

Question	The County Council's response
Chapter 2. What has influenced the development of the Local Plan	
<p>1: How do you think the Local Plan should be amended to address the NPPF requirement for Local Plans to set larger scale developments within a 30 year vision?</p>	<p>The County Council recognises the need to ensure that there will be an appropriate time horizon for strategic policies, and to anticipate and respond to long term requirements and opportunities, as now recommended in the National Planning Policy Framework (NPPF). Moreover, it notes the need for the Local Plan Review to provide for additional new housing and other development required to meet future needs. The County Council supports the inclusion of additional wording within the Vision and Strategic Objectives to recognise the potential for some allocations to deliver housing and development beyond the Local Plan period. Close working with infrastructure providers will be essential in ensuring the right infrastructure is delivered alongside growth, at the right time. In promoting an “Infrastructure First” approach to development, the County Council would emphasise the need for infrastructure to be planned for, funded and delivered in a timely manner, ahead of residential and commercial growth as appropriate. To deliver sustainable development, a collaborative approach with all key stakeholders will be crucial – taking in to account all necessary infrastructure and services required to deliver robust and resilient communities during the plan period and beyond. Once the option for growth is determined, KCC will look to work closely with the Borough Council to plan and deliver the necessary KCC infrastructure at the right time.</p> <p>The longer-term timescales for the build out of large site allocations can present a particular challenge in determining and reflecting changes in service provision and funding, and so will necessitate a flexible approach to ensure that infrastructure can be funded and delivered over the long term. County Council Officers will welcome continued and on-going work with the Borough Council to ensure that as any such allocations progress, all County Council services and infrastructure will be captured in the planning, phasing and delivery of new settlements. County Council responsibilities will extend beyond health and transportation infrastructure and for example, KCC will have vital roles as Lead Local Flood Authority, Education Planning Authority and Minerals and Waste Planning Authority. KCC would also encourage early engagement with partners to ensure that Design Codes are developed to enable the long-term delivery and maintenance of high-quality design.</p> <p>As the Local Plan Review progresses and at the appropriate time, the County Council would value early engagement in the shaping and inputting, as appropriate, into a Statement of Common Ground for Examination, to ensure that all cross-boundary and strategic matters are properly and clearly addressed.</p> <p>Provision of KCC community infrastructure and services: From an education and waste perspective, additional land will be required for extra schools to support growth (including 0-5 early years provision and special school provision) and waste sites, along with financial contributions towards the build costs. Community services like libraries, adult education, youth services and social care will require additional contributions to mitigate the impacts of additional users calling upon their services and in some instances, new facilities. All new development will require digital connectivity, with broadband fibre to the premises (FTTP) capable of delivering 1000mps (in line with NPPF paragraph 114).</p> <p>Heritage: It is important that the developments that will take decades to come to fruition are delivered to a coherent masterplan that is supported by Swale Borough Council over the entire period. The masterplan may need amending over the years, but the matters that it was originally designed to conserve and enhance, such as heritage, must remain in place as key themes and protected by such changes that take place. Heritage is a fragile and non-renewable resource, and its individual elements work most effectively together as part of a coherent heritage landscape integrated with the new build. Changes to masterplans or building design requirements can fragment that landscape and could lead to the degradation of the resource and its corresponding ability to play a role in shaping life in the Borough.</p>
<p>2. Do you have any comments on the interim Sustainability Appraisal? Please explain the reasons for your comments.</p> <p>Do you think any changes to the interim Sustainability Appraisal are necessary? If so, please set out these changes and the reasons why you think they are needed.</p>	<p>Highways and Transportation: The County Council, as Local Highway Authority, would make the following comments in respect of the Sustainability Appraisal (SA) chapters (which are also relevant to the questions relating to the five growth strategy options):</p> <p><i>Air Quality:</i> Notwithstanding that scoring has not been presented, the County Council acknowledges that the SA correctly reports on transport-related air quality matters and current Air Quality Management Areas (AQMA) with additional issues highlighted on the A251 heading to Ashford. Transport modelling completed in conjunction with the Borough Council would appear to support the statement that the South East Sittingbourne site within options 1 and 5 would improve air quality in the known areas of concern. It is however also noted that the report highlights concern regarding the Bobbing site currently proposed and its potential impact on the Keycol and St Paul's AQMAs, which KCC would agree. The SA states that it is difficult to draw conclusions, however, there would appear from the SA to be reasons to discount options 2 and 4 and potentially 1, on air quality grounds, due to the inclusion of sites along the A2.</p> <p><i>Community:</i> Community facilities and accessibility to such facilities can have a considerable bearing on transport. It is noted that growth strategy option 5 is reportedly the preference, with options 3 and 4 scoring second. Whilst KCC recognises that the provision of secondary schools should not be the only qualifying factor, the essential components of mixed-use development within the larger sites at East and South East Faversham and South East Sittingbourne, along with their proximity to existing facilities, would suggest that the appraisal scoring is appropriate on this matter.</p> <p><i>Transport:</i> Recently completed transport modeling evidence has been shared by the Borough Council, in line with its requirements under the Duty to Co-operate for the previous Regulation 19 consultation, along with modeling for the current Highsted Park (North and South) applications (planning application references 21/503914 and 21/503906). Option 3 appears most closely aligned to the Regulation 19 proposed growth strategy, and there is sufficient modeling completed to demonstrate considerable concern in regard to the severity of highway impact (as indicated in KCC's earlier response to that consultation, dated 26th April 2021).</p> <p>In summary, whilst the SA does not provide supporting transport evidence against each option presented, there is sufficient evidence completed to date to suggest that</p>

	<p>Option 5, or a combination of 5 and elements of Option 3, would be preferable from a transport perspective. This position would be further supported when considering the assessment of community and employment set out within the SA. Option 5 would appear to offer the greatest reduction of necessary travel to community facilities, and the SA analysis on employment identifies Sittingbourne as having the greatest requirement for employment land. Placing higher levels of housing to the east of the borough, away from employment need/demand would create an undesirable and potentially objectionable increase in traffic demand, which could raise issues if options 3 and 4 (where growth would be focussed to the east) are taken forward.</p> <p>Waste Management: The SA does not consider impact upon waste management and its sustainability. It is critical that the impact upon waste is considered. The County Council, as the Waste Disposal Authority, has previously highlighted the issue with lack of capacity at both Waste Transfer Station (WTS) facilities and Household Waste Recycling Centres (HWRCs) across the borough. All options have the potential to impact the sustainability of the service to different extents and therefore it is critical that this is included in the SA. KCC would welcome engagement with the Borough Council and its consultants to address this. The County Council has previously given information on how different growth options would impact our service and this may be used as a basis.</p> <p>Provision of KCC community infrastructure and services: The delivery of a new secondary school(s) is essential - it is urgently required in North West Sittingbourne (policy MU1 in the adopted Bearing Fruits Local Plan) and is also required in Faversham to meet projected growth. It is noted that this is captured on page ii, page 11 and page 28 of the SA).</p> <p>It is important that the term “Community” also captures other statutory responsibilities like libraries, adult education, social care and digital technology.</p> <p>Public Health: As a general point, it is disappointing that “health and wellbeing/health inequalities and deprivation” is not a consideration within the SA, despite being recognised as a key issue. Additionally, it is not clear whether any Public Health data has been reviewed. It is important to understand the health needs of the current and future population and how a Local Plan and proposed growth options provide an opportunity to improve health and wellbeing for residents. Evidence should be used from the Kent Joint Strategic Needs Assessment (JSNA) and / or other sources of public health data from the Public Health Outcomes Framework (PHOF), including ward level data.</p> <p>PRoW and Access Service: There is very little mention of the multiple benefits of Active Travel and a lack of consideration of how to boost opportunities to shift from short car journeys through investment in the PRoW network. Off road connectivity across the borough should be a priority encourage Active Travel. KCC seeks to promote the protection and enhancement of the PRoW network and is committed to working in partnership with the Borough Council to achieve the aims contained within KCC’s Rights of Way Improvement Plan (ROWIP). The ROWIP should be referenced as it is a strategic and statutory policy document for PRoW protection and enhancement. The population of Swale is predicted to grow, placing additional pressures on an already congested transport network that has limited spare capacity, even with proposed Junction and Highway improvements. To address this challenge, the priority should be to encourage a modal transport shift towards walking and cycling and other forms of sustainable transport. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve the health and well-being of Swale residents.</p>
<p>Chapter 3. Characteristics of the borough and the key challenges to be addressed</p>	
<p>3: Do you agree with the key issues and challenges that we have identified?</p> <p>If not, what other issues do you think need to be considered further and addressed by the Local Plan Review.</p>	<p>KCC identifies some suggestions below, and as the Local Plan Review process continues, should any further topic areas be incorporated the County Council would welcome the opportunity to consider any implications they may have on its services and infrastructure and to work with Swale Borough Council as the evidence base develops.</p> <p>PRoW and Access Service: KCC agrees with the identified issues regarding the necessary infrastructure needed for high quality development and the need for embedding sustainable and active travel options.</p> <p>Heritage: KCC agrees that one of the key challenges for the future will be “delivering sustainable growth while conserving and enhancing our natural, built and heritage assets”. Swale Borough has a rich and varied historic environment. It has numerous nationally and regionally important heritage assets, including more than twenty Scheduled Monuments and 1,400 Listed Buildings, 25 historic parks and gardens and numerous Conservation Areas. The Borough also contains a large number of archaeological sites that are known and in likelihood, many others that have yet to be discovered. This heritage has the potential to shape life in the Borough, helping to make it an attractive and interesting place to live and contributing to wellbeing, education and tourism (as explored in the Swale Heritage Strategy). Many of these sites are, however, vulnerable and need to be dealt with appropriately by the planning and development control system.</p> <p>Public Health: KCC agrees that improving health and wellbeing of residents should be one of the key challenges, however, given the large differences in the health and wellbeing and levels of deprivation between communities in Swale, reducing health inequalities and deprivation should also be emphasised here, as seen by the lower levels of life expectancy in the more deprived communities. Under paragraph 3.1.2, it is not clear where the information on life expectancy has come from, as data on the Public Health Outcomes Frameworks suggests the life expectancy for women is actually over eight years lower in the more deprived areas - not four years, as stated.</p>
<p>Chapter 4. Vision and Objectives</p>	
<p>4: Do you agree this is the right Vision for the</p>	<p>Highways and Transportation: KCC, as the Local Highway Authority, is generally supportive of improved sustainable and active transport connections. However, this</p>

<p>borough?</p> <p>If not, please explain what changes you would like to see made to the Vision and why.</p>	<p>should not be exclusive to Sittingbourne - it is of equal importance to all of the borough's major settlements.</p> <p>Provision of KCC community infrastructure and services: From the perspective of delivery of the vital KCC infrastructure and services, KCC is supportive of the Vision, provided that it delivers sustainable development, with adequate and timely infrastructure to support growth. A collaborative approach with the range of key stakeholders will be crucial in achieving this.</p> <p>PRoW and Access Service: KCC agrees with the identified aims for the Vision for Swale in respect of PRoW.</p> <p>Public Health: Even though health and wellbeing of residents has been recognised as a key issue and challenge, it does not appear to be explicitly considered within the objectives or vision for the Local Plan.</p>
<p>5: Do the draft Objectives support the Vision and set appropriate goals for the Local Plan?</p> <p>Please give your reasons, identifying the objectives that you support or objectives that you oppose explaining any changes you would like to see and why.</p>	<p>Provision of KCC community infrastructure and services: KCC welcomes the inclusion of the provision of community infrastructure.</p> <p>PRoW and Access Service: KCC supports the listed objectives, with its inclusion of objectives to achieve sustainable travel.</p> <p>Waste Management: KCC would request that waste is included in objective 6, as suggested below: <i>To deliver a level of investment and growth at key locations to facilitate significant improvements to support infrastructure e.g. schools, healthcare, waste and highways and sustainable and active travel options for the benefit of local communities;</i></p> <p>Heritage: The draft objectives do not include any that make any reference to Swale's environment or heritage. As the draft text notes in Chapter 3, the borough's environment is among its great strengths. Its rich heritage and high quality historic and natural landscape, including Areas of Outstanding Natural Beauty, are among those factors which make Swale an attractive place to live. It is, however, vulnerable to both the new development and to climate change. It is therefore important that among the strategic objectives for the Local Plan, is the goal of sustaining and enhancing this environment. The following objective is suggested: <i>To conserve and enhance Swale's high-quality landscape and rich heritage in the face of climate change, growth and development.</i></p> <p>Public Health: Even though health and wellbeing of residents has been recognised as a key issue and challenge, it does not appear to be explicitly considered within the objectives or vision for the Local Plan.</p>
<p>Chapter 5. Policy issues and preferred options</p>	
<p>6: Do you think that the council should attempt to justify not complying with the Government's Standard Method for calculating the borough's housing need figure (due to the constraints of the Swale, such as the natural environment, flood risk, infrastructure), which means that the council would not fully meet the housing target?</p>	<p>Whilst the County Council considers that this matter is for the Borough Council to decide, it would request that there is close collaboration to ensure that the growth strategy selected to meet the Local Plan's identified housing target will be delivered to take account of all necessary infrastructure and services required to deliver sustainable communities.</p>
<p>7: Do you believe that if we do not fully meet our target, we should consider asking our neighbours to provide for our unmet development needs? If asked by a neighbouring council to consider meeting their unmet development needs, what should be our response and why?</p>	<p>This will be a matter for discussion between Swale Borough Council and neighbouring authorities through the Duty to Cooperate (or potentially under the forthcoming Statement of Common Ground requirement likely to be introduced by Government shortly) and, as a key infrastructure provider, KCC would request involvement in planning for new development, as appropriate.</p>
<p>8: Do you agree that the allocations listed in Appendix 2 should be rolled forward into the reviewed Local Plan?</p> <p>If not, please explain why you think this, supporting your response with reference to any evidence.</p>	<p>Provision of KCC community infrastructure and services: KCC would highlight that it will be important for any allocations rolled forward into the Local Plan Review to mitigate their impacts and to provide either on site or off-site contributions for all services affected.</p> <p>Minerals and Waste: The allocations relate to sites that have gained planning permission, that are pending consideration and for which no planning application has yet been lodged. Where the principle of the development has been determined as acceptable, mineral and waste management safeguarding no longer applies to a consideration of their allocation in a new Local Plan. However, this is not the case for allocations where either a planning application is in the process of being considered or where no planning application is lodged. Therefore, where an allocation is coincident with a safeguarded landwon mineral and/or is within 250m of a safeguarded minerals or waste facility, it should be assessed against the exemption criteria as set out in Policy DM 7 and DM 8 of the Kent Minerals and Waste Local Plan 2013-30. It cannot be assumed that where minerals and waste assessments have previously been undertaken to support proposed allocations, they will remain robust and can be relied upon as relevant and up-to-date and that can enable the allocation to be 'rolled forward'. In order to assist in this process, KCC would welcome engagement with the Borough Council to help identify which of these, and any other potential allocations, should be assessed for minerals and waste safeguarding.</p>
<p>9: Do you agree with the proposed windfall</p>	<p>Provision of KCC community infrastructure and services: Where unplanned windfall sites are submitted, it will be important that individual site assessments are</p>

<p>allowance rate of 250 dwellings per annum?</p>	<p>undertaken to mitigate their own impacts, and that there also is an understanding and assessment of the aggregation of smaller sites, to factor in the need for infrastructure and service provision.</p>
<p>10: Do you agree that the strategy for allocating future development needs in the borough should include small scale development at thriving villages? If not, please explain why you think this?</p>	<p>Highways and Transportation: Any strategy for allocating future development needs that includes small-scale development at existing thriving villages will need to consider whether the locations are sustainable. Increasing development within unsustainable village locations could be considerably detrimental to the Borough Council's stated vision and could increase vehicle dependency.</p> <p>Provision of KCC community infrastructure and services: Any such strategy will need to be subject to reviews of capacity, to determine the critical mass required to provide fully functioning services (schools operate in full Form Entries) and to ensure that extra land / finance is made available to accommodate expansions.</p> <p>Heritage: If development is to take place at smaller settlements, then it will be important to ensure that it is successfully integrated into the existing landscape. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The Kent Historic Landscape Characterisation (2001) is a tool for understanding this historic context and should be used to inform decisions taken regarding the landscape character of Swale. Ideally, this county level study should be deepened to be more relevant at the district and local level as has recently happened in the Hoo Peninsula and in Tunbridge Wells Borough. KCC would be happy to discuss further how this can be taken forward for Swale Borough.</p> <p>In terms of development in rural areas more generally, it should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage, KCC and Kent Downs AONB have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that Swale Borough Council considers adopting the guidance as Supplementary Planning Document (SPD), as part of the Local Plan process. KCC would be happy to discuss this further.</p>
<p>Option 1 Business as usual</p> <p>11: Do you agree that the broad locations shown in the document will help to deliver this development option? If not, why not?</p> <p>12: Do you agree with the potential advantages and disadvantages listed in the document for this development option? Can you think of any others that you would add?</p>	<p>Highways and Transportation: This option includes the allocation of significant sites located along the A2 East of Sittingbourne and at Newington, which are likely to exacerbate the severity of issues such as air quality and congestion along that corridor. KCC does not support this option in its role as Local Highway Authority.</p> <p>Provision of KCC community infrastructure and services: Should this option be selected, KCC would emphasise the need for the growth strategy to be supported by the necessary section 106 financial contributions in respect of the need for additional provision and capacity in all County services, including land / sites where appropriate. KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services.</p> <p>Secondary: In respect of its role as Local Education Authority, KCC would advise that new secondary school sites are required in Faversham, North West Sittingbourne and on the Isle of Sheppey to underpin growth (KCC would note that, should the Highsted Park planning applications be approved and/or a site allocation for Highsted Park to be put in the Local Plan, this scheme would also require a new secondary school, with a 10ha site and appropriate financial contributions).</p> <p>Primary: KCC would need to consider the level of available capacity at existing primary schools and the potential for expansion at existing sites, along with preferred maximum sizes of schools. In respect of primary school provision, new 2FE primary school sites of 2.05ha (with financial contributions) will be required on any sites of 1,500 units, and for larger developments, one 2 FE primary school site would be required for each multiple of 1,500 units.</p> <p>Special Needs Provision: Demand created by new housing increases the need for places at primary, secondary and special schools. Forecasting the demand for special needs provision is challenging, but KCC uses a trend-based forecast system. KCC would welcome a dialogue with the Borough Council to explore how much additional special provision is needed following the planned housing development. In common with mainstream provision, such provision will require funding through section 106 contributions.</p> <p>0-5 Early Years Provision: KCC would also highlight the need for the Local Plan to set out requirements to enhance 0-5 early years provision. KCC would again welcome a dialogue with the Borough Council on this provision.</p> <p>KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services.</p> <p>Sustainable Urban Drainage Systems (SuDS): The diagrams provided are not sufficiently detailed to confirm whether there is sufficient provision or avoidance of any areas of surface water flood risk; however, KCC assumes that a full assessment has been undertaken and accounted for through the assessment and mapping for the Strategic Flood Risk Assessment. Therefore, KCC as Lead Local Flood Authority has no specific comments to raise.</p> <p>Heritage: Whilst from a heritage perspective, KCC has no preferred option for the general pattern of development in Swale, it must be emphasised that the Borough's heritage will have a significant role to play in ensuring that the option selected is carried out successfully. The Swale Heritage Strategy has identified the heritage</p>

	<p>themes of greatest relevance for Swale, and the range of benefits that heritage brings. For these to be delivered, the master-planning, development and building design that will accompany the new development must reference the strategy and draw upon its baseline data and recommendations. All the options identified, and the development that each will involve, will need extensive formal assessment for their impact on Swale's heritage before they are confirmed.</p>
<p>Option 2 - More even distribution of the additional development requirements across the borough's main urban centres and rural areas</p> <p>13: Do you agree that the broad locations shown in the document will help to deliver this development option? If not, why not?</p> <p>14: Do you agree with the potential advantages and disadvantages listed in the document for this development option? Can you think of any others that you would add?</p>	<p>Highways and Transportation: In its role as Local Highway Authority, this is not KCC's preferred option. KCC would advise that additional disadvantages would include the loss of opportunity to reduce dependence of private vehicles, promote modal shift and comply with the proposed net-zero vision. Moreover, there is no indication of improvements to highway infrastructure. There is also concern regarding highway capacity within central and eastern Sheppey (and particularly the constraints along the A250 and the A2500 corridors).</p> <p>Provision of KCC community infrastructure and services: Should this option be selected, KCC would emphasise the need for the growth strategy to be supported by the necessary section 106 financial contributions in respect of the need for additional provision and capacity in all County services, including land / sites where appropriate. KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services.</p> <p><i>Secondary:</i> In respect of its role as Local Education Authority, KCC would advise that new secondary school sites are required in Faversham, North West Sittingbourne and on the Isle of Sheppey to underpin growth (KCC would note that should the Highsted Park planning applications be approved and/or a site allocation for Highsted Park to be put in the Local Plan, this scheme would also require a new secondary school, with a 10ha site and appropriate financial contributions).</p> <p><i>Primary:</i> In respect of primary school provision, new 2FE primary school sites of 2.05ha (with financial contributions) will be required on any sites of 1,500 units, and for larger developments, one 2FE primary school site would be required for each multiple of 1,500 units. Should this option be taken forward, KCC would need to consider the level of available capacity at existing primary schools and the potential for expansion at existing sites, along with preferred maximum sizes of schools.</p> <p><i>Special Needs Provision:</i> Demand created by new housing increases the need for places at primary, secondary and special schools. Forecasting the demand for special needs provision is challenging, but KCC uses a trend-based forecast system. KCC would welcome a dialogue with the Borough Council to explore how much additional special provision is needed following the planned housing development. In common with mainstream provision, such provision will require funding through section 106 contributions.</p> <p><i>0-5 Early Years Provision:</i> KCC would also highlight the need for the Local Plan to set out requirements to enhance 0-5 early years provision. KCC would again welcome a dialogue with Swale Borough Council on this provision.</p> <p>Sustainable Urban Drainage Systems (SuDS): The diagrams provided are not sufficiently detailed to confirm whether there is sufficient provision or avoidance of any areas of surface water flood risk; however, KCC assumes that a full assessment has been undertaken and accounted for through the assessment and mapping for the Strategic Flood Risk Assessment. Therefore, KCC as Lead Local Flood Authority has no specific comments to raise.</p>
<p>Option 3 - More even distribution of the final requirements across the main urban centres (when combined with allocations in the current local plan, Bearing Fruit)</p> <p>15: Do you agree that the broad locations shown in the document will help to deliver this development option? If not, why not?</p> <p>16: Do you agree with the potential advantages and disadvantages listed in the document for this development option? Can you think of any others that you would add?</p>	<p>Highways and Transportation: In its role as Local Highway Authority, this is not KCC's preferred option. The County Council, as Local Highway Authority, would also add the following disadvantages - the loss of opportunity to reduce dependence of private vehicles, promote modal shift and ability to comply with the proposed net-zero vision. There is also concern regarding highway capacity within central and eastern Sheppey (and particularly the constraints along the A250 and the A2500 corridors). Additionally, there is no indication of improvements to highway infrastructure.</p> <p>Provision of KCC community infrastructure and services: Should this option be selected, KCC would emphasise the need for the growth strategy to be supported by the necessary section 106 financial contributions in respect of the need for additional provision and capacity in all County services, including land / sites where appropriate. Where this option is looking to spread growth across the borough, it will need to ensure that the scale of developments is sufficient to support the delivery of investment required, otherwise it could risk additional growth without the ability to secure infrastructure. Due to viability challenges, housing growth on the Isle of Sheppey would need a mechanism in place to secure regeneration investment to support it. KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services.</p> <p><i>Secondary:</i> In respect of its role as Local Education Authority, KCC would advise that new secondary school sites are required in Faversham, North West Sittingbourne and on the Isle of Sheppey to underpin growth (KCC would note that should the Highsted Park planning applications be approved and/or a site allocation for Highsted Park to be put in the Local Plan, this scheme would also require a new secondary school, with a 10ha site and appropriate financial contributions).</p> <p><i>Primary:</i> In respect of primary school provision, new 2FE primary school sites of 2.05ha (with financial contributions) will be required on any sites of 1,500 units, and for larger developments, one 2FE primary school site would be required for each multiple of 1,500 units. Should this option be taken forward, KCC would need to consider the level of available capacity at existing primary schools and the potential for expansion at existing sites, along with preferred maximum sizes of schools.</p> <p><i>Special Needs Provision:</i> Demand created by new housing increases the need for places at primary, secondary and special schools. Forecasting the demand for special needs provision is challenging, but KCC uses a trend-based forecast system. KCC would welcome a dialogue with the Borough Council to explore how much</p>

	<p>additional special provision is needed following the planned housing development. In common with mainstream provision, such provision will require funding through section 106 contributions.</p> <p><i>0-5 Early Years Provision:</i> KCC would also highlight the need for the Local Plan to set out requirements to enhance 0-5 early years provision. KCC would again welcome a dialogue with Swale Borough Council on this provision.</p> <p>Sustainable Urban Drainage Systems (SuDS): The diagrams provided are not sufficiently detailed to confirm whether there is sufficient provision or avoidance of any areas of surface water flood risk; however, KCC assumes that a full assessment has been undertaken and accounted for through the assessment and mapping for the Strategic Flood Risk Assessment. Therefore, KCC as Lead Local Flood Authority has no specific comments to raise.</p>
<p>Option 4 - More of the overall development requirements at the eastern end of the borough</p> <p>17: Do you agree that the broad locations shown in the document will help to deliver this development option? If not, why not?</p> <p>18: Do you agree with the potential advantages and disadvantages listed in the document for this development option? Can you think of any others that you would add?</p>	<p>Highways and Transportation: In its role as Local Highway Authority, this is not KCC's preferred option. KCC would also highlight disadvantages around highway capacity and air quality issues for Faversham Town Centre and the A251. There is also concern regarding highway capacity within central and eastern Sheppey (and particularly the constraints along the A250 and the A2500 corridors).</p> <p>Provision of KCC community infrastructure and services: Should this option be selected, KCC would emphasise the need for the growth strategy to be supported by the necessary section 106 financial contributions in respect of the need for additional provision and capacity in all County services, including land / sites where appropriate. KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services. Where this option is looking to spread growth across the borough, it will need to ensure that the scale of developments is sufficient to support the delivery of investment required, otherwise it could risk additional growth without the ability to secure infrastructure. Due to viability challenges, housing growth on the Isle of Sheppey would need a mechanism in place to secure regeneration investment to support it. KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services.</p> <p><i>Secondary:</i> In respect of its role as Local Education Authority, KCC would advise that new secondary school sites are required in Faversham, North West Sittingbourne and on the Isle of Sheppey to underpin growth (KCC would note that should the Highsted Park planning applications be approved and/or a site allocation for Highsted Park to be put in the Local Plan, this scheme would also require a new secondary school, with a 10ha site and appropriate financial contributions). With this option, there would be capacity issues to consider in respect of impacts on the Canterbury district and the need for coastal secondary provision (new Herne Bay/Whitstable secondary capacity).</p> <p><i>Primary:</i> In respect of primary school provision, new 2FE primary school sites of 2.05ha (with financial contributions) will be required on any sites of 1,500 units, and for larger developments, one 2FE primary school site would be required for each multiple of 1,500 units. Should this option be taken forward, KCC would need to consider the level of available capacity at existing primary schools and the potential for expansion at existing sites, along with preferred maximum sizes of schools.</p> <p><i>Special Needs Provision:</i> Demand created by new housing increases the need for places at primary, secondary and special schools. Forecasting the demand for special needs provision is challenging, but KCC uses a trend-based forecast system. KCC would welcome a dialogue with the Borough Council to explore how much additional special provision is needed following the planned housing development. In common with mainstream provision, such provision will require funding through section 106 contributions.</p> <p><i>0-5 Early Years Provision:</i> KCC would also highlight the need for the Local Plan to set out requirements to enhance 0-5 early years provision. KCC would again welcome a dialogue with Swale Borough Council on this provision.</p> <p>Sustainable Urban Drainage Systems (SuDS): The diagrams provided are not sufficiently detailed to confirm whether there is sufficient provision or avoidance of any areas of surface water flood risk; however KCC assumes that a full assessment has been undertaken and accounted for through the assessment and mapping for the Strategic Flood Risk Assessment. Therefore, KCC as Lead Local Flood Authority has no specific comments to raise.</p>
<p>Option 5 - Focus our development requirements on Strategic Development Sites and/or urban extensions primarily located within existing rural areas</p> <p>19: Do you agree that the broad locations shown in the document will help to deliver this development option? If not, why not?</p> <p>20: Do you agree with the potential advantages and disadvantages listed in the document for this development option? Can you think of any</p>	<p>Highways and Transportation: In principle, this strategy could provide additional highway infrastructure such that may be required to support the additional growth in the borough, however, it would depend on the sites chosen and the infrastructure that they would provide. The County Council would look to work closely with the Borough Council if this option is selected. KCC would advise that the advantages set out in the Local Plan Review document should be consistent with the accompanying Sustainability Appraisal. Advantages therefore could include expected improvements to traffic-related air quality compared to the other options put forward. There would be employment land availability in close proximity to proposed housing and reduced dependence of private vehicles. It is however essential that the sites either include, or can easily access, existing community amenities, employment and transport hubs.</p> <p>Provision of KCC community infrastructure and services: Should this option be selected, KCC would emphasise the need for the growth strategy to be supported by the necessary section 106 financial contributions in respect of the need for additional provision and capacity in all County services, including land / sites where appropriate. KCC would welcome further discussion with the Borough Council, should this option be taken forward, to ensure that growth is delivered alongside the necessary infrastructure and services.</p>

<p>others that you would add?</p>	<p><i>Secondary:</i> In respect of its role as Local Education Authority, KCC would advise that new secondary school sites are required in Faversham, North West Sittingbourne and on the Isle of Sheppey to underpin growth (KCC would note that should the Highsted Park planning applications be approved and/or a site allocation for Highsted Park to be put in the Local Plan, this scheme would also require a new secondary school, with a 10ha site and appropriate financial contributions). South East Faversham does require a new secondary school - not “potentially”, as the consultation document states on page 40). With this option, there would be capacity issues to consider in respect of impacts on the Canterbury district and the need for coastal secondary provision (new Herne Bay/Whitstable secondary capacity).</p> <p><i>Primary:</i> In respect of primary school provision, new 2FE primary school sites of 2.05ha (with financial contributions) will be required on any sites of 1,500 units, and for larger developments, one 2FE primary school site would be required for each multiple of 1,500 units. Should this option be taken forward, KCC would need to consider the level of available capacity at existing primary schools and the potential for expansion at existing sites, along with preferred maximum sizes of schools. KCC would also advise that Highsted Park would require more than 9FE for primary provision (as is stated in paragraph 5.1.81).</p> <p><i>Special Needs Provision:</i> Demand created by new housing increases the need for places at primary, secondary and special schools. Forecasting the demand for special needs provision is challenging, but KCC uses a trend-based forecast system. KCC would welcome a dialogue with the Borough Council to explore how much additional special provision is needed following the planned housing development. In common with mainstream provision, such provision will require funding through section 106 contributions.</p> <p><i>0-5 Early Years Provision:</i> KCC would also highlight the need for the Local Plan to set out requirements to enhance 0-5 early years provision. KCC would again welcome a dialogue with Swale Borough Council on this provision.</p> <p>Sustainable Urban Drainage Systems (SuDS): The diagrams provided are not sufficiently detailed to confirm whether there is sufficient provision or avoidance of any areas of surface water flood risk; however KCC assumes that a full assessment has been undertaken and accounted for through the assessment and mapping for the Strategic Flood Risk Assessment. Therefore, KCC as Lead Local Flood Authority has no specific comments to raise.</p>
<p>24: Do you think the Preferred Development Option (option 3) for meeting our housing target is the most suitable and meets our vision, objectives and the principles of sustainable development?</p>	<p>Highways and Transportation: The County Council, as Local Highway Authority, does not consider Option 3 to be the most suitable option. The proposed strategy would appear, on the evidence presented, to have significant detrimental impact on traffic, air quality and the ability for sustainable modal shift within the borough. The option reduces the ability of the Local Plan to deliver necessary highway infrastructure, which, on the evidence presented, exacerbates the already heavily congested and polluted network in the Borough.</p>
<p>25: Do you think that any of the areas identified for potential development should be progressed as 'Areas of Opportunity' to enable a more comprehensive approach to master planning for their development and infrastructure needs?</p>	<p>Provision of KCC community infrastructure and services: KCC would support comprehensive master-planning requirements for strategic sites and would welcome early engagement as key infrastructure provider to ensure that infrastructure can be funded and delivered in a timely manner over the long term.</p>
<p>26: Do you agree with the view held by the developers as shown on page 46 of the document? What evidence do you have to support your answer?</p> <p><i>“Many developers argued that Swale’s targets (climate change) were too ambitious, inconsistent with national policy on sustainability standards and may lead to deliverability/viability issues”.</i></p>	<p>SuDS: Issues in relation to flood risk and sustainable drainage are noted in the Climate Change section. KCC would reiterate that its expectation is that climate change allowances, as set by the Environment Agency, are accounted for in flood risk assessment and drainage design. These were set in policies DM 36 “Flood Risk” and DM 37 “Sustainable Drainage” of the Regulation 19 Local Plan. KCC has no further comment on these provisions, provided they remain unchanged.</p> <p>Heritage: The historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced guidance (‘Climate Change and the Historic Environment’, 2008) that reviews the threats to the historic environment posed by climate change (more recent guidance can also be found in ‘Climate Change Adaptation Report’ (Historic England, 2016). The guidance demonstrates that historic structures, settlements and landscapes can, in some scenarios, be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This has also been updated in the HE report ‘There’s no Place Like Old Homes: Re-use and Recycle to Reduce Carbon’ (Historic England 2019).</p> <p>PRoW and Access Service: KCC does not agree with the statement on page 46. Planning policy can also be used to ensure sustainable and connected transport connections to encourage walking, cycling and public transport as much as possible. Inter-connectivity and permeability between different modes of transport must be paramount, making use of existing PRoW within, round and through developments.</p>
<p>27: Do you think the council should accept this view or seek to be more ambitious and continue to aim to embed sustainable/active travel measures across new developments? What are the reasons for your answer?</p>	<p>Provision of KCC community infrastructure and services: Sustainable transport and active travel is required to relieve congestion around schools and enable expansion of existing schools constrained currently by highway issues.</p> <p>PRoW and Access Service: It is considered that the Borough Council should seek to embed sustainable and Active Travel in all policies, for multiple benefits, including population health, air quality and landscape design. There is an increasing body of research and evidence to suggest that off-road routes encourage cycling participation levels, especially amongst families with young children. Development of high quality ‘traffic free’ cycle routes should therefore be a priority, to encourage</p>

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<p>“Across the board there was a view that the infrastructure is not in place for sustainable/active travel and it is too expensive to implement.”</p>	<p>active travel among younger generations and to change long term travel patterns. The creation of new and improved routes could bring additional benefits to the local economy by providing green infrastructure for outdoor recreation and tourism, such as through promoted cycle routes.</p> <p>Public Health: From a public health perspective, consideration of the health issues in the Swale area, ambitious targets and aiming to have high quality sustainable/active travel measures across new developments is welcomed. Consideration should also be given to how new development can be used to improve already existing communities particularly those in areas of deprivation in order to tackle and not increase levels of health inequalities.</p> <p>Data from the Public Health Outcomes Framework in relation to active travel shows that Swale performs significantly worse on England and Kent averages for those killed and seriously injured on the roads. It also shows that Swale has significantly higher levels of both overweight and obesity in children of reception year and performs worse than the England average for the percentage of adults cycling for travel at least three days per week with just 1.3% of the population doing so. It is in the 2nd worst quintile for England and the worst quintile for Kent in terms of air pollution (fine particular matter).</p>
<p>28: Do you think the policies on design (as contained in the Pre-Submission Local Plan, February 2021) should be updated to reflect the changes in the NPPF?</p>	<p>The County Council would draw attention to the consultation underway on the refresh of the Kent Design Guide, which should be captured in any revisions around design, to ensure that all development is of high quality.</p>
<p>29: Do you think the policies on trees (as contained in the Pre-Submission Local Plan, February 2021) should be updated to reflect the changes in the NPPF?</p>	<p>Biodiversity: Paragraph 174 of the NPPF emphasises the importance of recognizing the intrinsic character and beauty of the countryside, and “the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”. KCC would like to see the wider benefits from natural capital and ecosystem services recognised. Specifically, average tree canopy cover can be an important component of natural capital, and reference to carbon sequestration and storage (climate regulation) as ecosystem services should also be considered.</p>
<p>30: Do you agree that the council should be ambitious in its requirement for biodiversity net gain on new developments and that 20% is justified even though the emerging Environment Bill 10% is "a minimum"?</p>	<p>Biodiversity: KCC welcomes the target of 20% Biodiversity Net Gain proposed. KCC supports the Kent Nature Partnership’s proposal that a 20% target should be adopted, where viable, by all the county’s planning authorities. Kent’s habitats have faced significant degradation, losses and fragmentation over the past decades and in the last century, there have been major losses in Kent’s wildlife. In the face of further exceptional development pressures, it is considered that a 20% biodiversity net gain target is a proportionate response and one that illustrates the county’s commitment to tackling the ecological crisis that faces Kent. Furthermore, the scale of previous biodiversity losses require aspirational levels of gain to make up for them.</p> <p>Sufficient flexibility within the policy will be required to allow for off-site provision of biodiversity net gain – whether delivered via a dedicated site or through a locally invested tariff - to address the issue of feasibility of delivering biodiversity net gain on site (particularly relevant for small sites) and to help to ensure that biodiversity net gain is actually delivering a meaningful gain. Delivery of biodiversity gains on development sites may not sufficiently address nature recovery priorities within the borough or county – having the option to deliver biodiversity net gain offsite will ensure we see investment and action where it is most needed as guided by the required Local Nature Recovery Strategy. Biodiversity net gain will need to be calculated in accordance with the government recognised Natural England/Defra biodiversity metric.</p> <p>Heritage: In respect of paragraph 5.4 “Protecting and enhancing environment and heritage”, it is disappointing that there is so little text in the draft document that relates to Swale’s heritage – even in this section which purports to focus on it. Currently, only one of the seven issues identified mentions heritage (“Swale’s heritage is one of its assets but needs better management and protection”). It is to be hoped that this is because this text is an options document and that the final Local Plan will contain much more information. This can be taken primarily from the Swale Heritage Strategy and should present the main actions from the Action Plan.</p>
<p>31: Do you agree that the Local Plan should be clearer on how the needs of older people will be met?</p>	<p>The County Council agrees that clarity should be required in the Local Plan on how to meet the needs of older persons within the Borough. The Ministry of Housing, Communities and Local Government (MHCLG) identified in its guidance; ‘Housing for older and disabled people’ (June 2019) that the need to provide housing for older, vulnerable and disabled people is critical. Accessible and adaptable housing enables people to live more independently and safely. It provides safe and convenient homes with suitable circulation space and suitable bathroom and kitchens. KCC requests the dwellings are built to Building Reg Part M4(2) standard to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupants’ requirements.</p> <p>The County Council would recommend that the Local Plan should include consideration of dementia friendly design requirements. Small design changes to housing and infrastructure can help someone living with dementia to be more independent, by providing a home and environment that is clearly defined, easy to navigate and feels safe. Well-designed housing can have long term benefits, including the meeting of market demand in an area that has a lack of supply, and can also improve health and wellbeing opportunities for residents. High quality design should also be accessible, taking into account the varying needs of the evolving community.</p>
<p>32: Do you agree new dwellings should be built to Nationally Described Space Standards?</p>	<p>KCC would highlight the value of designing in space for home working in new developments, particularly in light of the Covid-19 pandemic and changes to working patterns.</p>
<p>37: Do you agree the Local Plan should not allocate specific locations for the creative industries but instead draft the development management policies to provide flexibility to allow these businesses to establish & grow?</p>	<p>The County Council supports taking a flexible approach in supporting such businesses to establish and grow.</p>

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<p>38: Do you agree with our assessment of what we need to provide to ensure that the economy is sustained in Swale and that we can provide the right environment to attract new businesses to Swale & new employees?</p>	<p>KCC agrees with the Borough Council in the recognition that planning for long-term prosperity goes well beyond just finding employment land, but also requires having access to an appropriately skilled work force in place. The County Council agrees that a strong quality of place is fundamental to achieving a fit and strong economy – which will be achieved through ensuring that sites are well connected and that high quality communities are delivered. Detailed consideration will need to be given to access and movement requirements across the Borough. A high-quality transport network, which enables the public to move around quickly and easily, is an essential requirement for economic growth and prosperity. The PRoW Network can support public transport and the wider higher network, by providing opportunities for recreation and commuting, especially short distance journeys. KCC would also draw attention to the need for new hub in Sittingbourne and changing place facilities.</p>
<p>39: Where should we be locating the next generation of employment sites? For example, as extensions to existing sites? Close to the strategic road network? Adjacent to existing and/or new housing sites?</p>	<p>It will be necessary for new employment sites to be located in accessible locations within close proximity of suitable transport links. This will enable the shift towards more sustainable methods of transport such as walking, cycling or public transport, alleviating congestion and pressure on Swale's roads. It is important to ensure that employment generated traffic does not compound existing congestion or traffic generated air quality issues. Where possible, opportunities should be sought to reduce the impacts relating to existing distribution centres. New employment sites should also be located in areas that have good access to suitable fibre broadband, with the ability to provide strong internet connectivity. KCC would appreciate an opportunity to comment on employment sit suitability and any mitigation measures required to enable delivery during the Local Plan process.</p>
<p>41: Should there be a more flexible development management approach to building uses at ground and second floor and above in our town centres, to encourage occupation by a range of business types?</p>	<p>The County Council continues to support the aim to retain a strong sense of vitality within town centres. Ensuring town centres have the flexibility to meet changing demands and shopping patterns will boost the resilience of these centres in the long-term. The County Council supports the recognition of the need for town centres to evolve to meet the changing needs of the community and this may include long term changes resulting from a movement towards online retail and short-term shopping and behavioural changes resulting from the COVID-19 pandemic. The County Council would therefore support a more flexible approach, to include the provision of libraries, cultural uses, youth, adult education and the full range of community services.</p>