

Sustainability Appraisal (SA) of the Swale Local Plan

SA Report (Draft)

July 2026

Quality information

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Non-technical Summary

This report is currently in draft and primarily presents work to explore reasonable alternative 'growth scenarios'. Specifically, Section 6 explains a process to define four growth scenarios and then these are appraised in Section 6. The outstanding work the appraisal of the plan as a whole in Section 9.

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Swale Local Plan, which is being prepared by Swale Borough Council.
- 1.1.2. Once adopted, the Plan will set the strategy for growth and change for the Borough up to 2041, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.¹

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that appraises “the plan and reasonable alternatives”. The aim of the report is to inform consultation and then plan finalisation.
- 1.2.3. More specifically, the SA Report must answer the following **three questions**:²
 - What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3. This SA Report

- 1.3.1. The final draft (‘proposed submission’) version of the Local Plan is currently published under Regulation 19 of the Local Planning Regulations (2012) and the Regulations set out that the SA Report should be published alongside. This SA Report supersedes the Interim SA Report published as part of Regulation 18 consultation in 2022.
- 1.3.2. The aim of this report is to inform ‘representations’ on the Proposed Submission Local Plan and then plan finalisation (see discussion of ‘next steps’).
- 1.3.3. Finally, note that this report is currently in draft and will be finalised in time for publication such that it fully accounts for the final plan and the latest evidence and understanding, including evidence work that is ongoing at the time of writing, and is therefore best placed to inform representations (and, in turn, the Examination in Public).

Structure of this report

- 1.3.4. This report is structured so as to answer each of the **three questions** introduced above in turn. Specifically, the questions are answered across three ‘parts’ of the report.
- 1.3.5. Before answering the first question there is a need to further set the scene by discussing the scope of the plan (Section 2) and the scope of the SA (Section 3).

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the: context to plan preparation; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

2.2. Context to plan preparation

- 2.2.1. Plan-making began shortly after adopting the current Local Plan for Swale (‘Bearing Fruits’), which was adopted in **2017**. The requirement is to update local plans every five years, and so a plan was published under Regulation 19 in **2020**. However, that version of the Local Plan was not able to progress to the next stage (submission) and so the Council decided to take a step back and consult on “Issues and Preferred Options” in **2021** under Regulation 18, which was an opportunity to consider broad spatial strategy. This was then followed by a further Regulation 18 consultation in early **2026**, which focused on the plan vision and objectives alongside development management policies.
- 2.2.2. Identifying a ‘supply’ of land to meet development needs over the course of the plan period is at the very heart of local plan-making, with the National Planning Policy Framework (**NPPF**; para 11) clear on the need to maintain an up-to-date local plan that provides for development needs as far as is consistent with sustainable development.
- 2.2.3. Local Housing Need (**LHN**) is 1,064 dwellings per annum (dpa), as understood from the Government’s ‘standard method’, which can be contrasted with the figure of 776 dpa that is provided for within the adopted Local Plan (2017).
- 2.2.4. There is a strong expectation that local plans provide for LHN in full as well as any ‘unmet need’ from neighbouring areas where doing so would represent sustainable development. However, there can be scope to generate unmet need where necessary.
- 2.2.5. Specifically, the question is whether the **housing requirement** should be set precisely at LHN or alternatively at a higher or lower figure, where the housing requirement is defined as the number of homes a plan commits to delivering, and where under-delivery risks policies in the plan being deemed ‘out-of-date’ for decision-making purposes.
- 2.2.6. Where policies in a plan are deemed out-of-date then planning applications can be considered under the ‘**presumption in favour of sustainable development**’ (also known as the ‘tilted balance’), as set out at NPPF paragraph 11. The Council is currently subject to ‘the presumption’ because it cannot demonstrate a five year housing land supply (5YHLS) against its housing requirement,³ which is 1,064 dpa because the adopted Local Plan dates from 2017 (a local plan housing requirement applies for five years and, in turn, local plans should be reviewed every five years).⁴
- 2.2.7. As such, there is an **urgency** to progress a new Local Plan. Furthermore, there is an urgency because the Government has set a deadline of 31st December for local plans to be submitted under the current Regulations, such that if this deadline is missed the Council would likely have to ‘start again’ under the new Regulations.
- 2.2.8. In summary, key motivations for progressing the Local Plan are as follows:
- The housing requirement in the new Local Plan will apply for 5YHLS purposes for a period of five years post adoption. As well as deciding what the requirement will be over the plan period as a whole, local plans are also tasked with considering what it should be for each year within the plan period, i.e. whether/how it should be ‘stepped’.

³ As well as needing to maintain a 5YHLS, housing supply performance is also evaluated using the Housing Delivery Test (HDT).

⁴ It can be noted that the presumption also risks ‘planning by appeal’, i.e. a situation whereby the Council refuses an application only for it to be granted at appeal by an Inspector (and it should be noted that fighting appeals is costly and there can even be a risk of the Council having to pay the appellants costs if the Council is deemed to have acted unreasonably).

- Whatever the housing requirement there is a need for a major boost to supply in order to deliver on it (i.e. ensure that the Council can maintain a rolling 5YHLS) and clearly the best way to boost supply is in a coordinated / strategic way through a local plan.
- Planning applications will continue to be decided under ‘the presumption’ until the Council can achieve a 5YHLS via a new Local Plan.
- Meeting housing needs is of great importance in-and-of itself and due to secondary benefits, for example in terms of health / well-being and supporting the local economy.
- Plan-led housing growth creates an opportunity to strategically target investment and policy ‘asks’ of developers (in the context of development viability parameters), thereby maximising the benefits of growth and potentially delivering ‘planning gain’ (opportunities can and do go missed when new homes come forward piecemeal).

2.2.9. Finally, by way of context, it is important to acknowledge that Swale Borough is not an island but rather functions as part of a wider sub-region. In particular, Swale can be considered centrally located within a North Kent sub-region, with close links to Medway to the west and Canterbury; however there are also links to wider Kent authorities, in particular Maidstone Borough to the south (via the A429, although connectivity is otherwise limited on account of the intervening Kent Downs National Landscape). Sharing housing needs across a sub-region is often a key issue necessitating cooperation between neighbouring authorities, but there are also wide-ranging further strategic issues and opportunities to explore, including around transport infrastructure. In short, the Local Plan must carefully account for cross-boundary / larger-than-local issues, including in light of NPPF section on Maintaining Effective Cooperation.

2.3. The plan area

2.3.1. This section will present a spatial portrait of the Borough with a particular focus on key issues and opportunities of relevance to defining reasonable alternatives (Sections 4 and 5) and appraising the plan and reasonable alternatives (Sections 6 and 9).

2.4. The plan period

2.4.1. The duration of the Local Plan is 16 years from 1st April 2026 to 1st April 2041. This reflects paragraph 22 of the National Planning Policy Framework (NPPF), which states: *“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities...”*

2.4.2. Further points to note are:

- There is an acknowledged case for an extended plan period to 2042, recognising that the Local Plan is expected to be adopted in 2027. This would necessitate having to provide for an additional year of LHN (1,064 homes). However, on the other hand, there may be some flexibility in light of impending Local Government Reorganisation (LGR) and Devolution, in that future local plans under LGR and Devolution will be well placed to make provision for development needs looking to 2042 and beyond.
- As of 1st April 2025 ‘existing supply’ from sites with planning permission (including 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. This figure will be adjusted post submission in light of data for the 2026/27 monitoring year.
- In turn, the aim is to provide for housing supply over-and-above the existing supply (also a windfall assumption), primarily via site allocations (see NPPF para 72).
- In particular, the requirement is for specific “deliverable sites” for years 1 to 5 of the plan period (such that there is a 5YHLS); “developable sites or broad locations” for years 6-10; and “where possible” developable sites or broad locations for years 11-15.

2.5. Plan objectives

2.5.1. The plan objectives are established in order to guide the plan-making process and are also of importance for the SA process because they provide a starting point for defining reasonable alternatives (see Section 4). The plan objectives are as follows:

- Provide for homes and jobs that are best suited to meet the imposed Government Targets;
- Support and sustain communities across the borough, big and small, by planning to meet identified needs, including needs for community facilities and infrastructure;
- To protect and manage our resources to address climate change through delivering sustainable growth that supports urban and rural economies and makes the best use of infrastructure;
- Locate development in the least constrained parts of the borough in reasonable proximity to transport hubs;
- Provide a range of housing developments across the borough that deliver a range of housing sizes and types to meet the needs of young people, families and older people;
- Deliver a level of investment and growth at key locations to facilitate significant improvements to support infrastructure e.g. schools, healthcare and highways and sustainable and active travel options for the benefit of local communities; and,
- Focus development on the contribution that larger sites can deliver in a proportionate way to meet wider plan objectives and ensure delivery during the plan period and beyond.

3. The SA scope

3.1. Introduction

3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1). The aim here is to introduce the reader to the *broad scope* of the SA. The aim is not to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence. The SA scope is further discussed throughout this report, i.e. throughout the report there is discussion of key aspects of the sustainability context and baseline and key issues / opportunities. This allows for a targeted discussion, and avoids the need for a generic discussion of sustainability issues (etc.) that is poorly targeted in the context of the plan/alternatives.

3.2. Consultation on the scope

- 3.2.1. The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were formally consulted on the SA scope in 2025.
- 3.2.2. Consultation responses were received from all three statutory bodies, as discussed within the appraisal sections of this report.

3.3. The SA framework

3.3.1. The primary outcome of scoping is a list of topics/objectives that can then be utilised as a 'framework' under which to structure appraisal work. The aim is to ensure that appraisal is well-targeted, concise and engaging. Table 3.1 presents the SA framework.

Table 3.1: The SA framework

Topic	Objective
Accessibility	Improve accessibility to essential services and facilities across the borough
Air quality	Improve air quality, reduce air pollution and reduce exposure to air pollution
Biodiversity	Maintain, create and enhance the extent and quality of biodiversity habitats and networks within and surrounding the borough, and protect species and species diversity
Climate change adaptation	Increase resilience to the potential effects of climate change, including flood risk
Climate change mitigation	Mitigate climate change by increasing decarbonisation, with a focus on industry, transport and the built environment, increasing efficiency and reducing energy use
Communities and health	Promote and protect health, wellbeing, and safety by ensuring access to healthcare, reducing health inequalities, improving road safety, enhancing green infrastructure, and creating safe and sustainable communities
Economy and employment	Support a productive, diverse and resilient economy that provides opportunities for all
Historic environment	Protect, conserve and enhance the historic environment, heritage assets and their setting within the borough
Homes	Support the delivery of a range of housing to meet identified needs, with a focus on improving affordability for those most in need
Landscape	Protect and enhance the character and quality of the landscape, including green infrastructure corridors
Soils and natural resources	Protect soil and mineral resources, and manage waste effectively
Transport	Promote sustainable transport use and reduce the need to travel
Water	Protect and enhance water quality and resources, ensuring sustainable water management to support current and future needs while reducing pollution risks

Part 1: Work to date

4. Introducing Part 1

4.1. Overview

- 4.1.1. The aim here is to set out work undertaken to consider **reasonable alternatives** ahead of finalising the Proposed Submission Local Plan for publication.

4.2. Reasonable alternatives in relation to what?

- 4.2.1. The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a **supply** of land, including by allocating **sites**, to provide for housing needs (**LHN**) alongside delivering on wider plan objectives.
- 4.2.2. Establishing a spatial strategy is invariably a central objective of any local plan, and the Swale Local Plan is no exception, e.g. this matter was at the heart of the Regulation 18 consultation held in 2021. The plan also covers development management (DM) policies, but it is clear that spatial strategy / site selection / supply is the central matter.
- 4.2.3. Alternatives in respect of spatial strategy / site selection / supply can be referred to as ‘**growth scenarios**’, and can also be thought of as **alternative key diagrams**.
- 4.2.4. A focus on RAs in the form of ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the very heart of the local plan and, in turn, ensures a meaningful and engaging appraisal in support of effective consultation and debate.⁵

What about site options?

- 4.2.5. Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case. Rather, the key objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs should be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of individual site options as part of the process of establishing RA growth scenarios – see Sections 5.3 and 5.4.

5. Defining growth scenarios

5.1. Introduction

- 5.1.1. The aim here is to discuss the process that led to the definition of growth scenarios.

Structure of this section

- 5.1.2. This section explains a process to define growth scenarios as follows:
- **Section 5.2** – explores **strategic factors** that are a ‘top down’ input.
 - **Section 5.3** – considers **site options** that are ‘bottom up’ input (or ‘building blocks’).
 - **Section 5.4** – combines factors and concludes on **growth scenarios**.

⁵ SA must only focus on significant effects, and a focus on RA growth scenarios guarantees a focus on meaningfully differential significant effects thereby negating to ‘screen’ what should and should not be a focus of work to explore RAs. A further consideration is that the regulatory requirement, when read at face value, suggests a need to appraise and consult upon alternative plans (specifically, the requirement is to appraise and consult upon: “... *the plan and reasonable alternatives*”). Appraising alternative local plans is patently unachievable but a focus on RA growth scenarios represents the next best thing. Finally, in respect of RAs, it is important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because ‘do nothing’ is the baseline and significant effects are defined as effects *on the baseline*.

A note on limitations

- 5.1.3. The aim here is to describe the *process* that led to the definition of reasonable alternatives (growth scenarios) for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an “*outline of the reasons for selecting alternatives...*” [emphasis added].

5.2. Strategic factors

Introduction

- 5.2.1. The aim here is to explore strategic issues, opportunities and options with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:
- Quantum – *how many* new homes are needed (regardless of capacity)?
 - Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large (‘strategic’) sites versus smaller sites?

Quantum

- 5.2.2. This section recaps the Local Housing Need (LHN) figure for the plan area, before exploring *high-level* arguments for a housing requirement set above or below LHN.

N.B. this section focuses on housing but there is also brief discussion of **employment land** need and the need for **Gypsy and Traveller pitches**.

Background

- 5.2.3. A central tenet of local plan-making is the need to **A)** objectively establish housing needs (‘policy-off’); and then **B)** develop a policy response to those needs (‘policy-on’). The Planning Practice Guidance (PPG) explains:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process... It should be undertaken separately from... establishing a housing requirement figure...”

- 5.2.4. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment “conducted using the standard method”.
- 5.2.5. With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN; however, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Local Housing Need (LHN)

- 5.2.6. As discussed, LHN for the Borough is 1,064 dpa on the basis of the Government’s standard method, which accounts for: A) existing dwelling stock; and B) affordability. This equates to 17,024 homes over the 16 year plan period.

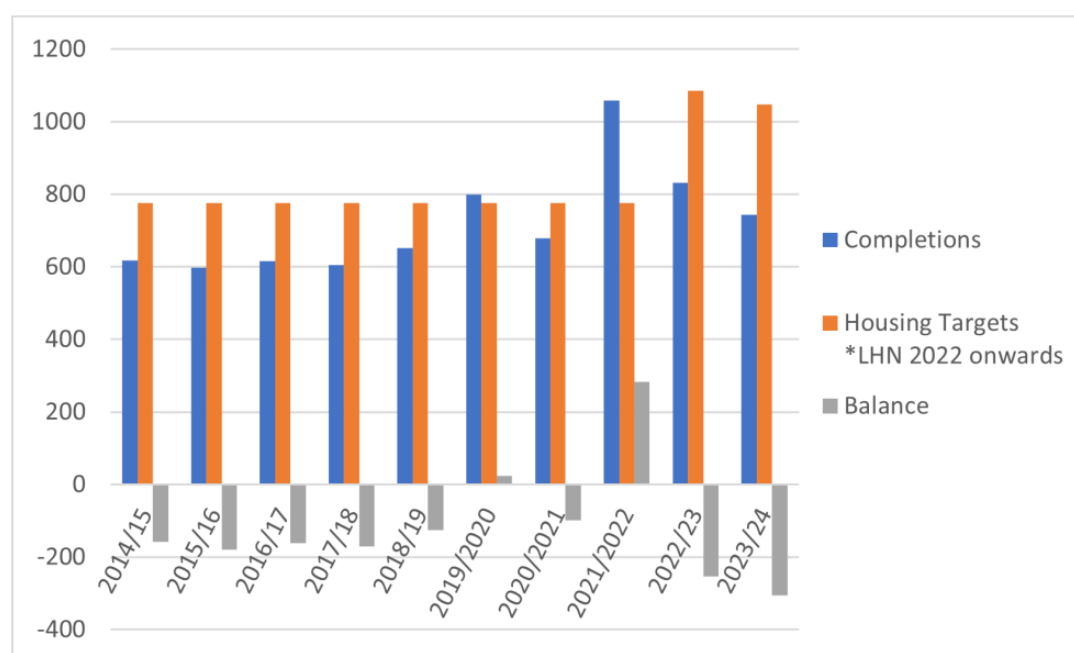
Is it reasonable to explore a housing requirement below LHN?

- 5.2.7. The key context is NPPF paragraph 11, which states:

*“... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits...”* [emphasis added]

- 5.2.8. There has always been the potential to evidence and ultimately justify a housing requirement set below LHN, where it is the case that providing for LHN is not achievable or would not represent sustainable development. However, it has also always been understood that there is high evidential bar that must be reached in order to justify a housing requirement set below LHN ('no stone left unturned'), particularly where there is little or no chance of the 'unmet need' generated being provided for elsewhere. Also, the latest situation is the context of the 2024 NPPF, which arguably somewhat 'raises the bar' that must be reached in order to evidence and ultimately justify LHN. Finally, further context also comes from recent revocation of the Duty to Cooperate, which arguably makes it more challenging to agree provision for unmet need.
- 5.2.9. Also, a further consideration is that any local plan must only ever commit to a housing requirement that is deliverable, because failing to deliver means that the local plan can be judged out-to-date (such that 'the presumption' applies). Delivering 1,064 homes per annum in Swale is challenging but achievable with an up-to-date Local Plan, including because this will assist greatly with infrastructure planning. Figure 5.1 is taken from the Swale Authority Monitoring Report (2025) and shows that delivery exceeded 1,000 homes in 2021/22, including as key allocations from the adopted Local Plan (2017) were building out (it also shows the housing requirement increasing in 2022, due to the adopted Local Plan becoming five years old). Only 683 homes were delivered in the 2025/26 monitoring year, and looking ahead delivery is expected to average around 900 homes up to 2029/2030 (there is very little that the Local Plan can do to influence this), but from 2030/31 there is confidence in the ability to achieve a step-change in delivery.

Figure 5.1: Housing deliver in Swale over recent years



- 5.2.10. In **conclusion**, there is no clear strategic case to be made for a housing requirement set below LHN, given the relatively limited constraints to growth affecting Swale and because LHN is likely to be deliverable over the plan period as a whole (although there is the question of whether it is deliverable in the early years of the plan period, i.e. could be the case that there is a need for a stepped housing requirement). This same conclusion was reached at the time of the previous Regulation 19 publication stage in 2020, and at the subsequent Regulation 18 stage in 2021 there was similarly a focus squarely on spatial strategy options that would provide for housing needs in full. In summary, growth scenarios involving a housing requirement set below LHN can be ruled out as 'unreasonable', including because there are plentiful supply options (Section 5.3).

Is it reasonable to explore a housing requirement above LHN?

5.2.11. NPPF para 69 states that local authorities should set a housing requirement:

*“... which shows the extent to which their identified housing need... can be met over the plan period. **The requirement may be higher than the identified housing need** if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.*

5.2.12. The matter of ‘growth ambitions linked to economic development or infrastructure investment’ is not considered to be a significant factor in the Swale context. However, the matter of ‘provision for neighbouring areas’ is invariably a consideration for local authorities across the South East of England. Key considerations are as follows:

- Ashford, Canterbury, Maidstone and Medway – are Swale’s closest neighbouring authorities, but none are at risk of generating unmet need. Specifically: the Ashford Local Plan was adopted in 2019, runs only to 2030 and the Council has now begun work on a ‘new style’ local plan under the new Regulations (as opposed to submitting plan by 31st December 2026 under the current Regulations), but Ashford is a relatively unconstrained area that is very capable of providing for LHN in full; the Canterbury Local Plan was recently published under Regulation 19 and provides for LHN in full (although with a stepped requirement); the Maidstone Local Plan was adopted in 2024 and provides for LHN in full (although the plan period is to 2038; there is a stepped requirement; total supply falls slightly short of the requirement over the plan period; and there is a very large unmet need for Gypsy and Traveller pitches); and the Medway Local Plan has proved challenging but the recently submitted Local Plan provides for LHN in full (but generates an unmet need for Gypsy and Traveller pitches).
- Elsewhere in Kent – there is limited risk of unmet need, for example: Gravesham recently published a Local Plan under Regulation 19 that provides for LHN in full (although there is reliance on ~1,800 homes supply in 2030/31 compared to delivery of ~250 homes in 2025/26); the Sevenoaks Local Plan is nearing Regulation 19 at the time of writing and provides for LHN in full; Tunbridge Wells recently adopted a Local Plan that provides for LHN in full (albeit with a short plan period; also it is noted that LHN has now increased by 66% following the new standard method in 2024); and Tonbridge and Malling are set to provide for LHN in full, with the Council’s website explaining *“The NPPF does allow for lower targets in exceptional circumstances, for example if there are constraints on land availability such as flood risk. However, the evidence...shows that the housing target can be met”*. Thanet perhaps stands out as a Kent authority at risk of generating unmet need, recognising that there has been very little progress on a new local plan following adoption of a plan in 2020 that committed to an “early review”; however, Thanet is distant from Swale (it is better linked to Canterbury and Dover) and the Council has not undertaken work to confirm unmet need, let alone unmet need that should or might be provided for in Swale.
- East Sussex – all of the East Sussex local authorities (Eastbourne, Hastings, Lewes, Rother and Wealden) are generating or likely to generate major unmet need, and Hastings has written to Swale requesting provision for a proportion of unmet need. However, Swale does not link well East Sussex and there is no basis upon which to suggest an unmet need figure that could potentially be provided for in Swale.
- London Boroughs – Bexley has an up-to-date Local Plan and Bromley recently published a high level consultation document within which they commit to providing for the ‘housing target’ set by the London Plan (2021), specifically 774 dpa, which is in the context of recent delivery of 229 dpa (2021/22 to 2023/24). It can also be noted that the standard method LHN is 3,001 dpa, although LHN is dealt with through the London Plan rather than individual boroughs. A new London Plan is imminent.⁶

⁶ It can be noted that the adopted London Plan (2021) generated unmet need that has not been provided for. Also, a new London Plan is now in preparation, and a commitment has been made to providing for standard method housing need in full, whether that be within London or with some unmet need provided for outside of London. If the new standard method LHN were to be provided for in full within London this would mean a major step change in delivery, with LHN 88,000 dpa compared to delivery of 32,000 homes in 2023/24. The Government has intervened and the situation is improving, but overall there is a risk of unmet need from London, albeit this cannot be quantified ahead of work on the new London Plan.

- 5.2.13. Overall, the bullet points above serve to demonstrate that unmet need is not a 'clear and present' issue for the Swale Local Plan. However, neither is the risk of unmet need from London, Sussex and Thanet a factor to discount entirely as part of work to define growth scenarios for the Swale Local Plan. This is notwithstanding the fact that: A) transferring unmet need from one local authority to another is very challenging in the absence of a sub-regional plan or a legal duty to cooperate, and differing local plan timescales;⁷ and B) future local plans under LGR and Devolution will be well placed to deal with the current issues/risks in respect of unmet need that are set out above.
- 5.2.14. One other high level consideration, in respect of possible scenarios involving a housing requirement set above LHN, is affordable housing need, given that the PPG states: "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*" The Swale Local Housing Market Assessment Update (2026) identifies a need for 304 affordable homes per annum (although with alternative assumptions applied this could increase to as high as 437 per annum) and recent delivery has been significantly below this need. A further contextual factor is the Affordable Housing Emergency declared in 2024.
- 5.2.15. Assuming a need for 304 affordable homes per annum, this would involve delivering affordable housing at rate of 28% were the housing requirement to be set at LHN, which is potentially achievable but challenging on account of development viability. Overall, this suggests limited case to be made for a housing requirement set above LHN in order to deliver additional affordable housing, although again the possibility of doing so cannot be discounted at this stage (of the process of defining growth scenarios).
- 5.2.16. Finally, it should be noted that the possibility of setting the housing requirement above LHN has been explored in the past, namely within the SA Report published alongside the previous Proposed Submission Local Plan in 2020. Specifically, the highest growth scenario at that time involve supply 15% above LHN, and the appraisal explained this could *potentially* enable a housing requirement set modestly above LHN. Specifically, a total plan period supply of LHN plus 15% would enable the housing requirement to be set above LHN unless it is determined that there is a need for a 15% supply 'headroom' as a contingency for unforeseen delivery issues, i.e. with a view to ensuring that the housing requirement can be delivered in practice year-on-year.⁸

Conclusion on housing quanta options

- 5.2.17. The above discussion serves to suggest that attention should focus primarily on growth scenarios that would enable the housing requirement to be set at LHN, but also that there is perhaps a strategic case for higher growth. This is broadly in line with the conclusion of an earlier high level exercise to consider broad growth quanta options, namely the Housing Targets Study (2023), which concluded: "*Local Plan-making should be undertaken with a focus on setting the housing requirement at Standard Method LHN, but the Council can/should remain open to setting the housing requirement at a lower/higher figure.*" In practice subsequent work to consider spatial strategy options over the course of 2023 to 2025 focused on options that would enable the housing requirement to be set at LHN, as discussed further below (the remainder of Section 5.2).
- 5.2.18. The matter of precise growth quanta figures to reflect across the growth scenarios is returned to in Section 5.4 following consideration of spatial strategy issues/options (the remainder of Section 5.2) and available site options (Section 5.3).

⁷ The NPPF states the following in respect of maintaining effective cooperation: "*Plans come forward at different times, and there may be a degree of uncertainty about the future direction... authorities... will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.*" The Draft Ashford Local Plan (2025) is of note as a case study, in that a supporting Duty to Cooperate Statement presents the following response (dated July 2024) to an unmet need request from Rother District: "*Consequently, and whilst we understand that your Authority may also have significant challenges, the Borough Council is not in a position to assist you in meeting your housing need and currently cannot envisage a scenario where this position will change.*"

⁸ 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).

Box 5.1: A note on employment land need

An Employment Land Review was undertaken in 2018 and updated in 2023. The ELR update concludes the demand for, and take-up of industrial land has been stronger and faster than was anticipated in the 2018 ELR, led by the strategic distribution market (particularly for retail and third-party logistics companies, but also manufacturing and freight and wholesalers). The ELR update concludes: “The unmet industrial need – 48 ha as a minimum (or 73 ha as the aspiration) should be met by new land allocations. Netting off the land within the designated Eurolink that can meet some of the need leaves 45 ha minimum.

The ELR update also sets out that the requirement for offices has shifted significantly since 2018. Both the demand and the availability of office space remains low and broadly in balance, with the market serving essentially local businesses. Rents are insufficient to stimulate viable development and the long-standing weak performance of the office market, coupled with more recent trends, has pulled the assessment substantially downwards. The latest assessments of office demand broadly align, suggesting the market is at equilibrium at best, but could equally see contraction. This means that the unmet need for new office floorspace is just 1.1 ha; virtually no requirement.

Box 5.2: A note on Gypsy and Traveller accommodation need

Swale is home to one of the largest Gypsy, Traveller and Travelling Showpeople populations in Kent and the wider South East with over 80 sites. In order to gain a greater understanding of the Borough’s need for pitch and plot provision, a Gypsy and Traveller Accommodation Assessment (GTAA, 2023) was completed, which considers needs over the period 2022/23 to 2037/38 (i.e. over a period not fully aligned with the plan period of 2026/27 to 2040/41). The GTAA concludes:

- Overall need is for 114 Gypsy and Traveller pitches, with 80 in the five year period to 2026/27.
- The short-term 5 year need has the potential to be largely met through the regularisation of existing unauthorised sites, the expansion/intensification of existing sites and turnover.
- A need for 7 Travelling Showperson plots and transit accommodation is also identified.
- To support the wider needs of Gypsies and Travellers and Travelling Showpeople, the council should also set out criteria-based policies to inform future planning applications for private Gypsy and Traveller sites and Showperson’s yards should they arise over the plan period.

In addition, some of the identified immediate 5 year need will have already been met through windfall permissions since the base date of the GTAA 2023 evidence. The Council’s monitoring between 1 April 2022 (base date of GTAA evidence) and 31 December 2025 has identified 23 pitches have been consented, which reduces the immediate 5 year need ($80 - 23 = 57$ pitches) and potentially also the plan period need of ($114 - 23 = 91$ pitches); however, there is also a need to consider the possibility of additional need over the three years 2038/39 to 2040/41.

Broad spatial strategy

5.2.19. A considerable amount of work has been undertaken to consider broad spatial strategy over recent years, in particular:

- 2020 – the SA Report published alongside the previous Proposed Submission Local Plan appraised five broad spatial strategy options (see Appendix III of the report).
- 2021 – the ‘Issues and Preferred Options’ consultation presented five broad spatial strategy options, and these were appraised within an Interim SA Report.
- Early 2026 – elected Councillors, particularly via the Planning and Transportation Policy Working Group (PTPWG), have iteratively explored six broad spatial strategy options (referred to as ‘growth options’), as presented in Table 5.1.

N.B. the figures in the final column of the table reflect latest understanding of broadly how many homes would need to be delivered at non-strategic sites in order to enable the housing requirement to be set at LHN; see further discussion in Section 5.4. Also, note that the names of the options have been adjusted for conciseness.

Table 5.1: The broad growth options considered by elected Councillors in early 2026

Growth option	Delivery from strategic sites	Specific strategic sites	Residual required from non-strategic sites
Continue Bearing Fruits approach	0	-	~7,000
Strategic site in the west	2,500	West of Bobbing	~4,500
Strategic site in the east	2,500	South East Faversham	~4,500
Strategic sites in west and east	5,000	West of Bobbing South East Faversham	~2,500
Large strategic site south east of Sittingbourne*	2,000	Highsted Park North (750) Highsted Park South (1,250)	~5,000
Large strategic site at Faversham	4,000	South East Faversham East of Faversham	~3,000

* Highsted Park is currently the subject of a planning application for 8,400 homes, but it is thought the site could only deliver around 2,000 homes in the plan period. It would arguably comprise a new settlement but would closely to Sittingbourne in part.

- 5.2.20. However, matters have now moved on considerably, in that two of the strategic sites that feature in the table now have a resolution to grant planning permission, such that it is reasonable to assume that they are committed (i.e. it is reasonable to assume that they will come forward), for the purposes of defining growth scenarios. Specifically, both West of Bobbing and South East of Faversham now have a 'resolution to grant'.
- 5.2.21. This results in very limited room for manoeuvre regarding broad spatial strategy, because it is unquestionably the case that, in addition to supply from strategic sites, there is also a need for supply from non-strategic sites. This is essentially because strategic sites will deliver in the longer term and are almost invariably associated with delivery risk (particularly on account of challenging infrastructure dependencies), whilst the overall Local Plan supply must ensure a good level of supply in the earlier years of the plan period (i.e. to avoid or minimise the need for a stepped requirement) and must be robust in terms of being characterised by minimal delivery risk (because failing to deliver on the committed housing requirement / maintain a rolling five year housing land supply risks 'the presumption'). Further considerations are: A) smaller greenfield sites can also 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; and B) the NPPF supports smaller sites because they are suited to delivery by SME housebuilders and can allow "villages to grow and thrive."

5.3. Site options

Introduction

- 5.3.1. The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise and 'sift' site options, in order to arrive at a shortlist that can then feed into Section 5.4.
- 5.3.2. In particular, there is a need to discuss the Housing and Economic Availability Assessment (HELAA), which is the key workstream for assessing individual site options.

HELAA

- 5.3.3. The published HELAA (2025) explains an iterative process for assessing known sites that are potentially available for development and for each one reaching a conclusion on whether the site is ‘deliverable’ (able to deliver within 5 years) or ‘developable’ (within the plan period) after having determined that the site is both:
- Available and achievable – meaning there is a reasonable prospect of development accounting for financial viability and assuming that the site will deliver on standard policy asks. This is not always clear cut, particularly for complex urban sites.
 - Potentially suitable – the aim is to reach a conclusion using a set of standard criteria, with a recognition that sites deemed potentially suitable through the HELAA will not always be suitable for allocation in light of wider analysis including consideration of the effects of developing the site in combination with others (as discussed below).
- 5.3.4. The HELAA begun with a long list of 423 site options, and then sieved out 171 sites for clear cut reasons. This resulted in 252 sites in the HELAA being subjected to a detailed stage 2 assessment consisting of: 15 Strategic sites with a capacity for at least 1,500 homes; 170 major sites of greater than 1ha but less than 1,500 homes; and 67 sites of less than 1ha in size. The HELAA stage 2 found 77 sites were potentially suitable, 16 sites were ‘unsuitable (brownfield)’, meaning that the site is potentially suitable once the fact that it comprises brownfield land is factored-in, and 164 sites were unsuitable.
- 5.3.5. The potential capacity of these sites is as follows: 19,276 at sites judged potentially suitable; 1,512 homes at sites judged ‘unsuitable (brownfield only)’; and 40,547 homes at sites judged unsuitable. As such, there is clearly limited case to be made for considering unsuitable sites for the purposes of defining growth scenarios. However, there is a need to introduce two unsuitable sites that warrant further consideration because they are strategic sites subject to current planning applications.

Select unsuitable sites

- 5.3.6. As discussed, whilst there is a clear case for focusing attention on HELAA suitable sites (also ‘unsuitable (brownfield)’ sites), for the purposes of defining growth scenarios, there is also a need to consider the following two unsuitable strategic sites.
- 5.3.7. Firstly, **Highsted Park** is a very large strategic site for 8,400 homes located to the east / south east of Sittingbourne that could deliver around 2,000 homes in the plan period. A planning application was submitted in 2021 is due to be decided by 1st September 2026 (the Inspector’s report following 54 days of appeal hearings was recently submitted to the Secretary of State, who will make a final decision). As can be seen from Table 5.1 (above), over the course of 2026 close consideration has been given to the possibility of allocating Highsted Park, despite it being ‘unsuitable’ in the HELAA. Also, it can be noted that: A) in 2020 the SA Report published alongside the previous Proposed Submission Local Plan appraised it as an option (referred to as ‘Southeast Sittingbourne’) as part of a comparative appraisal of strategic site options but determined it to perform relatively poorly such that it was not taken forward to the final reasonable growth scenarios; and B) in 2021 the Issues and Preferred Options consultation document, along with its accompanying Interim SA Report, considered the possibility of allocating Highsted Park / SE Sittingbourne under ‘Option 5’.
- 5.3.8. This site is taken forward for further discussion in Section 5.4.
- 5.3.9. Secondly, **Winterbourne Fields** would deliver an 1,815 home new settlement to the south of Dunkirk, which is small village located close to Boughton (a service village) in the east of the Borough. Again there is a pending planning application, which was submitted in 2024. The site was not formally considered at the previous plan-making / SA stages, and is judged to perform poorly in a number of key respects, with the HELAA concluding: *“Much of the site is affected by biodiversity constraints, therefore development of the site would be harmful to biodiversity. The site is also entirely within a Local Landscape Designation and does not relate well to any settlement.”*

5.3.10. Figure 5.2 is taken from the current planning application and shows the location Winterbourne Fields alongside what the applicant considered to be other competing strategic site options in the Borough. Points to note from Figure 5.2 are as follows:

- Very highly constrained land – Winterbourne Fields is closely associated with the Blean Woodlands complex, which is of national and international significance, albeit the Blean Woodlands SSSI is not directly adjacent to the site.
- Agricultural land – the figure serves to highlight the extent to which high quality agricultural land is a constraint to growth across the Borough. However, new data has recently become available that shows there to be some significant areas of ‘grade 3b’ quality land within the Borough, which is land not classed as ‘best and most versatile’ (BMV). With regards to the Winterbourne Fields site, the new data shows the site to comprise 3b quality land (not grade 4 as indicted by the previous data).
- With regards to the other options shown: 1) South east Faversham is discussed above (Table 5.1); 2) Highsted Park is discussed above (including in Table 5.1); West of Church Road is an existing allocation; 4) Land at Bobbing is discussed above (Table 5.1); 5) the Teynham Opportunity area was a proposal in 2020 but then was not a focus of the consultation in 2021 (it is discussed further below); 6) Scocles Road (Minster) was granted permission at appeal in 2025; and 7) East of Faversham is discussed above (Table 5.1).

5.3.11. Overall, this site can be ruled out at this stage, i.e. need not be discussed further in Section 5.4. The site performs poorly when viewed in isolation and it is very difficult to envisage a strategic case for allocation, given LHN (and limited case to be made for a housing requirement set above LHN), the potential supply from HELAA suitable sites and a view that Highsted Park is a sequentially preferable option.

Figure 5.2: A figure taken from the Winterbourne Fields planning application

3.0 The Site

Swale: Locations for Development

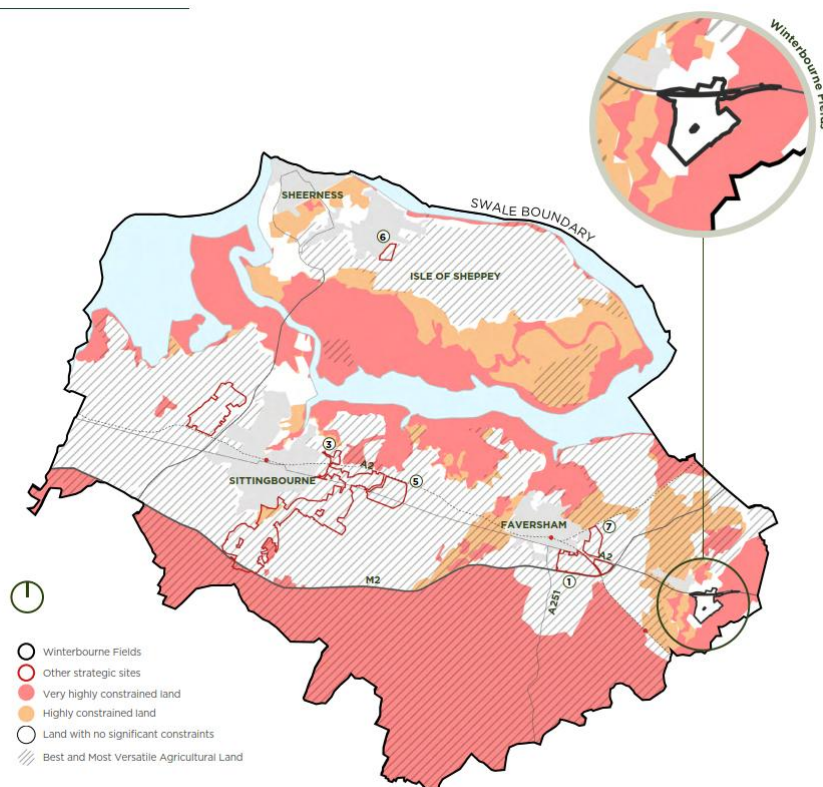
The summary plan on this page combines the very highly constrained, highly constrained and less constrained land to identify the most appropriate locations for larger scale development.

Winterbourne Fields is well placed and avoids all areas of constrained land. The Site's location also combines this unconstrained land with a location close to the community and employment infrastructure of nearby Faversham and Canterbury.

The wider Kent region is also accessible via the adjacent A2, and local links available using the network of local footpaths.

Other Strategic Sites

- ① Land South East of Faversham
- ② Highsted Park, Sittingbourne
- ③ Land West of Church Road
- ④ Land at Bobbing
- ⑤ Teynham Area of Opportunity
- ⑥ Scocles Road, Minster
- ⑦ Land East of Faversham



Shapton | Winterbourne Fields | Design & Access Statement

5.4. Reasonable growth scenarios

Introduction

- 5.4.1. Having discussed strategic factors (Section 5.2) and introduced site options (Section 5.3), the final task is to draw matters together ('top down' and 'bottom up') in order to define a set of reasonable alternative growth scenarios.
- 5.4.2. The discussion covers:
- Baseline supply (commitments and a windfall assumption)
 - Strategic site options
 - Non-strategic site options
 - The reasonable growth scenarios
 - Superseded growth scenarios

Baseline supply

- 5.4.3. The first matter for consideration is existing supply from sites with planning permission, which in Swale is high including because the 'the presumption in favour of sustainable development' has applied for some time.
- 5.4.4. Specially, as of 31st March 2025, existing supply from sites with permission (including 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.
- 5.4.5. 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.
- 5.4.6. Having accounted for supply from permissions and windfall as a **constant** across the growth scenarios, and assuming a housing requirement set at LHN, then there is 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 (or broad locations; NPPF para 72).
- 5.4.7. 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).⁹ However, on the other hand, 'existing supply' could increase ahead of plan adoption, which would commensurately reduce the residual figure for the Local Plan.¹⁰
- 5.4.8. Growth scenarios for the Swale Local Plan are therefore essentially alternative approaches to delivering in the region of 7,185 homes via site allocations.

Strategic site options

- 5.4.9. In turn, the question is "which site allocations", and a starting point is a clear need to allocate two large strategic sites that both now have a resolution to grant permission:
- South East Faversham – was recently granted permission for 2,500 homes (23/505533/EIHYB) and it 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).

⁹ 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).

¹⁰ A number of significant sites have gained planning permission since 31st March 2025. If, in turn, these sites are not proposed allocations then they are not counted in the local plan supply, but they will be counted once monitoring data is updated.

- West of Bobbing – was recently granted permission for 2,500 homes (22/503654/EIOUT) and it is expected to deliver in full in the plan period (with delivery starting in 2030/31 and a maximum delivery rate of 311 homes per annum).
- 5.4.10. Allocation of both sites can be clearly assumed as a **constant** across the growth scenarios, which reduces the residual target to 2,185 homes (7,185 – 2,500 – 2,500).
- 5.4.11. The next 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. A clear aim would be to secure comprehensive growth to the east of Faversham with a view to maximising the benefits of growth and avoiding sub-optimal piecemeal expansion of the town over time. It is not a proposed allocation at the current time,¹¹ but the possibility of allocation has been carefully considered by elected councillors through the committee process over recent months and years; for example, part of the site was a proposed allocation for 900 homes in the previous Proposed Submission Local Plan published in 2020 and, indeed, it featured as a ‘constant’ across all of the reasonable growth scenarios at that time).¹² Overall, whilst there is limited numerical case for its allocation, the possibility of allocation warrants further consideration as a **variable** across the growth scenarios.
- 5.4.12. The remaining strategic site option for consideration is then Highsted Park, which as discussed is currently the subject of a planning application for 8,400 homes (the appeal is reported to be the largest ever held in England for a residential led scheme, with 54 days of hearings) and which could deliver around 2,000 homes in the plan period. However, there is no clear strategic case for its allocation, given: A) the residual target figure set out above; B) limited case for a housing requirement set above LHN; C) the need for a significant proportion of supply to come from non-strategic sites; and D) a case to suggest that East of Faversham Extension is a preferable site for allocation in the context of the current Local Plan, including acknowledging the potential for in-combination effects to arise in the vicinity of Sittingbourne as a result of allocating Highsted Park in combination with West of Bobbing (also recalling committed growth following the adopted Local Plan, which focused growth strongly on Sittingbourne). Given the scale of the site over the long term (8,400 homes) very case consideration must be given to its allocation and appropriate forum for the necessary work would be a future Local Plan following LGR and Devolution, in that its merits could be compared and contrasted to other options for very large scale growth across the sub-region.
- 5.4.13. As such, Highsted Park is ruled out at this stage (of defining growth scenarios). However, see discussion below regarding ‘an alternative set of growth scenarios’.

Non-strategic sites

- 5.4.14. Firstly there is a need to account for supply from urban regeneration sites, which are strongly supported sites that can clearly be held **constant** across the growth scenarios. Specifically, the emerging proposed approach is to allocate 11 sites for a total of 1,111 homes, which breaks down as 871 homes in Queenborough/Rushenden and 240 homes in Sittingbourne. Box 5.1 introduces the former area in detail.
- 5.4.15. This reduces the residual target figure to 1,074 homes (2,185 – 1,111); however, it is important to be clear that this is a minimum figure due to the need for supply headroom, including noting delivery risks associated with the regeneration sites (see Box 5.1).

¹¹ The eastern-most part of the site is proposed to deliver a standalone employment site adjacent to M20 junction 7.

¹² 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.”

Box 5.1: The Queenborough/Rushenden regeneration area

Queenborough and Rushenden are two settlements that sit together on the Isle of Sheppey, with former a historic seafaring settlement and the latter developed from 1904 alongside industry (see [historic mapping](#)). The area has been a focus for investment and regeneration for some years, with the initial regeneration zone covering some 165 ha either side of Queenborough Creek.

The area has been dominated by heavy industry and associated poor environmental quality, and whilst a significant amount of investment and regeneration has already occurred, there is still more to do. There remain significant opportunities for further regeneration including to deliver improved community facilities, most notably a new school, improved health and community facilities and new open space. An original masterplan in 2010 envisaged 2,000 homes, but a revised masterplan in 2015 then reduced this figure to 1,180 homes, including with a view to focusing less on delivering higher density flatted homes, given viability challenges. Also, the 2015 masterplan removed the previous proposal to deliver a new marina.

A range of work has been completed to date, led by Homes England, including significant land decontamination and land raising, as well as the completion of local road infrastructure and the removal of the redundant railway track that formed a strong physical barrier between the two communities. Other significant achievements related to the Masterplan include:

- The completion of the Rushenden Relief Road, opening up the area with improved road access and reducing lorry movements through Queenborough.
- A large scale retrofit project to make homes more energy efficient. This was the first of its kind in England to cover private and social homes of various construction types.
- Progression of the Neats Court development including a large supermarket, convenience and comparison retail units, a petrol station, fast food takeaways, cafes and leisure uses.
- Completion of over 60,000m² of employment floorspace including an Aldi hub.
- The first phase of houses has been built at the junction of Rushenden Road and First Avenue, comprising 101 homes, including 30% Starter Homes (a type of affordable housing).

As well as social/community objectives, further considerations include:

- Addressing flood risk – most of the area is considered by the Environment Agency to be within an area with a high risk of flooding, but as it is defended, it is suitable for development. Site based flood risk assessments, however, will be required for development proposals with the need for any further flood defence upgrades informed by future assessment.
- Historic environment – the area is an under-appreciated asset, and so an aim is to secure a major uplift to the image and public realm of the area.

At the current time the component site allocations are:

- West of Rushenden Road (368 homes) – this is a large site immediately north of Rushenden. It represents an opportunity to bring Queenborough and Rushenden closer together.
- South of Queenborough Creek (246 homes) – this is a key site to enhance the level of services available in Queenborough. Development of new homes has the potential to unlock new services as part of a riverside development on an area of previously developed coastal land.
- Former Istil Site (140 homes) – a large brownfield site located between Queenborough and Rushenden. This area now benefits from improved access to local services via Thomsett Way.
- Land at West Street (80 homes) – an old marine industrial site on the northern bank of the creek, which can help to open up a currently inaccessible stretch of riverbank.
- The Foundry (37 homes) – an existing industrial / logistics site that may be suitable for regeneration in the future, making use of the site's river frontage.

The total capacity of these sites is 871 homes, which is a reduction on 1,196 homes agreed by elected members earlier in 2026. However, there is a strong element of delivery risk, with Homes England suggesting around 500 homes on viability grounds. Finally, it should be noted that the assumption is for only 10% affordable housing (in viability grounds), albeit with the potential for more, subject to ongoing review during the long-term construction phases.

- 5.4.16. The remaining task is to consider alternative ways of providing for ~ 1,074 homes via other non-strategic sites (i.e. non-strategic sites outside of regeneration areas).
- 5.4.17. The starting point is an understanding that the emerging proposed approach involves allocation of 33 sites for 1,755 homes. However, it is also reasonable to explore one or more scenarios where some of these sites are *not* allocated, i.e. it is reasonable to explore the approach to non-strategic allocations further as a **variable** across the growth scenarios (including recalling that East of Faversham Extension is a variable).
- 5.4.18. Specifically, 11 '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 to 856 homes (1,755 - 899). Key considerations are:
- Whilst several comprise brownfield land it is nonetheless considered important to question the suitability of these sites for housing.
 - 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).
 - 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.
 - The list does *not* include a proposed allocation for 138 homes at Upchurch, despite Upchurch being a fifth tier settlement. This is because the site is 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.
- 5.4.19. The following bullet points introduce each of the 11 variable non-strategic sites:
- Estuary View and Golden Leas Holiday Parks, Minster (247 homes) – the site is a part of the static home offer in coastal Sheppey. These caravans were not designed to be occupied year-round, and do not represent good quality housing stock. Increasingly a market for better insulated, self-contained park homes has emerged, and these are being introduced as replacements for caravans which are more suitable for year-round occupation, thereby improving the quality of the Borough's housing stock.
 - Land west of Warden (139 homes) – Warden is a 5th tier settlement that relates closely to Leysdown (a 4th tier settlement) in the rural east of Sheppey. The site represents an opportunity to secure much-needed transport improvements (there are five roads leading up to the site, but only one is surfaced), but coastal change is an issue.
 - Sheppey Beach Villas, Leysdown (133 homes) – the site contains a collection of beachside holiday homes located to the east of The Promenade in Leysdown. The existing environmental conditions in the area are in need of improvement, with several areas having unmade roads, and areas of the site that are derelict. Delivery is challenging, but the plan supports development "*which improves the standard of the local environment and regularises the homes to be suitable for year-round occupation.*"
 - Hollybush Farm Caravan Park, Oak Lane, Minster (124 homes) – the situation is similar to the Estuary View and Golden Leas Holiday Parks site discussed above.
 - Land at Norton Ash Garden Centre (100 homes) – is located on the A2 between Teynham and Faversham, and comprises previously developed land which has primarily returned to nature, and as such is a mixed greenfield/brownfield site. Whilst distant from a settlement there is a nearby service station with a shop and also a nearby employment area, plus there is a good bus service along the A2. A previous application for 67 homes was dismissed at appeal in 2016.
 - Land south of Little Groves, Leysdown (53 homes) – a greenfield site the village urban envelope that is surrounded by a Leisure Park to the north, east, and west.

- Amethyst Horticulture, London Road, Newington (52 homes) – located between Newington and Hartlip Hill on the A2, the site comprises an intensive greenhouse and warehouse business and, whilst there are existing homes to the east and west, there is an industrial estate across the A2 to the south that is proposed for expansion at the current time. Part of the site is to the north of the railway line, accessed via a railway arch, and the plan document explains: “... if development is to be permitted on that part of the site, the access arrangements will need to be very clearly justified.”
- Home Farm, Breach Lane, Lower Halstow (16 homes) – a rural site located ~400m south of Lower Halstow, with the potential to achieve footpath connectivity.
- Land at Street Farm, Pond Farm Road, Borden (Site B) (15 homes) – located within the village conservation area but reasonably well related to the existing built form. An application for 6 homes was dismissed at appeal in 2022 due to concerns in respect of impacts to heritage and character and access to services and facilities.
- Digswell, Lower Hartlip Road, Hartlip (11 homes) – a brownfield site closely associated with employment land. A previous application was recently dismissed at appeal including because this was judged an unsuitable location for housing. However, the new proposal is to secure footpath connectivity to enable pedestrian access,
- Syndale Park, London Road, Faversham (9 homes) – associated with a cluster of historic buildings and leisure uses within Syndale Park. Faversham is a short distance to the east but not easily accessed, including as there is a need to cross the A2.

5.4.20. 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.¹³
- 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, recognising that it was a focus of growth in the adopted Local Plan (‘Bearing Fruits’, 2017). The current plan document explains: “*Viability in and around Sittingbourne and Sheppey has historically impacted upon housing delivery rates. Additionally, much of the planned development at Sittingbourne allocated in Bearing Fruits has been impacted by capacity issues at junction 5 of the M2. This is now resolved with improvements to junction 5 completed in 2023 resulting in allocations for development having moved forward with planning applications. However, the delivery of this development is still yet to be fully achieved.*” Finally, with regards to the possibility of higher growth via non-strategic omission sites at Sittingbourne there is a need to recall the context of the Highsted Park application.
- Sheerness – is a tier 2 settlement but there are no stand-out omission sites. There is very limited potential to expand the town given marshland and flood risk, and viability creates a challenge for intensification. There are only two proposed allocations, both for 30 homes, with one recently having had its capacity reduced from 76 homes to account for overhead power lines. This site has planning permission for commercial uses, and the other site is an existing allocation for industrial land. Finally, it is important to note plans for the Port of Sheerness, in respect of which the current plan document explains: “*If realised, these areas would represent the single largest regeneration in Swale and one of the largest across north Kent.*”

¹³ 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.

- 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,¹⁴ 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.¹⁵ 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.
 - 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. Whilst there are 'potentially suitable' sites to the west and to the east, this would involve piecemeal expansion of sites recently delivered or with planning permission, and it can also be noted that a site to the north west was recently permitted at appeal.
 - 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, noting a distinct valley. At the time of the previous Reg 19 in 2020 the proposal was for a modest scheme of 100 homes to minimise landscape concerns.
 - South – an 'unsuitable' site here 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. The proposed allocation adjacent to the west can make use Claxfield Road which meets the A2 at the point where a mini-roundabout is under construction, but it could still be the case that capacity of Claxfield Road limits capacity for growth.
- 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 inherent transport and air quality constraints, at least in the absence of new strategic road infrastructure.
- 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 nearby. Furthermore West of Bobbing is located nearby, and A249 capacity is a factor.

¹⁴ 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](#)).

¹⁵ 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](#)).

- 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.

5.4.21. 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**)
- West of Bobbing – 2,500 homes (i.e. **constant**)
- East of Faversham Extension – 0 or 1,500 homes (i.e. **variable**)
- Regeneration sites – 1,111 homes (i.e. **constant**)
- Non-strategic sites (non-regen) – 856 or 1,755 homes (i.e. **variable**)

5.4.22. As such, there is a need to build growth scenarios on the basis of five 'constant' and three 'variable' supply components, and with it being the case that both of the variable supply components are associated with two options.

5.4.23. This directly leads to four reasonable alternative growth scenarios – Table 5.2. It is these growth scenarios that are a focus of appraisal in Section 6.

Table 5.2 *The reasonable alternative growth scenarios*

	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Existing supply	7,430	7,430	7,430	7,430
Windfall	2,409	2,409	2,409	2,409
South East of Faversham	2,500	2,500	2,500	2,500
West of Bobbing	2,500	2,500	2,500	2,500
East of Faversham ext.	0	0	1,500	1,500
Regeneration sites	1,111	1,111	1,111	1,111
Non-strategic sites	856	1,755	856	1,755
Total homes (2025-2041)	16,806	17,705	18,269	19,168
% over LHN (17,024)	-1%	4%	7%	13%

5.4.24. Final points to note regarding the reasonable growth scenarios are as follows:

- Scenario 2 is the proposed submission approach.
- Growth quanta – Scenario 1 is a reasonable low growth scenario. It would involve a total supply slightly below LHN but in practice supply will be higher once recent permissions are factored-in. Scenario 4 is a reasonable high growth scenario. It could potentially enable a housing requirement set modestly above LHN (e.g. LHN plus 5% leading to an 8% supply headroom over the plan period).

- Employment land – this is broadly held constant across the growth scenarios although East of Faversham Extension could potentially deliver some additional employment land under Scenarios 3 and 4 (assumed as a constant across all the scenarios is an employment allocation to the east of the site, adjacent to M20 junction 7). The current plan document lists 12 employment allocations for a total of 109 ha which compares to the need figure of up to 73 ha discussed above and, furthermore, both South East Faversham and West of Bobbing will deliver around 5 ha. As such, there is no case for higher growth, albeit delivery is uncertain for some of the sites (e.g. Ridham Docks which is in active use). With regards to lower growth, a number of the proposed allocations warrant ongoing scrutiny (through the whole plan appraisal presented in Part 2 of this report) but there is no clear lower growth scenario. Several of these are constrained or otherwise challenging to deliver, but matters can be considered further at the development management stage, recalling that there is limited pressure for all 12 allocations to deliver given the extent of established need and because unlike for housing the Council does not commit itself to a strict employment land requirement.¹⁶
- Gypsy and Traveller pitches – supply is held constant as there is not known to be any potential to deliver new pitches at East of Faversham Extension. The plan lists 12 allocations for a total of 29 pitches, and whilst there is a need for further work to clarify how this relates to the need figure(s) discussed above, it seems likely that there is set to be an unmet need for Gypsy and Traveller pitches (notwithstanding good potential for windfall supply assuming suitably supportive/permissive development management policy). However, there are no known omission sites. For context it can be noted that the Maidstone Local Plan was adopted in 2024 with an unmet need for 500+ pitches, and a follow-on plan is now no longer being taken forward (see discussion [here](#)).

Superseded growth scenarios (June 2026)

- 5.4.25. An alternative set of growth scenarios was defined and appraised in June 2026 and presented to the Planning and Transport Policy Working Group meeting of 30th June.
- 5.4.26. Specifically, because these scenarios were defined prior to West of Bobbing being granted a resolution to grant planning permission, they treated West of Bobbing as a 'variable' and, in turn, also Highsted Park. Also, as a pragmatic step (to reduce the number of scenarios from eight to six, which is a number better suited to an accessible and engaging appraisal) the decision was taken to rule out two lower growth scenarios.
- 5.4.27. The appraisal of the alternative set of scenarios from June 2026 (now superseded) is presented in Appendix II of this report. Finally, it should be noted that the report explained that the decision to treat Highsted Park as a variable was reached on balance:

"... at the time of writing (June 2026) there is also a need to remain open to the possibility of... allocating 'Highsted Park'... because West of Bobbing is not committed; however, this situation could change in the very near future..."

Also, it is important to note that a planning application for Highsted Park is due to be decided [by September] 2026... following hearings that ran over [54 days] (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).

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."

¹⁶ One of the sites could deliver an extension to Eurolink Industrial Estate, which is a key employment area, but the plan explains: "The site is adjacent to the Swale SPA/ SSSI to the north, and this relationship needs to be carefully managed. Should the development of the site be able to create an improved edge to these designations then the site would be suitable for supporting local economic growth." Another site that is clearly not ideally located is the site at Hartlip, but the plan explains: "Subject to securing appropriate access onto the A2 there is potential for an expansion of the industrial area." It is also noted that the two adjacent sites south of Bobbing are the subject of a planning application for 90 homes (24/504121/HYBRID).

6. Growth scenarios appraisal

6.1. Introduction

6.1.1. The aim here is to appraise the reasonable growth scenarios introduced above under the SA framework (Section 3). In summary, the scenarios can be described as follows with reference to the proposed submission approach which is Scenario 2:

1. The proposed approach **minus** 11 non-strategic sites
2. The proposed approach
3. The proposed approach **minus** 11 non-strategic sites **plus** East of Faversham Ext.
4. The proposed approach **plus** East of Faversham Ext.

Appraisal methodology

6.1.2. Under each sustainability topic the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.3. There is a need to draw upon wide ranging sources of evidence and make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. Sources of evidence and assumptions are explained as appropriate, but there is also a need to balance explanation of evidence base and assumptions with a need for conciseness.

6.1.4. Another key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be a risk of sub-optimal growth under the presumption in favour of sustainable development. This is an important assumption, because a predicted significant effect is, by definition, a significant effect are *on the baseline*.

6.1.5. Finally, please note that the appraisal remains subject to adjustment ahead of publication, although the headline conclusions are very unlikely to change. Furthermore, note that the appraisal conclusions are mostly in line with that previously published for the 30th June PTPWG meeting although the appraisal has been adjusted under 'biodiversity' and 'economy/employment' to reflect latest evidence/understanding.

6.2. Accessibility

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
3	4	1	2

- 6.2.1. There is support for strategic growth locations that can deliver community infrastructure alongside new homes and, in this regard East of Faversham could potentially deliver a secondary school to address an existing need. Latest understanding (information received in July 2026) is that there is not necessarily a clear need, with KCC explaining: *“Including Land at SE Faversham, 3FE required, accounted for in Abbey School expansion funded by land at SE Faversham. [This is] for all Secondary, non-selective and selective. KCC work to the principle that 25% of pupils attend Selective schools. Grammar schools in Sittingbourne/Sheppey Planning Group or Faversham – QE Grammar school, do not have capacity to expand. Faversham is part of Canterbury and Faversham Planning Group, and mitigation required will impact on Grammar schools in Canterbury.”* However, there could still be merit to delivering a new school at Faversham, including with a view to avoiding the need to travel by bus to school.
- 6.2.2. It is also noted that the committed site currently under construction to the west of East of Faversham Extension is set to deliver a 1fe primary, which highlights the importance of comprehensive planning for growth in order to deliver primary school capacity.
- 6.2.3. There is also support for lower growth via non-strategic sites (Scenarios 1 and 3) with a view to a focus of growth at more accessible locations. However, it is acknowledged that supporting growth in Leysdown and Warden could support investment and general vitality that is potentially supportive of accessibility objectives. A further consideration is potentially in respect of village primary school capacity, but there are not known to be any significant issues or opportunities (village schools can struggle to maintain rolls).
- 6.2.4. With regards to Scenario 1, whilst this is judged to be preferable to Scenario 2 this is marginal because the plan could potentially struggle to progress to adoption leading to a risk of sub-optimal growth under the presumption in favour of sustainable development.
- 6.2.5. Scenario 3 is considered to perform very well (a ‘significant positive effect’) given a strong focus of growth at strategic sites. A ‘neutral’ effect is predicted for Scenarios 1 and 2 on balance, but this is marginal because there is support for West of Bobbing, including because it is expected to deliver a GP surgery / medical facility. It is noted that the Council declared a mental health crisis in 2025 and, as part of this, called on Kent and Medway NHS and Social Care Trust to urgently improve the doctor to patient ratio in Swale and to ensure better access to mental health services at the point of need. It can also be noted that Swale performs below the Kent average for a number of health indicators, as discussed in the current plan document, and there are also significant health inequalities, with life expectancy about 8.3 years lower for men and 6.4 years lower for women in the most deprived areas of Swale compared to the least deprived.

6.3. Air quality

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
?	?	?	?

- 6.3.1. This is a significant issue in Swale although there is a need to account for the improving situation nationally associated with the transition to electric vehicles. Two air quality management areas (AQMA) were revoked in 2025, but several others remain.
- 6.3.2. 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.
- 6.3.3. 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.

6.4. Biodiversity

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
1	2	3	4

- 6.4.1. A key source of evidence is the Habitats Regulations Assessment (HRA) Report, which was published in Draft in July 2026 and is being finalised at the time of writing. It only considers the proposed submission approach (Scenario 2), but does flag some potential concerns in respect of allocations in proximity to the internationally designated 'North Kent Bird Sites'. All of these challenging allocations also feature in Scenario 1, and so it is appropriate to flag a 'moderate or uncertain' negative effect for both Scenarios 1 & 2.
- 6.4.2. With regards to higher growth via additional allocation of East of Faversham Extension, the location of the site suggests a degree of concern, but as a strategic site there would be good potential to deliver onsite strategic green infrastructure including aimed at minimising offsite recreational pressure. The Interim SA Report from 2021 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."
- 6.4.3. Under both Scenario 3 and Scenario 4 there would be a need for further HRA, feasibly to include work to confirm the sufficiency of the long-established SPA mitigation strategy.
- 6.4.4. Finally, with regards to West of Bobbing, whilst this is a constant across the growth scenarios it is notable that the Interim SA Report in 2021 explained that the site is associated with biodiversity constraint for two reasons:

- 6.4.5. *“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.”*
- 6.4.6. In summary, the alternative scenarios are ranked according to growth quantum, and there is a ‘moderate or uncertain’ negative effect in light of the Draft HRA Report.

6.5. Climate change adaptation

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
=	=	=	=

- 6.5.1. 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.
- 6.5.2. 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. Three of the proposed allocations on the Isle of Sheppey that feature only in Scenarios 2 and 4 are adjacent to the CCMA, and the CCMA may be 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.
- 6.5.3. Overall, it is not clear that there is a case for flagging a preference for the scenarios that would see lower growth at non-strategic sites, but it is certainly appropriate to flag a ‘moderate or uncertain’ negative effect, including accounting for sites that feature as a constant across the growth scenarios, including the regeneration sites at Queenborough / Rushenden. A Level 2 Strategic Flood Risk Assessment (SFRA) that examines all of the proposed allocations is not yet available at the time of writing, but officers recently explained: *“A Level 2 SFRA... will be ready in time for submission of the Local Plan. An initial high-level report will be made available on the Local Plan website ahead of the forthcoming Regulation 19 Consultation. Consultant advice to date is that all sites are developable, with mitigation.”*

6.6. Climate change mitigation

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
3	4	1	2

- 6.6.1. 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). East of Faversham Extension should be well placed to deliver net zero development given strong development viability at Faversham (N.B. it has not been possible to review site-specific proposals), 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 2 & 4, and these same sites are all in less accessible locations, i.e. locations likely to be associated with relatively high car dependency.
- 6.6.2. Finally, with regards to significant effects, whilst the Borough has 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 Scenario 3.

6.7. Communities

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
1	1	2	2

- 6.7.1. 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 growth at Faversham, and this would likely apply to 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.
- 6.7.2. With regards to the lower accessibility non-strategic sites that feature only in Scenarios 2 & 4, as discussed there is a 'communities' case for supporting growth at villages, most notably at Leysdown and Warden, but some of the sites would not be well linked to a settlement. For example, there are two sites to the west of Newington that would necessitate walking along the A2 to reach Newington, and in respect of the smaller site a Planning Inspector previously stated: *"Whilst the site is not very far from the edge of the settlement of Newington to reach the convenience store and other services in Newington on foot would take approximately 20 minutes. The journey would be on a narrow footpath alongside the northern side of the A2, a busy road. This would not be a convenient or comfortable experience, particularly in inclement weather."*

- 6.7.3. With regards to significant effects, a neutral effect is predicted on balance, but there is a case for predicting a positive effect including given the focus on regeneration sites, most notably at Queenborough/Rushenden but also in Sittingbourne town centre. With regards to the former area, the current plan document explains: *“The emerging Local Plan strategy supports the expansion of the opportunities at Rushenden for further redevelopment that will deliver a landscape-led mixed use scheme in a part of the borough where the investment will have a meaningful positive impact and deliver much needed community infrastructure and open space.”*

6.8. Economy and employment

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
=	=	=	=

- 6.8.1. Employment land needs would be provided for in full across all of the scenarios, as discussed above. With regards to East of Faversham Extension, the assumption is that new strategic employment land would be delivered adjacent to M2 junction 7 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. With regards to the package of ‘lower accessibility’ sites (Scenarios 12 & 4), 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. Finally, it is noted that the site west of Newington is currently in an employment use and could be suited to being retained for employment noting the existing employment area on the opposite side of the A2 which is proposed for expansion through the Local Plan.
- 6.8.2. Overall, whilst there is a case for supporting East of Faversham Extension, on balance the scenarios are judged to perform broadly on a par. With regards to significant effects, there is a case for predicting a ‘significant’ positive effect given the extent of proposed employment land, and also noting the proposal to support key areas notably Eurolink Industrial Estate, Port of Sheerness and the Kent Science Park, but one factor is uncertainties around traffic congestion affecting employment areas.

6.9. Historic environment

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
?	?	?	?

- 6.9.1. Whilst it is appropriate to flag a ‘moderate or uncertain’ negative effect under all of the 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 Scenarios 1 and 2, as they would avoid higher growth at Faversham, it is not clear that East of Faversham Extension is subject to significant constraint, and its allocation could potentially help to assure the timely progression of the Local Plan to adoption (at which point the Borough will have an up-to-date Local Plan and not be subject to ‘the presumption’).

- 6.9.2. In respect of East of Faversham Extension, the following bullet points present analysis from the Interim 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.”
- 6.9.3. Finally, with regards to the lower accessibility non-strategic sites that only feature in Scenarios 2 and 4, one of these is notably constrained, namely the site at Borden. This site was previously refused at appeal (for a smaller scheme) with the Inspector stating: *“I conclude that the proposed development would be harmful to the character or appearance of the CA and the setting of the nearby Listed building, Yew Tree Cottage.”*

6.10. Homes

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
3	2	2	1 

- 6.10.1. Scenario 1 performs poorly as a low growth scenario with a total plan period supply falling short of LHN. On the one hand concerns are allayed by the fact that there have been significant recent planning permissions that will be added to the supply once monitoring data has been updated. However, on the other hand, there is a case for extending the plan period to 2042 so that it covers a 15 year period post adoption.
- 6.10.2. Scenarios 2, 3 & 4 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.
- 6.10.3. In this regard, on the one hand there is support for dispersed smaller sites under Scenarios 2 & 4. 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.
- 6.10.4. 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. A further consideration is the possibility of delivering specialist housing/accommodation, potentially to include a Gypsy and Traveller site (discussed above) and quite possibly to include older persons housing. The current plan document explains: *“Specialist dwellings for older persons has a need for 928 additional units of sheltered housing for older people/ retirement housing and 267 additional extra care units/ supported living housing over the Plan period. It is also identified that an additional 360 Registered Care spaces (nursing and residential care homes) will be required.”*
- 6.10.5. In conclusion, Scenario 4 performs 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.

6.11. Landscape

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
		2	2

6.11.1. 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.

6.11.2. With regards to 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."

6.11.3. In conclusion, whilst it is appropriate to rank the scenarios in order to flag a concern with East of Faversham Extension on balance significant negative effects are not predicted. There would be merit in planning comprehensively for this sector of land in order to avoid the risk of ongoing sub-optimal piecemeal expansion of Faversham.

6.11.4. 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 West of 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."*

6.12. Soils / resources

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
		2	2

6.12.1. 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.

- 6.12.2. Numerous of the non-strategic sites that feature only in Scenarios 2 & 4 are brownfield sites or otherwise not in agricultural use, but East of Faversham Extension is shown by the recently released new Agricultural Land Classification (ALC) dataset to comprise grade 2 quality land (the previous dataset had suggested grade 1).

6.13. Transport

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
		3	4

- 6.13.1. 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.
- 6.13.2. There is considerable historical context to exploring transport solutions to enable growth, for example the Interim SA 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....”*
- 6.13.3. Also, the Interim SA 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”.*
- 6.13.4. Finally, the Interim SA 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...”*
- 6.13.5. 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.”*

- 6.13.6. It is difficult to differentiate between the growth scenarios, but on balance the scenarios are ranked broadly in order of total growth quantum and in light of the following:
- The variable non-strategic sites perform relatively poorly in transport terms and some would feed into constrained road corridors.
 - 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).
- 6.13.7. 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 scenarios. West of Bobbing and South East Faversham are key strategic sites that feature as a constant across the growth scenarios and transport modelling to consider the in combination effects of growth locations remains ongoing at the time of writing. Focusing on West of Bobbing, it can be noted that the site is not ideally linked to Sittingbourne and there are potentially M2 J5 capacity challenges.

6.14. Water

Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
?	?	?	?

- 6.14.1. 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 (IDP) became available in early July 2026, but it is difficult to ascertain whether there are any risks in respect of water supply or wastewater treatment capacity that might lead to delays to the committed housing supply trajectory or otherwise give rise to a risk of growth that is problematic such that there is a risk of impacts to the water environment or impacts to water availability for communities. 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 over recent years, and over recent months water supply has begun to emerge as a strategic constraint in parts of Kent.

6.15. Appraisal conclusion

- 6.15.1. 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’.
- 6.15.2. As part of this, account can be taken of the fact that Scenario 1 (the proposed submission approach minus 11 less accessible non-strategic sites) is ranked first under the greatest number of sustainability topic headings.

6.15.3. However, it is important to be clear that this does not automatically mean that Scenario 1 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 an aim is to spark debate). Also, under Scenario 1 there it could prove challenging to progress the plan to adoption such that the Borough continues to be subject to 'the presumption' with wide-ranging negative consequences.

Table 6.1: Growth scenarios summary appraisal

	Scenario 1 Minus small sites	Scenario 2 The proposed approach	Scenario 3 Minus small sites Plus East Fav. Ext.	Scenario 4 Plus East Fav. Ext.
Accessibility	3	4	★1	2
Air quality	?	?	?	?
Biodiversity	★1	2	3	4
Climate change adaptation	=	=	=	=
Climate change mitigation	3	4	★1	2
Communities	★1	★1	2	2
Economy and employment	=	=	=	=
Historic environment	?	?	?	?
Homes	3	2	2	★1
Landscape	★1	★1	2	2
Soils / resources	★1	★1	2	2
Transport	★1	★1	3	4
Water	?	?	?	?

7. The preferred growth scenario

7.1.1. Officers provided the following text to explain why Scenario 2 is 'justified':

"Whilst the appraisal serves to highlight arguments for supporting an alternative scenario, supporting Scenario 2 as the proposed submission approach is considered justified on balance, in that it represents "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" (NPPF paragraph 36).

Scenario 1 would risk not providing for local housing need in full, although there is an acknowledgement of the case for lower growth in Swale to reflect local challenges including in respect of biodiversity, flood risk, high quality agricultural land and transport.

Scenario 3 would involve a similar quantum of growth to Scenario 2 (the proposed submission approach), but with a concentration of growth at a strategic site to the east of Faversham in place of 11 non-strategic allocations. This concentration of growth could generate challenges, including in terms of the robustness of housing supply trajectory, and the 11 non-strategic sites in question are supported in light of the Housing and Economic Land Availability Assessment (HELAA). Several would help to deliver on specific objectives, perhaps most notably the sites on the Isle of Sheppey.

With regards to Scenario 4, whilst the appraisal makes the case for a higher growth strategy, Scenario 2 (the proposed submission approach) would provide for local housing need (LHN) in full, including from the early years of the plan period, and there is no clear strategic case for a housing requirement set above LHN. With regards to the specific site that would be additionally allocated in order to deliver higher growth, namely East of Faversham Extension, it is difficult to suggest that the site would deliver on key objectives for Faversham beyond new homes, and there are constraints/challenges including in terms of transport infrastructure, landscape and grade 2 agricultural land."

Part 2: SA findings at this stage?

8. Introducing Part 2

- 8.1.1. This part of the report will present an appraisal of the Proposed Submission Local Plan as a whole under the SA framework (i.e. under the same set of 13 topic headings used to structure the appraisal in Section 6).
- 8.1.2. The appraisal will essentially expand on the appraisal of growth scenario 2, including accounting for site-specific policies, which are of considerable importance, and which have only recently been finalised. It will also need to account for the latest evidence and understanding, because the report as published in August must be fully up-to-date.

9. The Proposed Submission Plan

- 9.1.1. As things stand the overall conclusion is as follows:

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, communities and landscape; moderate or uncertain **negative** effects in terms of air quality, biodiversity, 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.

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 may not be met on viability grounds.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Following the receipt of representations on the Proposed Submission Local Plan the aim is to submit the plan for examination in public alongside a summary of the issues raised. The Council will need to remain confident that the plan as previously published is sound and so ready for submission, and there will not be the potential to make amendments to the plan (although suggested amendments might be submitted alongside the plan).
- 10.1.2. This SA Report will also be submitted alongside the Local Plan.
- 10.1.3. Following submission the Local Plan will be subject to an Examination in Public overseen by one or more Planning Inspectors, and there will invariably be a consultation on proposed Main Modifications in order to address matters of plan soundness.
- 10.1.4. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

11. Monitoring

- 11.1.1. Suggests for monitoring indicators will be presented here, in light of the plan appraisal.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements for the SA Report.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulations

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>		
<i>The report must include...</i>	<i>The report must include...</i>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3. The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed throughout the report as appropriate, i.e. in light of the scope of the plan/alternatives.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented throughout this report. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented at the start of the report.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that an Interim SA Report was published as part of a Regulation 18 consultation held in 2021, and prior to that an SA Report was published alongside a previous proposed submission version of the Local Plan in 2020.

Appendix II: Superseded growth scenarios

As discussed in Section 5, an earlier iteration of work to define and appraise reasonable growth scenarios was completed in June 2026 ahead of West of Bobbing gaining a resolution to grant planning permission. This Appendix presents that previous appraisal unamended.

The superseded 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 A: The superseded growth scenarios (June 2026)

	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
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
Regeneration sites	1,111	1,111	1,111	1,111	1,111	1,111
Non-strategic sites	1,755	856	1,755	1,755	856	1,755
Total homes (2025-2041)	17,705	18,269	19,168	17,168	17,769	18,668
% over LHN (17,024)	4%	7%	13%	1%	4%	10%

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

Accessibility

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

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.

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.¹⁷ 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.

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.

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

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.

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."*
- 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."*

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

Climate change adaptation

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.

¹⁷ 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.

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.

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

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.

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

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

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].”

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.”*

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.

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

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.

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.”*

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 Ospringle 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

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.

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.

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.

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.

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

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.

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."

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."

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'."

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."

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.

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

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.

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

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.

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..."*

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."

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).

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

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.

Appraisal conclusion

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’.

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.

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 B: Summary appraisal of the superseded growth scenarios (June 2026)

	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	?	?	?	?	?	?

