

Sustainability Appraisal (SA) of the Swale Local Plan

**SA Report
Non-technical Summary (Draft)**

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Quality information

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1. Introduction

- 1.1.1. This is the Non-technical Summary (NTS) of the Sustainability Appraisal (SA) Report published as part of the SA process for the Swale Local Plan. Specifically, the SA Report is published alongside the proposed submission version of the Swale Local Plan under Regulation 19 of the Local Planning Regulations (2012).
- 1.1.2. The Local Plan aims to establish a strategy for growth and change across the District up to 2042, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. The SA Report aims is to present an appraisal of the plan alongside 'reasonable alternatives' with a view to informing representations and subsequent plan finalisation (see discuss of next steps, below). The SA Report is structured so as to:
 - explain work up to this point including appraisal of **reasonable alternatives**;
 - present an appraisal of **the proposed submission plan**; and
 - discuss **next steps**.
- 1.1.4. This NTS is structured as per the SA Report.

2. Reasonable alternatives (RAs)

- 2.1.1. Within the main report the key sections are as follows:
 - Section 4 – explains a focus on RAs and specifically in the form of **growth scenarios**.
 - Section 5 – defines growth scenarios.
 - Section 6 – appraises growth scenarios.
 - Section 7 – explains why the preferred scenario is 'justified' in light of the appraisal.

2.2. Defining growth scenarios

- 2.2.1. Section 5 (defining growth scenarios) is a key section that explains a lengthy process of evidence-gathering and decision-making / narrowing of options over time.
- 2.2.2. For context, 'growth scenarios' are defined as alternative approaches to the supply of land, primarily by allocating sites, in order to provide for development needs alongside delivering on wider objectives. Identifying a supply of land is a key aim of any local plan.
- 2.2.3. All local plans summarise the proposed broad approach to land supply in a 'key diagram', and so growth scenarios are defined, in short, as alternative key diagrams.
- 2.2.4. A starting point for defining growth scenarios is always understanding of local housing need (LHN), as defined by the Government's standard method. For Swale the plan period is 2025 to 2041 and the standard method sets LHN at 1,064 dwellings per annum (dpa), hence LHN over the plan period is $16 \times 1,064 = 17,024$.
- 2.2.5. The next question is whether there are any clear reasons for the local plan setting a 'housing requirement' either above or below LHN, where the housing requirement is defined as the number of homes that the local plan commits to delivering, in the knowledge that under delivery leads to punitive measures, namely the presumption in favour of sustainable development (NPPF para 11).
- 2.2.6. For Swale there are no clear reasons for a housing requirement that departs from LHN, and so attention focuses squarely on growth scenarios involving a total supply sufficient to enable the housing requirement to be set precisely at LHN. This is discussed further in the main report.

- 2.2.7. The next consideration is existing supply from sites with planning permission, which in Swale is high including because the ‘the presumption’ has applied for some time.
- 2.2.8. Specially, as of 31st March 2025, existing supply from sites with permission (including to resolution to grant) was 7,167 homes and additionally there were 263 homes set to be delivered at sites allocated within a ‘made’ neighbourhood plan, which brings the total existing supply figure (as of 31st March 2025) to **7,430 homes**.
- 2.2.9. Also, it is appropriate to account for future supply from windfall, i.e. to assume a future supply of homes that will come forward in line with policy despite not having a local plan allocation. The total windfall assumption (there are two components) is **2,409 homes**.
- 2.2.10. This leaves a residual figure of 7,185 homes (17,024 - 7,430 – 2,409) to plan for through the Local Plan, which essentially means via new allocations (there is also potential to assume supply from ‘broad locations’, but in practice the focus is on allocations).
- 2.2.11. On the one hand this residual figure should be considered a minimum, because there is a need to consider a supply ‘headroom’ as a contingency for delivery issues, i.e. with a view to ensuring that the housing requirement can be delivered in practice (year-on-year).¹ However, on the other hand, ‘existing supply’ could increase ahead of plan adoption, which would commensurately reduce the residual figure for the Local Plan.
- 2.2.12. Growth scenarios for the Swale Local Plan are therefore essentially alternative approaches to delivering in the region of 7,185 homes via site allocations.
- 2.2.13. In turn, the question is “which site allocations”, and a starting point is a large strategic site for **2,500 homes** that now has a resolution to grant planning permission, namely South East Faversham ([23/505533/EIHYB](#)). This site is for **2,500 homes** and is expected to deliver in full in the plan period (with delivery starting in 2027/28 and a maximum delivery rate of 261 homes per annum) and clearly its allocation can be assumed as a ‘constant’ across all of the growth scenarios.
- 2.2.14. This reduces the residual target figure to 4,685 homes (7,185 – 2,500).
- 2.2.15. Next there is a need to account for supply from urban regeneration sites, which can also reasonably held constant across the growth scenarios. Specifically, the emerging proposed approach is to allocate a ten sites for a total of **1,074 homes**, which breaks down as 834 homes in Queenborough/Rushenden and 240 homes in Sittingbourne.
- 2.2.16. This reduces the residual target figure to 3,611 homes (4,685 – 1,074); however, there is a need to add a note of caution in that there is an element of uncertainty regarding delivery from certain of these urban regeneration sites, such that they could deliver less.
- 2.2.17. The remaining task is to consider alternative ways of providing for ~ 3,611 homes via ‘non-regen’ site allocations and, in this regard, there is a key distinction between:
- Strategic sites – there is strong support for ensuring a good proportion of supply from sites delivering at least ~1,000 homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery strategic infrastructure alongside new housing. The NPPF supports strategic sites (para 77).
 - Non-strategic sites – there is a need to ensure that a good proportion of supply from smaller greenfield sites, with a view to a robust supply trajectory (i.e. a rolling 5YHLS over the early years of the plan period) and because such sites tend to benefit from strong development viability, e.g. such that they can deliver the full quota of affordable housing alongside delivering on wider policy asks such as net zero development. Also, the NPPF supports smaller sites because they are suited to delivery by SME housebuilders and can allow “opportunities for villages to grow and thrive.”

¹ Specifically, there is a need for a supply headroom over the early years of the plan period to ensure that the Council can maintain a ‘five year housing land supply’ (5YHLS) ahead of a new local plan that represents a new opportunity to boost supply. It is also important to note that as part of the 5YHLS calculation there is a need to apply a 5% or 20% ‘buffer’ (NPPF para 79).

- 2.2.18. Beginning with strategic sites (aside from South East Faversham, which has been discussed above), the emerging proposed approach is to allocate **West of Bobbing** for 2,500 homes (again with delivery entirely within the plan period, beginning in 2030/31).
- 2.2.19. However, at the time of writing (June 2026) there is also a need to remain open to the possibility of alternatively allocating '**Highsted Park**' (located to the east / south east of Sittingbourne), which is a much larger site for 8,400 homes that would deliver 2,000 homes in the plan period.² Specifically, there is a need to remain open to this possibility because West of Bobbing is not committed; however, this situation could change in the very near future, with a planning application set to be decided on 24th June 2026 in light of an officer recommendation to approve.³ Were it to transpire that West of Bobbing is approved then Highsted Park would become 'unreasonable' as an option for allocation, given LHN and because the sites are located in relative proximity.
- 2.2.20. Also, it is important to note that a planning application for Highsted Park is due to be decided in 2026, with the decision being made by the Secretary of State informed by the recommendations of a planning inspector following hearings that ran over a period of 8 months in 2025 (there are 4,721 documents associated with the application). This is a very large-scale and complex site that is proposed to deliver a range of strategic infrastructure including a new motorway junction and strategic link road, such that it is inherently difficult to appraise it here (i.e. there is no practical way of the appraisal accounting for all of the detailed evidence considered through the planning application).
- 2.2.21. In summary, on balance it is considered necessary to feature Highsted Park in the growth scenarios despite the inherent challenge and a clear risk of the appraisal becoming out of date prior to the Local Plan / SA Report being published.
- 2.2.22. The final strategic site for consideration is then '**East of Faversham Extension**', which could deliver around 1,500 homes alongside strategic employment land, and *might* also deliver a secondary school to meet an established need (N.B. Highsted Park would also naturally deliver a secondary school, recognising its much larger scale). This option has been carefully considered by elected councillors through the committee process over recent months and years (e.g. part of the site was a proposed allocation for 900 homes in an early draft version of the plan published for consultation in 2021 and, indeed, this allocation featured as a 'constant' across all of the reasonable alternative growth scenarios at that point in time);⁴ however, it does not feature as part of the proposed strategy at the current time (but the eastern-most part of the site is proposed to deliver a standalone employment site). In a number of respects there is clear merit to allocating the site in full, as opposed just allocating the eastern part of the site for employment land, but there are challenges including relating to the proximity of South East Faversham (which is adjacent to the south). On balance there is a reasonable need to explore the option of allocation further through the appraisal of growth scenarios, but precisely how it should feature requires further consideration (see discussion below).⁵
- 2.2.23. The final 'ingredient' of growth scenarios is then supply from **non-strategic sites** (outside of regen areas) and, in this regard, the starting point is an understanding that the emerging proposed approach involves allocation of 31 sites for 1,809 homes.

² In the plan period around 1,250 could be delivered in the north of the site (north of the A2) and 750 homes in the south.

³ The application was debated by Planning Committee in March 2026, but a decision was deferred to allow time for officers to seek clarifications on: A) foul water; B) open space provisions (on-site and off-site financial contributions); D) delivery of 40% affordable housing; and E) viability, with the specific request being that a viability assessment is provided.

⁴ At the subsequent Regulation 18 'issues and preferred options' stage (October 2021) the site did not feature explicitly, but the following was stated in respect of the preferred broad strategy: "*Large scale strategic growth at Faversham would provide good potential to successfully masterplan and deliver a new community, or series of new communities, in line with established best practice principles and to ensure that it was planned in a holistic way. It would also deliver a much needed new secondary school. This option performs well in terms of air quality because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns as sustainable and active travel measures are easier to implement at these scales of new development as the critical mass is there. Trip internalisation can be implemented, funds can be directed to walking and cycling infrastructure, masterplanning and design measures can focus on supporting walking and there is some potential to walk/cycle to the town centre. It also allows for larger scale biodiversity and net gain achievements; again, due to the critical mass.*"

⁵ One other strategic site of note is 'Winterbourne Fields' located at Dunkirk (east of Boughton), where there is a pending planning application for 1,815 homes. However, this site is considered to perform relatively poorly such that it need not be considered further, i.e. because it would not be allocated ahead of the better forming sites discussed above.

- 2.2.24. It is also reasonable to explore one or more scenarios where some of these sites are *not* allocated and, specifically, 12 'lower accessibility sites' can be identified that do not relate well to a higher order settlement. Total capacity of these sites is 899 homes, i.e. such that under a scenario whereby they are not allocated the supply from non-strategic sites (outside of regen areas) would be reduced 1,043 homes (1,809 - 899).
- 2.2.25. The main report presents further information on the reasons for identifying these 12 sites, but there are four key points to make here. Firstly, whilst several comprise brownfield land it is nonetheless considered important to question the suitability of these sites for housing. Secondly, two of the sites are located at Leysdown, which is a fourth tier settlement, but one that is located in a very rural area (the east of Sheppey) where there are some wider challenges to growth to explore through the appraisal. Thirdly, three of the sites are proposed for park homes to meet a specific need, but it is nonetheless considered reasonable to test the possibility of non-allocation on the grounds of locational challenges including accessibility. Fourthly, the list of 12 sites does *not* include the four adjacent proposed allocations at Upchurch, despite Upchurch being a fifth tier settlement. This is because the sites are considered to be strongly performing including on the basis that Upchurch has a relatively good local offer (for a fifth tier settlement) and benefits from reasonable links to Rainham.
- 2.2.26. The final consideration is then the possibility of featuring one or more non-strategic omission sites within the growth scenarios, with considerations as follows:
- Several large sites have gained planning permission since the 31st of March 2025 cutoff date (such that they are not counted within the 'existing supply figure') but are not proposed for allocation. These sites need not feature explicitly within the reasonable growth scenarios, but they are acknowledged as forming part of the existing supply in practice ('the baseline'), such that they naturally factor-into all appraisal work.⁶
 - Attention focuses particularly on omission sites that are rated as 'potentially suitable' through the Council's Housing and Economic Land Availability Assessment (HELAA).
 - Sittingbourne – is a tier 1 settlement but is set to see considerable growth over the plan period and there are no stand-out omission sites.
 - Sheerness – is a tier 2 settlement but there are no stand-out omission sites of note.
 - Faversham – is a tier 2 settlement but is set to see considerable growth over the plan period plus there has been significant recent growth. In terms of non-strategic sites (recalling discussion above regarding strategic sites) attention focuses on land to the south west, where there are two pending planning applications and a concern is sub-optimal piecemeal growth over time,⁷ with opportunities missed around infrastructure and steps to avoid/mitigate impacts, particularly noting significant heritage, landscape and transport / air quality constraints in this area. However, at the current time it is not possible to envisage an opportunity for strategic / coordinated growth and so, on balance, omission sites in this area are ruled out.⁸ It can also be noted that the possibility of planning strategically for further growth in this area was a focus of appraisal and consultation at the Regulation 18 consultation stage in 2021.
 - Isle of Sheppey – Queenborough & Rushenden is a tier 3 settlement but there are no omission sites of note. Minster & Halfway is also a tier 3 settlement, and there are omission sites of note, but there is set to be high growth over the plan period and there growth-related challenges such that there is a need to ensure a strategic approach / avoid further piecemeal growth. Finally, in the east of the Island there are no stand-out omission sites and there is not considered to be a strategic case for higher growth.

⁶ The most significant sites are at Minster (650 homes allowed at appeal; [22/502086/OUT](#)); Faversham (100 homes on a site allocated for employment land; [25/501495/OUT](#)); and Newington (90 homes; [25/500761/FULL](#)). These sites and others that have been permitted since the 31st March 2025 cutoff date, but which are not allocated, lead to additional plan period supply, and others will deliver additional supply in the plan period over-and-above supply accounted for

⁷ There is a pending application for 250 homes in the centre of this area (west of Brogdale Road; [25/504265/ENVSCR](#)) and another for 100 homes in the east of this area (west of Ashford Road; [25/501495/OUT](#)).

⁸ There are also two HELAA 'unsuitable' sites of note at Faversham. Firstly, to the north west is a 250 home site allowed at appeal and now the subject of a legal challenge ([23/502113/OUT](#)). Secondly, to the north east is a site where a request for an EIA screening opinion was recently submitted ahead of a potential application for 240 homes ([26/500667/ENVSCR](#)).

- Newington – is a tier 4 settlement that benefits from good accessibility and transport credentials but is set to see high growth and there are no stand-out omission sites.
- Teynham – is a tier 4 settlement that benefits from a railway station, but there is a large committed site to the west, and there is also a need to note the proximity of Highsted Park. In 2021 a previous version of the plan identified the possibility of strategic growth at Teynham to “*maximise opportunities for more comprehensive placemaking*”, and potentially with a view to delivering a village bypass; however, concerns were raised and latest understanding is that a bypass is not likely to be achievable. Potential sites are located around the edge of the village as follows:
 - West – a large site would extend the existing committed site, but this site also forms the north east extent of the Highsted Park proposal.
 - East – a large site benefits from proximity to the rail station, but there are landscape constraints. At the time of the previous consultation in 2021 the proposal was for a modest scheme of 100 homes to minimise landscape concerns.
 - South – a smaller site of note despite being categorised as ‘unsuitable’ in the HELAA. Specifically, it is of note because a coordinated scheme in combination with an adjacent proposed allocation might be envisaged; however, in practice it is not clear that there are significant in-combination opportunities. Also, there is a degree of heritage constraint affecting Lynsted Lane and its junction with the A2.

Overall, whilst there are site and settlement growth options that warrant ongoing consideration, on balance omission sites at Teynham are ruled out. As well as the context of adjacent Highsted Park, there is also a need to recognise strategic road / connectivity and air quality constraints, at least in the absence of new strategic road infrastructure as proposed to be delivered by Highsted Park.

- Boughton and Iwade – are the remaining tier 4 settlements, but there is limited strategic case for considering omission sites nor do any stand-out as having merit in site-specific terms. There are large omission sites at Iwade, but there is also a large committed site, plus a large committed site at Sittingbourne is located nearby. Furthermore West of Bobbing is located nearby, and A249 capacity is a factor.
- Tier 5 settlements – Upchurch stands out as having the best local offer (see the Settlement Hierarchy Study, 2020), and an omission site for 40 homes was recently considered closely as an option for allocation by elected councillors. However, in addition to the proposed allocations it would risk problematic high growth at Upchurch, and it can also be noted that there is currently a pending planning application for 101 homes on a HELAA unsuitable site (26/500852/OUT). One other site at a tier 5 settlement that was recently closely considered by members as a possible allocation is a 26 home site at Lower Hartlip, but the village has a limited offer and connectivity between the site, and the village primary school appears to be challenging.

2.2.27. In summary, the discussion above has considered the following supply components:

- Existing supply – 7,430 homes (i.e. **constant**)
- Windfall – 2,409 homes (i.e. **constant**)
- South East of Faversham – 2,500 homes (i.e. **constant**)
- Regeneration sites – 1,074 homes (i.e. **constant**)
- West of Bobbing – 0 or 2,500 homes (i.e. **variable**)
- Highsted Park – 0 or 2,000 homes (i.e. **variable**)
- East of Faversham Extension – 0 or 1,500 homes (i.e. **variable**)
- Non-strategic sites (non-regen) – 910 or 1,809 homes (i.e. **variable**)

2.2.28. As such, there is a need to build growth scenarios on the basis of four ‘constant’ and four ‘variable’ supply components, and with it being the case that each of the variable supply components is associated with two options.

- 2.2.29. A starting point is the emerging proposed approach, which is presented in Table 2.1 as growth scenario 1. This would involve a supply 4% above LHN over the plan period.
- 2.2.30. There is feasibly a lower growth scenario simply involving lower supply from non-strategic sites, but this would lead to a total supply below LHN and so is unreasonable.
- 2.2.31. The next two scenarios then involve additional allocation of East of Faversham Extension alongside either the lower or the higher non-strategic sites supply figure.
- 2.2.32. The final three scenarios then assume Highsted Park in place of West of Bobbing, and it is important to recall that whilst Highsted Park would deliver fewer homes in the plan period it would deliver very significant further growth beyond the plan period.
- 2.2.33. In conclusion, there are **six reasonable growth scenarios**. These can be understood in summary as three involving West of Bobbing (lower growth to higher growth) and three involving Highsted Park (lower growth to higher growth).

Table 2.1 The reasonable alternative growth scenarios (constants greyed-out)

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Existing supply	7,430	7,430	7,430	7,430	7,430	7,430
Windfall	2,409	2,409	2,409	2,409	2,409	2,409
South East of Faversham	2,500	2,500	2,500	2,500	2,500	2,500
Regeneration sites	1,074	1,074	1,074	1,074	1,074	1,074
West of Bobbing	2,500	2,500	2,500	-	-	-
Highsted Park	-	-	-	2,000	2,000	2,000
East of Faversham Ext.	-	1,500	1,500	-	1,500	1,500
Non-strategic sites	1,809	910	1,809	1,809	910	1,809
Total homes (2025-2041)	17722	18323	19222	17222	17823	18722
% over LHN (17,024)	4%	8%	13%	1%	5%	10%

2.3. Growth scenarios appraisal

- 2.3.1. Section 6 of the main report presents an appraisal of the growth scenarios under the ‘SA framework’, which primarily comprises a list of 13 sustainability topics. The appraisal concludes with a summary appraisal ‘matrix’ with a column for each of the SA topics and a row for each of the scenarios. The summary matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence, and “?” used where there is uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green** / **no colour**.⁹
- 2.3.2. The appraisal shows a mixed picture, with all of the scenarios associated with pros and cons, and it is for the Council to weigh these pros and cons before deciding on which of the scenarios best represents sustainable development ‘on balance’.

⁹ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- 2.3.3. As part of this, account can be taken of the fact that Scenario 1 (the proposed submission approach) and Scenario 4 (which sees Bobbing replaced with Highsted Park) are ranked first under the greatest number of sustainability topic headings.
- 2.3.4. However, it is important to be clear that this does not automatically mean either Scenario 1 or Scenario 4 is appraised as performing best overall, because: A) there is also a need to account for the conclusions reached in respect of significant effects; B) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and, to be clear, the topics are not assumed to have equal weight); and C) the topic specific appraisal conclusions are open for debate (indeed the very aim is to spark debate).

Table 2.2: Growth scenarios summary appraisal

	Scenario 1 Bobbing Small sites	Scenario 2 Bobbing East Fav.	Scenario 3 Bobbing East Fav. Small sites	Scenario 4 Highsted Small sites	Scenario 5 Highsted East Fav.	Scenario 6 Highsted East Fav. Small sites
Accessibility	4	2	3	3	1	2
Air quality	?	?	?	?	?	?
Biodiversity	1	2	3	1	2	3
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	3	1	2	3	1	2
Communities	1	2	2	1	2	2
Economy and employment	2	2	2	1	1	1
Historic environment	?	?	?	?	?	?
Homes	2	2	1	2	2	1
Landscape	1	2	2	3	4	4
Soils / resources	1	2	2	1	2	2
Transport	1	2	3	1	2	3
Water	?	?	?	?	?	?

- 2.3.5. Appraisal conclusions for each of the topics are set out below.

Accessibility

- 2.3.6. There is support for strategic growth locations that can deliver community infrastructure alongside new homes and, in particular, Highsted Park which would deliver a range of strategic community infrastructure, and East of Faversham which could potentially deliver a secondary school to address an existing need (although there is uncertainty regarding both need and delivery). There is also support for lower growth via non-strategic sites (Scenarios 2 and 5) with a view to a focus of growth at more accessible locations. The best performing scenarios are considered to perform very well ('significant positive effects') given a strong focus of growth at strategic sites.

Air quality

- 2.3.7. This is a very significant issue in Swale although there is a need to account for the improving situation nationally associated with the transition to electric vehicles.
- 2.3.8. Highsted Park aims to deliver a strategic transport solution to address traffic congestion in the Sittingbourne area. However, it would mean committing a constrained area to high growth over the very long term (with ~6,400 homes delivered beyond the plan period) and potentially tying the hands of a future Local Plan prepared for an area extending far beyond Swale following Local Government Reorganisation (LGR) and in the context of Devolution.¹⁰ It could well be that a future local plan is able to direct growth to locations within Kent that are preferable from an air quality perspective.
- 2.3.9. Support for East of Faversham Extension would mean supporting higher growth within a constrained Borough, but the site benefits from good connectivity to both Faversham and the M2, which would have the effect of reducing the need for car journeys along the problematic A2. See further discussion below under the 'transport' topic heading.
- 2.3.10. Overall, it is not possible to reach conclusions with any confidence, but it is appropriate to flag a concern ('moderate or uncertain' negative effect) under all of the scenarios.

Biodiversity

- 2.3.11. The Borough as a whole is subject to significant biodiversity constraint, but this has factored-in strongly as part of spatial strategy / site-selection work over the course of the plan-making process and it is not clear that there are significant concerns under any scenario. However, under the higher growth scenarios there could be a need for further work to confirm the sufficiency of the long-established SPA mitigation strategy.
- 2.3.12. Focusing on the three variable strategic sites, as an initial point it is important to note that all three could deliver onsite strategic green infrastructure including aimed at minimising offsite recreational pressure. It is then challenging to differentiate between the three sites with confidence, but the following bullet points present previous analysis from the Interim SA (ISA) Report at the Regulation 18 stage in 2021:
- With regards to Bobbing, the ISA Report explained that the site is associated with biodiversity constraint for two reasons: *"Firstly, the site is slightly closer to the SPA than is the case for [Highsted Park], and whilst it is not clear that this is a particularly accessible or sensitive part of the SPA, there is a need to consider in-combination impacts given committed growth at Iwade and North West Sittingbourne (also the potential for the Bobbing scheme to expand in the future). Secondly, the proposal is for development to largely envelop a small ancient woodland (Rook Wood)... [which] could lead to a challenge in respect of... biodiversity net gain. There is a need to consider functional connectivity between Rook Wood and Hawes Wood to the west."*

¹⁰ See discussion of Kent LGR [here](#). Also, it is important to be clear that whatever the outcome of LGR, the intention is for future local plan-making to be informed by sub-regional Spatial Development Strategy (SDS) under the devolution agenda.

- With regards to Highsted Park, the ISA Report suggested that the site is ‘notably constrained’ because: “... *there would likely be a need for a focus of growth in the Highstead / Rodmersham Green area, where there is a high density of woodland (including ancient woodland) and traditional orchard priority habitat that is shown by the Biodiversity Baseline Study (2020) to comprise a northern promontory of the North Downs Priority Area (also, the study highlights connectivity between traditional orchard habitat patches as a priority). Development is not necessarily precluded within priority areas; however, taking a precautionary approach it is appropriate to flag a risk of development worsening ecological connectivity... at the landscape scale (also potentially direct impacts to habitat patches, e.g. from recreational pressure).*”
- With regards to East of Faversham, the ISA Report explained that under certain of the growth scenarios: “...*there could well also be strategic growth to the east of Faversham (north of the A2), and if this were to extend north beyond the Graveney Road / as far as the railway line (to Whitstable), then this would give rise to degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields [Local Wildlife Site]; the SPA would be c.2.25km by public footpath; and there would also be a convenient driving route to the SPA, via Goodnestone.*”

2.3.13. In summary, the alternative scenarios are ranked according to growth quantum.

Climate change adaptation

- 2.3.14. Flood risk is a significant issue across large parts of the Borough, and whilst this has factored-into spatial strategy / site-selection work there are some proposed allocations subject to a degree of risk and the Environment Agency has not yet had the opportunity to formally comment on the proposed allocations through a consultation.
- 2.3.15. Another key climate change adaptation consideration is then the defined a Coastal Change Management Area (CCMA), which defines the area likely to be affected by physical change to the shoreline over the next 100 years, through erosion, coastal landslip, permanent inundation, or coastal accretion. Three of the proposed allocations on the Isle of Sheppey that do not feature in Scenarios 2 and 5 are adjacent to the CCMA, and there is a need to acknowledge that the CCMA is defined with an element of uncertainty including given climate change uncertainties. Also, a fourth site is located at Warden, which is a settlement at risk of coastal change.
- 2.3.16. Finally, it is noted that land to the south east of Sittingbourne (Highsted Park) is characterised by a series of valleys with associated with surface water flood zones. However, there is likely potential to avoid flood zones through masterplanning (green/blue infrastructure) and avoid worsening of downstream flood risk through high quality Sustainable Drainage Systems (SuDS).

Climate change mitigation

- 2.3.17. Whilst the proposal is to require all sites to come forward as ‘net zero development’, in practice this would likely prove challenging at some sites where development viability is weaker (without having to accept compromises in respect of wider objectives, notably affordable housing). All of the strategic sites should be well placed to deliver net zero development (N.B. it has not been possible to review site-specific proposals) but it is important to note that viability is strongest at Faversham (although there could feasibly be a concern regarding market saturation affecting viability). Viability is then challenging – with implications for net zero development – at several of the non-strategic sites that feature only in Scenarios 1, 3, 4 and 6. Also, these same sites are all in less accessible locations, i.e. locations likely to be associated with relatively high car dependency.
- 2.3.18. Finally, with regards to significant effects, whilst the Borough has now revised its net zero target date from 2030 to 2045 there is nonetheless a need to demonstrate considerable ambition in order to deliver the required decarbonisation trajectory, such that it is appropriate to predict a ‘moderate or uncertain’ negative effect for all but the two better performing scenarios.

Communities

- 2.3.19. This is an opportunity to consider issues and opportunities over-and-above those relating to ‘accessibility’. Whilst there are numerous matters to consider, the appraisal reflects an understanding that there is a significant degree of concern amongst local communities in respect of the two strategic sites where there are currently pending planning applications (Bobbing and Highsted Park) and that there would likely be significant local community concern in respect of East of Faversham Extension, including recognising its proximity to South East Faversham (which has a resolution to grant permission). Whilst the appraisal is undertaken on the assumption of a strategic approach to growth to the east and south east of Faversham that maximises benefits / avoids issues, in practice this could prove challenging.

Economy and employment

- 2.3.20. Employment land needs would be provided for in full across all of the scenarios, but on balance it is considered appropriate to flag support for Highsted Park for the reasons set out in the ISA Report from the Regulation 18 stage in 2021:

“... strategic growth at SE Sittingbourne represents a very significant opportunity, from an ‘economy and employment’ perspective, given the potential to: deliver a new motorway junction, which will improve transport connectivity to Eurolink, Kent Science Park and potentially the Port of Sheerness (from the east); support objectives for Kent Science Park (the scheme website suggests: “With Kent Science Park at the heart of the proposals for Highsted Park – Swale can become a leader for inward investment especially targeting growth sectors”); and potentially support new warehousing/distribution in a location well-linked to a motorway junction, thereby fully reflecting ELR recommendations, although proposals are less clear in this respect. However, there are additional considerations to factor-in, when considering the merits of strategic growth at SE Sittingbourne from an ‘economy and employment’ perspective, in particular around the possibility of growth here detracting from growth elsewhere in the Borough (Sittingbourne, Faversham and Sheppey) and in the neighbouring authorities of Medway and/or Maidstone [e.g. in around Junction 8 of the M20 in Maidstone].”

- 2.3.21. With regards to Bobbing, the ISA Report in 2020 flagged some concerns regarding a lack of clarity and potentially ambition in respect of employment land, but the current planning application now proposes a 5.2 ha commercial/employment zone adjacent to the A249 junction. The ISA Report also flagged *“concerns regarding traffic at the A249 junctions with the B2006 and M2... traffic could affect the functioning of... employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey.”*
- 2.3.22. With regards to East of Faversham Extension, the assumption is that new strategic employment land would be delivered adjacent to the M2 junction under any scenario (i.e. it is not reliance on East of Faversham Extension), but a new employment area would benefit from an adjacent new community.
- 2.3.23. Finally, with regards to the package of ‘lower accessibility’ sites (Scenarios 1, 3, 4, and 6), there is potentially a ‘local economy’ case for housing growth on the Isle of Sheppey, including in the east of the Island, but it is not clear that this is a significant factor.

Historic environment

- 2.3.24. Whilst it is appropriate to flag a ‘moderate or uncertain’ negative effect under the other scenarios in the knowledge that Historic England is yet to be consulted on a draft version of the Local Plan, at this stage it is not possible to differentiate between the scenarios with confidence. There is a case for favouring Scenario 1 as it would avoid higher growth at Faversham and Bobbing is potentially preferable to Highsted Park; however, the context is that historic environment matters will presumably have been a focus of detailed consideration through the pending planning applications for both Bobbing and Highsted Park.

2.3.25. The following bullet points present analysis from the previous ISA Report (2021):

- Highsted Park – “... there is the potential to draw upon a valley topography to frame growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and landscape containment / lower risk of ‘sprawl’); however, the corollary is growth would be in proximity to existing historic environment assets. The current proposed masterplan seeks to take a ‘landscape led approach’ and avoid impacts as far as possible, including by avoiding development in proximity to the only conservation area in the vicinity (Rodmersham Green); however, tensions remain nonetheless, most notably at the northern extent of the area, where a new link road would cut through the Tonge Conservation Area, and in the central area, where development would abut the hamlet of Rodmersham, where there is a cluster of four listed buildings including a grade 1 listed church, which the Swale Landscape Sensitivity Assessment (2019) describes as “an important local landmark and skyline feature”. A further statement made by the Assessment, as part of a discussion of ‘time depth’, is also of note: *“It is evident that there have been changes in land cover in recent years, with the conversion of areas of commercial orchards to arable, and vice versa, for example along Church Street and Pitstock Road. However, this does not change the fundamental character of the landscape. The loss of some areas of traditionally managed orchards has adversely affected the historic and scenic character of the landscape, although more intensive commercial orchards remain an important feature which contributes to a distinctive sense of place”.*”
- Bobbing – “The site is subject to notably lower constraint. The new settlement would envelop the string of ten listed buildings that stretches between Bobbing in the south (where there is a grade 1 listed church) and Howt Green in the north; however, there is no... conservation area; the historic character of this area is presumably somewhat affected by the nearby A429; and development would deliver a bypass of Bobbing. Development would envelop only one historic farmstead (with one grade II listed building), although the possibility of further expansion (in the future) encroaching upon two further farmsteads can be envisaged.”

2.3.26. In respect of East of Faversham Extension, the following bullet points present analysis from the ISA Report (2021) in respect of growth both to the south east of Faversham (i.e. the site that now has a resolution to grant permission) and to the east:

- “... as noted by the Swale Heritage Strategy (2020): *“It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough”.* In this context, there is potentially merit to a strategic growth to the east / southeast of the town, from a historic environment perspective, in order to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the east and southeast of Faversham is relatively unconstrained in historic environment terms, and also an understanding that there would be good potential to avoid and mitigate historic environment impacts by taking a strategic approach... There could also be good potential to deliver a new community – with associated employment, services, facilities, retail and infrastructure upgrades – that supports Faversham as a thriving market town and visitor/tourist destination. However, there are wide ranging risks and uncertainties, including around traffic (including through the Ospringe Conservation Area)... impacts to the historic agricultural and horticultural landscape setting of the town and impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. A key consideration is the integrity of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone. Historic England’s response to the consultation in early 2021 [mostly focused on] policy requirements... [but] a notable comment was that: *“Ewell Farm is... one of several historic farmsteads surrounding the town of Faversham which illustrate a historic landscape character intimately connected with agriculture.”*

- “... much of the 20th and 21st Century expansion of Faversham has been to the east hence further expansion potentially gives rise to relatively limited concerns... However, there is a need to consider the rural setting of Faversham... with the Swale Landscape Sensitivity Assessment (2019) explaining: *“The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area.”* A further consideration is encroachment... towards historic farmsteads, and impacts to views from cycling routes and public footpaths that link Faversham to the Goodnestone Conservation Area and the marshland walking and cycling routes beyond.”

Homes

- 2.3.27. All of the scenarios would involve a total supply comfortably above LHN, but there is also a crucial need to consider the robustness of the supply over the early years of the plan period, i.e. with a view to ensuring that the Council can maintain a five year housing land supply (5YHLS) ahead of a future supply boost through a new local plan.
- 2.3.28. In this regard, on the one hand there is support for dispersed smaller sites under Scenarios 1, 3, 4 and 6; however, on the other hand, some of these sites may be associated with challenging viability, leading to both delivery risk and also a concern regarding affordable housing delivery.
- 2.3.29. With regards to East of Faversham Extension, strong viability at Faversham could suggest good delivery credentials, but there could be some delivery risks given proximity of South East Faversham and the likely need to give further consideration to strategic transport upgrades and potentially a secondary school.
- 2.3.30. With regards to Highsted Park delivering mostly beyond the plan period, there is a case for highlighting this as a positive, including because there is a case for extending the plan period to 2043; however, in the context of LGR and devolution what is of paramount importance is supply in the early and middle parts of the plan period.
- 2.3.31. In conclusion, the two higher growth scenarios perform very well because the housing requirement could be set at LHN over the plan period, there would not be a need for a stepped requirement, and there would be confidence in the ability to deliver on the housing requirement / maintain a 5YHLS (particularly once account is taken of the likelihood of the housing land supply position improving once recent permissions are factored in). There could even be the potential to set the requirement slightly above LHN, e.g. as a proactive approach to affordable housing delivery.

Landscape

- 2.3.32. The first point to note is that several of the variable non-strategic sites (Scenarios 1, 3, 4 and 6) are brownfield sites, and none are known to be sensitive in landscape terms.
- 2.3.33. With regards to the variable strategic sites, whilst there is uncertainty at this stage given the ongoing planning applications, on balance it is considered appropriate to flag a concern with Highsted Park relative to the other two sites. This is in line with the conclusion from the ISA Report published at the Regulation 18 stage in 2021:

“... as per the conclusion of the equivalent appraisal in 2020, it is appropriate to highlight Option 5 as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and to the east / south east of Faversham. The potential to comprehensively plan for the very long term future growth of the Borough’s two main settlements can be envisaged; however, in neither case are the current proposals considered to respond to the opportunity in full.”

- 2.3.34. In terms of more detailed analysis, the first point to note is that the following analysis in respect of Bobbing from the ISA Report (2021) likely still holds broadly true:

“... stands-out as least constrained [of the strategic site options under consideration]. The site is distant from the AONB and associated with broad landscape units assigned ‘moderate’ and ‘low-moderate’ sensitivity scores by the Landscape Sensitivity Assessment. The southern part of the site is more sensitive, given existing narrow settlement gaps; however, the current proposal is for development to extend only as far south as the railway line, meaning that, whilst the Bobbing settlement gap would be eroded or lost, the gap(s) between Sittingbourne and Newington would not be affected. In this respect, it is important to note that an earlier masterplan proposed a large area of parkland to the south of the railway. Finally, it is important to note that the Stantec Assessment of Stage 2 Submissions (2019) identifies the potential for the scheme to expand beyond its current ‘red line boundary’ (see page 15 of the report). There is an argument for comprehensive long-term planning for this part of the Borough, rather than piecemeal growth. The possibility of comprehensively planning for the entire area of land between the A249 in the east, the A2 in the south, the Lower Halstow – Iwade Ridge in the west and Iwade in the north might be envisaged, with a view to securing infrastructure, environmental protection/enhancement and employment land.”

- 2.3.35. In respect of Highsted park the ISA Report (2021) presented lengthy analysis, but the concern is that some of it might now be less than fully up-to-date given that so much work has subsequently been undertaken through the planning application process. The analysis from 2021 covered factors including: A) impacts to the Kent Downs National Landscape, particularly relating to a new motorway junction; B) settlement gaps, including the gap between Sittingbourne/Bapchild and Teynham; and C) the sensitivity of the Rodmersham, Milstead and Highstead Dry Valley character area, which is a “a topographically distinct landscape with a strong sense of place and rural character”, albeit one where “the quality has deteriorated notably on the edge of Sittingbourne”. The appraisal in 2021 concluded:

“The current masterplan proposals are described as ‘landscape led’, and it is recognised that the scheme has evolved considerably and repeatedly over recent years, with the latest Stantec report explaining that efforts have been made to avoid the valley and valley slopes, and that proposals have “move[d] away from a necklace approach”. However, there is a need to understand the pros and cons of achieving the required scale of growth whilst containing growth west of a line that runs between Cromer's wood, Rodmersham Green, Rodmersham, Bapchild and Tonge Conservation Area / Church, thereby achieving a scheme that is more contained in landscape terms, in that it remains ‘facing’ Sittingbourne. Under the current proposal there could be a concern regarding long term sprawl at the edge of Sittingbourne and also in the Teynham/Lynstead area, which might be argued for as ‘infilling’ or ‘rounding off’.”

- 2.3.36. Finally, in respect of East of Faversham Extension, a recent study has assessed the landscape sensitivity of the site, although it should be noted that the site assessed extends as far east as the A299 Thanet Way, i.e. to include the proposed employment allocation that is assumed a constant under all of the growth scenarios. The assessment concludes overall ‘moderate’ sensitivity to housing development, but does highlight a number of potential concerns. It concludes:

“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... 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.”

- 2.3.37. In conclusion, whilst it is appropriate to rank the scenarios in order to flag a concern with Highsted Park on balance significant negative effects are not predicted. This is a reflection of the inability to fully account for the evidence generated through the planning application process.

- 2.3.38. Finally, with regards to significant effects, it should be noted that a Landscape Sensitivity Assessment has recently been completed that examines select proposed allocations (N.B. it does not examine Bobbing) and flags a concern with two proposed allocations that are a constant across the growth scenarios, namely: 1) Upchurch, where it assigns 'moderate-high' landscape sensitivity; and 2) the proposed employment allocation to the east of Faversham, where it assigns 'moderate-high' landscape sensitivity to the area of land between Faversham and the A299 as a whole and specifically recommends: *"Avoid developing the more elevated fields closer to the A299 which are more prominent in views within the surrounding landscape."*

Soils / resources

- 2.3.39. This is a key issue for Swale, given its strong association with the Kent Fruit Belt, and the recently released national agricultural land quality dataset confirms that there would be a very significant loss of the highest quality agricultural land under all scenarios.
- 2.3.40. Numerous of the non-strategic sites that feature only in Scenarios 1 and 3 are brownfield sites or otherwise not in agricultural use, and Highsted Park would involve some growth focused away from the A2 corridor that is grade 2 quality land as opposed to grade 1 quality land, but overall the primary consideration is a need to flag a concern with higher growth including looking beyond the plan period. Again, it could feasibly be the case that a future SDS gives weight to protecting highest quality agricultural land.

Transport

- 2.3.41. Whilst there have been recent improvements to the A249 it remains the case that road capacity is a major constraint to growth along the A2 corridor, through Sittingbourne, at the A249 / M2 junction (south of Sittingbourne), at the A2 / M2 junction (east of Faversham, known as Brenley Corner), at on the Isle of Sheppey (particularly in tourist season). It can be suggested that the Borough is inherently constrained, because whilst very well connected by rail the main settlements feed onto a limited number of strategic road corridors, including the A2 which passes through the centre of settlements (the only bypasses are at Sittingbourne town centre and Boughton). Enabling longer distance trips via the M2 rather than the A2 is an important objective, but just three junctions serve the Borough and two are known to have capacity issues.
- 2.3.42. There is considerable historical context to exploring transport solutions to enable growth, for example the ISA Report (2021) quoted the following from the Infrastructure Delivery Plan (IDP, 2021): *"The Inspector who examined the Bearing Fruits Local Plan was satisfied that the level of growth in the first part of the plan period could be accommodated on the local road network. Beyond this there were implications in delivering the full housing need figure for both the strategic and local road network that would require the implementation of improvement works. At the time of the examination, the nature of improvement works had not been determined, but the Inspector did not consider this to be a showstopper to the Local Plan being adopted. The Inspector, therefore, found the Local Plan sound subject to a commitment to undertake an early review of the Local Plan to address the highway capacity issues...."* Also, the ISA Report (2021) noted that the adopted Local Plan (2017) explains: *"The main strategic risk to the plan overall relates to any significant deferral in the improvement to Junction 5 of the M2".* Finally, the ISA Report (2021) explained the context of KCC having raised significant transport concerns at the preceding Regulation 19 stage: *"KCC is concerned that the consultation is missing critical highway evidence to justify the Local Plan strategy and as a consequence the Local Plan is currently supported by an inaccurate evidence base. There are fundamental changes from the modelling used as evidence for the Local Plan and the housing proposals within this regulation 19 consultation. Specifically, the housing numbers are higher in the Teynham area, greater levels of employment land and a reliance on a design solution for Brenley Corner that cannot at this stage be relied upon. The County Council, as Local Highway Authority, requires further supporting transport modelling that accurately reflects the proposed housing and employment strategy as presented before it can make a fully informed comment..."*

- 2.3.43. Further context then comes from the following statement made within the consultation document published under Regulation 18 in 2021:

“The solutions to the existing infrastructure issues are now coming forward (M2 junction 5 and capacity issues on the A249) which opens Sittingbourne and the Isle of Sheppey back up for development.”

- 2.3.44. It is difficult to differentiate between the growth scenarios with confidence, but on balance the scenarios are ranked broadly in order of total growth quantum and in light of the following considerations:
- The variable non-strategic sites perform relatively poorly in transport terms.
 - Bobbing is not well linked to Sittingbourne and there are M2 J5 capacity challenges.
 - Whilst Highsted Park would deliver a transformational road infrastructure solution, and it is acknowledged that the proposal is to front-load infrastructure delivery (as far as possible, within the bounds of what can be viably achieved), again a need to consider the context of forthcoming LGR and devolution.
 - East of Faversham Extension is relatively well related to a town centre, and there could be transport opportunities to explore (the Regulation 18 consultation document in 2021 highlighted an opportunity “to look at the role of the A2 at Faversham and divert traffic to the M2 allowing greater integration of sites south of the A2”). However, there would be a need for further work to model traffic impacts, and it is not clear that allocation would help significant in respect of funding upgrades to M2 J7 (Brenley Corner).
- 2.3.45. Finally, with regards to significant effects, whilst there is a case for flagging a significant negative effect under the worst performing scenarios, on balance it is considered appropriate to conclude a ‘moderate or uncertain’ negative effect under all six scenarios.

Water

- 2.3.46. Whilst the ISA Report from 2021 presented a detailed discussion of potential issues relating to water resources and wastewater treatment, the evidence referenced at that time is now dated, and there is limited more recent evidence (the Infrastructure Delivery Plan is not available at the time of writing). Whilst there are not known to be any key challenges in respect of either water resources or wastewater treatment capacity, the Environment Agency and Southern Water will wish to comment through the consultation. Capacity at wastewater treatment works has been rising up the agenda as a key issue for local plan spatial strategy / site selection over recent years, and over recent months water supply has begun to emerge as a strategic constraint in parts of Kent.

2.4. The preferred growth scenario

- 2.4.1. Officers will complete this section prior to publication, explaining why Scenario 1 is on balance ‘justified’, in that it represents “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 36).

3. Whole plan appraisal

- 3.1.1. Part 2 of the report presents an appraisal of the proposed submission plan as a whole, which in practice means expanding on the appraisal of growth scenario 1, including factoring development management (DM) policies and with additional focus on site allocations that are held ‘constant’ across the growth scenarios.

- 3.1.2. Overall the appraisal reaches the conclusion that the plan as a whole performs as per Scenario 1 (i.e. appraisal conclusions are not 'boosted' to account DM policies), in summary: moderate or uncertain **positive** effects in terms of economy/employment and 'homes'; **neutral** effects in terms of accessibility, biodiversity, communities and landscape; moderate or uncertain **negative** effects in terms of air quality, climate change adaptation, climate change mitigation, the historic environment, transport and water; and a **significant negative** effect in terms of loss of high quality agricultural land.
- 3.1.3. With regards to DM policies, the current draft NPPF proposes 'national development management policies' such that a primary consideration is site-specific policies, which must respond to locationally specific issues and opportunities and be deliverable in light of viability parameters. However, under the new NPPF there will likely still be some scope for area wide DM policies that respond to a locally specific issue / opportunity where firmly evidenced. Viability is a key consideration, and trade-offs must be acknowledged, e.g. sites with more challenging viability may only be deliverable if compromises are made regarding policy 'asks' in terms of infrastructure delivery / contributions, affordable housing, net zero development or wider matters. A Whole Viability Assessment has been completed that concludes *"the Council can continue to confident that the development in the Local Plan will be deliverable [but] 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."* However, even for greenfield sites there is a need for ongoing scrutiny of the viability impact of policy requirements in order to avoid false comfort in respect of requirements that fall away at the planning application stage on viability grounds. Further discussion is presented in the main report.

4. Next steps

- 4.1.1. Following the current Regulation 19 publication stage the intention is to submit the plan (as previously published) for an Examination in Public overseen by the Planning Inspectorate alongside this SA Report and all of the representations received.

