

Submission to the Secretary of State
for Housing, Communities and Local Government

Statement of Reasons (DRAFT)

Proposed Designation of Areas of Special Control of Advertisements

July 2026



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Summary

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.

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 designation of an ASCA (subject to approval by the Secretary of State) within the commercial centre of 8 identified conservation areas of Swale would facilitate better management of their shopfronts and historic significance.

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.

Swale Borough Council has undertaken a comprehensive review of the ASCA to see whether it should be designated. An 8-week consultation was undertaken as part of the review process in April 2026 and May 2026. The April/May consultation was supported by a consultation document that set out fully the purpose and implications of the ASCA designation, the reasons for undertaking the review and the principles that were followed to identify areas that should be either included in or excluded from the ASCA. This statement of reason does not repeat the contents of that consultation statement: it focusses on the justification for why the areas identified should be included/excluded from the ASCA based on the principles that were adopted during the review process. Full details of the consultation and supporting documents are available at the council's website

The review identified that six of the Conservation Areas would benefit from ASCA designation across their entire extent, reflecting the vulnerability of their historic high streets and the need for consistent, area wide protection. It also showed that, for the remaining two Conservation Areas, it would be appropriate to limit ASCA designation to their commercial centres, where advertisement pressures are most concentrated. Swale Borough Council has drawn up the ASCA Order accordingly and has submitted the proposed Order to the Secretary of State for approval in accordance with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). These regulations require that additional documents are submitted and that advertisements are placed in the London Gazette and in a local newspaper.

This statement of reasons forms one of the required submission documents. The other documents submitted are:

- The proposed order, which includes a schedule and maps of the land affected by the proposed designation (more detailed maps are available online) and
- A plan showing the boundaries of the proposed order.

Overall, the proposed ASCA designation represents a proportionate and evidence-based response to the identified harm arising from poorly controlled advertisements within Swale's historic town centres, and is consistent with national policy and the requirements of the Regulations.

1 The Principles

1.1 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.

1.2 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.'*

Accordingly, the proposed ASCA designation is considered necessary in the interests of amenity, having regard to the cumulative impact of advertisements within the identified areas. To give effect to this, the Council has made an Area of Special Control Order, which will be submitted to the Secretary of State for approval in accordance with the Regulations. The designation will take effect upon such approval.

1.3 The scope of the review focussed on Conservation Areas with a commercial centre, based on which 8 conservation areas were identified as follows:

- 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

Of the eight Conservation areas identified, all except Faversham Town and Queenborough 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 frontages and the historic significance of their high streets.

1.4 In addition to considering sites in relation to the principles set out in paragraph 1.3, alternatives were considered as follows:

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.

1.5 Map shows the extent of the ASCA now proposed.

2. Consultation

2.1 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 has guided the review. A press notice to advertise the consultation was published 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 included local amenity groups and the Campaign for the Protection of Rural England (CPRE), the local Chamber of Commerce and the Advertising Association.

2.2 A presentation was made to the members on designating ASCA, further to which a briefing paper was presented to IAM in Autumn 2024 for permission to start the process of designating ASCA. A document to guide public consultation based on this initial work was presented to PTPWG and Policy & Resources Committee in December 2025 and February 2026 respectively, which after approval by both the committees was published in April 2026. Targeted consultation on the review took place in April and May 2026. Twenty representations were received. All affected parish council's, local Ward Members and the national advertising body (the Advertising Association) were sent details of the review and asked for comments. In addition, the review was available for comment on the SBC web site. Twenty responses were received to this consultation, which are set out in full on the relevant web page.

2.3 A report was made to the Policy & Resources Committee on 13th July 2026 (agreed by Full Council on Date TBC). The designation of ASCA across the proposed areas was agreed, incorporating all issues raised in response to the 2026 consultation.

2.5 The remainder of this statement of reason will consider how each settlement involved in the review was considered against the principles and considerations set out in paragraphs 1.3 and 1.4. Photographs of all the areas proposed to be put into the ASCA have been provided to help justify their inclusion. All site references correspond to the sites identified during the consultation

3 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 the entire Conservation Area is designated as ASCA

Reasons for designating the entire 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.

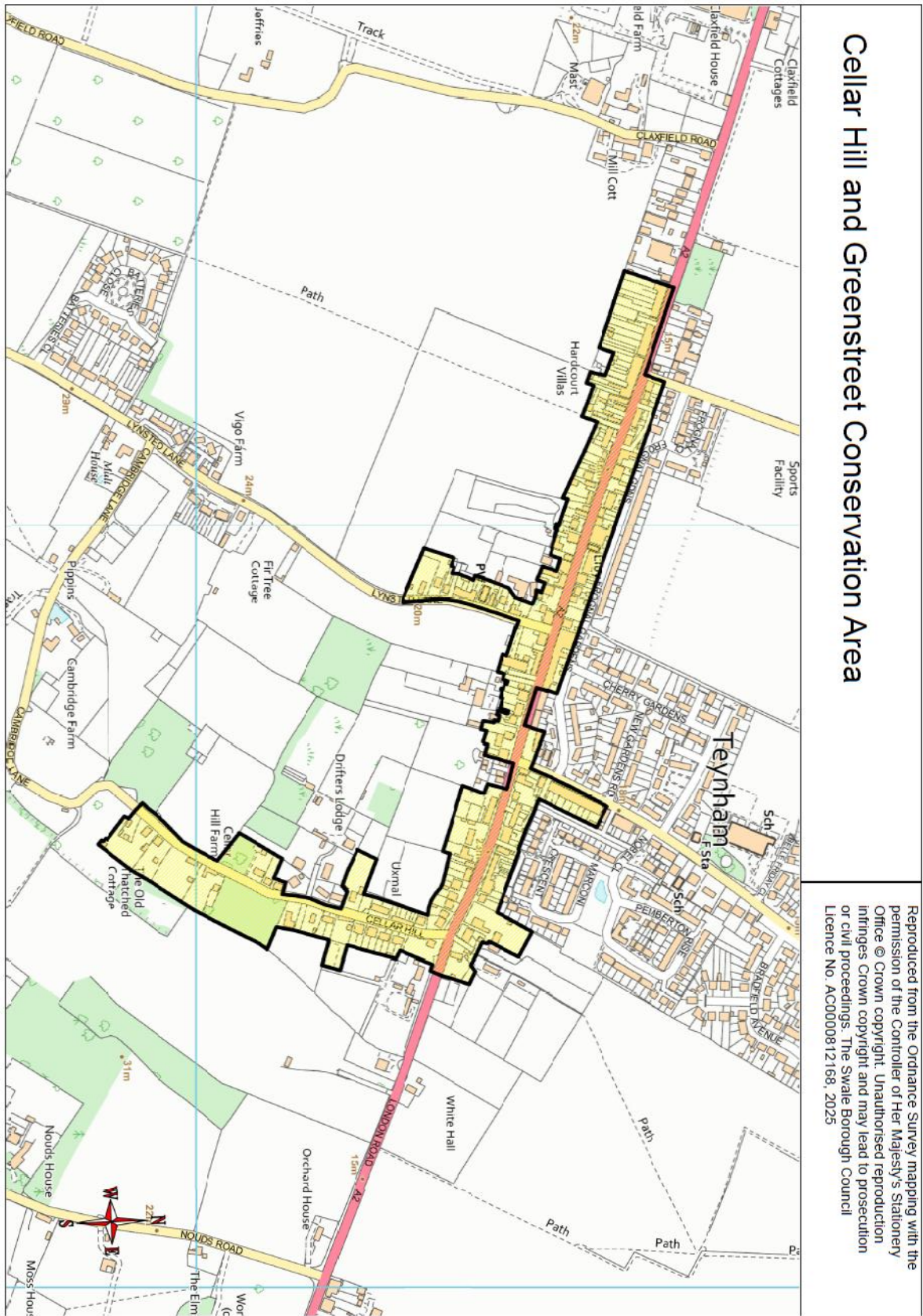
7. A proportionate and reasonable approach

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.





Views of London Road in Cellar Hill & Greenstreet Conservation Area
Map CA 001 Cellar Hill & Greenstreet Conservation Area



4 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 detract from the character and appearance of the conservation area.

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.'

Reasons for designating the entire 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 would benefit from 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.

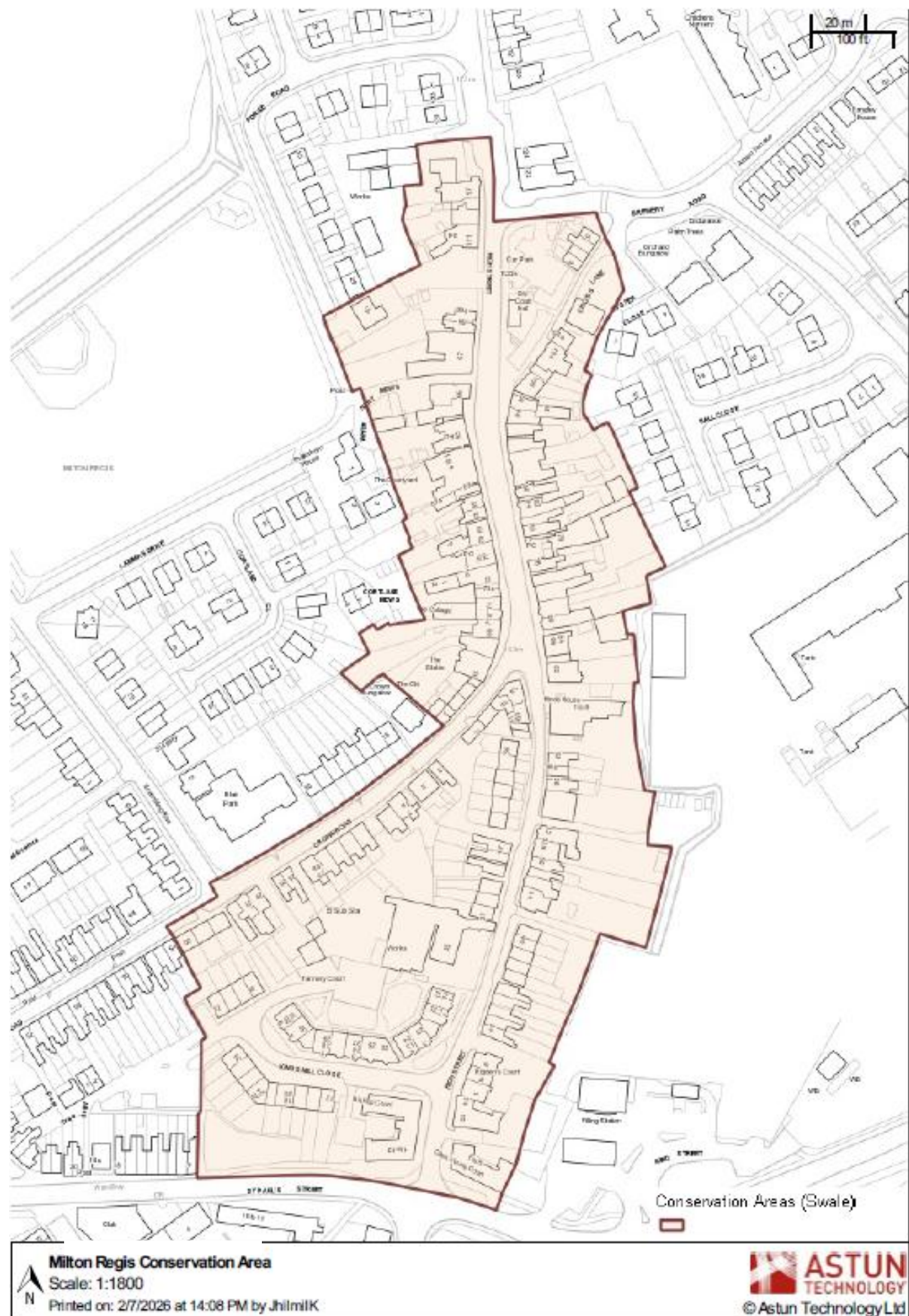
7. A proportionate and reasonable approach

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



View of Milton Regis High Street

Map CA 003 Milton Regis Conservation Area



5 Newington High Street Conservation Area

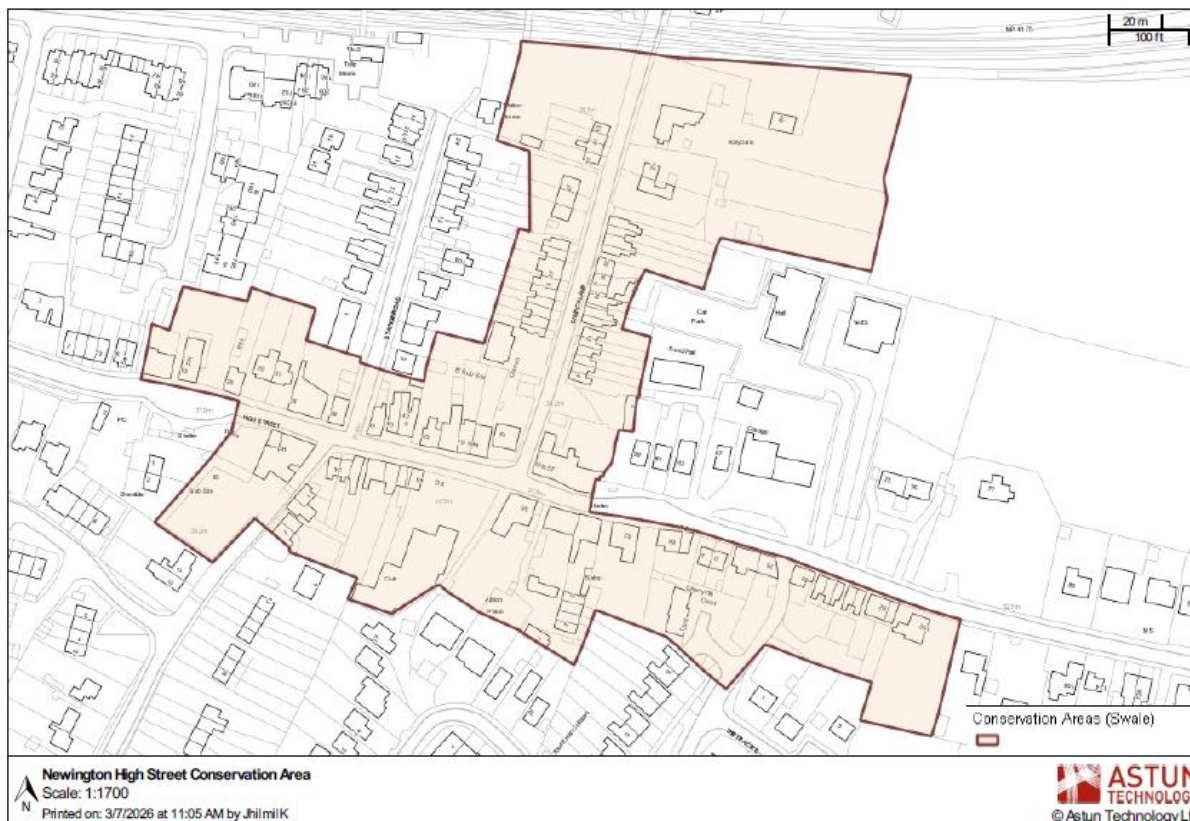
Newington High Street was first designated a conservation area in September 1992. It has not been reviewed since its designation.

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 Newington High Street Conservation Area



6 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.

Reasons for designating the entire 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

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 indicates strong community and Member support 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:

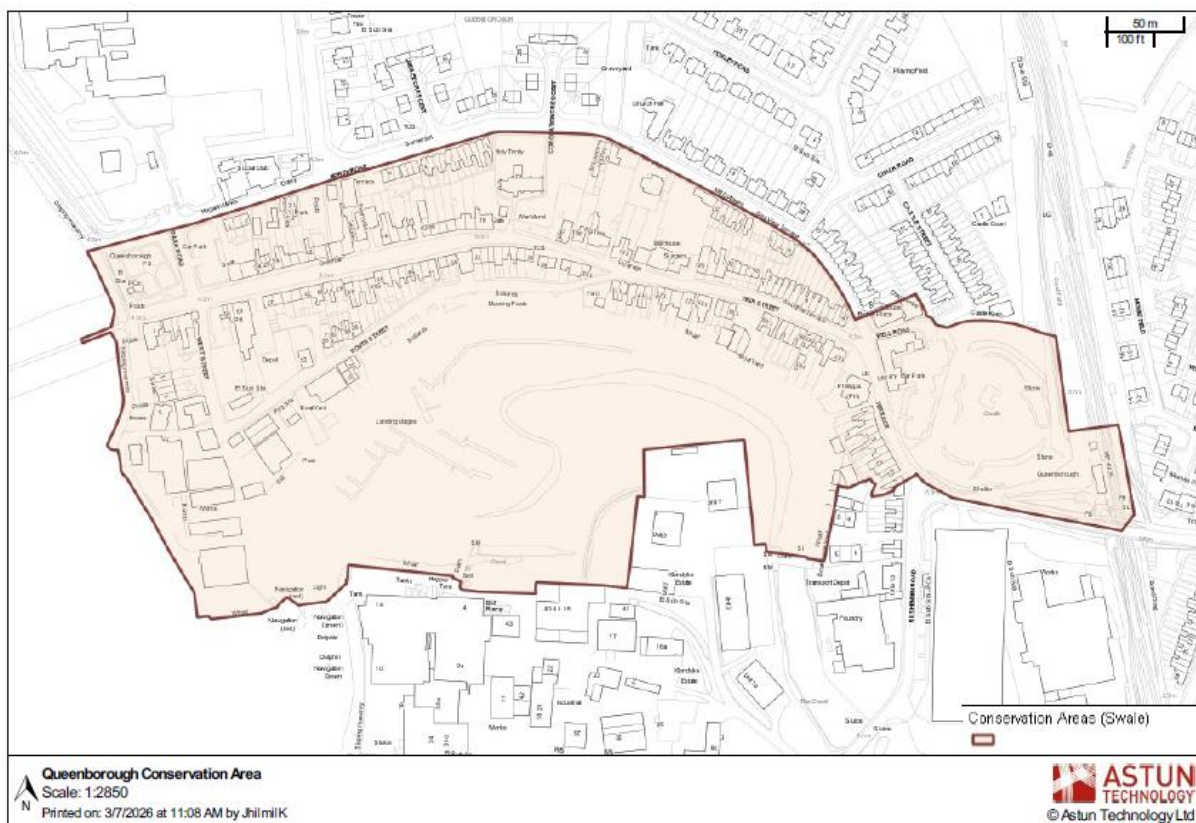
- are well-designed
- are not overly dominant
- respect the historic environment

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.



View of Railway Terrace

Map CA 005 Queenborough Conservation Area



7 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.

10 reasons for full-area ASCA designation in Sheerness Mile Town

- **Unified Victorian grid character** — Mile Town's distinctive late-Victorian grid, consistent building heights, and repetitive terraced frontages form a single coherent character area. A partial ASCA would artificially divide what is, in heritage terms, one unified historic townscape.
- **Dispersed commercial activity** — Retail and service uses are not confined to the High Street; small shops, takeaways, and independent businesses appear throughout the grid. Advertisement pressures therefore occur across the whole CA, not just in the core.
- **Historic shopfront survivals** — Several streets outside the main commercial spine retain original fascias, pilasters, stall risers, and traditional joinery. These are highly sensitive to modern signage and would benefit from consistent protection.
- **Vulnerability of corner plots** — Mile Town's urban form includes numerous corner buildings that act as visual anchors. These are prime targets for oversized or illuminated adverts unless the entire CA is designated.
- **Coastal-townscape sensitivity** — As a planned naval town with a strong maritime identity, the character relies on uncluttered frontages and clear architectural lines. Excessive signage anywhere within the CA undermines this distinctive coastal aesthetic.
- **Pressure from takeaways and small independents** — Mile Town has a high concentration of small independent businesses that frequently seek illuminated or large-format signage. These pressures are spread across the CA, not concentrated in one zone.
- **Protecting long views along the grid** — The straight, uninterrupted streets create long axial views where even a single intrusive advert can dominate the vista. Full ASCA coverage ensures these views remain coherent.
- **Avoiding enforcement complexity** — A partial ASCA boundary would be difficult to communicate and enforce in a dense grid layout. Aligning the ASCA with the CA boundary provides clarity for businesses and officers.
- **Supporting regeneration and town-centre uplift** — Sheerness regeneration objectives emphasise improving the visual quality of the town centre. Borough-wide ASCA coverage strengthens this by ensuring signage contributes positively to the public realm.
- **Consistency with other Swale designations** — Other Swale CAs with unified character and dispersed commercial activity (e.g., Queenborough, Newington High Street) are being designated in full. Applying the same logic to Mile Town ensures a coherent borough-wide approach.

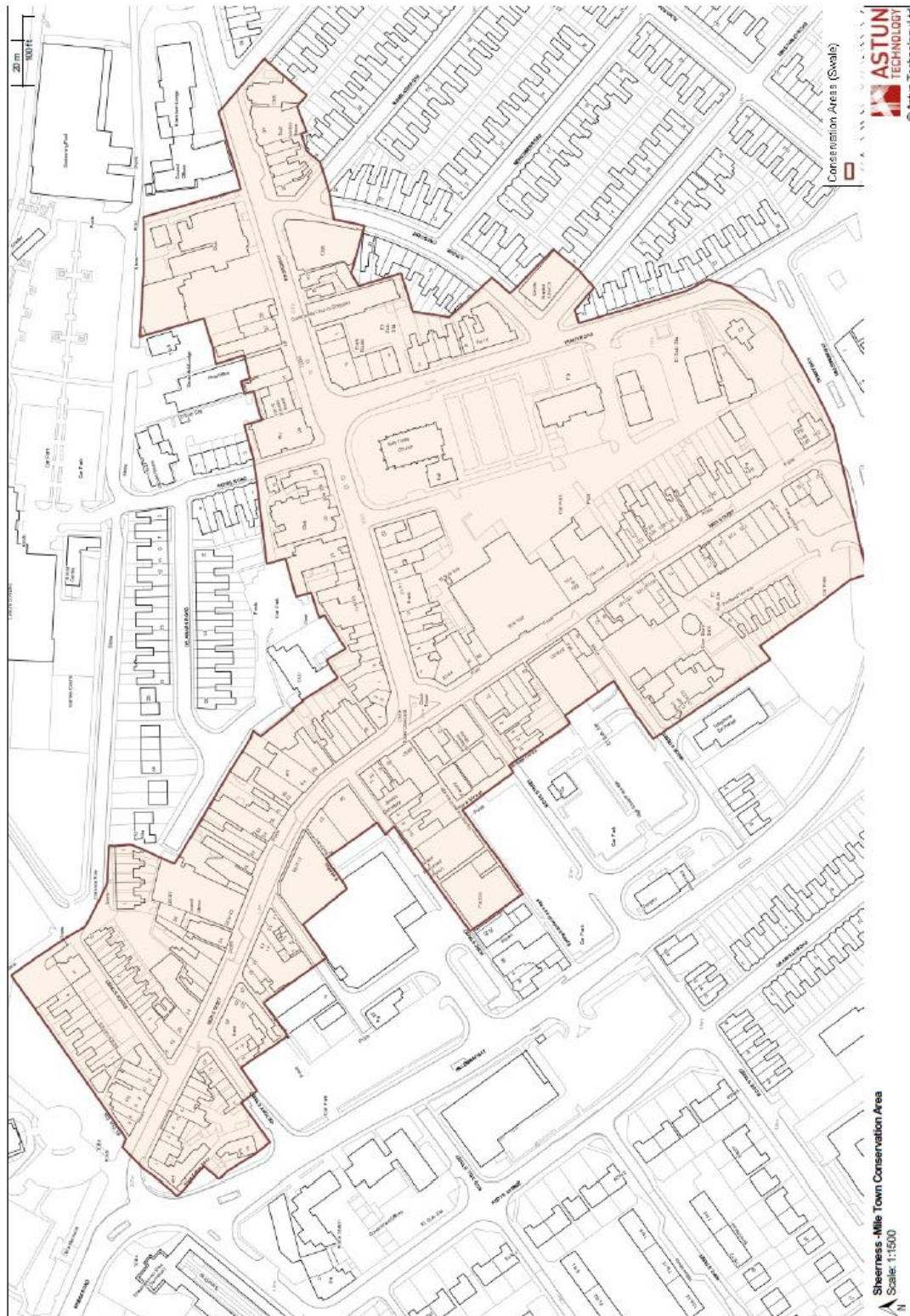


View of Broadway in Sheerness Mile Town



View of High Street in Sheerness Mile Town

Map CA 006 Key questions for Sheerness Mile Town Conservation Area



8 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



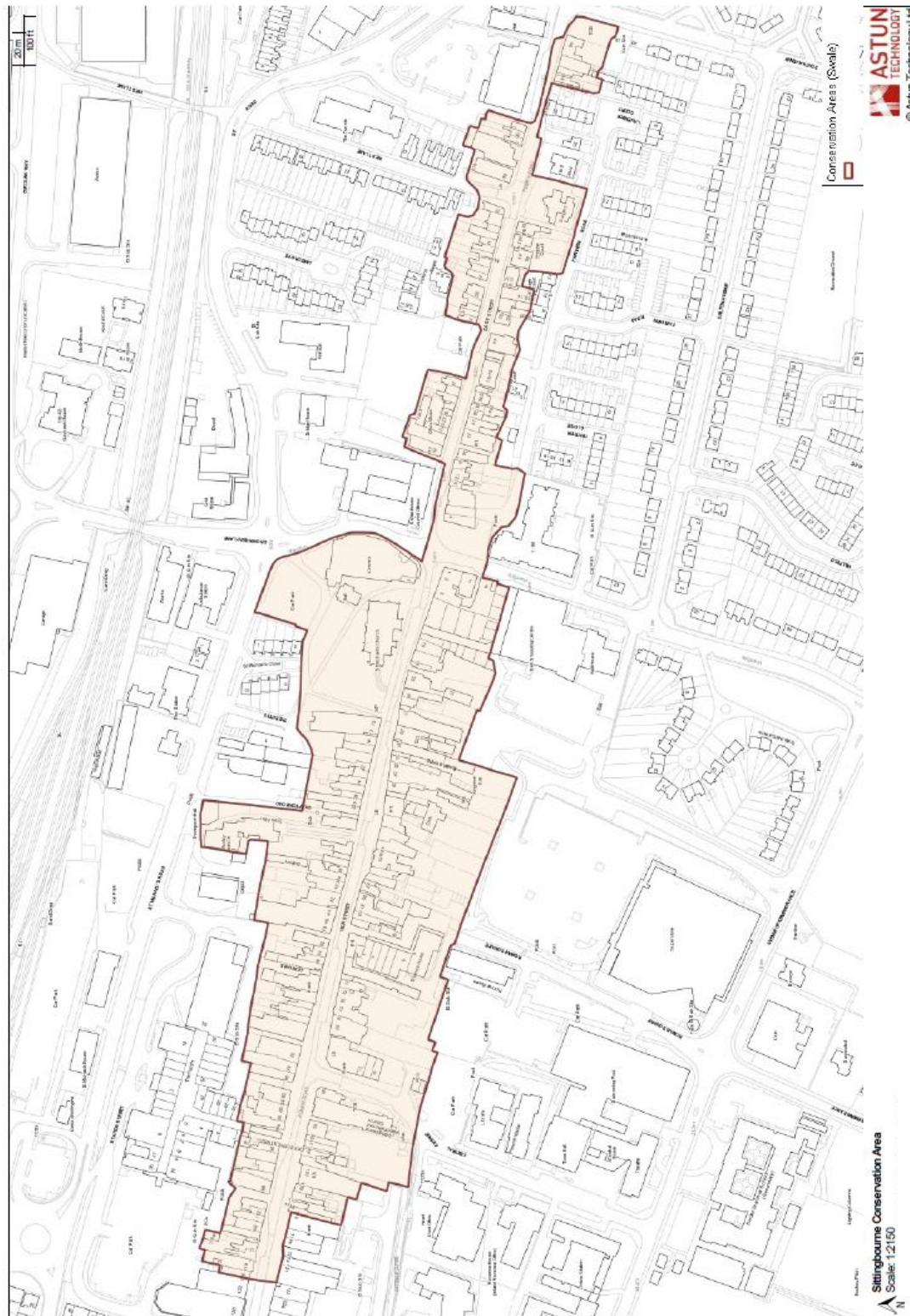
View of East Street

Reasons for full-area ASCA designation

- Unified historic character — The Conservation Area is defined by a continuous 18th–19th century townscape, with shopfronts, upper-floor detailing, and historic plot widths forming a single coherent character zone. A partial ASCA would artificially divide what is, in heritage terms, one uninterrupted historic environment.
- Advertisement pressure beyond the core — Modern signage pressures extend along the full length of the High Street and into side streets. Restricting controls only to the busiest commercial blocks would leave visually sensitive frontages exposed to incremental harm.
- Consistent approach to shopfronts — Many buildings outside the central cluster still contain historic shopfronts or traditional fascias. A whole-area ASCA ensures consistent expectations for illumination, fascia depth, and materials.
- Upper-floor sensitivity — Even where ground floors are less commercial, upper floors retain historic sash windows, brickwork, and parapets. Large or illuminated adverts on lower floors can harm the setting of these features unless controlled borough-wide.
- Gateway and approach views — Approaches into the High Street from East Street, West Street, and Station Street all contribute to the CA's character. Without full ASCA coverage, gateway views remain vulnerable to oversized or brightly lit signage.
- Avoiding boundary confusion — A partial designation creates enforcement ambiguity and public misunderstanding. A whole-area ASCA provides a simple, easily communicated boundary identical to the Conservation Area itself.

- Supporting regeneration aims — Sittingbourne's regeneration strategy emphasises high-quality public realm and heritage-led placemaking. Full ASCA coverage reinforces this by ensuring signage contributes positively to the town's visual identity.
- Protecting surviving historic fabric — Several buildings outside the commercial heart retain original detailing, including cornices, pilasters, and traditional materials. These are highly sensitive to visual clutter and require the same level of protection.
- Preventing displacement of harm — If only the central blocks are controlled, businesses may relocate large or illuminated adverts to the edges of the CA, creating new concentrations of harm. Whole-area designation prevents this displacement effect.
- Alignment with other Swale CAs — Milton Regis, Cellar Hill, Newington High Street and Queenborough are all being treated as full-area ASCA designations due to unified character and dispersed commercial activity. Sittingbourne follows the same logic and ensures borough-wide consistency.

Map CA 008 Sittingbourne Conservation Area



9 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.

Sheerness–Blue Town: Reasons to limit ASCA to the commercial core

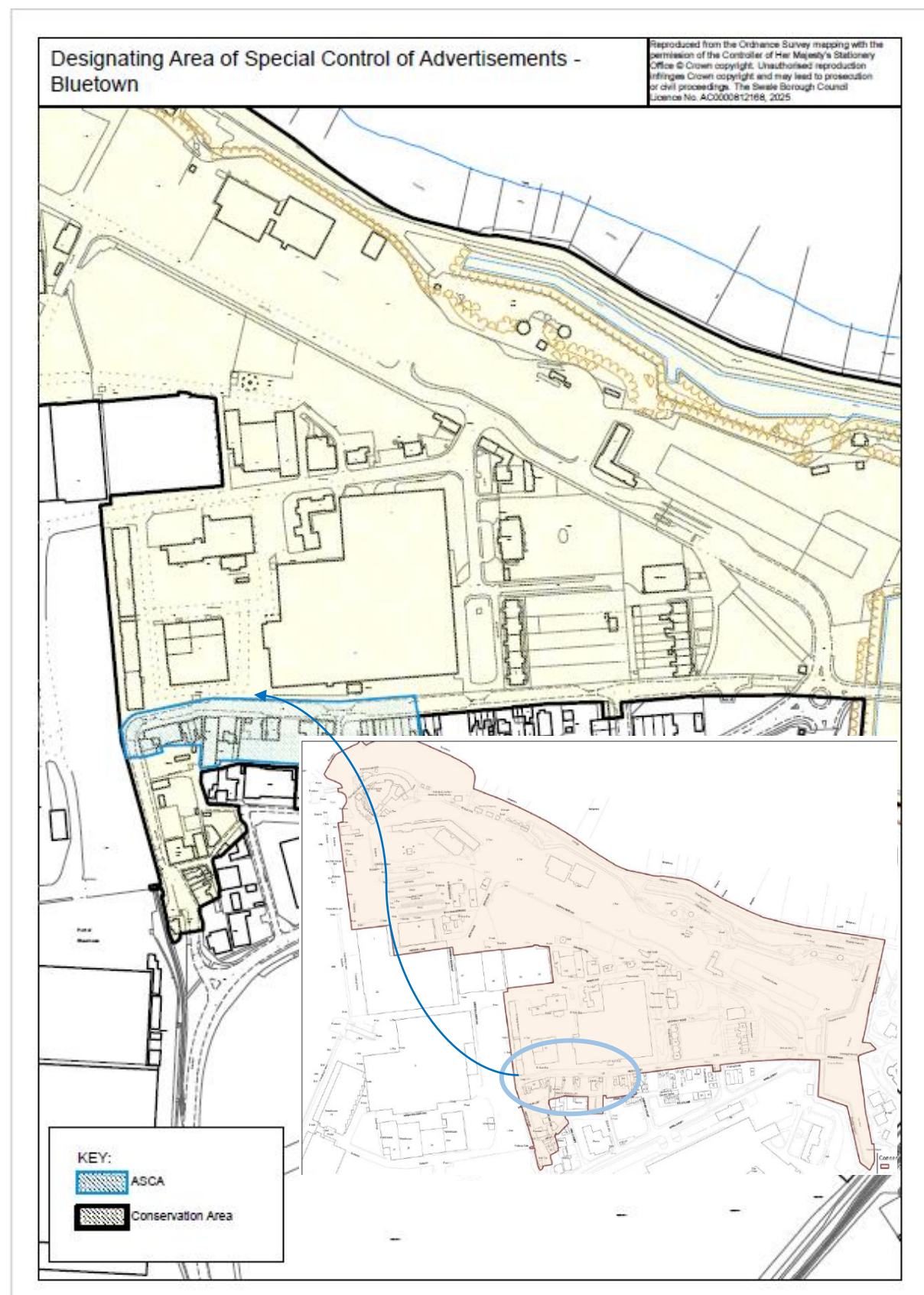
1. **Distinct commercial nucleus** — The High Street/Broadway corridor is the only area with sustained advertisement pressure; outer residential and dockyard-character streets do not experience comparable levels of commercial signage.
2. **Large geographic footprint** — Blue Town's unusually extensive boundary includes industrial edges, naval heritage zones, and low-density housing, making blanket ASCA coverage disproportionate.
3. **Highly varied character zones** — The Conservation Area contains dockyard walls, military structures, Victorian terraces, and commercial frontages; applying a single ASCA regime across all would ignore this diversity.
4. **Minimal advertisement presence** — Large parts of Blue Town have almost no commercial signage; regulating areas with no issue would be unlikely to meet the "necessity and proportionality" test.
5. **Focus on areas at risk** — The commercial centre contains the highest concentration of vulnerable historic shopfronts and façades where uncontrolled signage could cause harm.
6. **Avoiding regulatory burden** — Extending ASCA across industrial and residential streets would impose unnecessary controls on areas where advertisements are rare or absent.
7. **Supporting regeneration aims** — Targeting the commercial core aligns with heritage-led regeneration by improving visual quality where footfall, investment, and perception matter most.
8. **Clearer enforcement boundaries** — A focused ASCA avoids confusion between commercial and non-commercial areas, making enforcement more transparent and defensible.
9. **Respecting historic dockyard character** — The dockyard and naval-industrial edges have a distinct, robust character where advertisement control is less relevant and could be seen as intrusive.

10. **Evidence-based proportionality** — Consultation and site analysis show that harm risk is concentrated in the commercial spine; limiting ASCA to this area ensures the designation is justified and defensible.



Views of High
Street within
Sheerness Blue
town

Map CA 009 Sheerness Royal Naval Dockyard and Bluetown Conservation Area



10 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.

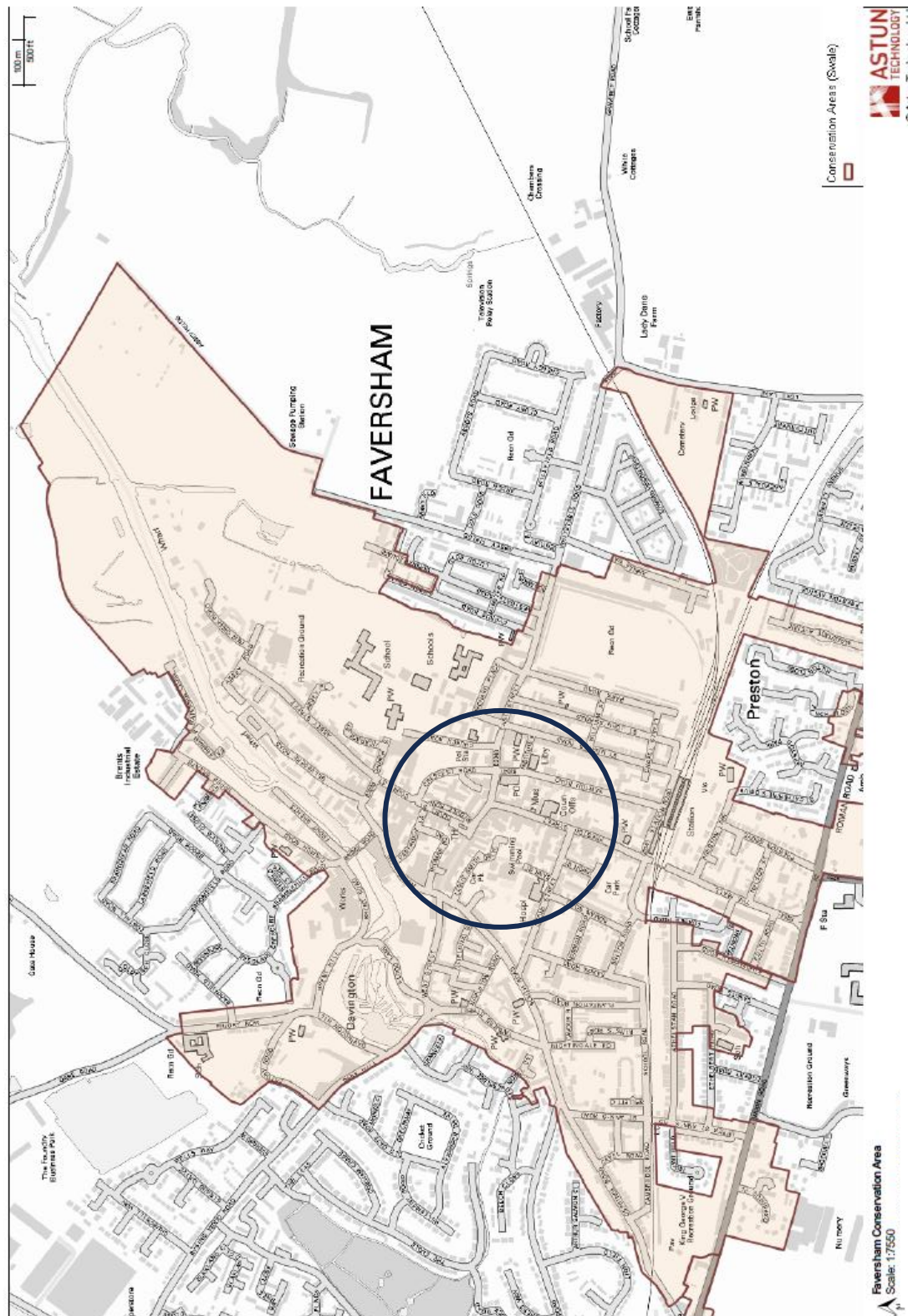
There are lots of surviving Georgian, Victorian and Edwardian shopfronts. These are mainly of timber construction, though some have masonry stallrisers. Shopfronts have a common formula of fascia, window(s) and door and stallriser, flanked by pilasters and capitals. They include symmetrical shopfronts, 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

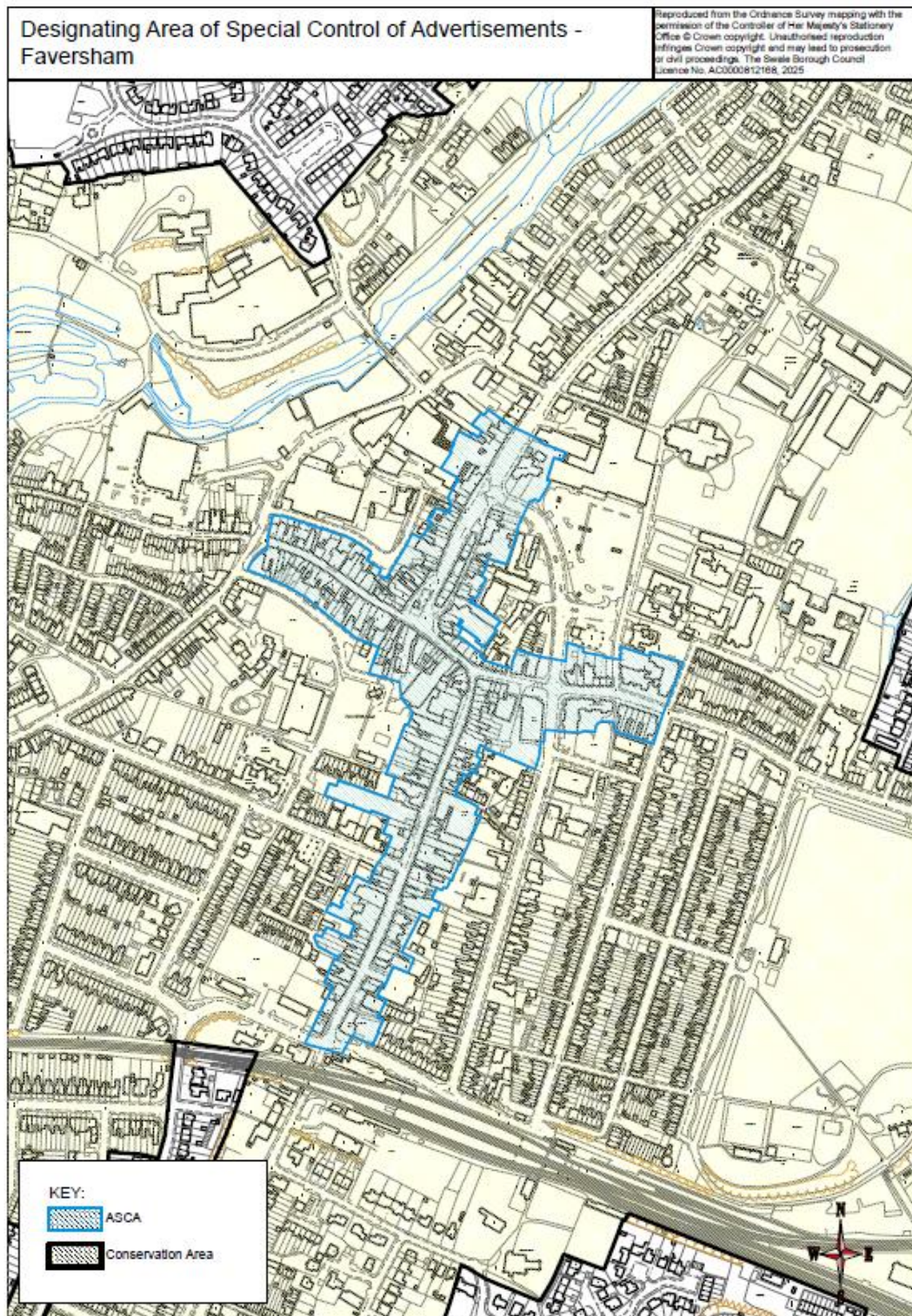
It is proposed that ASCA is designated only in the town centre that would focus on West Street, East Street, Market Street, Market Place, Court Street and Preston Street.

Faversham Town: 10 reasons to limit ASCA to the commercial core

1. **Complex multi-neighbourhood CA** — Faversham Town Conservation Area covers multiple neighbourhoods with distinct identities; only the town centre experiences sustained advertisement activity.
2. **Historic retail heart** — The medieval street pattern around Market Place, Court Street, and West Street forms the true commercial hub where signage pressure is highest.
3. **Extensive residential hinterlands** — Much of the CA comprises quiet residential streets, wharf-side housing, and civic buildings where advertisements are minimal or absent.
4. **Diverse character sub-areas** — The CA includes medieval cores, Georgian suburbs, industrial creekside, and Victorian terraces; a blanket ASCA would not reflect this diversity.
5. **Avoiding unnecessary restrictions** — Applying ASCA to areas with no commercial frontage would impose controls without clear heritage benefit.
6. **Targeting harm hotspots** — The commercial centre contains vulnerable historic shopfronts, narrow streets, and key views where inappropriate signage would have the greatest impact.
7. **Supporting town-centre vitality** — A focused ASCA enhances the visual quality of the retail core, supporting tourism, markets, and local business identity.
8. **Clear management framework** — Limiting ASCA to the commercial centre provides a clear, easily understood boundary aligned with commercial activity patterns.
9. **Respecting creekside industrial character** — The creekside and industrial heritage areas have a different visual language where advertisement control is less relevant and could hinder appropriate commercial signage for marine/industrial uses.
10. **Proportionate and defensible** — Evidence shows advertisement pressure is concentrated in the town centre; a targeted ASCA ensures the designation is proportionate, justified, and aligned with national policy tests.

Map CA 002 Faversham Town Conservation Area







View of Market Street



View of Preston Street

Conclusion

The proposed ASCA designation, as set out in this Statement of Reasons, represents a proportionate and evidence-based response to the cumulative impact of advertisements within Swale's historic town centres. It is considered that the approach taken appropriately balances the needs of local businesses with the protection of amenity and the special character of the Borough's Conservation Areas.