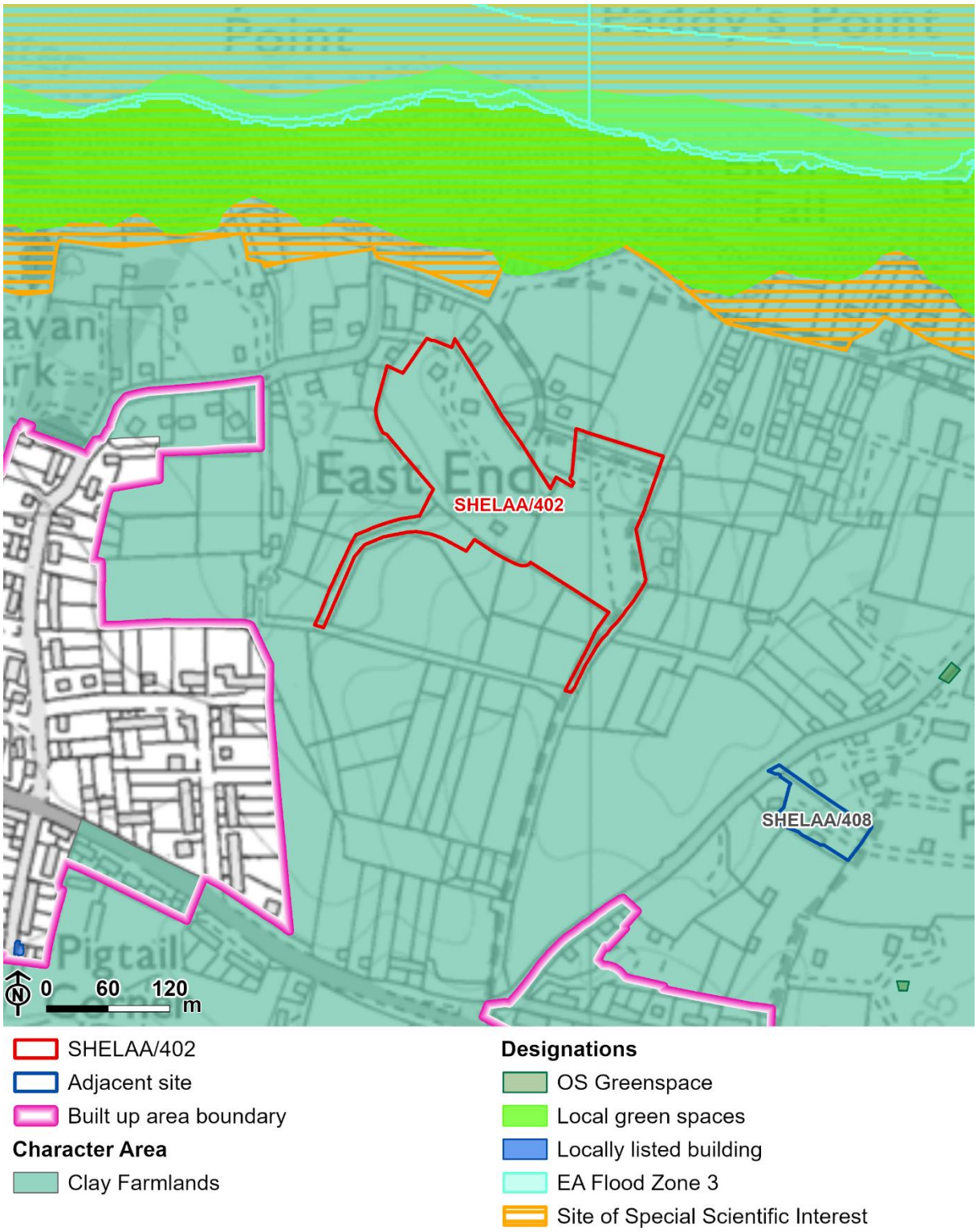
Figure A.10: Opportunities and constraints

SHELAA/402 Hollybush Farm Caravan Park, Oak Lane, Minster-on- Sea, ME12 3QR

Figure A.11: Location and context map

Created by LUC - 15034_Swale_LSA/15034_001_Site_Location_housing_A4P 05/05/2026
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.12: Site constraints



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Location and description

The site lies to the east of Minster. It comprises the existing Hollybush Farm Caravan Park with open grassland, caravan pitches, storage areas and internal access tracks. The site is enclosed by residential development to the north and west. There is mature vegetation to the south and sparse vegetation with open views to the east and south-east.

Landscape character

A.11 The site lies wholly in LCA 16 Minster and Warden Farmlands. The key characteristics of the LCA are:

- Rolling farmland rising southwards from the marshland edge.
- Complex geology of Clay, brickearth, and gravel.
- Large-scale arable fields with pockets of grazing and remnant orchards.
- Fragmented mature hedgerows along narrow rural lanes.
- Dispersed settlement pattern of small villages, hamlets and isolated farmsteads.
- Traditional buildings dating from the 17th to 19th centuries with limited modern infill.
- Mixed perceptual character combining rural tranquillity with urban-fringe influences.
- Access via narrow winding lanes connecting settlements and historic routes.

Figure A.13: View of the site looking north-west from the public right of way.

Figure A.14: View looking east from the public right of way on the site towards existing settlement, Mill Hill

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The site occupies gently sloping land falling westwards from around 60m to 45m AOD.
- The internal structure is enclosed and large-scale due to the caravan park layout, with limited small-scale landscape features.

Physical character sensitivity	**Moderate**

Natural character

- Natural features are limited by the existing caravan park. The east of the site contains semi-improved grassland is present to the east, and there are sparse trees and hedgerows in the south-west and west. Boundary hedgerows are present on all sides but vary in strength, with the southern boundary being the most robust.

Natural character sensitivity	**Low-Moderate**

Historic landscape character and time depth

- There are no recorded historic features within the site. Two Grade II listed buildings (East End Farmhouse and Illogan) lie to the north-west. Although the site forms part of their wider landscape context it does not strongly influence their immediate setting due to intervening development and vegetation. The introduction of the caravan site has removed any evidence of historic land use.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the east of the built-up area of Minster. It adjoins a fragmented and irregular settlement edge at East End along Oak Lane, characterised by back-garden boundaries and piecemeal development.
- The site is already developed as a caravan park, however permanent development on the site would reinforce the impression of East End as part of Minster. It would extend the settlement eastwards into a more open landscape. The site does not play a significant role in settlement separation, as it is already developed.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is enclosed to the north and west by residential development and vegetation. The eastern and south-eastern edges are more open, allowing outward views across the rising landform of the wider Warden and Minster farmlands. The east of the site occupies higher ground and forms part of a local skyline when viewed from lower land to the west.
- Vegetation along the public right of way on the northern and eastern boundaries restrict views into the site, although in the east there are more open views.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- The site has a semi-rural character influenced by the caravan park, nearby residential development and local road activity. Tranquillity is reduced by human activity associated with the caravan park and settlement edge.

- The Oak Lane is unlit, however light pollution from East End and Kingsborough impact the experience of dark night skies within the site.
- A public right of way along the northern and eastern boundaries provides access and occasional views into the site, particularly from the eastern boundary.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.12 Features which increase sensitivity are the open eastern edge, localised visual prominence and access along the eastern edge. Features which reduce sensitivity are the existing caravan park development within the site, limited natural and cultural heritage features and proximity to existing development to the north and west. Sensitivity is higher in the east of the site where openness and elevation increase visibility.

A.13 It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

Potential effects on landscape character and features

A.14 Residential development on the site could:

- Result in the loss of semi-improved grassland and the open internal character of the caravan park.
- Lead to the removal or alteration of boundary hedgerows, particularly along the more open eastern and southeastern edges.
- Increase built form on elevated land to the east, affecting the local skyline and altering views from PRoW along the northern and eastern boundaries.

- Reinforce the fragmented and irregular settlement edge along Oak Lane.
- Reduce the perceived rural backdrop to the east of Minster by extending development into a more open and visually exposed part of the landscape.
- Introduce lighting and activity that could diminish the semi-rural perceptual qualities of the eastern part of the site.

Potential for mitigation and enhancement

A.15 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Retain and strengthen the southern boundary hedgerow to reinforce an existing strong landscape edge and reduce visibility from the PRoW.
- Enhance the eastern and south-eastern boundaries with native hedgerow planting and small woodland blocks to limit views into the site and soften the transition to open countryside.
- Focus development within the more enclosed western and central areas of the site, avoiding the elevated eastern grassland where visual sensitivity is higher.
- Create a more coherent and vegetated settlement edge along Oak Lane, addressing existing fragmentation and improving integration with the surrounding landscape.
- Incorporate species-rich grassland margins and hedgerow enhancements to support the adjacent Biodiversity Opportunity Network and improve ecological connectivity.
- Minimise lighting associated with new development and use dark-sky-friendly fittings to reduce night-time visual effects.

A.16 A summary map indicating the key constraints and opportunities is shown on **Figure A.15** below

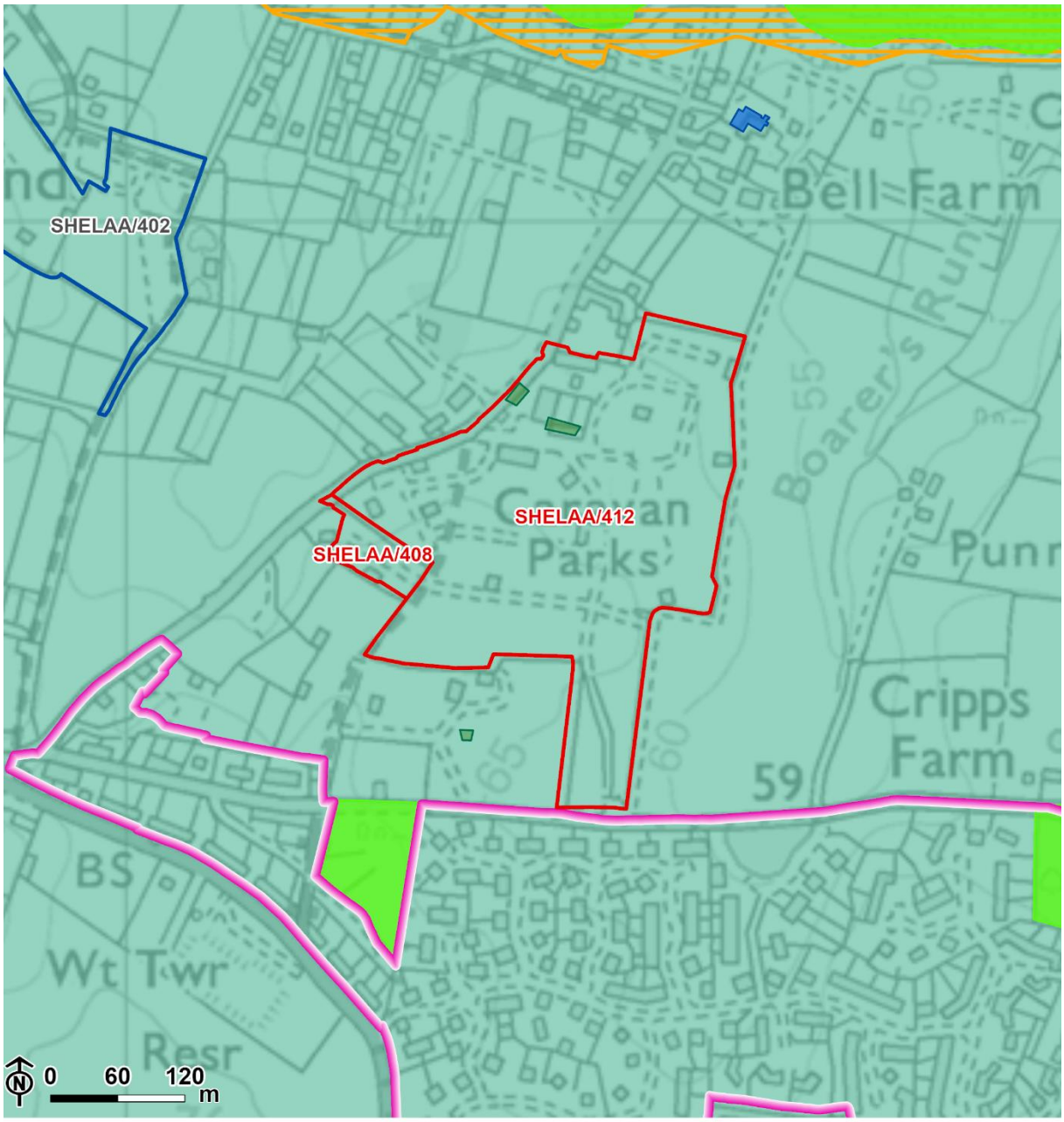
Figure A.15: Opportunities and constraints

Bell Farm Lane, Minster-on-Sea, ME12 4JA (SHELAA/408 and SHELAA/412)

Figure A.16: Location and context map

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.17: Site constraints



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Location and description

The sites lie to the east of Minster and north of Kingsborough. They comprise Golden Leas Holiday Park, including caravan pitches, storage areas, play spaces and internal access tracks.

Landscape character

A.17 The site lies wholly in LCA 16 Minster and Warden Farmlands. The key characteristics of the LCA are:

- Rolling farmland rising southwards from the marshland edge.
- Complex geology of Clay, brickearth, and gravel.
- Large-scale arable fields with pockets of grazing and remnant orchards.
- Fragmented mature hedgerows along narrow rural lanes.
- Dispersed settlement pattern of small villages, hamlets and isolated farmsteads.
- Traditional buildings dating from the 17th to 19th centuries with limited modern infill.
- Mixed perceptual character combining rural tranquillity with urban-fringe influences.
- Access via narrow winding lanes connecting settlements and historic routes.

Figure A.18: View of the site boundary looking north-west from Plough Road.

Figure A.19: View of the site looking east across fields from public right of way to the west.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The sites occupy sloping land that falls north-eastwards from approximately 60m AOD to 65m AOD.
- The internal structure is enclosed and large-scale due to the holiday park layout, with limited landscape features.
- Boundaries are generally open, with sparse vegetation and post-and-wire fencing, increasing susceptibility to built form, particularly on the lower eastern plateau.

Physical character sensitivity	**Moderate**

Natural character

- The sites are in use as a holiday park, limiting the natural features. The sites contain sparse vegetation, with scattered trees and intermittent hedgerows along the southern edge of the site.
- The south of SHELAA/412 contains amenity grassland, offering some semi-natural character, though the majority of the site is developed as a holiday park.

Natural character sensitivity	**Low**

Historic landscape character and time depth

- There are no recorded historic features within the sites. The introduction of the caravan site has removed any evidence of historic land use.

Historic landscape character and time depth sensitivity	**Low**

Character of the settlement and relationship with the landscape

- The sites lie to the east of the built-up area of Minster. They adjoin residential development to the west and north-west, forming a fragmented settlement edge along Bell Farm Lane and Plough Road, characterised by back-garden boundaries and piecemeal development.
- The sites are already developed as a caravan park; permanent development on the site would reinforce the impression of Kingsborough as part of Minster. Development on the sites would extend the settlement eastwards into a more open landscape. The site does not play a significant role in settlement separation, as it is already developed.

Character of the settlement and relationship with the landscape sensitivity	**Low-Moderate**

Visual prominence, skyline and views

- The SHELAA/412 site is visually open along its eastern, northern and south-western boundaries, with limited vegetation to filter views across the rising landform of the wider Warden and Minster farmlands. The lower eastern part forms a local skyline when viewed from the lower land to the west and south-west.
- A public right-of-way crosses the west of SHELAA/412, with clear views into both sites.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- The sites have a rural character influenced by the caravan park, nearby residential development and local road activity. Tranquillity is reduced by human activity associated with the caravan park and settlement edge with moderate levels of light pollution. There is a more rural character evident in the south of SHELAA/412.

- A public right of way runs north to south through SHELAA/412, adjacent to the east of SHELAA/408, providing access through SHELAA/412 and occasional views into both the sites.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Summary of overall landscape sensitivity (including any variations)

A.18 Features which increase sensitivity are the combination of open and elevated western edge, localised visual prominence and access along the eastern edge, visibility from PRoWs and limited boundary vegetation to the east. Features which reduce sensitivity are the existing caravan park development within the site, limited natural and cultural heritage features and proximity to existing development to the north and west. Sensitivity is higher in the east of the site, where openness increase visibility.

A.19 It is considered that the site has a Low-Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Low-Moderate**

Potential effects on landscape character and features

A.20 Residential development on the site could:

- Result in the loss of open grassland, of the holiday park.
- Lead to the removal or alteration of boundary hedgerows, particularly along the eastern, northern and south-western edges.
- Introduce built form on elevated land to the west, affecting the local skyline and altering views from surrounding areas.
- Reinforce the fragmented and irregular settlement edge along Bell Farm Lane and Plough Road.

- Reduce the perceived rural backdrop to the east of Minster by extending development into a more open and visually exposed part of the landscape.
- Increase lighting and activity, reducing the semi-rural perceptual qualities of the site and its surroundings.

Potential for mitigation and enhancement

A.21 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Strengthen the eastern and northern boundaries with native hedgerow planting and small woodland blocks to reduce visibility and soften the transition to open countryside.
- Avoid developing the elevated western plateau where visual sensitivity is highest.
- Enhance the south-western boundary to improve integration with the rural landscape and reduce exposure to open views.
- Retain and reinforce vegetation along Bell Farm Lane and Plough Road to create a more coherent settlement edge and address existing fragmentation.
- Enhance the PRoW corridor through the west of SHELAA/412 by maintaining open space, improving surfacing and providing landscape buffers.
- Minimise lighting associated with new development and use dark-sky-friendly fittings to reduce night-time visual effects.

A.22 A summary map indicating the key constraints and opportunities is shown on **Figure A.20** below

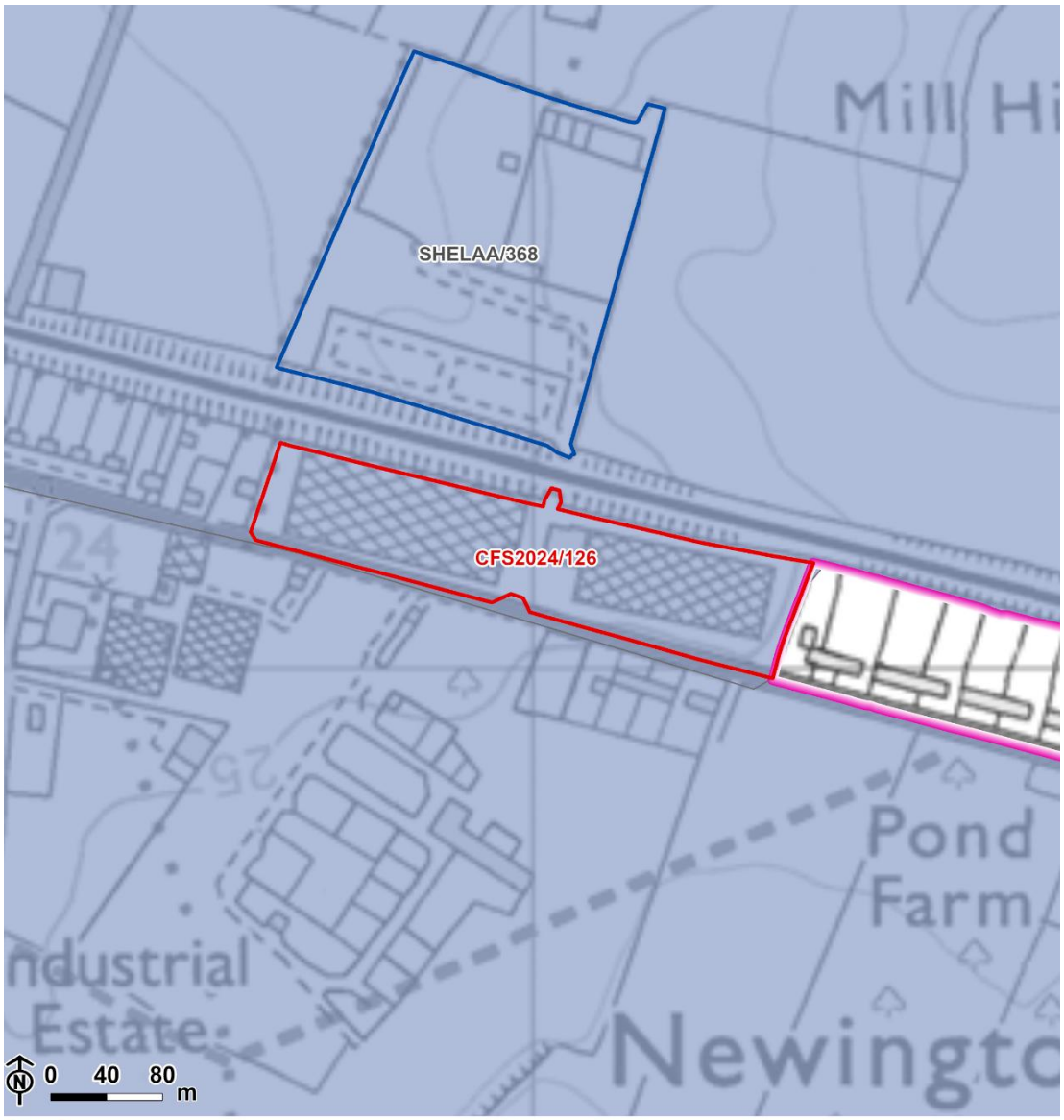
Figure A.20: Opportunities and constraints

CFS2024/126 Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY

Figure A.21: Location and context map

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.22: Site constraints



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Location and description

The site lies to the west of Newington, between the A2 London Road and London Chatham and Dover railway line. The site comprises part of Newington Nurseries, including large greenhouse structures, access track, car parking, buildings associated with horticultural use and an orchard in the south-east.

Landscape character

A.23 The site lies wholly in LCA 32 Upchurch and Lower Halstow Fruit Belt. The key characteristics of the LCA are:

- Rolling farmland rising southwards from the marshland edge.
- Complex geology of Clay, brickearth, and gravel.
- Large-scale arable fields with pockets of grazing and remnant orchards.
- Fragmented mature hedgerows along narrow rural lanes.
- Dispersed settlement pattern of small villages, hamlets and isolated farmsteads.
- Traditional buildings dating from the 17th to 19th centuries with limited modern infill.
- Mixed perceptual character combining rural tranquillity with urban-fringe influences.
- Access via narrow winding lanes connecting settlements and historic routes.

Figure A.23: View of the existing site entrance looking west from the A2.

Figure A.24: View of the site boundary looking east along the A2.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The site occupies relatively flat land at around 25 metres AOD.
- It is largely developed with glasshouses and associated hardstanding, set within a medium-scale plot.

Physical character sensitivity	**Low-Moderate**

Natural character

- Naturalistic features within the site are limited due to intensive horticultural use and extensive greenhouse coverage.
- Low hedgerows line the A2 along the southern boundary, and there is trackside vegetation along the railway line to the north.

Natural character sensitivity	**Low- Moderate**

Historic landscape character and time depth

- There are no recorded historic features within the site. Historic mapping indicates long-term agricultural use, including former orchard, and the site retains some semblance of a medium-scale historic field pattern despite its current developed use.
- Newington High Street Conservation Area lies approximately 400 metres to the south-east; glimpsed views towards the site are possible, but intervening housing limits the relationship. The A2 to the south follows the route of the Roman Watling Street.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the west of Newington, which retains a distinct village identity. Development has already extended north of the A2 and railway line to the north-east of the village. However, this has already occurred to the north of the A2 and therefore would be in accordance with the general pattern and form of Newington.
- The site forms part of the developed fringe north of the A2 rather than open countryside but still contributes to the wider rural setting of Newington. Further development would be seen as infill development; new development would not be seen as extension into the countryside

Character of the settlement and relationship with the landscape sensitivity	**Low-Moderate**

Visual prominence, skyline and views

- The site is relatively flat with an undeveloped skyline that is not particularly prominent in the wider landscape.
- Mature vegetation along all boundaries creates a high degree of enclosure and limits views into the site from the A2, the railway line and the surrounding land. Views are largely restricted to glimpsed views from adjacent residential properties to the east and west.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access to the site, beyond access to the existing business.
- The site has a semi-urbanised character due to glasshouses, buildings and hardstanding, although boundary vegetation provides a green edge.

- Proximity to the A2 and railway line results in high levels of noise and activity and low tranquillity. Light pollution from Newington and existing nursery operations affects night-time conditions, particularly in the south of the site.

Visual prominence, skyline and views sensitivity	**Low- Moderate**

Summary of overall landscape sensitivity (including any variations)

A.24 The boundary hedgerows and undeveloped skyline increase sensitivity to housing development.

A.25 The site already comprises extensive built form and hardstanding, is strongly enclosed by mature boundary vegetation, which reduces visual sensitivity, and has limited historic or nature value. These reduce sensitivity to housing development.

A.26 It is considered that the site has a Low-Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Low-Moderate**

A.27 The existing use is commercial horticulture with large greenhouse structures and associated activity, so continued or intensified employment use would represent a similar change to existing infrastructure. Strong boundary vegetation and the site's contained form reduce sensitivity.

A.28 It is considered that the site has a Low-Moderate overall sensitivity to employment development.

Overall sensitivity to employment development	**Low-Moderate**

Potential effects on landscape character and features

A.29 Residential development on the site could:

- Result in the loss of horticultural land and glasshouse structures, further eroding the working agricultural character of the Fruit Belt.
- Change the appearance of the site from the existing nursery to residential.
- Increase domestic lighting, activity and paraphernalia, altering the semi-rural character of the site and its immediate surroundings.
- Slightly increase the influence of built form in glimpsed views from nearby residential properties and from the A2 and railway access.

A.30 In addition, Employment development on the site could:

- Intensify the existing commercial character, potentially increasing building mass, height or hardstanding
- Increase traffic, servicing and associated activity, reinforcing the semi-urbanised character north of the A2.
- Introduce larger-scale built form that, if not carefully designed, could appear out of scale with the small- to medium-scale rural landscape to the south.

Potential for mitigation and enhancement

A.31 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Retaining and strengthening all boundary tree cover, particularly along the A2, railway line and site boundaries, to maintain enclosure and limit views.
- Using building forms, heights and materials that reflect the small-scale rural settlement character of Newington rather than suburban estate typologies.
- Incorporating orchard and hedgerow planting within open space to reference the Fruit Belt character and partially replace lost horticultural elements.
- Minimising external lighting and using dark-sky-friendly fittings to limit additional night-time effects.
- Retaining the strong vegetated enclosure and enhancing boundary planting to screen larger buildings or yard areas.
- Keeping building heights and massing broadly comparable with, or only modestly greater than, existing glasshouse and nursery structures.

- Using muted colours and simple forms to reduce visual contrast with the surrounding rural landscape.
- Incorporating green infrastructure (e.g. hedgerows, tree belts, orchard blocks) to reinforce the Fruit Belt structure and improve habitat connectivity, in line with guidance to restore hedgerows and shelterbelts.
- Managing lighting, signage and external storage to avoid an overly industrial appearance and limit night-time visual effects.

A summary map indicating the key constraints and opportunities is shown on **Figure A.25** below.

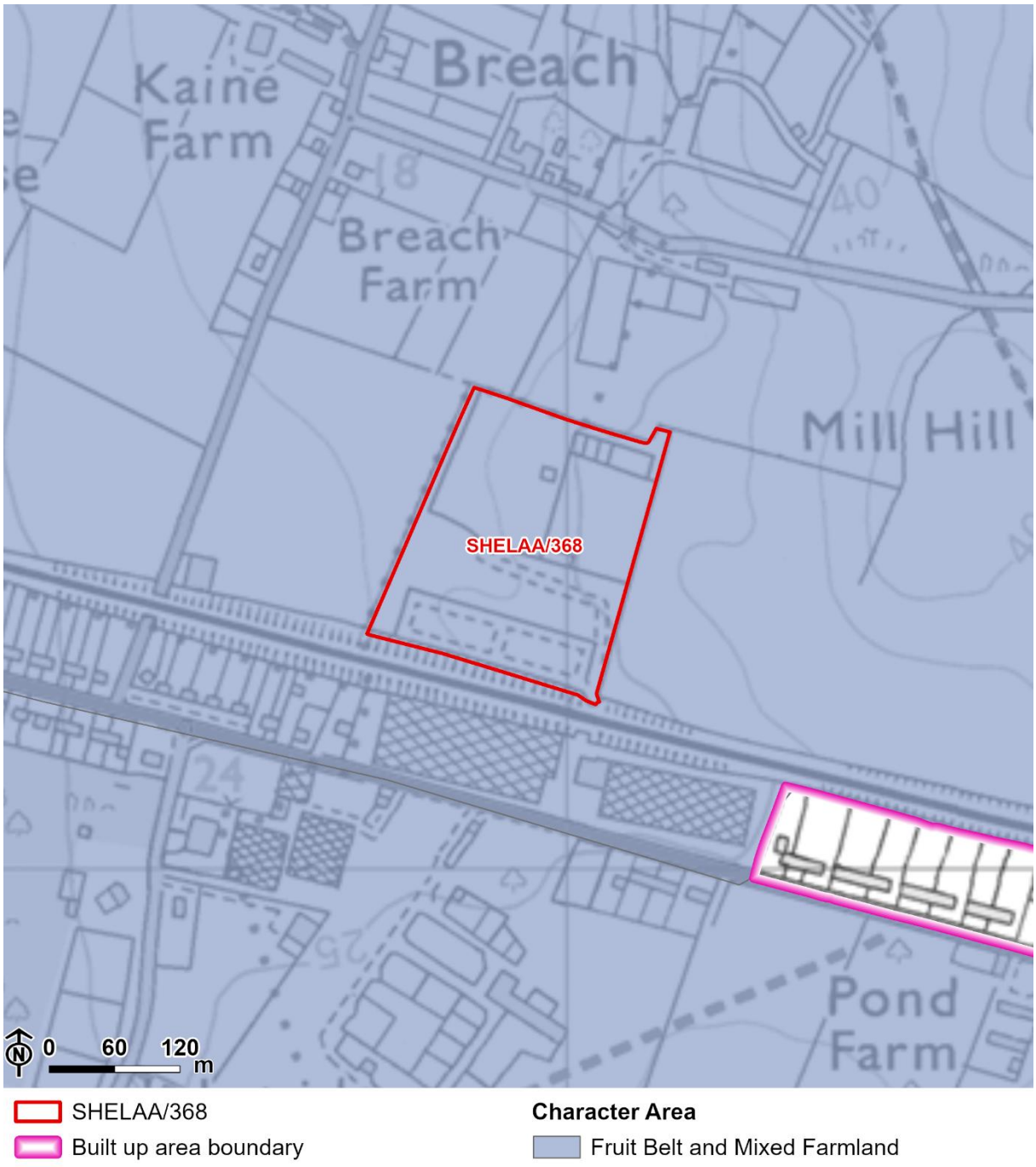
Figure A.25: Opportunities and constraints

SHELAA/368 Amethyst Horticulture, Land at Newington Nurseries, London Road, Newington, ME9 7NY

Figure A.26: Location and context map

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.27: Site constraints



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Location and description

The site lies to the north-west of Newington, north of the London Chatham and Dover railway line and east of Breach Lane. The site comprises an arable field and Newington Nurseries, including associated nursery infrastructure.

Landscape character

A.32 The site lies wholly in LCA 32 Upchurch and Lower Halstow Fruit Belt. The key characteristics of the LCA are:

- Small- to medium-scale rural landscape with a strong sense of enclosure.
- Small nucleated villages with historic centres and modern expansion on the periphery.
- Undulating landscape with occasional long views to north and south.
- Distinctive coastal edge where marshland abuts arable/horticultural land, with estuary views.
- Fragmented structure of mature hedgerows and shelterbelts around orchards, pasture and arable fields.
- Narrow winding lanes, with the busy A2 forming a key southern boundary.

Figure A.28: View of the site looking east from Breach Lane.

Figure A.29: View of the southern half of the site, looking east from Breach Lane.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The site occupies relatively flat land at around 20m-25m AOD. The landform rises to the north-east and is noticeably elevated in views from the west.
- It is formed of a simple medium-scale field and an associated plant nursery.
- The surrounding landscape is consistent with the small- to medium-scale rural pattern typical of the LCA with greenhouses and polytunnels.

Physical character sensitivity	**Moderate**

Natural character

- Land cover is predominantly arable and there are no nature designations within or adjacent to the site.
- Strong hedgerows define the northern and western boundaries and run through the centre of the site forming the boundary to the plant nursery. The southern boundary is defined by mature trees along the railway line. The eastern boundary is largely open, allowing views eastwards.

Natural character sensitivity	**Low- Moderate**

Historic landscape character and time depth

- There are no recorded historic features within the site.
- Historic mapping indicates long-term agricultural use, with previous orchard use forming part of the traditional Fruit Belt pattern. The site retains some resemblance of a medium-scale historic field structure despite subdivision related to the plant nursery.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the north-west of Newington. Newington retains a distinct village identity, with linear development extending north of the A2 to the west. The railway line forms a strong barrier to development in this location.
- The site forms part of the rural approach and backdrop to Newington from the west; which is formed of scattered properties and farms.
- Development of the site would contrast to the existing general development pattern.

Character of the settlement and relationship with the landscape sensitivity	**Moderate-High**

Visual prominence, skyline and views

- The site is relatively flat but has a raised landform to the east with an undeveloped skyline that is noticeable in the wider landscape.
- The site is relatively open, allowing views into the site from adjacent fields and local roads.
- Views from the south are restricted by mature vegetation along the railway line, although glimpsed views may be available from elevated points on the railway.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- There are no public rights-of-way within the site. A PRoW crosses the adjacent field to the east in an elevated position with views across the site.
- The site retains a rural character due to farmland and boundary vegetation, although proximity to the railway line introduces regular noise and movement.
- Light pollution from Newington affects the southern part of the site, while the northern part experiences darker skies.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.33 The sites contribution to the rural Fruit Belt landscape and the rural setting and approach to Newington, the elevated landform, which is visible from neighbouring roads and PRoW, and its mature hedgerows and tree boundaries increase sensitivity to housing development.

A.34 The limited natural and cultural heritage features, proximity to the railway and the simple pattern and scale reduce sensitivity to housing development.

A.35 It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

Potential effects on landscape character and features

A.36 Residential development on the site could:

- Result in the loss of pastoral land and further erosion of the traditional agricultural character associated with the LCA.
- Lead to the removal or alteration of boundary vegetation.
- Extend built form north of the railway line, at odds with the existing settlement pattern and reducing the rural setting and backdrop to Newington from the west.
- Alter views from the neighbouring roads and PRoW, introducing built form into currently open views.

Potential for mitigation and enhancement

A.37 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Avoid developing the northern part of the site, which would be visible on elevated landform from the surrounding landscape.
- Strengthen the eastern boundary with native hedgerow and tree planting to reduce visibility and soften the transition to open countryside.
- Enhance the western boundary hedgerow to reinforce the medium-scale field pattern characteristic of the LCA.
- Retain and protect the mature tree cover along the southern boundary by the railway line and along the northern boundary to maintain enclosure and screening.
- Use building forms and materials that reflect the small-scale rural character and traditional vernacular of the area.
- Incorporate species-rich grassland margins and hedgerow enhancements to support local habitat connectivity, in line with guidance to restore hedgerow networks and field margins within the LCA.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 6**]** and use dark sky-friendly lighting.

A summary map indicating the key constraints and opportunities is shown on **Figure A.30** below

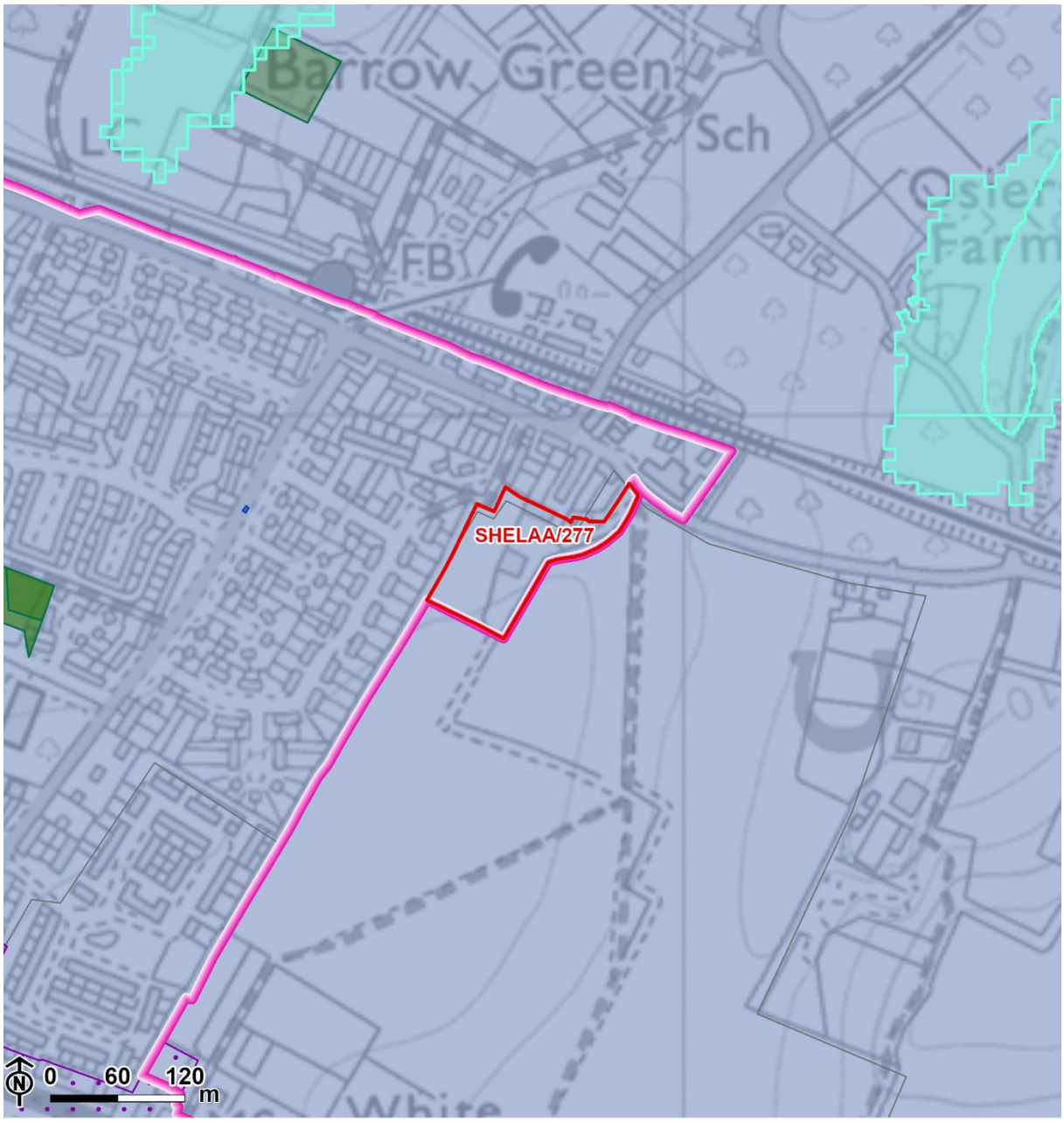
Figure A.30: Opportunities and constraints

SHELAA/277 Barrow Green Farm, Barrow Green

Figure A.31: Location and context map

Created by LUC - 15034_Swale_LSA/15034_001_Site_Location_housing_A4P 05/05/2026
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.32: Site constraints



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Location and description

The site lies at the north-eastern edge of Teynham. The site consists of garage buildings and associated yards to the east and part of a medium scale arable field to the west.

Landscape character

A.38 The site lies wholly in LCA 26 Lynsted Enclosed Farmlands. The key characteristics of the LCA are:

- Gently undulating topography with steep sided dry chalk valley.
- Complex geology of fertile drift deposits, chalk and clay-with-flints.
- Small isolated historic villages and farmsteads, medieval houses, twentieth century infill housing.
- Characteristic development pattern “one building deep” alongside lanes and roads.
- Small to medium-scale irregular field pattern.
- Many well managed orchards, with strong shelterbelts and hedgerows.
- Open areas of sheep grazing and historic parkland.
- Narrow winding lanes and major roads.
- Views generally enclosed with some long views to the north from high point opened up for sheep grazing.

Figure A.33: View of site looking south from public right of way off Broadacre.

Figure A.34: View looking north towards the site from public right of way to the east.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat, lying around 15 metres AOD, falling very gently to the south-east.
- The open field in the west of the site is part of a larger medium scale field which expands south and east.
- A small industrial development comprising 3 buildings and associated yards, separated from the west of the site by a hedgerow, lies in the east, contributing to the small-scale landscape features.

Physical character sensitivity	**Low**

Natural character

- The western field is in arable use. There is a boundary hedgerow between the field to the west and the garage development to the east.
- There are no priority habitats recorded within the site.

Natural character sensitivity	**Low**

Historic landscape character and time depth

- There are no recorded historic features within the site.
- The existing split between the light industrial use of the east of the site and agricultural use in the west is longstanding.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site sits at the north-eastern edge of Teynham. It plays some role in supplying a rural backdrop to a small number of residential dwellings on Bradfield Avenue, The Crescent, French's Row and Broadacre.
- Development of the existing industrial area would change the typology of the buildings to be more in-keeping with the residential developments to the north and east.
- Development would extend the edge of Teynham's residential development to the south and east. Although this would be perceived as expansion into open countryside, it would not extend further east than existing development to the north.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is visible from the public right of way off Broadacre. From across the fields to the east the views are screened by existing mature hedgerows.
- The site is visible when approaching from the east along Lower Road, and from the Chatham main line railway line approaching Teynham.
- Views from the north and west are blocked by residential developments and are likely to be experienced from the backs of private residential properties.
- The relatively flat topography and low rise light industrial buildings result in an indistinctive skyline.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access to the site. A public right of way runs off Broadacre meet the north-west boundary. Another runs approximately from the north-east corner out into the fields to the east.
- Proximity to existing residential developments in Teynham reduce dark sky experiences and tranquillity.
- Rural character is retained across the fields bordering to the south and east edges of the site.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Summary of overall landscape sensitivity (including any variations)

A.39 Development on the site would expand Teynham further east and south, into a semi-rural landscape, which increases the sites sensitivity.

A.40 The limited natural and cultural heritage features, generally flat topography and proximity to the existing residential developments of Teynham reduce sensitivity to housing development.

A.41 It is considered that the site has a Low-Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Low-Moderate**

Potential effects on landscape character and features

A.42 Residential development on the site could:

- Expand Teynham's residential development into open arable fields.
- Disrupt the medium-scale field pattern by developing a parcel within the wider field.

- Result in the loss of the hedgerow that runs through the middle of the site.
- Change the rural backdrop to a limited number of residential properties and alter the experience and views of people using the public rights of ways to the north, east and south of the site.

Potential for mitigation and enhancement

A.43 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Consider interconnectivity and access to existing public rights of way around the site.
- Retain and enhance the hedgerow that divides the site.
- Ensure that the structure of the development comes to a defined edge in keeping with the eastern boundary of Teynham.
- Provide hedgerow/ vegetation along the south and east of the site to form a strong settlement boundary and screen views from the PRoWs to the south and east.
- The height of the development should be in keeping with the development along the eastern edge of Teynham.

A.44 A summary map indicating the key constraints and opportunities is shown on **Figure A.35** below

Figure A.35: Opportunities and constraints

SHELAA/206 Land at Norton Ash Garden Centre

Figure A.36: Location and context map

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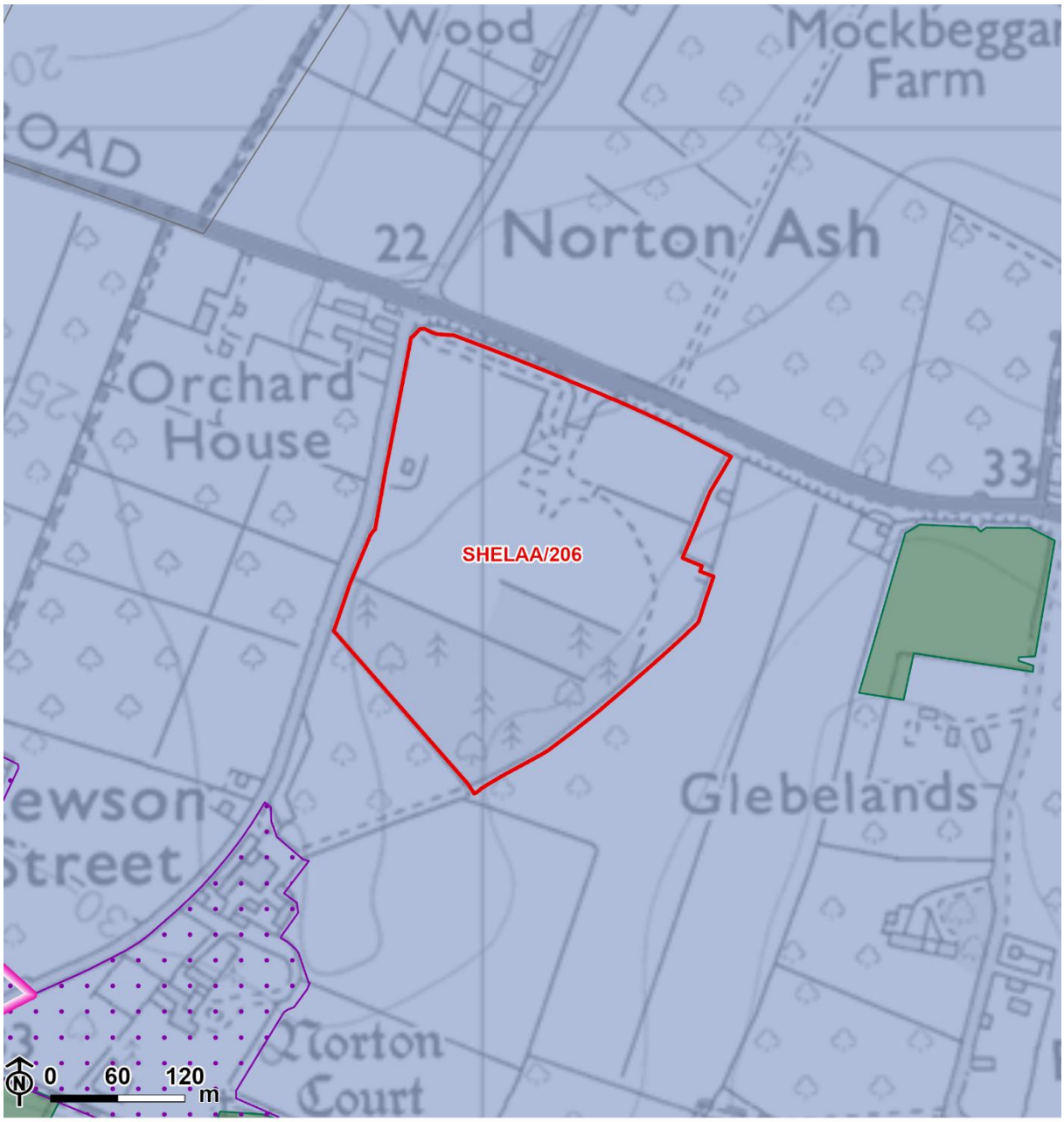
Figure A.37: Site constraints



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Location and description

The site is at Norton Ash to the east of Teynham. It lies between the A2 to the north and Norton Lane to the west. The site consists of two small fields surrounded and interspersed with hedgerows, and a dense woodland in the south.

Landscape character

A.45 The site lies wholly in LCA 26 Lynsted Enclosed Farmlands. The key characteristics of the LCA are:

- Gently undulating topography with steep sided dry chalk valley.
- Complex geology of fertile drift deposits, chalk and clay-with-flints.
- Small isolated historic villages and farmsteads, medieval houses, twentieth century infill housing.
- Characteristic development pattern “one building deep” alongside lanes and roads.
- Small to medium-scale irregular field pattern.
- Many well managed orchards, with strong shelterbelts and hedgerows.
- Open areas of sheep grazing and historic parkland.
- Narrow winding lanes and major roads.
- Views generally enclosed with some long views to the north from high point opened up for sheep grazing.

Figure A.38: View looking north at southern woodland site boundary.

Figure A.39: View looking south into site from access point on A2.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat. It slopes very gently to the south-east from 25 metres AOD in the north-west to 30 metres AOD in the south-east.
- The north of the site consists of three small fields and a sealed turning circle access. Regenerating woodland and mixed coniferous/ deciduous linear hedgerows provide small-medium scale landscape features.
- The east boundary is defined by a mature woodland hedgerow that connects to dense woodland that covers the south of the site.

Physical character sensitivity	**Moderate**

Natural character

- The woodland in the south of the site is recorded as priority habitat deciduous woodland. The woodland comes to a definitive edge at the southern site boundary in contrast to the surrounding fields.
- Hedgerows create divisions across the northern regenerating fields and define the east boundaries and partially define the north boundary of the site.

Natural character sensitivity	**Moderate**

Historic landscape character and time depth

- There are no recorded historic features within the site. The Lewson Street Conservation Area is 160 metres to the south. Established roadside vegetation along Norton Road prevents a visual connection between the site and conservation area.
- Historically the site was in use as an orchard. Woodland has been regenerating for the past 30-40 years.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the south of the A2 and is not connected to any settlements. A small industrial estate at Orchard House is next to the north-west of the site, part of a pattern of scattered farmsteads and hamlets on the rural road network.
- The site is part of the wider small to medium-scale field pattern characteristic of the area.

Character of the settlement and relationship with the landscape sensitivity	**Low-Moderate**

Visual prominence, skyline and views

- The site is relatively enclosed by hedgerows along the east boundary and by the woodland to the south. Views travelling west along the A2 London Road are restricted by mature vegetation, travelling from the east views are restricted by the existing small industrial estate.
- The site boundary is open and visible from the A2 London Road.
- The mature woodland to the south and hedgerow along the east boundary screen the site from views and contributes to the natural backdrop of the site and surrounding area.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access to the site or its immediate surrounds.

- The deciduous woodland in the south hedgerows and regenerating species contribute to a rural character. However, proximity to the A2 provides a constant source of traffic noise and activity. The A2 is unlit, however some light pollution from Teynham reduces the experience of dark night skies within the site.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.46 The deciduous woodland in the south of the site, mature hedgerow along the east boundary, and regenerating vegetation increase the sites sensitivity to housing development.

A.47 The generally flat topography limited cultural heritage features, and proximity to the A2 and the small Norton Cross industrial estate reduce sensitivity to housing development.

A.48 It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

Potential effects on landscape character and features

A.49 Residential development on the site could:

- Result in the loss of the mature deciduous woodland in the south of the site, the mature east boundary hedgerow, and regenerative growth in the north.
- Change the existing scattered settlement pattern of isolated ribbon developments within the small to medium scale field pattern that exists between Teynham and Faversham.
- Introduce lighting that could interrupt the isolated rural feel of the stretch of the A2 between Teynham and Faversham.

Potential for mitigation and enhancement

A.50 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Retain and enhance the deciduous woodland in the south. Concentrate development in the north of the site.
- Retain and enhance the mature woodland hedgerow along the east boundary (Norton Road).
- Consider how the frontage of the development interfaces with the A2 and Norton Lane. Site access to the development at the existing point on the A2.
- Utilise local materials and enhance hedgerows along the northern boundary.
- Consider enhancement to public access and ecological habitat support.
- Retain regenerating woodland species and incorporate into hedgerows within the development where possible. Remove coniferous species.
- Follow the area's characteristic linear development pattern of "one building deep" alongside lanes and roads.
- The height of the development should be in keeping with other isolated villages, farmsteads and twentieth century infill housing characteristic of the area.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference 7]** and use dark sky-friendly lighting.

A.51 A summary map indicating the key constraints and opportunities is shown on **Figure A.40** below

Figure A.40: Opportunities and constraints

SHELAA/119 Land west of Lower Hartlip Road/Munn's Lane

Figure A.41: Location and context map

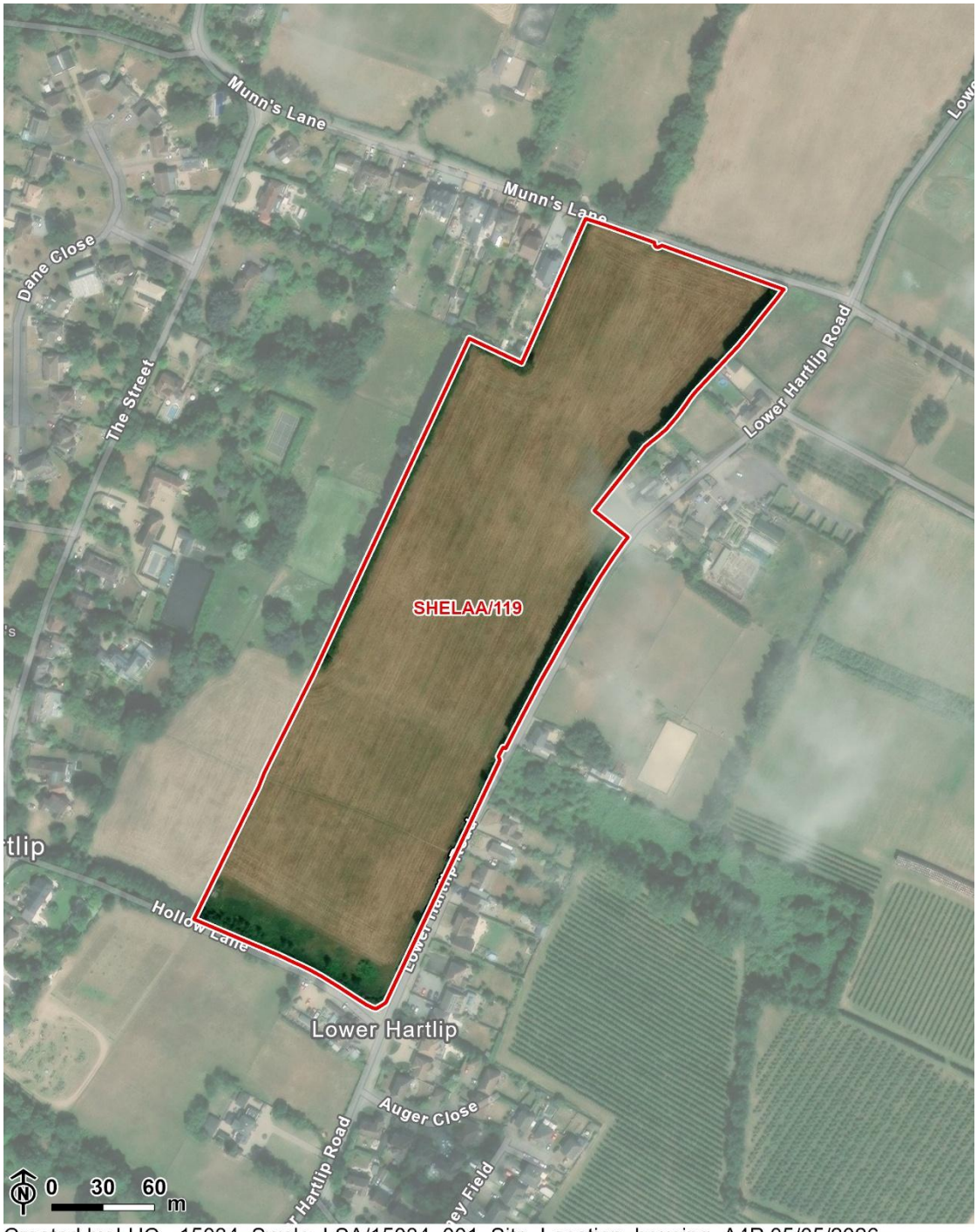

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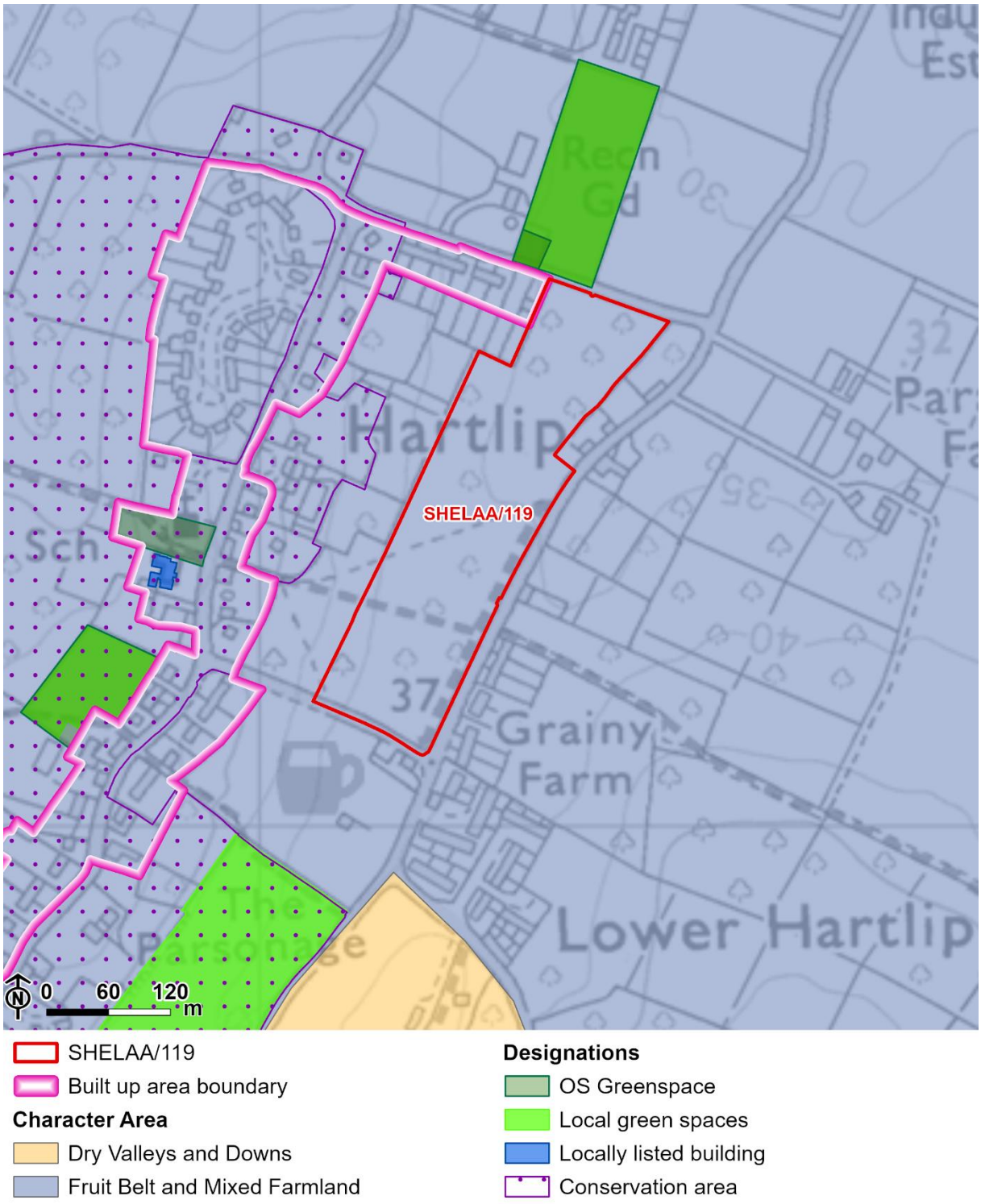
Figure A.42: Site constraints



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Location and description

The site sits to the north-west of the linear village of Hartlip. The site is a linear field which runs parallel to Lower Hartlip Road between Munn's Lane and Hollow Lane.

Landscape character

A.52 The site lies wholly in LCA 28 Newington Fruit Belt. The key characteristics of the LCA are:

- Undulating landscape of rich loam soils.
- Strong landscape structure formed by the network of mature hedgerows and shelterbelts that surround orchards.
- Views largely enclosed.
- Narrow winding lanes enclosed by hedgerows and shelterbelts.
- Linear village with historic core, scattered isolated farmsteads and cottages of mixed age and building style.

Figure A.43: View across site looking from the corner of Lower Hartlip Road and Hollow Lane.

Figure A.44: View of the site looking south from public right of way at Hartlip Village.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat, lying at around 35 metres AOD, the western boundary follows a gentle rise to the village of Hartlip.
- The site consists of a medium-scale amenity grassland, with small-scale features provided by the boundary hedgerows along the lanes.

Physical character sensitivity	**Low**

Natural character

- The site cover is predominantly amenity grassland, with no recorded semi-natural habitats.
- Low clipped hedgerows define the boundary of the site along Hollow Lane and the southern half of Lower Hartlip Road. Coniferous shelterbelts define the northern-western boundary and the northern half of the boundary along Lower Hartlip Road.

Natural character sensitivity	**Low-Moderate**

Historic landscape character and time depth

- There are no recorded historic features within the site. The Hartlip Conservation Area lies 50 metres to the west and 150 metres to the south. Enclosed views within Hartlip limit the visibility of the site, but glimpses are available between buildings from the conservation area.
- Historically the site was entirely orchards which have been completely cleared.

Historic landscape character and time depth sensitivity	**Low**

Character of the settlement and relationship with the landscape

- The site lies between the historic village of Hartlip, to the west, and more modern Lower Hartlip to the south-east.
- Hartlip is a roughly 1km long linear village developed along a ridge that runs on a roughly north/south axis that has been accentuated by 20th Century infilling.
- Development on this site could alter the longstanding linear nature of Hartlip, risk the coalescence of Hartlip and Lower Hartlip by joining the areas of development on Lower Hartlip Road and Munn's Lane.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is very open, with low hedgerows along the south and west boundaries.
- Views of the site down liminal spaces between buildings on The Street in the Harlip from the conservation area are available. More open views of the site are experienced from the modern development of Lower Hartlip.
- The site is relatively flat with an undeveloped skyline, although this is not particularly prominent in the landscape.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- The site is crossed by two public rights of way – one running parallel to Lower Hartlip Road and one crossing the site from west to east between Hartlip and Lower Hartlip Road.
- The site retains a sense of rural character and tranquillity and is surrounded by narrow unlit country lanes. Light pollution from Newington impacts the experience of dark night skies within the site.

Perceptual and scenic qualities sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.53 The public right of way access, rural character, glimpsed views from and proximity to Hartlip and potential for settlements coalescing increase the site's sensitivity to housing development.

A.54 The limited natural and cultural heritage features and generally flat topography reduce the sites sensitivity to housing development.

A.55 It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

Potential effects on landscape character and features

A.56 Residential development on the site could:

- Result in the loss of the existing medium-scale open grass field that separates the historic village of Hartlip from the modern development of Lower Hartlip.
- Increase the density of residential development and detract from the linear nature of Hartlip Village.
- Result in a loss of openness experienced from Lower Hartlip Road.
- Alter the experience and views of people using the public rights of way through the site.

Potential for mitigation and enhancement

A.57 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Retain and reinforce the existing deciduous hedgerows along the south and east boundaries of the site. Replace coniferous shelterbelts along the north, south and west boundaries with new hedgerows which should be in character with the locality, using native species where possible.
- Consider the potential for pedestrian connectivity between Hartlip, Lower Hartlip and Hartlip park along public right of ways.
- Development should be set back from the public rights of way which cross the site, to retain a rural character and experience for people using the route.
- Focus on developing in a linear village feel originating from Lower Hartlip to avoid the amalgamation of Hartlip and Lower Hartlip.
- The development should use local and vernacular materials appropriate to the area.
- The height of development should be in keeping with the development of Lower Hartlip.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 8**]** and use dark sky-friendly lighting.

A.58 A summary map indicating the key constraints and opportunities is shown on **Figure A.45** below

Figure A.45: Opportunities and constraints

SHELAA/324 Home Farm, Breach Lane, Lower Halstow, ME9 7DB

Figure A.46: Location and context map

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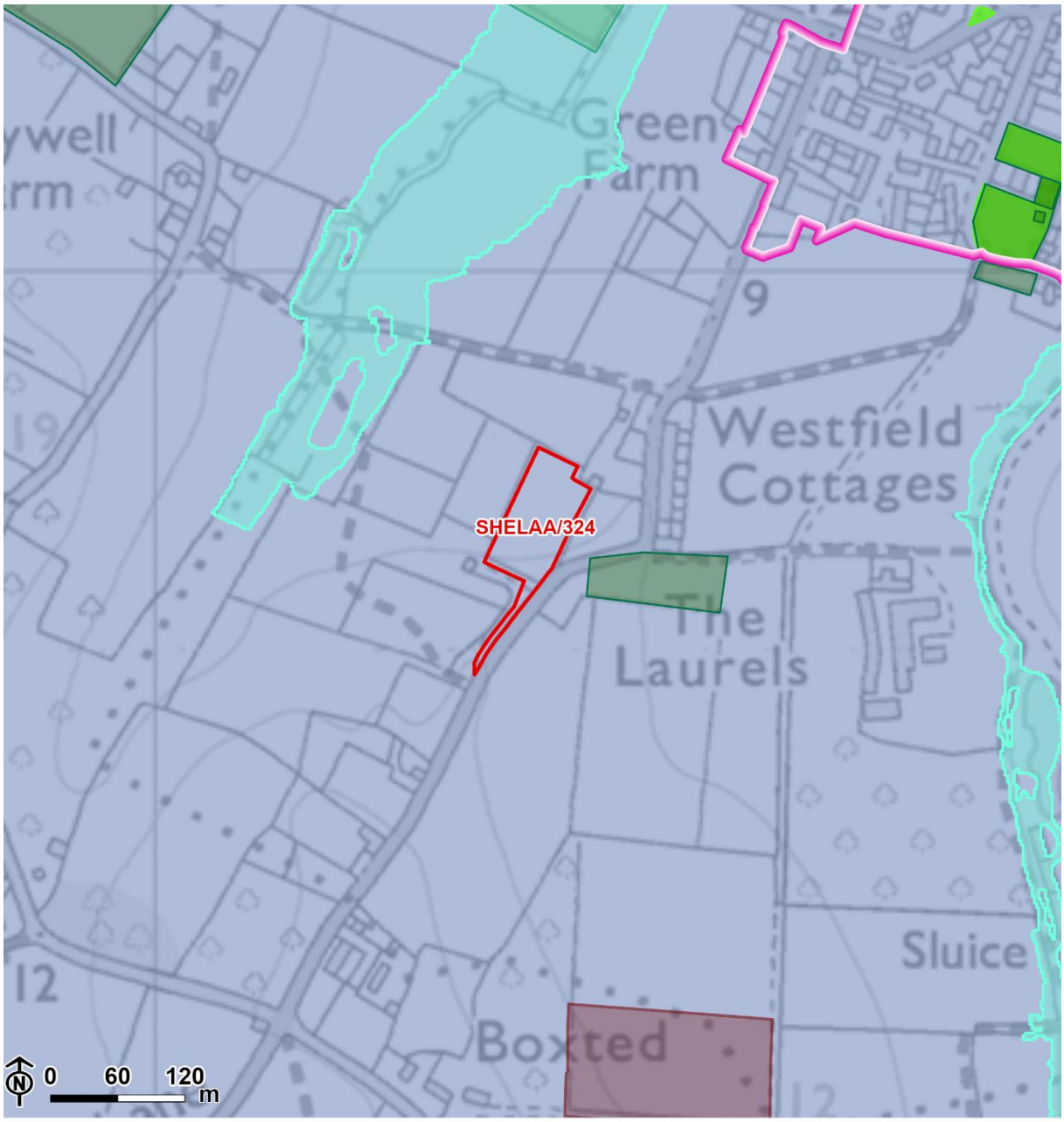
Figure A.47: Site constraints



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Location and description

The site is located to the west of Breach Lane, to the south of Lower Halstow. The site consists of a small grass field and hedgerow that extends to the south along Breach Lane.

Landscape character

A.59 The site lies wholly in LCA 32 Upchurch and Lower Halstow Fruit Belt. The key characteristics of the LCA are:

- Small to medium-scale rural landscape with a strong sense of enclosure.
- Small nucleated villages with historic centres and modern urban expansion on periphery.
- Undulating landscape with occasional long views to north and south.
- Distinctive coastal edge formed by abutting marshland and arable/ horticultural land, with views of estuary and rising land.
- Fragmented structure of mature hedgerows and shelterbelts surround orchards, pasture and arable fields.
- Grazing marsh to the west of Ham Green.
- Narrow winding lanes, with the busy A2 on the southern boundary.

Figure A.48: View into the site looking west from Breach Lane.

Figure A.49: View looking south down Breach Lane at boundary hedgerow.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat, lying at around 10 metres AOD.
- The grass field that makes up most of the site is part of a wider medium-scale field pattern that is characteristic of the area.
- Small scale landscape features include; mixed coniferous and deciduous hedgerows, and some mature specimen trees.

Physical character sensitivity	**Low**

Natural character

- The field is maintained as an open pasture.
- The hedgerow running along Breach Lane to the east of the site is clipped at a medium height.
- The northern and eastern site boundaries contain some mature specimen trees.
- The southern site boundary is defined by a coniferous shelterbelt that is not characteristic of the area.

Natural character sensitivity	**Low**

Historic landscape character and time depth

- There are no recorded historic features within the site. Looking west from Breach Lane across the site there are long distance view towards Upchurch with the church steeple visible on the horizon.
- The site has historically been maintained as part of a medium-scale open pasture field that expands to the west.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies around 270 metres to the south of the settlement edge at Lower Halstow accessed via Breach Lane. The site forms part of the rural approach into Lower Halstow from the south.
- Existing development on Breach Lane includes the terraced Westfield Cottages to the north-east of the site, and a small collection of farmyard buildings to the south-west. Development of the site would increase the presence of residential properties along Breach Lane and the approach to Lower Halstow.

Character of the settlement and relationship with the landscape sensitivity	**Low-Moderate**

Visual prominence, skyline and views

- The site is relatively open, with low hedgerows along Breach Lane allowing views into the site from the road and across the fields from the west.
- The site is relatively flat with an undeveloped skyline, although this is not particularly prominent in the landscape.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- Allotments lie to the east of the site along Breach Lane.
- Two public rights of way connect to Breach Lane and run north and south of the site, connecting to Holywell Lane. There is no public access within the site.
- The site retains a sense of rural character and tranquillity. Beach Lane is unlit however, light pollution from Upchurch impacts the experience of dark night skies within the site.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Summary of overall landscape sensitivity (including any variations)

A.60 The site's rural character, tranquillity, openness across the fields to the west, intervisibility with Holywell Farm historic farmstead and contribution to the rural approach to Lower Halstow increase its sensitivity to development.

A.61 The limited natural features and generally flat topography reduce sensitivity to housing development.

A.62 It is considered that the site has a Low-Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Low-Moderate**

Potential effects on landscape character and features

A.63 Residential development on the site could:

- Result in the loss of the irregular field pattern to the west of Breach Lane
- Alter the rural approach to the south of Lower Halstow.
- Result in the loss of low-lying mixed hedgerows along Breach Lane.
- Alter the experience and views of people using the public right of ways around the site.

Potential for mitigation and enhancement

A.64 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Consider the scale and form and height of Westfield Cottages and utilise local and vernacular materials.

- Retain and enhance hedgerow species that are appropriate to the area along Breach Lane and to the south of the site. Replace coniferous species with others more indicative of the area.
- Retain existing mature specimen trees on site and consider complementary plantings to soften built form into the surrounding fields
- Create hedgerows along the western boundary to soften views experienced across the fields to the west.
- Consider the potential for interconnectivity between the public rights of way to the north and south of the site, and connections to the allotments to the east.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference 9]** and use dark sky-friendly lighting.

A.65 A summary map indicating the key constraints and opportunities is shown on **Figure A.50** below

Figure A.50: Opportunities and constraints

SHELAA/310 Land adjacent to Oak Lane - Chaffes Lane (Site B)

Figure A.51: Location and context map

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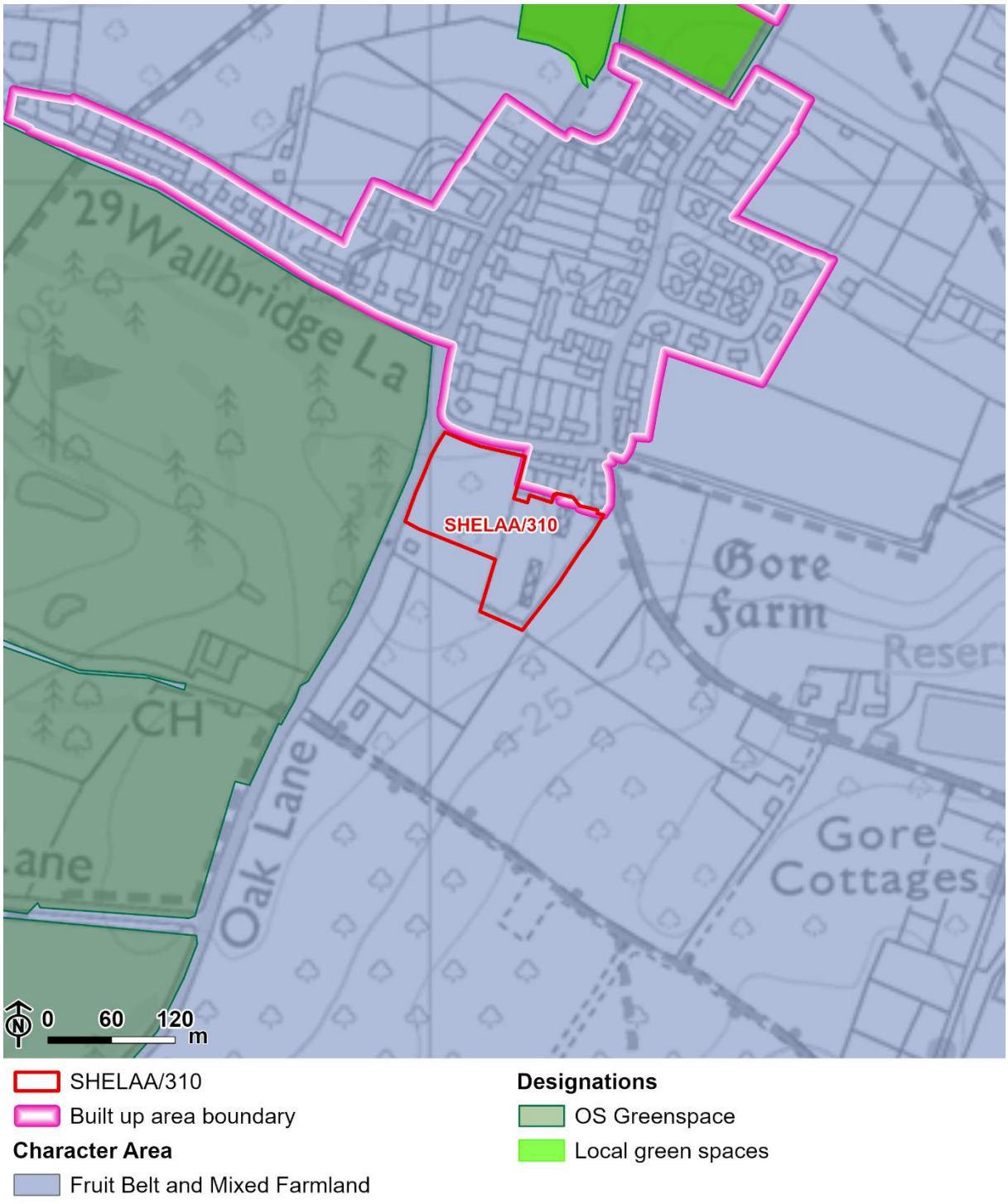
Figure A.52: Site constraints



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Location and description

The site is located south of Upchurch. The site consists of two fields; to the west a small regenerating field and the eastern field contains polytunnels, greenhouses and caravan storage.

Landscape character

A.66 The site lies wholly in LCA 32 Upchurch and Lower Halstow Fruit Belt. The key characteristics of the LCA are:

- Small to medium-scale rural landscape with a strong sense of enclosure.
- Small nucleated villages with historic centres and modern urban expansion on periphery.
- Undulating landscape with occasional long views to north and south.
- Distinctive coastal edge formed by abutting marshland and arable/ horticultural land, with views of estuary and rising land.
- Fragmented structure of mature hedgerows and shelterbelts surround orchards, pasture and arable fields.
- Grazing marsh to the west of Ham Green.

Figure A.53: View looking south at site boundary from Chaffe's Lane.

Figure A.54: View looking north-east at site boundary from Oak Lane.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat, lying at around 35 metres AOD.
- The small-scale west field contains a mix of regenerating woodland species and overgrown orchard trees.
- The small-scale eastern field is defined by hedgerows along its west, south and east boundaries and contains a number of greenhouses/polytunnels and caravan storage.
- The northern third of the west field is currently surrounded by site hoardings with evidence of early-stage residential developments starting along Chaffe's Lane.

Physical character sensitivity	Low-Moderate

Natural character

- The west of the site contains a mix of regenerating vegetation and mature orchard trees.
- The eastern field is defined by hedgerows along its western and eastern edges and a patchy hedgerow along the southern boundary. Natural heritage features are limited due to the existing development.

Natural character sensitivity	Low-Moderate

Historic landscape character and time depth

- There are no recorded historic features within the site or its immediate surrounds. The land was historically in orchard use.
- The nursery/ polytunnel use in the west field is longstanding.

Historic landscape character and time depth sensitivity	**Low**

Character of the settlement and relationship with the landscape

- The site lies at the southern boundary Upchurch, a village with two distinct areas. A historic core centred on a staggered crossroads and church that is surrounded by rather commonplace, suburban late 20th Century developments that have little connection to the historic context. Development of the site would expand modern urban expansion at Upchurch's southern periphery.
- Existing houses lie to the south of Chaffe's Lane, next to the east of the site. Development of the site would increase development along all of Chaffe's Lane and extend the settlement edge of Upchurch. Residential development along the Chaffe's Lane portion of the site appears to be underway.
- An isolated house sits on the southern boundary of the site on Oak Lane. Development of the site would integrate this property along with the rest of the site into the southern limit of the Upchurch built area.
- The mature trees along the eastern boundary of the site contribute to the rural lane approach along Oak Lane into Upchurch from the A2 to the south.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The west of the site is enclosed by a mature hedgerow, which reduces views from Oak Lane and the neighbouring golf course. Mature orchard trees are visible along the skyline from Oak Lane.
- There are no views into the site from the public right of way to the east.
- Site clearing for residential development has already opened the site completely to Chaffe's Lane to the north.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access within the site. A public right of way passes by the north-east corner of the site.
- The site retains some sense of rural character. Oak Lane and Chaffe's Lane are unlit, however light pollution from Upchurch impacts the experience of dark night skies within the site.

Perceptual and scenic qualities sensitivity	**Low-Moderate**

Summary of overall landscape sensitivity (including any variations)

A.67 The expansion of modern urban expansion at Upchurch's southern periphery, presence of mature orchard trees, hedgerows and regenerated vegetation on the site increases the sites sensitivity to development.

A.68 The limited cultural heritage features and generally flat topography reduce sensitivity to housing development.

A.69 It is considered that the site has a Low-Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Low-Moderate**

Potential effects on landscape character and features

A.70 Residential development on the site could:

- Result in the loss of the regenerated vegetation that covers the west of the site.

- Extend the settlement edge of Upchurch south of Chaffe's Lane, reducing Upchurch's rural setting and approach to the village, and integrate the existing standalone property on Oak Lane into the village.
- Loss of the nursery/horticultural use in the east of the site, altering the backdrop to the existing residences on Chaffe's Lane.
- Increase the presence of residential activity and lighting south of Chaffe's Lane.

Potential for mitigation and enhancement

A.71 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Retain and enhance portions of the regenerated vegetation to form shelterbelts and hedgerows around the boundaries of the development.
- Create hedgerows and shelterbelts to soften the edges of the development in keeping with the character of the area.
- Consider the heights of existing developments along Chaffe's Lane and use built forms and materials that are in keeping with the vernacular of Upchurch.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 10**]** and use dark sky-friendly lighting.

A.72 A summary map indicating the key constraints and opportunities is shown on **Figure A.55** below

Figure A.55: Opportunities and constraints

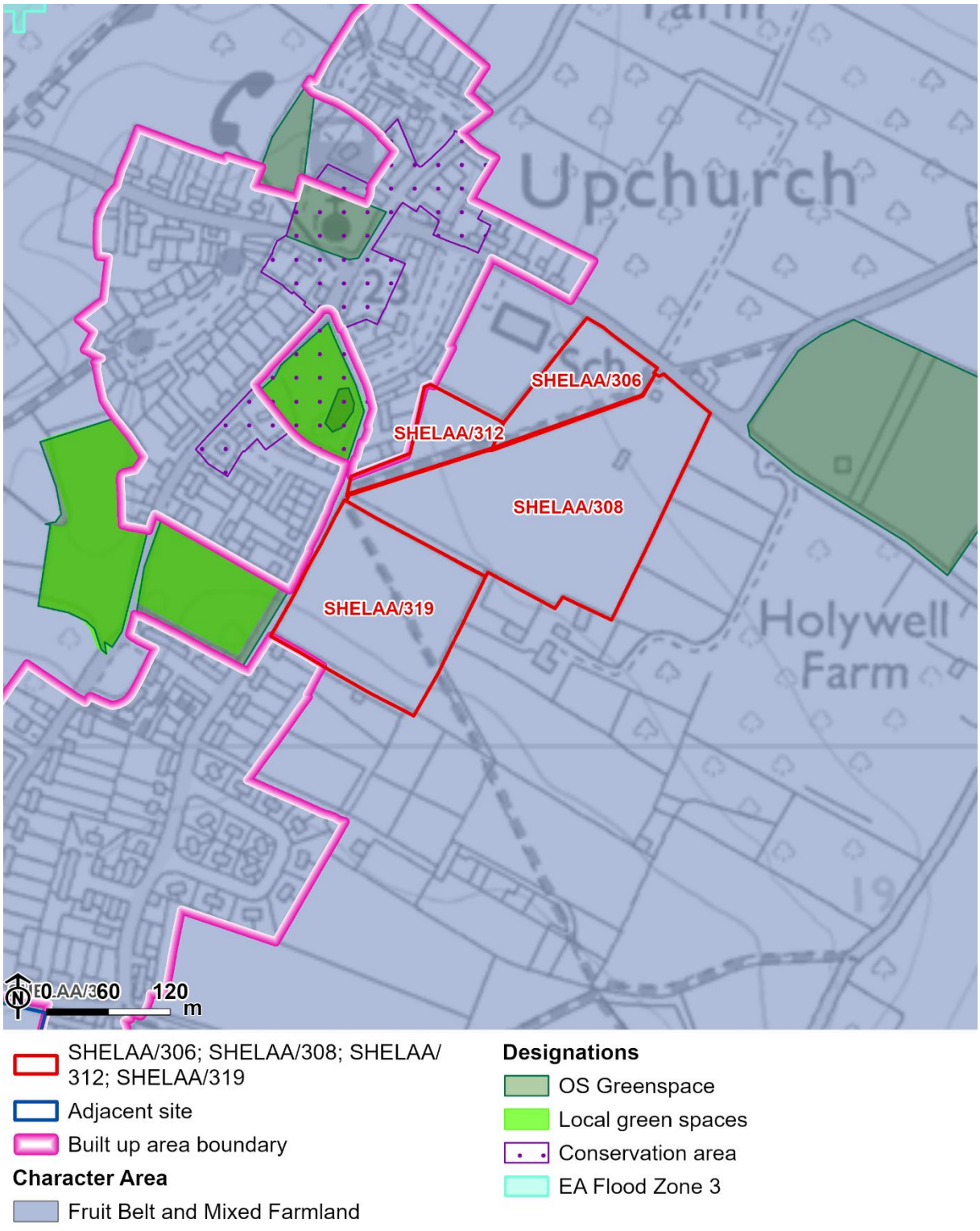
Land at Chaffes Lane and Forge Lane, Upchurch: SHELAA/306, SHELAA/308, SHELAA/312 and SHELAA/319

A.73 The four sites at Upchurch have been assessed as one. Where variations between the sites exist, these have been noted.

Figure A.56: Location and context map

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.57: Site constraints



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Location and description

The sites lie to the south-east of Upchurch, between Chaffes Lane and Forge Lane. The sites consist predominantly of open mixed arable and pastoral agricultural land with occasional field boundary vegetation, particularly along the southern edges of SHELAA/308 and SHELAA/319 and the western edge of SHELAA/306. A small cluster of farm buildings lies in the north-east of SHELAA/308.

Landscape character

A.74 The site lies wholly in LCA 32 Upchurch and Lower Halstow Fruit Belt. The key characteristics of the LCA are:

- Small to medium-scale rural landscape with a strong sense of enclosure.
- Small nucleated villages with historic centres and modern urban expansion on the periphery.
- Undulating landscape with occasional long views to north and south.
- Distinctive coastal edge formed by abutting marshland and arable/horticultural land, with views of estuary and rising land.
- Fragmented structure of mature hedgerows and shelterbelts surround orchards, pasture and arable fields.
- Grazing marsh to the west of Ham Green.
- Narrow winding lanes, with the busy A2 on the southern boundary.

Figure A.58: View looking south from Forge Lane across SHELAA/306 to the existing farmhouse on SHELAA/308.

Figure A.59: View of SHELAA/319 looking south-east from public right of way off Chaffe's Lane.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The sites occupy gently undulating land which gently rises to the south-west from 15 metres AOD in the north-east of SHELAA/306 and SHELAA/308 rising to 25 metres AOD in the south of SHELAA/319.
- The field pattern across the sites is predominantly medium-scale. Although the fields have been subdivided historically, the underlying structure remains legible.
- Small-scale landscape features include a small cluster of agricultural buildings in the north-east of SHELAA/308, orchards, hedgerows along Forge Lane and Chaffes Lane. There are also mature hedgerows and occasional trees along the southern boundary of SHELAA/319, and intermittent field boundary vegetation along the south of SHELAA/308.

Physical character sensitivity	Moderate

Natural character

- The sites consist predominantly of mixed arable and pastoral agricultural land, with limited internal vegetation. Priority habitat traditional orchard is present around the agricultural buildings in SHELAA/308, providing a small but locally important semi-natural habitat.
- Mature hedgerows along Chaffes Lane, hedgerows and trees along the southern boundary of SHELAA/319, and hedgerows along Forge Lane also provide semi-natural habitats.

Natural character sensitivity	Low-Moderate

Historic landscape character and time depth

- There are no recorded historic features within the sites. The sites lie approximately 15 metres east of Upchurch Conservation Area, and the western edges of the sites are visible from the edge of the conservation area. The Grade I listed Church of St Mary the Virgin lies approximately 175 metres west of

SHELAA/312, and there are views towards the church from the west of the sites.

- Historic mapping indicates that the sites have been in long-term agricultural use, with evidence of former orchard use across parts of the land.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- Upchurch has two distinct areas, the historic core centred around the staggered crossroads and church and 20th century development to the south between Oak Lane and Chaffe Lane. The sites lie to the south-east of the historic core of Upchurch and development of the sites would extend built form south of Forge Lane, Holywell Primary School and Chaffes Lane, altering the current settlement pattern. However, development has already occurred to the east of Chaffes Lane, and therefore development of the sites would be partly consistent with the general pattern and form of Upchurch.
- The sites form part of the rural approach and backdrop to Upchurch from the south and east. Development of the sites would extend development along Holywell Lane and Chaffes Lane. If the sites are developed, the rural approach to Upchurch would be retained to the east of Chaffes Lane and south of Forge Lane, where open agricultural land continues.
- SHELAA/319 forms an important role in separating the two areas of Upchurch. Development of this site would remove the existing separation between the historic core and 20th century development.

Character of the settlement and relationship with the landscape sensitivity (SHELAA/306, SHELAA/308, SHELAA/312)	**Moderate**
Character of the settlement and relationship with the landscape sensitivity (SHELAA/319)	**Moderate-high**

Visual prominence, skyline and views

- The sites are relatively flat with an undeveloped skyline, which is not particularly prominent in the wider landscape. Views towards the Grade I listed Church of St Mary the Virgin are available from parts of the sites, particularly from SHELAA/312 and SHELAA/319.
- Mature hedgerows along Chaffes Lane limit views into the south-west of SHELAA/319. However, the majority of the boundary along Chaffes Lane consists of post-and-wire fencing with occasional hedgerows, creating open views into SHELAA/312, SHELAA/3018 and the north-west of SHELAA/319. Hedgerows have been removed from Forge Lane, allowing open views into SHELAA/306 and SHELAA/308.
- The eastern edges of all four sites are open, with no boundary vegetation, allowing long views across adjoining agricultural land. Shelterbelts around Sedgemoor House provide some screening to the south-east of SHELAA/308 and the east of SHELAA/312. There are open views across the sites from the public rights of way crossing the sites.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- Two public rights of way cross the sites, one runs along the boundary of SHELAA/306 and SHELAA/312, connecting Chaffes Lane and Forge Lane. The

other PRoW runs south-east within SHELAA/319 and continues south-east to Hollywell Lane. PRoWs provide access through open countryside, increasing perceptual sensitivity.

- The sites retain a rural farmed character and long views eastwards. However, proximity to Upchurch reduces tranquillity and the experience of dark night skies.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.75 The presence of public rights of way and open views from the footpaths, intervisibility with Upchurch Conservation Area and the Grade I listed Church of St Mary the Virgin, the rural approach the sites provide to Upchurch and the open eastern and southern boundaries of the sites increase sensitivity to housing development.

A.76 The limited natural and cultural heritage features within the sites, the generally flat topography, and the proximity to existing development along Chaffes Lane and Holywell Primary School reduce sensitivity to housing development.

A.77 It is considered that SHELAA/306, SHELAA/308 and SHELAA/312 have a Moderate overall sensitivity to housing development.

A.78 SHELAA/319 is considered to have a Moderate-High sensitivity to housing development due to its role in separating the two distinct areas of Upchurch.

Overall sensitivity to housing development (SHELAA/306, SHELAA/308, SHELAA/312)	**Moderate**
Overall sensitivity to housing development (SHELAA/319)	**Moderate-High**

Potential effects on landscape character and features

A.79 Residential development on the sites could:

- Result in the loss of the existing medium-scale field pattern, arable and pastoral agricultural land use.
- Result in the loss of hedgerows along Forge Lane, Chaffes Lane and the southern boundary of SHELAA/319, and the loss of orchard habitat around the agricultural buildings in SHELAA/308.
- Extend built form south of Forge Lane and Chaffes Lane, reducing the rural setting of Upchurch and altering the rural approach to the village.
- Result in the loss of separation between the two distinct areas of Upchurch, especially if SHELAA/319 is developed.
- Affect the intervisibility with Upchurch Conservation Area and the rural backdrop to the Grade I listed Church of St Mary the Virgin.
- Views back towards the open eastern and southern boundaries of the sites from Forge Lane SHELAA 306 AND SHELAA308.
- Alter the experiences and views of people using the public rights of way crossing the sites.
- Introduce suburbanising influences such as lighting, domestic boundaries and increased activity.

Potential for mitigation and enhancement

A.80 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Strengthen the open eastern and southern boundaries with native hedgerows and tree belts to limit views into the sites and soften the transition to open countryside.
- Retain and enhance hedgerows along Forge Lane and Chaffes Lane, replacing post-and-wire fencing with native hedgerows where possible and appropriate.
- Incorporate orchard planting, hedgerow alignments and field-pattern references within open spaces to reflect the wider Fruit Belt landscape character.
- In order to retain the perception of separation along Chaffes Lane between the two areas of Upchurch, avoid development on SHELAA/319.

- Step down building heights and densities towards the open eastern and southern boundaries to create a softer settlement edge.
- Set development back from the public rights of way crossing the sites, maintaining a rural character and experience for users.
- Use building forms and materials that reflect the vernacular of Upchurch, including brick, weatherboarding and simple rooflines.
- Minimise the influence of lighting associated with new development and use dark-sky-friendly lighting.

A.81 A summary map indicating the key constraints and opportunities is shown on **Figure A.60** below

Figure A.60: Opportunities and constraints

CFS50 Land East of Faversham expansion

Figure A.61: Location and context map

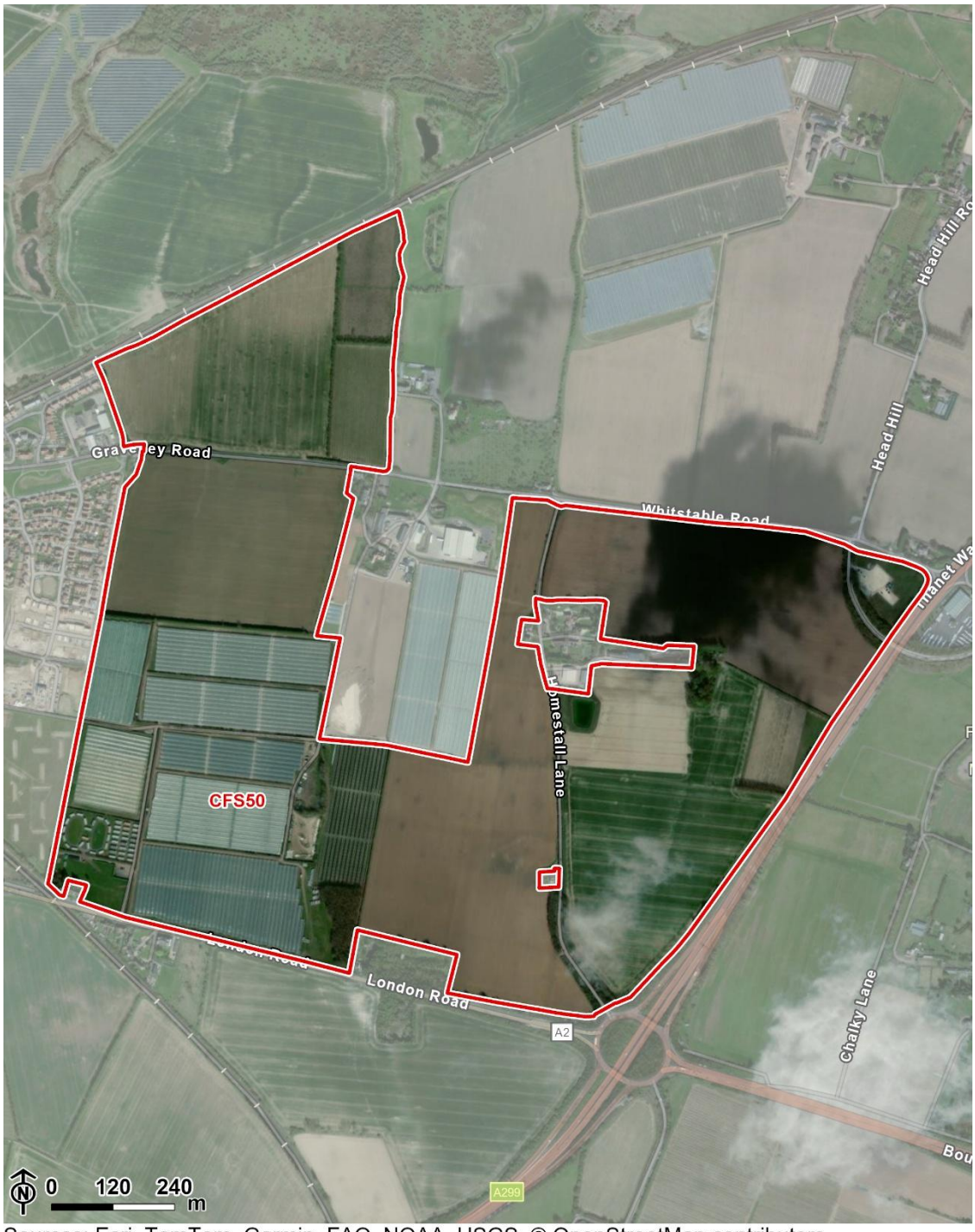

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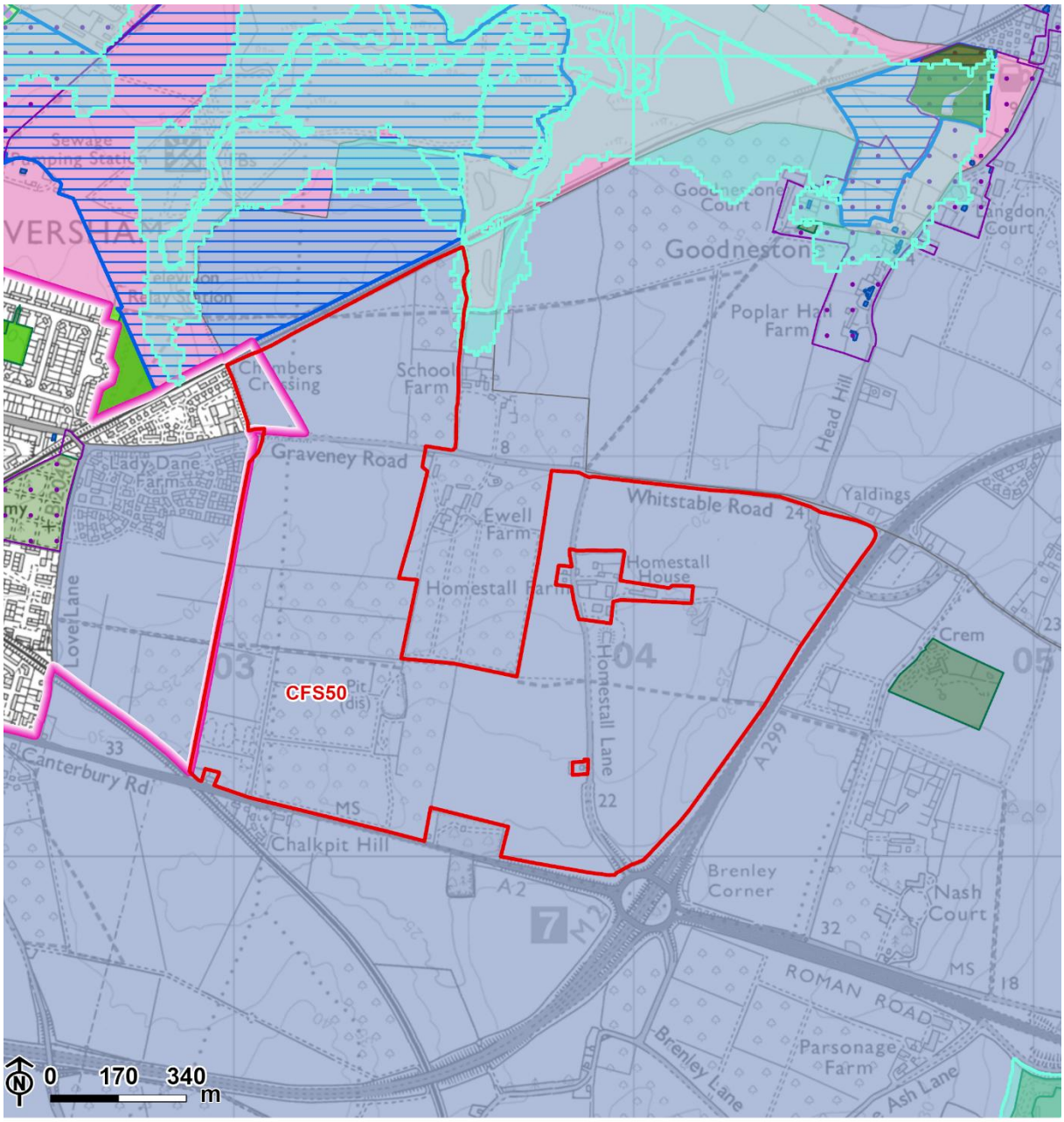
Figure A.62: Site constraints



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Location and description

The site lies to the east of Faversham. The site consists of arable fields and plant nurseries / glasshouses. A campsite is located in the south-west corner and a small woodland block on the southern boundary. Sections of Graveney Road, and Homestall Farm Lane run through the site.

Landscape character

A.82 The site lies wholly in LCA 20 Faversham and Ospringe Fruit Belt. The key characteristics of the LCA are:

- Gently undulating landscape that steadily climbs southwards.
- Mixed geology of head brickearth, Thanet beds drift, clay-with-flints and chalk.
- Small- to medium-scale orchards and large open arable fields.
- Woodland shaws and new plantation.
- Mature fragmented hedgerows supplemented with post and wire fencing.
- Many fine historic buildings in local vernacular style.
- Motorways, A and B roads, and narrow winding lanes, including historic routes.

Figure A.63: Looking west across the site from the PRoW south of Homestall House.

Figure A.64: Looking south-west from Homestall Lane across the site.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The site occupies gently sloping land between approximately 5m and 30m AOD, falling northwards towards tributaries of Faversham Creek (outside the site). The landform rises to its highest point adjacent to the A299 in the east and south-east, noticeable from the surrounding landscape.
- It forms part of a medium to large-scale farmed landscape with polytunnels and associated farm infrastructure. Small scale landscape features include hedgerows along roadsides and field boundaries.

Physical character sensitivity	Low-Moderate

Natural character

- Land cover is predominantly arable fields and fruit farming, with extensive glasshouses/polytunnels.
- There are no designated sites or priority habitats within the site. The site is located adjacent to floodplain grazing marsh in the north, locally designed as a Site of Biodiversity Value, however connections towards this are fragmented by the Chatham Main Line railway.
- Mature hedgerows and hedgerow trees are found across the site, along roadsides and field boundaries. The hedgerows along the southern boundary with the A2 Canterbury Road are particularly tall and adjacent to a small block of woodland.

Natural character sensitivity	Moderate

Historic landscape character and time depth

- There are no recorded historic features within the site. Homestall House barn and stables (Grade II) and Ewell Farmhouse (Grade II) are listed buildings. These have been excluded from the site boundary but are adjacent to and surrounded by the site.

- Faversham Conservation Area lies to the west, with glimpsed views towards the site but a limited relationship due to intervening development. Goodnestone Conservation Area lies approximately 300m to the north and is visible from the northern edge of the site across the marshes. The A2 follows the route of the Roman Watling Street.
- Historic mapping indicates long-term agricultural use with former orchards, and the site retains elements of a medium-scale historic field pattern.

Historic landscape character and time depth sensitivity	**Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the east of Faversham, which retains a distinct market town identity. Development has already extended east from the settlement. New housing development is located adjacent to the western site boundary.
- Goodnestone in the north retains a distinct village identity in a rural setting, which is contributed to by the site.
- The site contributes to the rural approach and backdrop to Faversham along the A2. Development would extend development further along the A2 and towards the A299 and M2 junction.
- Although in accordance with the general pattern and form of Faversham, it would increase risk of coalescing with Goodnestone.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site occupies gently sloping land with an undeveloped skyline. Views within the site are open, due to the large arable fields.
- Vegetation along the site boundaries filter and screen views towards the site from neighbouring roads and PRoW, particularly in the south. There are

however glimpsed views through gaps in hedgerows. The rising landform to the south-east is noticeable.

- There are views from the marshes and from Goodnestone Conservation Area towards the northern edge of the site.
- Lighting and signage along the A299 Thanet Way form vertical features in glimpsed views.

Visual prominence, skyline and views sensitivity	**Moderate**

Perceptual and scenic qualities (including access and recreation)

- Two ProW run broadly east–west through the site, providing access across the railway line in the north and connecting Faversham with Goodnestone. Views from these footpaths are generally open, however the footpath south of Ewell Farm is inaccessible in part as it runs past the polytunnels.
- The site retains a rural character through its farmed land, but proximity to the A2, A299 and railway results in traffic noise, movement and lighting, reducing tranquillity and reinforcing a transitional, infrastructure-influenced character.
- A campsite is located in the south-west corner of the site and includes caravans.

Visual prominence, skyline and views sensitivity	**Moderate**

Summary of overall landscape sensitivity (including any variations)

A.83 The access along the PRoW, mature hedgerows, rural approach to Faversham, proximity to listed buildings and rural context between Faversham and Goodnestone increase sensitivity to development.

A.84 Due to the presence of existing modern housing adjacent to the site, development would be in accordance with the general settlement pattern and scale. This, along with the well filtered nature of the site's boundaries, and the influence of

neighbouring road and rain infrastructure, would reduce sensitivity to housing development.

A.85 It is considered that the site has a Moderate overall sensitivity to housing development.

Overall sensitivity to housing development	**Moderate**

A.86 Part of the site is in intensive agricultural use with glasshouses / polytunnels and associated infrastructure. Although this moderates sensitivity to further employment-type development in part, employment development would be a larger scale than existing infrastructure, proposed housing or mixed-use development. This scale would be less inconspicuous in the landscape and is not representative of existing land uses or scale, which would increase the sensitivity to employment development. Sensitivity would be higher in areas which are not influenced by existing polytunnels / glasshouses.

A.87 It is considered that the site has a Moderate-High overall sensitivity to employment development.

Overall sensitivity to employment development	**Moderate-High**

A.88 The smaller scale employment development and housing are more in keeping with the neighbouring residential scale. The combination of employment with housing could help integrate the development into the surrounding landscape and settlement edge more successfully and create a less obtrusive gateway to Faversham than employment development on its own.

A.89 It is considered that the site has a Moderate overall sensitivity to mixed-use development.

Overall sensitivity to mixed development	**Moderate**

Potential effects on landscape character and features

A.90 Housing and mixed-use development on the site could:

- Result In the loss of productive agricultural land, eroding the Fruit Belt's traditional agricultural character.
- Result in the loss of mature hedgerows and hedgerow trees which create structure and screen views towards the site.
- Detract from the rural approach and increase the risk of coalescence between Faversham and Goodnestone.
- Increase the visual prominence of the site from the surrounding landscape, including Goodnestone Conservation Area.
- Alter the experience of users on PRoWs crossing the site.
- Impact the rural setting of nearby listed buildings (Homestall House, Ewell Farmhouse).

A.91 In addition, employment on the site could:

- Intensify built form and hardstanding, reducing the proportion of open farmland.
- Introduce larger, more industrial-scale buildings that may be out of scale with the Fruit Belts character and scale.
- Increase traffic and servicing activity at the A2/A299 junction, reinforcing an urbanised gateway east of Faversham.

A.92 In addition, mixed use development on the site could:

- Introduce contrasting building forms, creating a visually incoherent settlement edge.

Potential for mitigation and enhancement

A.93 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Retaining and strengthening boundary vegetation, including along the A2, A299, Homestall Lane, railway line and western edge. Using existing and creating additional robust boundary planting to screen both residential and employment elements.

- Avoid developing the more elevated fields closer to the A299 which are more prominent in views within the surrounding landscape.
- Avoiding developing the north-eastern corner of the site, to retain separation between Faversham and Goodnestone.
- Using vernacular materials (e.g., red/yellow brick, weatherboarding, Kent-peg tiles) consistent with LCA 20 guidance. Ensuring coherent materials and design language across both development types, particularly relevant for mixed-use development.
- Incorporating orchard blocks, hedgerows and shaws to reflect the Fruit Belt structure.
- Improve access and create green buffers along PRoWs to maintain rural character and reduce visual impacts.
- Locating the largest buildings away from PRoWs, gateways and heritage assets (including the listed buildings), stepping down heights towards sensitive edges.

A.94 A summary map indicating the key constraints and opportunities is shown on **Figure A.65** below

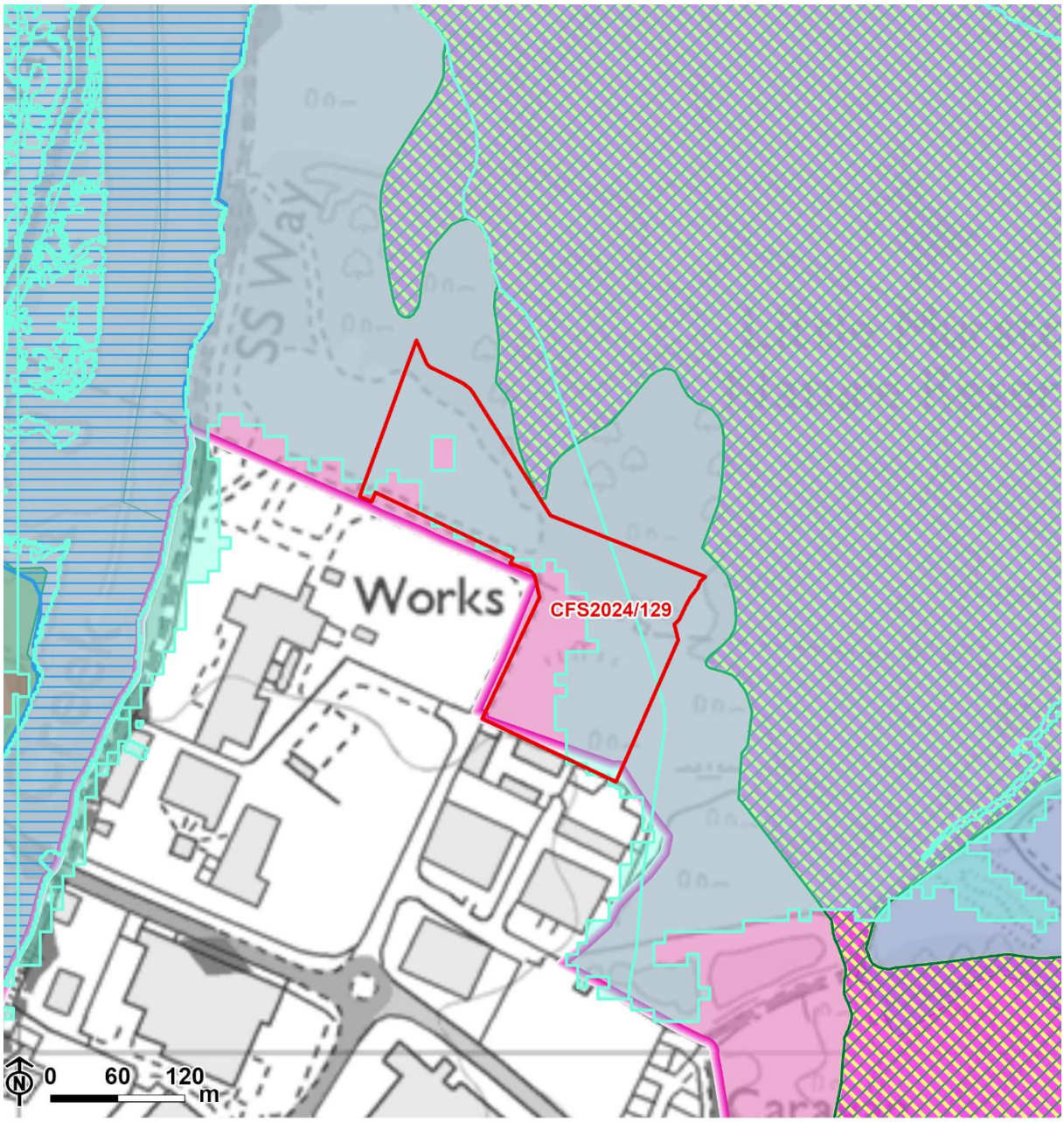
Figure A.65: Opportunities and constraints

CFS2024/129 - Smeed Dean Works, Eurolink Industrial Estate, Castle Road

Figure A.66: Location and context map

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.67: Site constraints



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Location and description

The site lies at north-eastern edge of Sittingbourne at the outer limit of an existing industrial estate. The northern site boundary meets the boundary of the Swale conservation area. The site consists of scrub, woodland and works associated with the neighbouring industrial estate.

Landscape character

A.95 The site lies wholly in LCA 8 Luddenham and Conyer Marshes. The key characteristics of the LCA are:

- Flat alluvial marshland with sinuous reed filled ditches. Traditional gates and fences leading into ditches prevent cattle crossing into other fields.
- Large open and often dramatic skies.
- Rough grassland largely used for cattle and sheep grazing.
- Important wetland habitats.
- Access routes limited to Harty Ferry approach and Conyer.
- Boats in the Swale and creek.
- Large-scale landscape with little sense of enclosure.
- Strong sense of place, remote and isolated.

Figure A.68: View looking into the east of the site from the roadside.

Figure A.69: View looking north into the west of the site from the roadside.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is generally flat, lying below 5 metres AOD. Most of the site sits in Flood Zone 3.
- The west of the site is utilised as a storage area for industrial materials/mounds.
- Small scale landscape features across the eastern portion of the site include regenerating vegetation and varying stages of maturity and a mature hedgerow along the western boundary. Pylons and neighbouring industry form large scale features.

Physical character sensitivity	Low

Natural character

- The site is located adjacent to the southern boundary of the internationally and nationally designated Swale which is a Ramsar site, Special Protection Area, SSSI and RSPB Nature Reserve.
- There is priority habitat deciduous woodland in the north of the site, although this has been degraded by industrial activity. Elsewhere there are areas of scrub.

Natural character sensitivity	Moderate-High

Historic landscape character and time depth

- There are no recorded historic features or conservation areas within the site or its immediate surrounds.
- The site is on the edge of a longstanding industrial estate. Historic mapping shows that the eastern area of the site has previously been used for industrial activity.

Historic landscape character and time depth sensitivity	**Low**

Character of the settlement and relationship with the landscape

- The site sits at the north-east edge of Sittingbourne at the transition point between the industrial estate and important marshland habitat.
- Mature vegetation along the north-west boundary and in the eastern area of the site softens the transition between industrial estate and the marshland.
- The south-west boundaries of the site are defined by the outer roads of the existing industrial estate. Large scale industrial buildings neighbour the site to the south-west.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is relatively open, with glimpsed views from gaps in vegetation along surrounding public rights of way. Including from Saxon Shore Way long distance footpath along both sides of Milton Creek to the north, and from the PRoW and nature reserve at Little Murston to the north-east.
- The site is open and visible from the raised areas of the B2005 Swale Way.
- The site is relatively flat with a skyline that is defined by earth mounds to the west and a skyline of existing trees to the east. Pylons form prominent vertical features on the skyline across the site.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- There are no public rights of ways or access points on the site or within its immediate surrounds.
- The site is part of a large-scale landscape with little sense of enclosure. This is most prevalent looking north from the site across the marshland.
- Industrial activities have deteriorated the natural character in the west of the site while regenerated vegetation in the east of the site helps to screen the industrial estate from the wetland area.

Perceptual and scenic qualities sensitivity	**Low-Moderate**

Summary of overall landscape sensitivity (including any variations)

A.96 The proximity of the site to the internationally and nationally designated Swale Ramsar site, SSSI, SPA and RSPB (Little Murston) Nature Reserve, presence of priority habitat areas, and location within Flood zone 3 increase its sensitivity to employment development.

A.97 The existing hard edge of the industrial estate and existing industrial activity in the west of the site reduce its sensitivity to employment development.

A.98 It is considered that the site has a Moderate overall sensitivity to employment development.

Overall sensitivity to employment development	**Moderate**

Potential effects on landscape character and features

A.99 Employment development on the site could:

- Result in industrial activities creeping into the internationally and nationally designated Swale Ramsar site and SSSI.
- Result in the further loss of the deciduous woodland priority habitat area.

- Change the backdrop experienced from public right of ways along Saxon Shore Way and through Little Murston Nature Reserve.
- Change the outlook across the Swale from the B2005 Swale Way.

Potential for mitigation and enhancement

A.100 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Utilise existing management and enhancement guidance for The Swale to create an appropriate boundary between industrial activities and valued habitats. This could include maintaining and enhancing existing woodland vegetation along the north-east site boundaries adjacent to The Swale.
- Prioritise restoration in the site areas designated as priority habitat deciduous woodland and seek opportunities for interconnectivity to the diverse range of marshland habitats to the north of the site.
- Ensure that development is set back from the north-east boundaries adjacent to the Swale.
- New employment development should be designed to integrate with existing developments to the south of the site and consider reducing the height of built forms towards the north-east of the site to soften the interface between built and natural form.
- Recessive colours and materials should be used to reduce the contrast between the industrial area and the Swale.
- Consider opportunities for interconnectivity between the PRoW along Saxon Shore Way to the west of the site and through Little Murston Nature Reserve to the east of the site.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 11**]** and use dark sky-friendly lighting. Ensure that proposed lighting does not adversely affect sensitive habitats and species within the designated Swale area.

A.101 A summary map indicating the key constraints and opportunities is shown on **Figure A.70** below

Figure A.70: Opportunities and constraints

CFS2024/188 Land north of Keycol Hill (Yellow/Blue parcel)

Figure A.71: Location and context map

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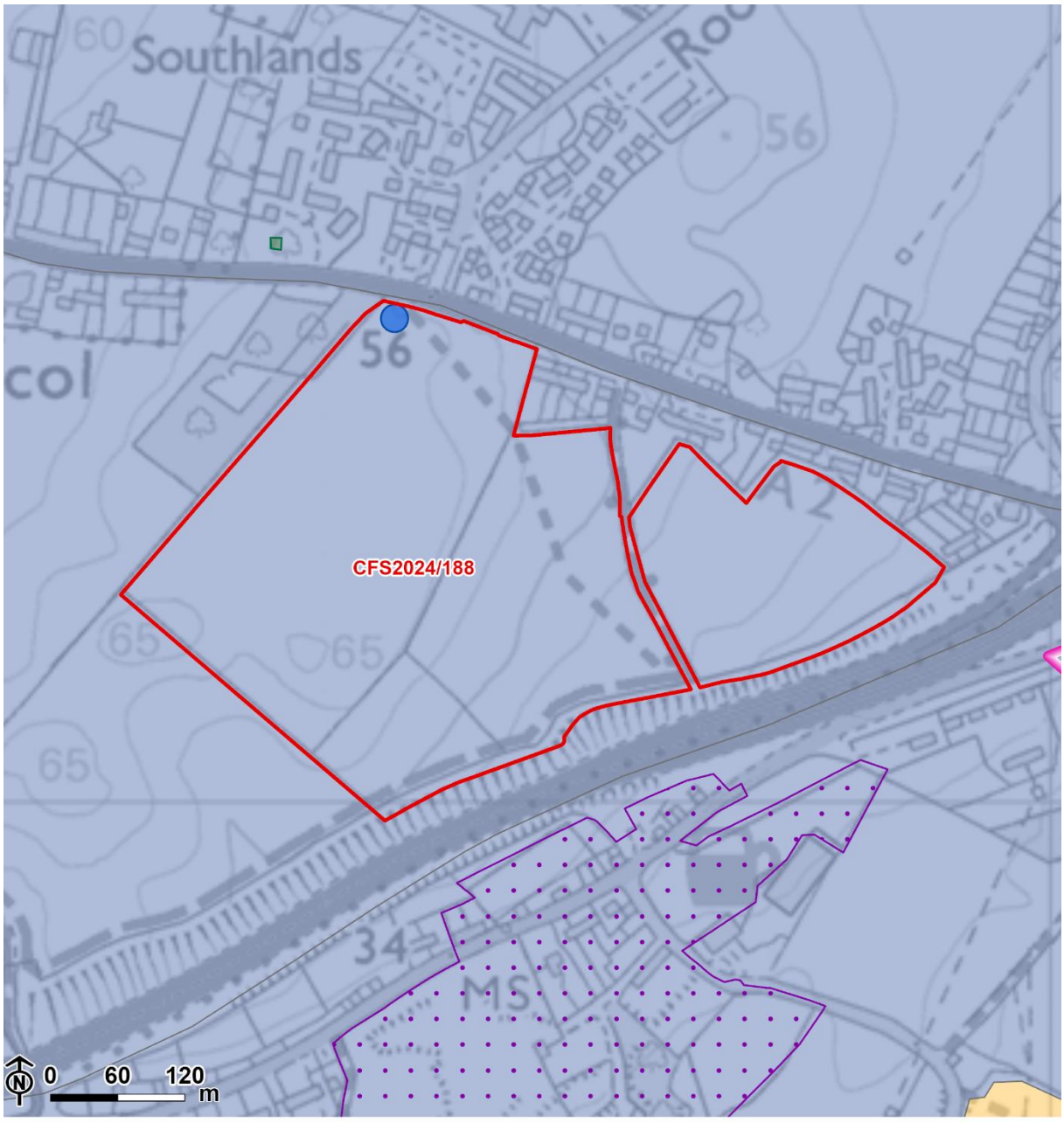
Figure A.72: Site constraints



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Location and description

The site is located to the south of Keycol, south of the A2 and to the west of the A249 Maidstone Road. The site consists of two open arable fields divided by a hedgerow. Wide panoramic views across to the Swale and Kent Downs National Landscape can be experienced from the plateau at the top of the western field.

Landscape character

A.102 The site lies wholly in LCA 27 Newington Arable Farmlands. The key characteristics of the LCA are:

- Rolling arable landscape.
- Simple geology of Thanet Bed deposits.
- Settlement limited to ribbon development along major roads and isolated farmsteads.
- Mixed field pattern, generally medium-scale.
- Few isolated remnant woodlands at field margins.
- Views mainly enclosed by topography, roadside screening and built development.
- ‘A’ roads, motorway and open narrow winding lanes.

Figure A.73: Views looking south from the plateau at the top of the west field.

Figure A.74: Looking east into small east field from the public right of way.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The site forms part of a rolling arable hill characteristic of the area. It gently rises from the east from 30 metres AOD to an open skyline plateau at 65 metres AOD in the west.
- The eastern field is small-scale, while the western field is medium-scale. The site is defined by hedgerows and shelterbelts, which provide small-scale features.

Physical character sensitivity	Moderate

Natural character

- The two fields which make up the site are in arable use. There are no semi-natural habitats recorded, although a mature hedgerow separates the two fields.
- Mature roadside planting along the A249 defines the southern edge of the site. A woodland to the north-west of the site is recorded as priority habitat deciduous woodland and traditional orchard.

Natural character sensitivity	Low

Historic landscape character and time depth

- Two disused military pill boxes lie within the site – a First World War example in the north-east and a Second World War pill box in the south-west.
- The Chestnut Street, Borden Conservation Area is across the dual carriageway, Maidstone Road. Vegetation along Maidstone Road screens the site from the visibility of the conservation area, built form along the upper plateau in the west field would be visible from the conservation area

Historic landscape character and time depth sensitivity	Moderate

Character of the settlement and relationship with the landscape

- The site lies to the south of the linear development of Keycol along the. Employment development of the site would alter the existing linear settlement pattern and introduce a typology of built form that is not currently present in the area.
- The site contributes to the rural backdrop of Sittingbourne experienced along the A2 and the A249 Maidstone Road.

Character of the settlement and relationship with the landscape sensitivity	**Moderate**

Visual prominence, skyline and views

- The site is very open provides panoramic views from public rights of way across the district from the Swale to the Kent Downs National Landscape. Employment development would alter the outlook from the site.
- Roadside vegetation on Maidstone Road screens views from the Chestnut Street Conservation Area.
- The site is very open and raised to the west. Pillboxes along the soft ridge of the hillside indicate long standing importance associated with views from the site across the district to the Swale and the Kent Downs National Landscape from the raised plateau in the west field.
- Development sited on the upper plateau in the west field would be highly visible along the skyline in views from developments south of the A249.

Visual prominence, skyline and views sensitivity	**Moderate-High**

Perceptual and scenic qualities (including access and recreation)

- Public rights of way cross through the centre of the site and run along the south-west along Maidstone Road. Open panoramic views across the district to the

Swale and the Kent Downs National Landscape can be experienced from the public rights of way in particular from the top of the west field.

- The site retains a sense of rural character. The A2 is lit along the portions with existing residential developments. The A249 dual carriageway, Maidstone Road, is unlit but contributes to a constant sense of traffic noise.

Perceptual and scenic qualities sensitivity	**Moderate-High**

Summary of overall landscape sensitivity (including any variations)

A.103 The rising topography, historic features (Pillboxes), PRoWs and open views from residential properties increase the sites sensitivity to employment development.

A.104 The limited semi-natural features, and proximity to Sittingbourne and the dual carriageway reduce the site's sensitivity to employment development.

A.105 It is considered that the site has a Moderate overall sensitivity to employment development.

Overall sensitivity to employment development	**Moderate**

Potential effects on landscape character and features

A.106 Employment development on the site could:

- Result in a loss of rolling arable fields to the west of Sittingbourne that are characteristic of the area.
- Change the linear settlement pattern of Keycol along the A2 and introduce a new typology of development to the area.
- Change the experience of users accessing the public rights of way that cross through the site and along Maidstone Road from a very open rolling arable landscape with open panoramic views to a built environment.

- Increase the presence of commercial activity and lighting between the A2 and Maidstone Road to resulting in a coalescing effect that could extend the outer boundary of Sittingbourne.

Potential for mitigation and enhancement

A.107 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- Site development carefully within the topography of the site avoiding the upper plateau in the west field. Focus development around lower ground less sensitive areas along the A249 and in the small east field.
- Retain and enhance the existing roadside vegetation along Maidstone Road and the A2.
- Consider the experience of users and interconnectivity of the public rights of way that run through the site. Retain and enhance the experience of panoramic views across the district.
- Consider the northern boundaries where the site meets existing residential properties.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary. Follow the Institute of Lighting Professionals guidance **[See reference** 12**]** and use dark sky-friendly lighting.

A.108 A summary map indicating the key constraints and opportunities is shown on **Figure A.75** below

Figure A.75: Opportunities and constraints

LPR247 0 (R15) Lamberhurst Farm, Yorkletts - proposed southern expansion

Figure A.76: Location and context map

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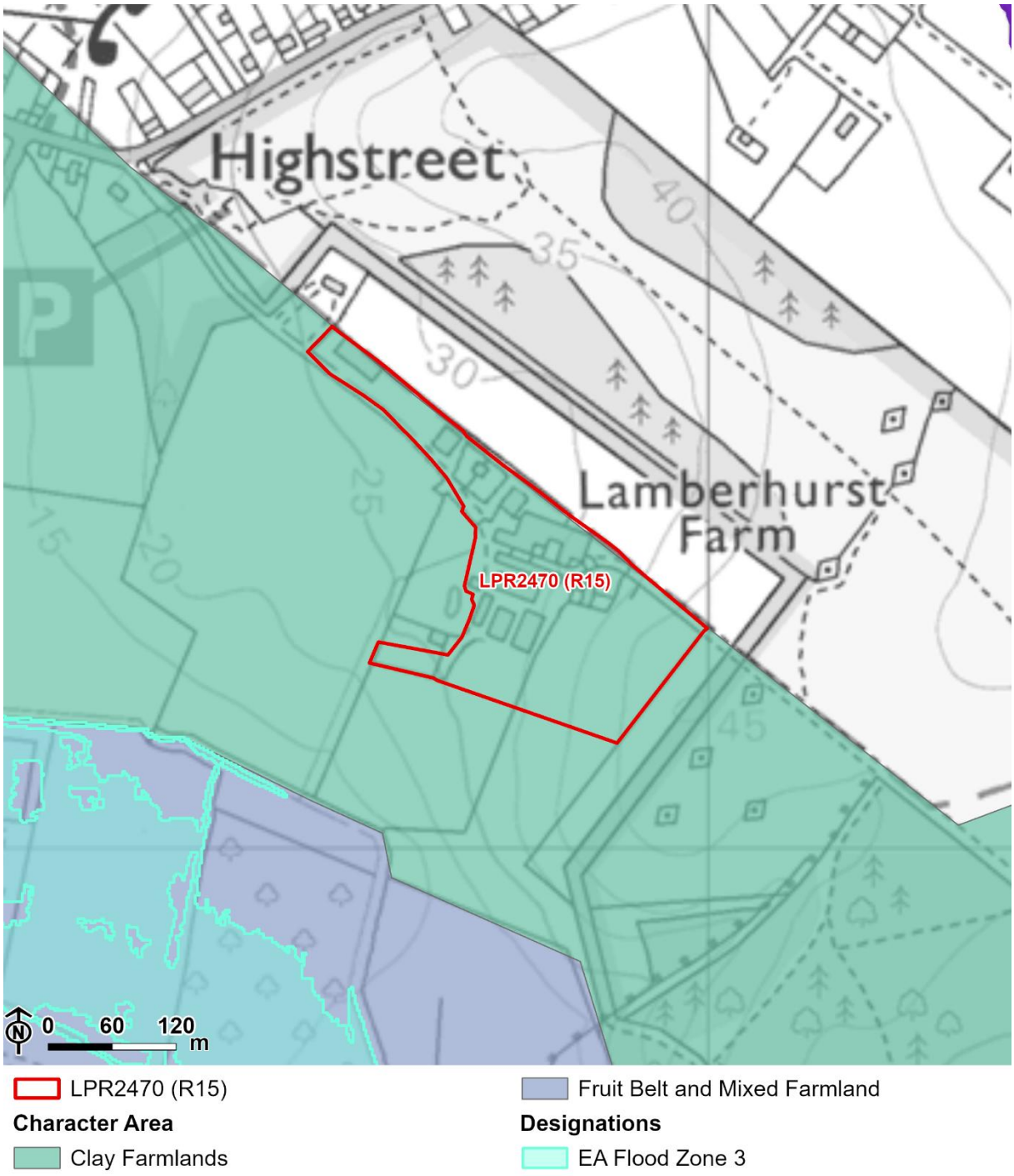
Figure A.77: Site constraints



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Location and description

The site lies to the north of Dargate and south-west of Yorkletts. The site contains industrial and transport-related uses, including vehicle yards, MOT and car-related businesses, industrial sheds and hangars, and associated hardstanding. The east of the site contains part of a larger arable field.

Landscape character

A.109 The site lies wholly in LCA 18 Waterham Clay Farmlands. The key characteristics of the LCA are:

- Distinctive domed hills set within an otherwise low-lying landscape.
- London clay geology with heavy soils.
- Ephemeral streams feed into the marshes.
- Clay Hill cleared of woodland in mid-20th century for cereal production.
- Woodland planting across Clay Hill to reinstate the landscape as part of the Blean complex.
- Small areas of remnant woodland at field boundaries.
- Rising ground abuts marshland.
- Monkshill and Horse Hill used for sheep grazing.
- Many hedgerows lost and fragmented. Field boundaries replaced with post and wire fencing.
- Isolated farmsteads and groups of cottages. Large industrial units.
- A and B roads.
- Extensive views over Seasalter Levels and Graveney Marsh to coast and beyond.

Figure A.78: View of site looking south-east from access road.

Figure A.79: Existing buildings on site.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is sloping, rising from approximately 25 metres AOD in the west to around 40 metres AOD in the north-east. The landform reflects the distinctive domed hills described in the LCA, with the site occupying part of the west-facing slope.
- The historic pastoral field pattern has been largely eroded by industrial development, although the wider landscape retains a more irregular small- to large-scale field structure.
- Small-scale landscape features within the site are limited to scattered trees and occasional hedgerows along the western boundary.

Physical character sensitivity	Low-Moderate

Natural character

- The site contains very limited semi-natural features. Vegetation is sparse, comprising scattered trees and occasional hedgerows surrounding the residential properties within the site, part of Lamberhurst Farm.
- The boundaries are largely open, with little or no boundary vegetation.
- There are no priority habitats within the site, although Victory Wood to the east provides a strong ecological presence in the wider landscape.

Natural character sensitivity	Low

Historic landscape character and time depth

- There are no recorded historic features within the site. The Old Farmhouse Lamberhurst, a Grade II listed building, lies immediately to the west of the site and the site forms part of its immediate setting.
- The historic settlement of Dargate, designated as a Conservation Area, lies approximately 800m to the south. Due to the elevated position of the site, shelterbelts and the land sloping down towards Dargate, the Conservation Area

is not visible in views from the site. Existing development is nestled within the topography.

- The site has been in long-term agricultural use, although the traditional field pattern has been substantially altered by industrial development.

Historic landscape character and time depth sensitivity	**Low-Moderate**

Character of the settlement and relationship with the landscape

- The site lies to the south-east of Yorkletts and north of Dargate. Yorkletts retains its linear settlement pattern, although it has extended along Highstreet Road.
- The site is in use for light industrial uses currently. Redevelopment of the site for commercial / industrial use would not alter the settlement pattern of Yorkletts. However, development on the site would extend further east into open countryside.
- The site forms part of the backdrop to Yorkletts. Development of the site would extend development along Highstreet Road.

Character of the settlement and relationship with the landscape sensitivity	**Low-Moderate**

Visual prominence, skyline and views

- The site is relatively open, with no boundary vegetation along the northern, eastern or southern edges, allowing views into the site from surrounding farmland.
- The sloping landform increases visibility from the south, including from the Dargate Conservation Area. Victory Wood sits on higher ground to the east and north-east, forming a wooded skyline that frames views from within the site.

  The industrial sheds and vehicle yards contrast strongly with the wooded backdrop and the more traditional rural character of the surrounding landscape.

Visual prominence, skyline and views sensitivity	**Low - Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access within the site beyond access to the existing businesses. A multi-use path runs along the northern edge of the site, providing access between Highstreet Road and the wider countryside. The Victory Wood Discovery Trail is about 200 metres north. Victory Wood forms a dense backdrop, visible only from the access road and bordered by buildings and vegetation.
- Tranquillity is reduced within and immediately around the site due to operational noise, although the surrounding farmland and Victory Wood retain a more rural character.

Visual prominence, skyline and views sensitivity	**Low**

Summary of overall landscape sensitivity (including any variations)

A.110 The elevated landform, open boundaries, visibility from the surrounding countryside, and intervisibility with the Dargate Conservation Area increase sensitivity to employment development. The proximity of The Old Farmhouse, Lamberhurst (Grade II) on the western boundary also increases sensitivity in relation to historic setting.

A.111 The existing industrial and transport-related uses within the site, the limited semi-natural features, and the already eroded traditional field pattern reduce sensitivity to additional employment development, particularly where it replaces or rationalises existing built form rather than extending into currently undeveloped land.

A.112 It is considered that the site has a Low-Moderate overall sensitivity to employment development.

Overall sensitivity to employment development	Low-Moderate

Potential effects on landscape character and features

A.113 Employment development on the site could:

- Result in the loss of the arable field in the east of the site.
- Intensify the industrial character of the site through larger or more numerous buildings, increased hardstanding and expanded vehicle storage.
- Increase the visual prominence of built form on the west-facing slopes, particularly in views from Dargate and the surrounding countryside.
- Further erode the rural setting of The Old Farmhouse, Lamberhurst (Grade II) by introducing additional large-scale or visually intrusive development in its immediate vicinity.
- Affect the experience of visitors approaching Victory Wood, by reinforcing an industrial foreground to the woodland.

Potential for mitigation and enhancement

A.114 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- The introduction of robust native boundary planting along the northern, eastern and southern edges should be prioritised to limit views into the site and soften the transition to surrounding farmland and woodland.
- Development should be set back from the western boundary to protect the setting of The Old Farmhouse, Lamberhurst (Grade II), with a generous landscaped buffer.
- New employment buildings should be designed to integrate with the sloping landform, avoiding overly tall or bulky structures on the most elevated parts of the site in the east.
- Recessive colours and materials should be used to reduce contrast with the surrounding landscape and the wooded backdrop of Victory Wood.

- Enhance the interface with the multi-use path along the northern edge through planting, boundary treatment and careful design of frontage to improve the experience for users.
- Keep views of Victory Wood from the access road; replace post and wire fence with a suitable hedgerow.
- Planting specimen trees to preserve the defined and integrated landscape topography on the western edge of the site.

A.115 A summary map indicating the key constraints and opportunities is shown on **Figure A.80** below

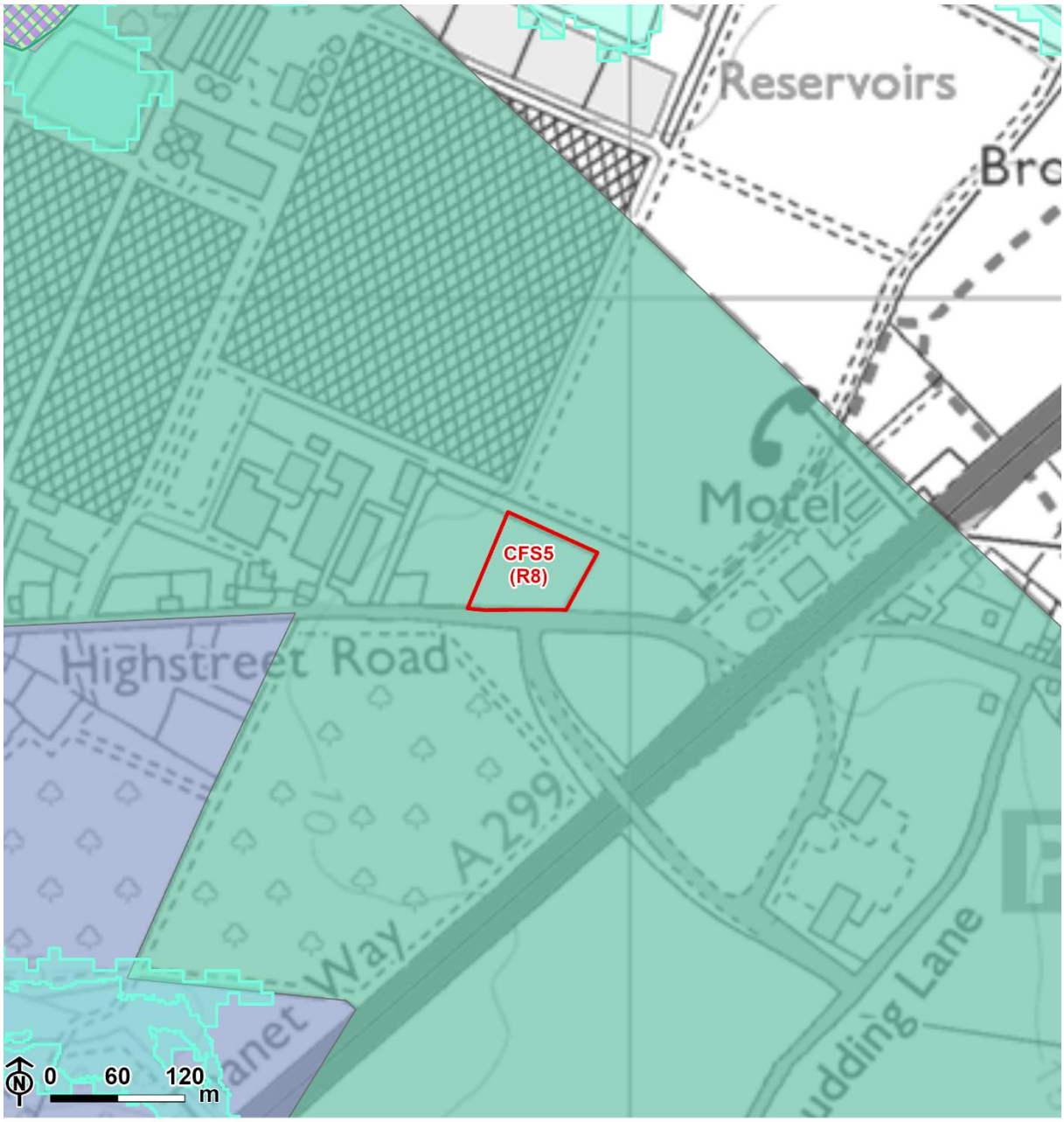
Figure A.80: Opportunities and constraints

CFS5 (R8) Waterham Industrial Estate - expansion east

Figure A.81: Location and context map

Created by LUC - 15034_Swale_LSA/15034_001_Site_Location_employ_A4P 05/05/2026
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Microsoft, Vantor. Swale Borough Council © AC0000812168.

Figure A.82: Site constraints



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Location and description

The site lies to the south-west of Yorkletts. It is located to the north of Highstreet Road, between Waterham Business Park and Thanet Way services. Extensive greenhouses and polytunnels lie to the north. The site is part of a larger area of amenity grassland and consists of access tracks serving loading and unloading areas for the nurseries, together with storage and disposal bays.

Landscape character

A.116 The site lies wholly in LCA 18. Waterham Clay Farmlands. The key characteristics of the LCA are:

- Distinctive domed hills set within an otherwise low-lying landscape.
- London clay geology with heavy soils.
- Ephemeral streams feed into the marshes.
- Clay Hill cleared of woodland in mid-20th century for cereal production.
- Woodland planting across Clay Hill to reinstate the landscape as part of the Blean complex.
- Small areas of remnant woodland at field boundaries.
- Rising ground abuts marshland.
- Monkshill and Horse Hill used for sheep grazing.
- Many hedgerows lost and fragmented. Field boundaries replaced with post and wire fencing.
- Isolated farmsteads and groups of cottages. Large industrial units.
- A and B roads.
- Extensive views over Seasalter Levels and Graveney Marsh to coast and beyond.

Figure A.83: View looking north-west into site from exisiting access on Highstreet Road.

Figure A.84: View of site looking east from Thanet Way Services PRoW.

Landscape sensitivity assessment

Physical character (including landform, scale and field pattern)

- The topography of the site is flat, lying at around 10 metres AOD.
- The site forms part of a medium-scale field pattern, which has been altered by the adjacent commercial nurseries.
- Small-scale landscape features are limited to the hedgerow with occasional trees along the southern boundary (Highstreet Road).

Physical character sensitivity	**Low**

Natural character

- The land cover is predominantly amenity grassland, used in association with the adjacent nurseries and storage operations. The site has historically been in pastoral use.
- Natural features are limited, with no priority habitats recorded. The southern boundary along Highstreet Road is defined by a hedgerow with occasional trees, providing the main semi-natural feature.

Natural character sensitivity	**Low**

Historic landscape character and time depth

- There are no recorded historic features within the site. Meadow Farmhouse, a Grade II listed building, lies approximately 400 metres to the south-west, but is not visible from the site due to intervening buildings within Waterham Business Park.
- The site has been in long-term agricultural use, although its historic pastoral character has been eroded by adjacent commercial and nursery development.

Historic landscape character and time depth sensitivity	**Low**

Character of the settlement and relationship with the landscape

- The site lies to the east of Waterham Business Park. Development of the site would extend development further along Highstreet Road. Further employment development would consolidate the existing commercial corridor along Highstreet Road and the A299.

Character of the settlement and relationship with the landscape sensitivity	**Low-Moderate**

Visual prominence, skyline and views

- The site is relatively open, with no boundary vegetation along the eastern and western edges. There are open views from the edge of the Thanet Way services and the public right of way along the edge of the services, and from Highstreet Road where gaps in the southern hedgerow occur. The nursery greenhouses and tall fencing immediately to the north form a prominent built edge in views from within the site.
- The skyline is flat and does not form a prominent skyline feature in the wider landscape, but the site itself.

Visual prominence, skyline and views sensitivity	**Low-Moderate**

Perceptual and scenic qualities (including access and recreation)

- There is no public access within the site. A public right of way runs approximately 100 metres to the east, providing access through the wider countryside.
- The site is strongly influenced by the adjacent commercial and nursery uses. Proximity to Highstreet Road, Waterham Business Park and the Thanet Way services reduce tranquillity. Artificial light from nearby development and the A299 Thanet Way contributes to light pollution.
- There is traffic noise from Highstreet Road and the A299 Thanet Way.

Visual prominence, skyline and views sensitivity	**Low -Moderate**

Summary of overall landscape sensitivity (including any variations)

A.117 The open character of the site, views from the public right way of wayand its role in the transition between Waterham Business Park, the A299 services and the surrounding farmland increase sensitivity to employment development, particularly where development would introduce larger or more visually prominent buildings.

A.118 The limited natural and cultural heritage features within the site, the generally flat topography, and the proximity to existing commercial and nursery development reduce sensitivity to employment development, especially where proposals are of a similar scale and character to adjacent uses.

A.119 It is considered that the site has a Low-Moderate overall sensitivity to employment development.

Overall sensitivity to employment development	**Low-Moderate**

Potential effects on landscape character and features

A.120 Employment development on the site could:

- Increase the extent and intensity of built form and hardstanding between Waterham Business Park and the nursery complex to the north.
- Reinforce the perception of a continuous commercial corridor along Highstreet Road and the A299 Thanet Way, reducing the sense of separation between different land uses.
- Alter views from Highstreet Road by introducing more prominent buildings or structures above the existing hedgerow.
- Affect the experience of users of the nearby public right of way to the east, through increased visibility of commercial development.

Potential for mitigation and enhancement

3.3 Landscape and visual effects could be avoided and/or minimised mitigation and enhancement:

- The hedgerow with occasional trees along the southern boundary should be retained, protected and enhanced to limit views into the site from Highstreet Road.
- New native boundary planting should be introduced along the eastern and western edges to reduce visual exposure and soften the transition between commercial uses and surrounding farmland.
- Retain and strengthen the eastern boundary hedgerow to reinforce an existing strong landscape edge and reduce visibility from the PRoW.
- New employment buildings should be of modest height and scale, reflecting the low, horizontal form of nearby nursery structures and avoiding overly bulky or visually dominant forms.
- Recessive colours and materials should be used to reduce contrast with the surrounding landscape and adjacent development.
- Lighting should be carefully designed and minimised, using directional, low-spill fittings to limit light pollution and maintain as dark a night environment as practicable.
- Where possible, incorporate small areas of green infrastructure, such as grassed margins, native shrubs and tree planting, to enhance biodiversity and reflect the LCA guidance to restore hedgerows and woodland networks.

A.121 A summary map indicating the key constraints and opportunities is shown on **Figure A.85** below.

Figure A.85: Opportunities and constraints

References

1 Swale Landscape Character and Biodiversity Appraisal Supplementary Planning Document (SPD) 2011 (Swale Borough Council. 2011) https://swale.gov.uk/your-council/publications/planning-and-planning-policy/swale-landscape-character-and-biodiversity-appraisal-supplementary-planning-document-spd-2011

2 'An approach to landscape sensitivity assessment – to inform spatial planning and land management' (Natural England, 2019)

3 'An approach to landscape sensitivity assessment – to inform spatial planning and land management' (Natural England, 2019)

4 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

5 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

6 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

7 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

8 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

9 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

10 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

11 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/

12 See the Institute of Lighting Professionals guidance for further information: https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/