



Strategic Environmental Assessment (SEA) for the Faversham Neighbourhood Plan

Environmental Report to accompany the Regulation 14 version
of the Neighbourhood Plan

Faversham Town Council

December 2022

Quality information

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Front cover: Faversham Guildhall, taken during October 2022 on the day of the SEA reasonable alternatives workshop with representatives from AECOM, the FNP Steering Group, Faversham Town Council, and Swale Borough Council.

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Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Faversham Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Faversham Neighbourhood Plan?

The Faversham Neighbourhood Plan (hereafter referred to as the 'FNP') has been prepared as a Neighbourhood Development Plan under the Localism Act 2011¹ and the Neighbourhood Planning (General) Regulations 2012².

The FNP has been prepared in the context of the Swale Borough Local Plan, also known as 'Bearing Fruits 2031', which was adopted in July 2017³. The FNP seeks to guide development in the neighbourhood area, through a range of policies, during the plan period 2022-2038. This includes 16 site allocations, which will help deliver the housing required set out for the neighbourhood area by Swale Borough Council.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the FNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2022), which provided a baseline analysis of the environmental and social constraints associated with the neighbourhood area.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the FNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the FNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the FNP has been assessed.
- The appraisal of alternative approaches for the FNP.

¹ UK Government (2011) 'Localism Act 2011' can be accessed [here](#).

² UK Government (2012) 'The Neighbourhood Planning (General) Regulations 2012' can be accessed [here](#).

³ Swale Borough Council (2017): 'Bearing Fruits 2031 The Swale Borough Local Plan', [online] can be accessed [here](#).

- The likely significant effects of the FNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the FNP.
- The next steps for the FNP and accompanying SEA process.

Assessment of reasonable alternatives for the FNP

Housing numbers to deliver through the FNP

As noted in **Chapter 2** in the main body of the Environmental Report, the FNP is being prepared in the context of the Swale Borough Local Plan, also known as 'Bearing Fruits 2031', which was adopted in 2017. Since the Local Plan was adopted, the Council have been preparing a Local Plan Review (LPR), which will set out the planning framework for the borough for the period up to 2038.

The LPR identifies a housing target of 3,500 for the wider Faversham area (including several strategic allocations), which includes a housing target of 200 homes for the neighbourhood area. A further 19 homes have been added to this target from an unmet need in the Faversham Creek Neighbourhood Plan (which is included in the neighbourhood area of the FNP). Therefore, the housing target for the neighbourhood area totals 219 homes.

Recent engagement between the neighbourhood group and Swale Borough Council indicate that this target can be considered as a minimum figure.

Initial consideration of site options

Contributing to the evidence base for the FNP, an independent and objective site assessment process was completed on behalf of the Steering Group.⁴ A total of 49 sites were considered in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation. Sites were identified via a local 'call for sites'⁵ exercise along with sites which were put forward in Swale Borough Council's Strategic Housing Land Availability Assessment⁶ (SHLAA).

Following the site assessment process, a total of four sites were given a 'green' rating (i.e., suitable to take forward as a Neighbourhood Plan allocation). A further 27 sites were given an 'amber' rating (i.e., potentially suitable sites to take forward as a Neighbourhood Plan allocation, with some minor constraints to development). The sites are shown below in **Figure NTS1**. Further details can be found in the site assessment report accompanying the Regulation 14 version of the FNP.

⁴ The site assessment report, prepared by AECOM in 2021, contributes to the evidence base for the FNP and accompanies the FNP at Regulation 14 consultation.

⁵ Faversham Town Council (2021): [Neighbourhood Plan - Call for Sites](#)

⁶ Swale Borough Council (2020): [SHLAA - Final Draft Report](#)

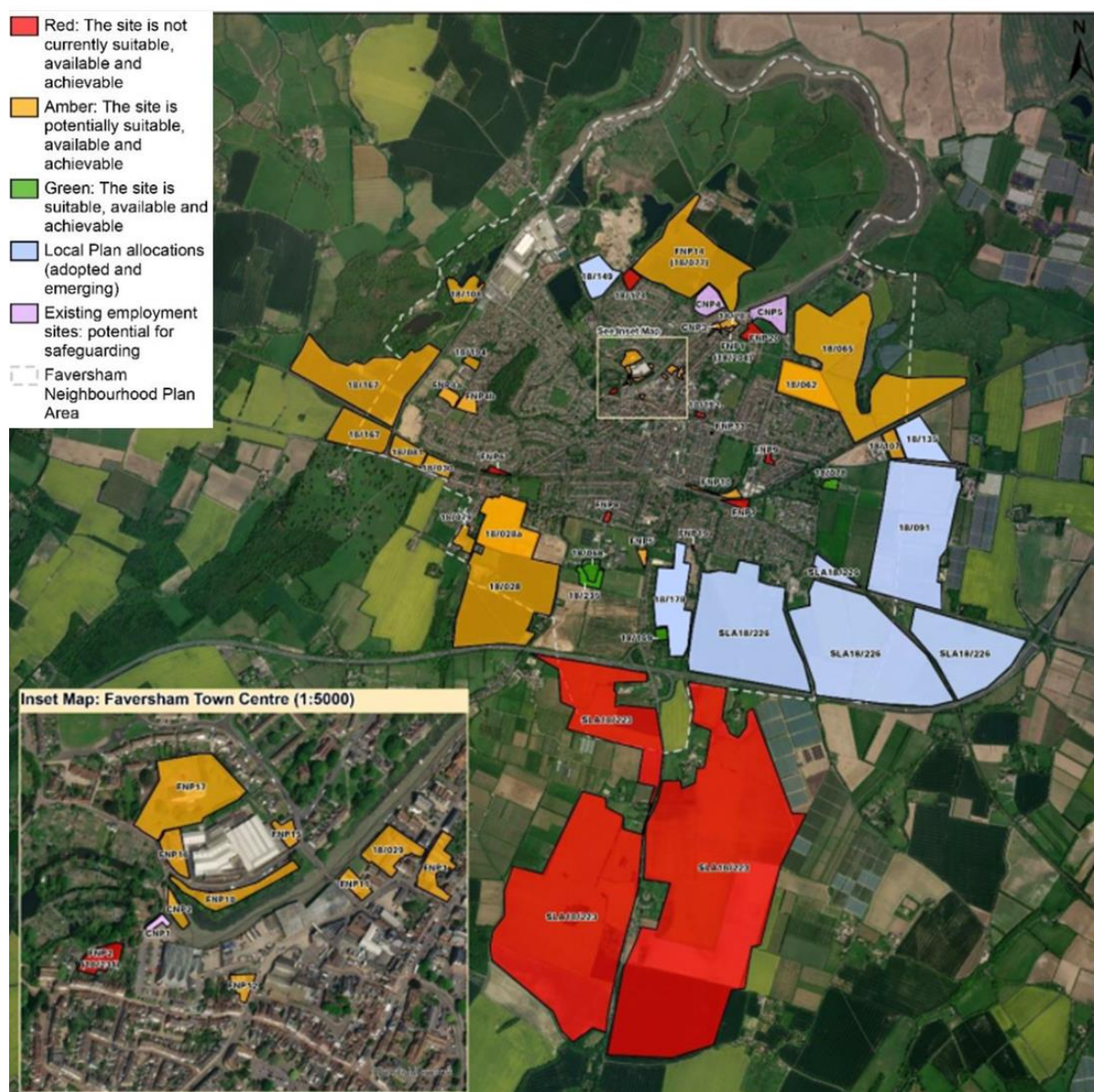


Figure NTS1: Findings of the site assessment

Potential locations to focus the delivery of new homes

As shown in **Figure NTS1** above, the 31 'green' and 'amber' sites cover several locations within the neighbourhood area. In light of this, the SEA has considered the potential constraints and opportunities associated with broad locations which could be a focus for the delivery of new homes within the neighbourhood area. Following a 'points of the compass' approach, the following broad locations for growth (BLG) were identified (as shown below in **Figure NTS2**):

- **BLG 1:** Land to the north of the town.
- **BLG 2:** Land to the east of the town.
- **BLG 3:** Land to the south of the town.
- **BLG 4:** Land to the west of the town.

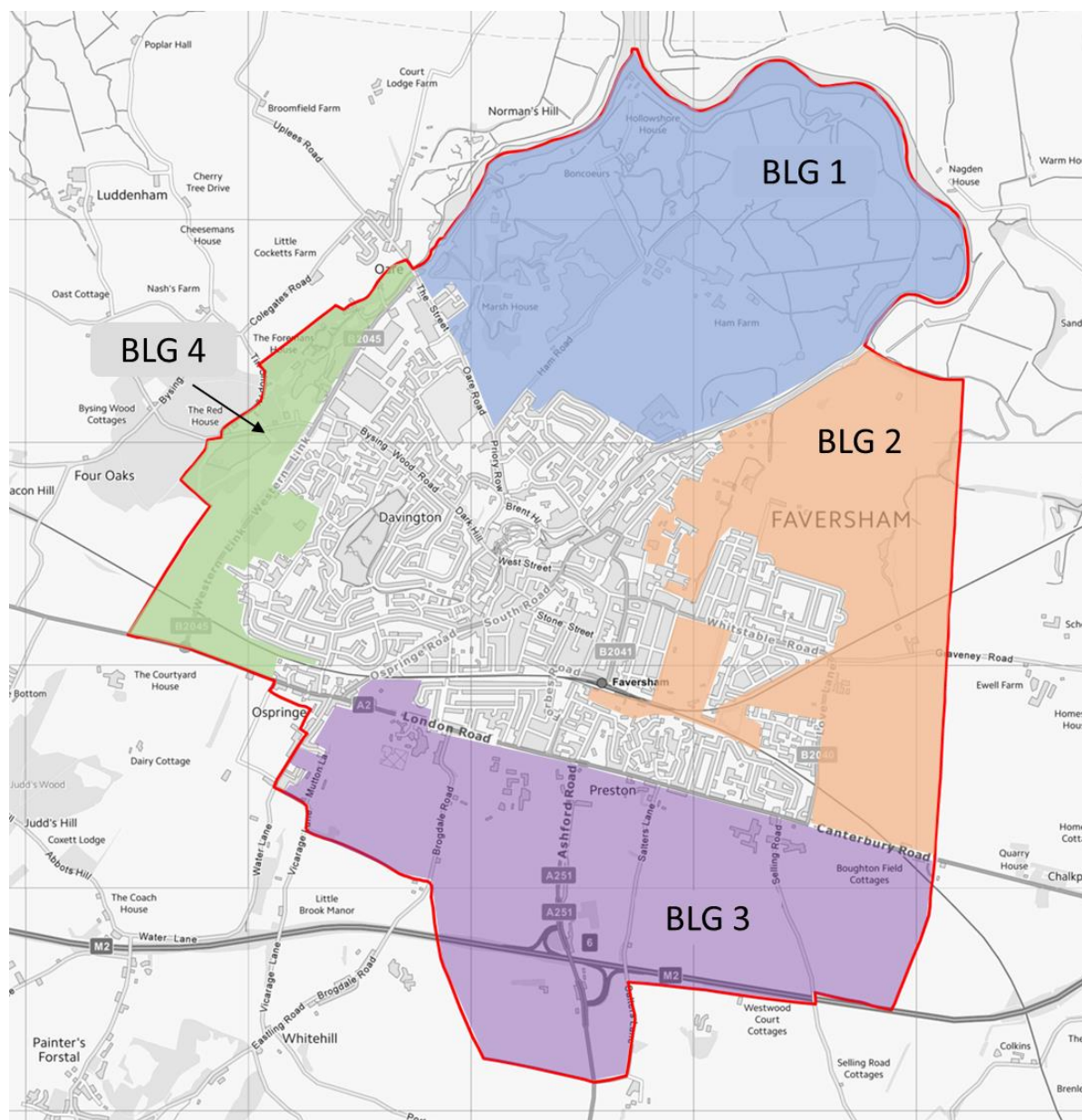


Figure NTS2: BLGs within the neighbourhood area

For each BLG, the SEA has considered the potential constraints and opportunities associated with delivering new homes in these locations. Informed by the SEA topics which have been scoped into the assessment (as explained within **Chapter 3** of this Environmental Report), the appraisal findings are presented as a commentary of effects. The full appraisal results are presented in **Chapter 4** within the main body of the Environmental Report, with a summary of the appraisal findings as follows.

Overall, all four BLGs present a combination of constraints and opportunities which are unique to their location and setting. However, it could be argued that BLG 2 is slightly less constrained than the other three BLGs, as it is only likely to have adverse impacts with respect to three SEA topics: air quality, biodiversity, and historic environment. Meanwhile, BLG 1 and 3 are likely to have adverse impacts with respect to four SEA topics, whilst BLG 4 is likely to have adverse impacts with respect to five SEA topics.

Whilst air quality is a constraint for BLG 2, 3 and 4, it is arguable the biggest issue for BLG 3 as it is the only BLG that intersects with the AQMA on the A2. This BLG

also has the longest boundary with the A2, meaning that a large proportion of development in this area is likely to require access of the A2.

BLG 1, 2 and 3 are all constrained in terms of biodiversity due to varying degrees of overlap with The Swale SPA/ Ramsar/ SSSI. However, BLG 1 is by far the most heavily constrained by the internationally and nationally designated site for biodiversity, which covers over half of the area of this BLG.

Climate change, specifically climate change adaptation, is a significant constraint for both BLG 1 and 4 as both BLGs contain significant areas within Flood Zone 2/ 3. Whilst BLG 2 also contains areas with Flood Zone 2/ 3, these areas are not so widespread as they are in BLG 1 and 4.

Whilst all four BLGs will have some impact on the surrounding landscape, BLG 3 is the most heavily constrained due to its proximity to the Kent Downs AONB. BLG 4 is also constrained with respect to this SEA topic as it contains a significant areas of deciduous woodland, a BAP priority habitat.

All four BLGs contain heritage assets, and in this respect, they are all constrained by the historic environment to some extent. However, it could be argued that BLG 4 is particularly constrained as it contains a large scheduled monument which covers approximately one quarter of the area of the BLG.

In terms of land, soil, and water resources, only BLG 3 is considered to be significantly constrained. This is because it intersects with a large SPZ. In this respect, development in this location has potential to impact groundwater sources, however the protection provided by this designation is noted.

Only BLG 4 is considered to be heavily constrained in terms of the community wellbeing SEA topic. This is because the centre of the BLG is located furthest from Faversham town centre, including the train station, which many residents utilise to access employment opportunities further afield.

Despite these constraints, some of these BLGs have notable opportunities associated with them. Whilst all BLGs perform well in terms of their ability to meet the identified housing need of the neighbourhood area, BLG 2 performs particularly well as it is closest to Faversham town centre, including the train station. Due to this, residents are more likely to walk or cycle to access services and facilities and employment opportunities in the town centre. In this respect, it also performs well concerning the transportation SEA topic.

In addition to the above, BLG 1 performs well by locating development away from the AQMA on the A2, and associated congestion, and the Kent Downs AONB. Meanwhile, BLG 3 performs well by locating development away from The Swale SPA/ Ramsar/ SSSI and associated fluvial flood risk, with only a small area along the BLGs western boundary being within Flood Zone 3. Whilst the western part of BLG 2, which extends into the built-up area of Faversham, intersects with the conservation area and some heritage assets, the remainder of the BLG is relatively unconstrained in terms of the historic environment.

Appraisal of options for the focus of development within the neighbourhood area (greenfield or brownfield site options)

With respect to the potential focus areas for delivering new homes, the SEA appraisal findings presented above highlight that all four BLGs have constraints to development which would need to be appropriately considered and addressed if proposals were brought forward in these locations.

In recognition of the availability of brownfield site options within the neighbourhood area (shown in **Figure NTS1** above and discussed in further detail within the site assessment report) and considering that most of the greenfield site options are within the four BLGs, the SEA has considered the relative sustainability merits of taking forward a greenfield first or a brownfield first approach to development.

The options are as follows:

- **Option A:** take a greenfield first approach to delivering new development within the neighbourhood area.
- **Option B:** take a brownfield first approach to delivering new development within the neighbourhood area.

Approach to the options appraisal process

The options have been considered against the SEA Framework of objectives and assessment questions developed at SEA scoping. The following information is presented:

- A description of the options appraised (as presented above).
- A rankings diagram showing the sustainability performance of each option with respect to each SEA topic to highlight their relative sustainability merits, with '1' the most favourable ranking as shown by the 'green' shaded areas on the diagram, and '2' the least favourable ranking as shown by the 'red' shaded areas on the diagram. Each SEA topic is represented by an icon on the rankings diagram, for ease of identification; and
- An overview of the likely significant effects (both positive, and negative) of each option. The positive impacts are presented in the 'green' shaded areas on the likely significant effects diagram, and the negative impacts are presented in the 'red' shaded areas on the likely significant effects diagram. The number of positive 'stars' and negative 'exclamation marks' within each shaded area represents the potential impact of the likely significant effects (i.e., minor, moderate, or major).

The full appraisal findings (including the rankings diagrams and the likely significant effects diagrams) are presented in **Chapter 4** within the main body of this Environmental Report. A summary of the appraisal findings is presented below.

Summary of appraisal findings

Overall, Option B performs more favourably than Option A, and is ranked the highest under each SEA topic, with the exception of air quality, where uncertainty is noted for both options. The results of the appraisal, organised by SEA topic, are discussed in more detail below.

In terms of air quality, whilst Option A could deliver growth at greenfield sites to the north of the town, away from the existing AQMA on the A2, this would also increase the likelihood of localised air quality issues and congestion. However, it is noted that many of the available greenfield sites are located to the east and south of the town, with potential to exacerbate air quality issues. Furthermore, greenfield development is more likely to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues. Meanwhile, brownfield development through Option B will deliver growth closer to services and facilities and public transport hubs in the centre of Faversham, reducing the likelihood of residents driving to meet their needs, with positive implications for air quality. In addition to this, Option B could deliver green infrastructure at brownfield sites which currently lack this, with potential to improve air quality. Nevertheless, it is also recognised that Option B has potential to contribute to air quality issues and congestion in the town centre if residents chose to drive. Hence, uncertainty is noted for both options.

Regarding biodiversity, greenfield development through Option A has potential to lead to the loss of key landscape features of biodiversity value over a large area and has the potential to disrupt existing ecological corridors. However, it is noted that Option A will still be required to deliver biodiversity net gain and has potential to deliver more coordinated green infrastructure enhancements through the design of schemes, linking with existing green and blue corridors within the neighbourhood area. Conversely, Option B has potential to improve biodiversity at brownfield sites with little to no existing biodiversity value, which will likely be delivered due to the requirement to deliver biodiversity net gain. In addition to this, key areas of biodiversity value are largely located outside of the town centre, and in this respect, development at brownfield sites is less likely to have adverse impacts on internationally and nationally designated sites for biodiversity. Therefore, Option B is ranked more favourably than Option A.

In terms of climate change mitigation, Option A has potential to deliver more coordinated infrastructure, due to the larger size of available greenfield sites, including decentralised energy and active travel infrastructure, contributing to a reduction in operational emissions. However, Option A is also likely to lead to a higher dependency on the private car to access services and facilities and employment opportunities in the town centre as most of the greenfield sites are located outside of the town. Meanwhile, brownfield development through Option B has potential to reduce the emissions associated with infrastructure delivery by encouraging development within the most accessible locations in the neighbourhood area, in proximity to local public transport networks. In addition to this, Option B provides opportunities to enhance the resilience of the existing built-up area of Faversham to the effects of climate change through the delivery of green infrastructure as part of scheme design (i.e., integrating sustainable drainage to tackle surface water run-off issues). Option B is also likely to lead a higher uptake of active travel and public transport as it is located close to existing footpaths, cycleways, and public transport nodes. Due to this, Option B is ranked more favourably than Option A.

Regarding landscape, greenfield development through Option A has potential to negatively impact landscape character, especially in relation to the Kent Downs AONB, by reducing the amount of open countryside surrounding the town, which contributes to the setting and feel of the town. Issues are likely to be more pronounced to the south of the town and the M2, which is approximately 250 metres from the AONB boundary, or within areas of high landscape sensitivity as defined

within the Swale Landscape Sensitivity Assessment. Conversely, Option B will safeguard the open countryside surrounding the town from inappropriate development, maintaining important views, and protecting the integrity of the AONB and areas of high landscape sensitivity. Also, Option B, through encouraging development on potentially underutilised areas of brownfield land, has the potential to positively contribute to townscape character and enhance the quality of the public realm. However, this is dependent on the design of the schemes which come forward. Nonetheless, Option B performs more favourably with respect to this SEA topic.

With respect to the historic environment, greenfield development through Option A is more likely to locate development away from Faversham Conservation Area and associated heritage assets and performs well in this respect. However, it is noted that large-scale greenfield development will also impact views into/ out of the town, with potential to negatively impact the setting and significance of the conservation area. Meanwhile, brownfield development through Option B has a greater potential to impact the setting of the conservation area and associated heritage assets within the existing built-up area of Faversham. Nevertheless, brownfield development also provides opportunities to enhance the local townscape character, including the setting of heritage assets, through high-quality redevelopment of sites that may currently be detracting from heritage assets. However, this is dependent on the design of schemes. In light of this, Option B is the preferable option.

In terms of land, soil and water resources, greenfield development through Option A will lead to the permanent loss of greenfield land, including BMV agricultural land, which cannot be mitigated. Conversely, brownfield development through Option B supports the efficient use of land through the reuse of existing structures, whilst rejuvenating previously developed land. Option B also has potential to lead to medium to long-term improvements to water quality and surface water drainage through SuDS. However, it is noted that brownfield development is more likely to involve ground contamination and associated remediation works, which may reduce the viability of bringing forward development at these locations. Nevertheless, development provides an opportunity to improve soil quality at these sites, which can be seen as a positive. In this respect, Option B is ranked highest.

In terms of community wellbeing, development on greenfield land surrounding the town is likely to support the delivery of relatively large schemes which could offer a wide range of housing types and tenures, including affordable homes. It is recognised that larger greenfield sites also have the potential to generate significant contributions for community infrastructure enhancements, which is more readily achievable through Option A. Furthermore, greenfield development at the settlement edge provides easier access to the surrounding countryside, with positive impacts on the health and wellbeing of residents. Meanwhile, brownfield development through Option B delivers development in areas accessible to existing services and facilities and employment opportunities, supporting their use. Moreover, brownfield development has potential to enhance the quality of the public realm and improve the satisfaction of residents with their neighbourhoods. The significance of the opportunities associated with larger greenfield sites (Option A) is less relevant in the context of this neighbourhood plan, as 1) greenfield sites are coming forward through the emerging Local Plan as strategic site allocations, and 2) a key focus of the neighbourhood plan is to regenerate and rejuvenate the town centre environment. In this respect, Option B is ranked highest.

Finally, in terms of transportation, Option B is ranked more favourably than Option A as it would facilitate development in the existing built-up area of Faversham, close to existing active travel and public transport networks. Whilst the potential for Option A to deliver new infrastructure, including footpaths, cycleways, and connections to the existing bus network, is recognised, this is more readily achievable through Option B.

Appraisal of options for managing the impact of development within the conservation area

Within the site assessment report, heritage considerations are recognised as a key constraint to development, and the primary reason behind the 'amber' rating for some of the sites. This is particularly the case for sites within the town centre which overlap with conservation area boundaries. In this respect, it is acknowledged that some of the site options, in their current form, contribute to the significance of the conservation area. This includes (but is not limited to) in terms of visual amenity, framing nearby listed buildings and providing views to key locations within the conservation area (i.e., Faversham Creek).

In the context of the above and recognising that the Neighbourhood Plan may take a brownfield first approach to delivering new development, the SEA has considered options for managing the impacts of development within the conservation area. This is primarily linked to 1) the significance of the conservation area and the number of available site options within its boundaries (as discussed above), 2) a key focus of the Neighbourhood Plan which is to protect the significance of the historic core of the town (including the Faversham Creek), and 3) the absence of an up-to-date conservation area appraisal which does not necessarily reflect the most current threats to the conservation area (which the Steering Group identify as being linked to the erosion of the heritage significance associated with new development).

The SEA has considered the relative sustainability merits associated with the following options with respect to managing the impacts of development within the conservation area:

- **Option A:** take a policy approach which limits building heights within the conservation area.
- **Option B:** do not take a policy approach which limits building heights within the conservation area.

The full appraisal findings are presented in **Chapter 4** within the main body of this Environmental Report. A summary of the appraisal findings is presented below.

Summary of appraisal findings

Overall, Option B performs slightly more favourably than Option A, however both options have their own merits with respect to certain SEA topics. Option B is ranked highest under the climate change, land, soil and water resources, and transportation SEA topics. Option A is ranked highest under the landscape and townscape and historic environment SEA topics, which are arguably particularly important SEA topics with respect to Faversham. Uncertainty is noted under the air quality and community wellbeing SEA topics, whilst no significant effects are anticipated for the biodiversity and geodiversity SEA topic as this topic is not deemed to be impacted by incremental changes in building height. The results of the appraisal, organised by SEA topic, are further discussed below.

In terms of air quality, limiting building heights through Option A is considered less likely to lead to isolated air quality issues and congestion due to the capacity for fewer residents at each site. Conversely, Option B is more likely to lead to isolated air quality issues and congestion as tall buildings can accommodate more residents, increasing the number of vehicles used in proximity of the site. In addition to this, tall buildings are more likely to limit air ventilation on streets, trapping pollutants, with negative health implications for pedestrians. However, it is noted that by not restricting building heights, Option B has the potential to deliver more housing within proximity to public transport networks, which will, in turn, limit the amount of greenfield land lost to development (and the loss of natural features which absorb pollutants). In this respect, uncertainty is noted for both options.

As mentioned above, no significant effects are anticipated for the biodiversity and geodiversity SEA topic as this topic is not deemed to be impacted by incremental changes in building height.

With respect to climate change mitigation, limiting building heights through Option A will deliver lower density development, increasing emissions on a per capita basis. Conversely, Option B will deliver high density development, limiting emissions on a per capita basis. No significant effects are anticipated in terms of climate change adaptation as a result of limited building heights. In light of this, Option B is ranked more favourably than Option A.

Regarding townscape character, limiting building heights through Option A is considered to protect the character and setting of the town by ensure new buildings remain in keeping with existing buildings. Option A is also more likely to enhance the quality of the streetscape by integrating new development with existing buildings. Conversely, Option B has a greater potential to negatively impact the surrounding townscape due to the imposing presence associated with taller buildings. Option B also has a greater potential to impact key views into/ out of the town as taller buildings are more likely to obscure existing views. Taller buildings are also more likely to negatively impact the streetscape as they make streets feel more enclosed. Considering these points, Option A is ranked more favourably than Option B.

In terms of the historic environment, limiting building heights through Option A is more likely to protect the setting of Faversham Conservation Area and associated heritage assets. This is because, according to the Faversham Conservation Area Character Appraisal, the majority of the buildings found within the conservation area range from single to three stories. Therefore, limiting the height of buildings within new development at certain locations will ensure that they are in keeping with existing buildings nearby, preserving their historic significance. The Character Appraisal also stresses the importance of views out of/ in to heritage assets within the conservation area, which will be conserved by limiting building heights. Conversely, Option B has a greater potential to negatively impact the setting of the conservation area and associated heritage assets by delivering buildings that are not in keeping with existing buildings, with a greater potential to block important views out of/ in to heritage assets. In this respect, Option A is ranked more favourably than Option B.

Regarding land, soil and water resources, Option B is ranked more favourably than Option A as by not limited building heights, less land will be required to meet the identified housing need. This will reduce the loss of greenfield/ BMV land and is less likely to negatively impact water resources as the total area of hard surfaces is likely to be reduced.

In terms of community wellbeing, limiting building heights through Option A is more likely to support social inclusion as residents will feel more connected to their surrounding environment. Option A is also less likely to negatively impact the surrounding environment for existing residents, and more likely to support continued tourism by maintaining the existing character of the town, which is a key contributor to the visitor economy. However, limiting building heights reduces the potential of this option to deliver more homes in the most accessible locations to services and facilities in the neighbourhood area. In addition to this, Option A has the potential to reduce footfall on streets due to the capacity for fewer residents in sites located in the town centre. Conversely, Option B has a greater potential to deliver additional community and employment uses through mixed-use development. Option B is also more likely to incorporate active frontages on the ground floor of buildings, making streets feel safer for pedestrians. However, residents are more likely to feel isolated and alienated from the surrounding environment when living in taller buildings. Taller buildings also have a greater potential to negatively impact existing residents' surrounding environment, including blocking out light, leading to minor significant negative effects. In light of the reasons presented above, uncertainty is noted for both options.

Finally, in terms of transportation, Option B is ranked more favourable than Option A as fewer sites will be required to meet the identified housing need, meaning that more residents will be able to live close to the town centre where existing services and facilities, employment opportunities and public transport hubs are located. Due to this, a higher number of residents will likely walk or cycle to undertake day-to-day activities within the neighbourhood area.

Developing the preferred approach

Preferred approach in light of the appraisal findings

The preferred approach has been informed by the findings of the site assessments undertaken for the FNP, community consultation events, and the SEA findings presented above. Specifically, the Regulation 14 version of the FNP takes a brownfield-first approach to development within the town centre environment, encouraging a limitation of building heights within the conservation area (where appropriate) to retain and protect the significant contribution that the sites make to the conservation area.

It is anticipated that the limitation of building heights will be considered on a site-by-site basis, following an understanding of the contribution that the sites make to its heritage significance. The SEA recommends that each site allocation is accompanied by a proportionate heritage assessment at the planning application stage to determine the potential impacts of the proposal to the historic environment. This is further discussed within the plan appraisal presented in **Chapter 5** of this Environmental Report.

The Steering Group confirm that the following factors were also prioritised during the identification of site allocations. Specifically, sites should:

- *Have no adverse impact to the setting of existing designated and non-designated heritage assets.*
- *Stimulate economic regeneration through sensitive and sustainable mixed-use development.*

- *Encourage the sustainable reuse of previously developed land.*
- *Have the least environmental or amenity value and avoid development on existing agricultural land.*
- *Have the potential for community economic, social, and environmental gain.*
- *Fall within the existing ‘built-up’ boundary of Faversham.*
- *Be small and medium-sized (up to 1 hectare in size).”*

Choice of sites taken forward as allocations within the Neighbourhood Plan

The FNP allocates 16 brownfield sites within the town. The Town Council (and Steering Group) are also committed to working with Swale Borough Council to identify additional suitable locations for development in the town.

The site allocations are listed below in **Table NTS1** and are further discussed within the plan appraisal section in **Chapter 5** within the Environmental Report.

Table NTS1: Site options taken forward as Neighbourhood Plan allocations

Site ref.	Location	Area (ha)	Current land use	Proposed use
FNP1	Land at New Creek Road	0.15	Industrial building and associated parking	Mixed-use
FNP3	Buildings between Abbey Street and Belvedere Road	0.21	Brownfield	Mixed-use
FNP4	Kiln Court and Osborne Court	2.74	Brownfield – former care home facilities	Residential or hybrid scheme
FNP5	Beaumont Davey Close, Off Ashford Road	0.42	Residential	Residential
FNP10	The Railway Yard, Station Road	0.73	Residential	Residential
FNP11	Chaff House, Junction of Conduit Street/ Bridge Road	0.06	Brownfield	Residential
FNP12	Former White Horse Car Park site, North Lane	0.08	Car Park	Residential
FNP13	Rear access land to Market Inn	0.02	Rear garden	Residential
FNP15	BMM Weston Ltd FNP1b Land at Brent Road	0.09	Redundant factory accommodation	Residential
FNP16	BMM Weston Ltd FNP1c Land at Brent Road	0.16	Redundant factory accommodation	Residential
FNP17	BMM Weston Ltd Parcel 2 Land at Brent Road	1.00	Offices within large grounds with parking	Residential
FNP18	BMM Weston Ltd Parcel 3 Land at Brent Road	0.38	Car park	Residential and commercial
CNP2	Ordnance Wharf	0.1	Former factory site, disused	Mixed-use

Site ref.	Location	Area (ha)	Current land use	Proposed use
CNP3	Former Coach Depot	0.1	Light industrial/ mechanics garage	Mixed-use
18/029	Swan Quay	0.25	Brownfield	Mixed-use
18/079	Queen Court Farmyard, Water Lane	1.7	Farmyard	Residential

The following site options, despite comprising brownfield land and receiving an amber or green rating within the site assessment process, have not been taken forward as allocations within the FNP:

- Site 18/068 – this site contains one building (i.e., partially brownfield), however it is primarily an area greenfield land.
- Site 18/078 – this site is entirely brownfield land; however, it was withdrawn by the landowner and is therefore no longer available.
- Site 18/108 – this site contains one building (i.e., partially brownfield), however it is primarily an area greenfield land; it is also adjacent to Bysing Wood, which is a Biodiversity Action Plan (BAP) priority habitat (deciduous woodland) and therefore sensitive to disturbance from development.
- Site 18/194 – this site is entirely greenfield land and was only given brownfield status due to its use as a former school ground.
- Site 18/203 – this site is entirely brownfield land; however, the Steering Group have highlighted that it is an important local heritage asset; the existing commercial/ warehouse-style buildings have evolved over time to hospitality/ commercial/ retail units and have become a visitor destination.

The FNP has taken a pro-active approach in identifying and allocating many of the available brownfield sites within the town centre to meet local housing requirements. In this respect, the FNP has a strong aspiration and focus to revitalise the town centre environment by facilitating the delivery of high-quality design through the regeneration of previously developed land.

In the wider context, there are several larger greenfield site options surrounding the town which are currently being considered by Swale Borough Council as potential strategic-scale allocations within the emerging Local Plan. It is anticipated that the strategic-scale allocations will deliver the 3,500 new homes for the wider Faversham area, positively contributing towards local needs alongside the delivery of new community assets and infrastructure.

Appraisal of the Regulation 14 version of the Faversham Neighbourhood Plan

The Regulation 14 version of the FNP presents 29 planning policies for guiding development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the Regulation 14 version of the FNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the

Regulation 14 version of the FNP. The Environmental Report has presented the findings of the assessment under the following SEA topics:

- Air Quality.
- Biodiversity and Geodiversity.
- Climate Change.
- Landscape.
- Historic Environment.
- Land, Soil, and Water Resources.
- Community Wellbeing; and
- Transportation.

The assessment has concluded that the Regulation 14 version of the FNP is likely to have significant positive effects in relation to the 'Community Wellbeing' SEA topic through delivering housing which contributes towards local needs, by supporting accessibility to services and facilities, enhancing community facilities, and through promoting the regeneration of the town centre environment. This will support social inclusion, the quality of life of residents, and community vitality. Positive effects in relation to the 'Community Wellbeing' SEA topic are also linked to the Plan's promotion of green and blue infrastructure enhancements and encouragement of healthier modes of travel.

The FNP has taken a pro-active approach in identifying and allocating many of the available brownfield sites within the town centre to meet local housing requirements. The Town Council (and Steering Group) are also committed to working with Swale Borough Council to identify additional suitable locations for development in the town.

The FNP is also likely to lead to positive effects in relation to the 'Landscape and Townscape' and 'Land, Soil and Water Resources' SEA topics. These benefits largely relate to the Neighbourhood Plan's emphasis on allocating sites in the existing built-up area of Faversham (i.e., taking a brownfield-first approach to allocating sites), which provides opportunities to enhance the townscape through incorporating high-quality and sensitive design through new development proposals. Importantly, greenfield land surrounding the town is provided with a measure of protection in sensitive locations through the plan's proposals. Policies and proposals within the FNP seek to protect and enhance the relationship between the natural and built environment (i.e., between the town and the open countryside), helping to safeguard the open countryside from inappropriate development.

In relation to the 'Historic Environment' SEA topic, the FNP includes several measures which seek to conserve and enhance both designated and non-designated heritage assets (and their settings). This should help ensure that the design of any new development is in keeping with the existing character and feel of Faversham and the wider neighbourhood area. Additionally, a key focus of the FNP is to rejuvenate the town centre and protect the heritage significance of the conservation area and key areas of the town (including Faversham Creek). The spatial strategy has potential to bring high-quality and sympathetic redevelopment/regeneration of brownfield sites in the built-up area of the town. However, it is noted that this is largely dependent on the design and layout of sites, which has not been confirmed yet. In this respect, **the SEA recommends** that the wording of the site-

specific policies is enhanced to encourage development proposals to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas. This will ensure that appropriate mitigation is provided to assuage any concerns by Historic England.

Additionally, the FNP will bring positive effects in relation to the 'Biodiversity and Geodiversity' SEA topic through seeking to retain and enhance ecological networks through the design of new development areas, in addition to encouraging net gains. Alongside, the allocation of sites within the existing built-up area of Faversham will facilitate development at further distance from designated sites for biodiversity (most of which are located to the north of the town) and on brownfield land which is likely to have a low biodiversity value in its current form. However, given the approaches taken forward through the FNP will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are less likely to comprise significant positive effects overall. Within the HRA, several recommendations in the form of additional policy wording have been made to ensure that adequate mitigation measures are delivered by developers at the planning application stage. Providing that the recommended mitigation measures within the HRA are appropriately reflected within the FNP, no adverse impacts on the integrity of internationally designated sites are expected as a result of the policies and proposals within the FNP.

Regarding the 'Climate Change' SEA topic, the policy framework of the FNP seeks to deliver sustainable design, local renewable energy schemes and sustainable transport, which will help to minimise the emissions associated with development in the neighbourhood area. Whilst the policy framework also gives due consideration to climate change adaptation, particularly regarding flood risk, several of the site allocations are within or within proximity to areas of Flood Zone 3. In this respect, the FNP requires flood risk assessments as part of any planning applications on these sites to identify and address any concerns. As the sites are existing brownfield sites, it is also acknowledged that the regeneration of currently underutilised areas within the town centre environment also has the potential to incorporate adaptation measures. However, this is dependent on the extent to which these adaptation measures are incorporated into the design of the schemes.

The Neighbourhood Plan will also initiate several beneficial approaches regarding the 'Transportation' and 'Air Quality' SEA topics, given its focus on enhancing the active travel network, including public rights of way and cycle routes, and encouraging sustainable modes of transportation.

Next steps

This SEA Environmental Report accompanies the FNP for Regulation 14 consultation. Following the close of Regulation 14 consultation, any representations made will be considered by the Steering Group, and the FNP and Environmental Report will be updated as necessary. The updated and final version of the SEA Environmental Report will then accompany the FNP for submission to the Local Planning Authority, Swale Borough Council, for subsequent Independent Examination.

At Independent Examination, the FNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the FNP will be subject to a referendum, organised by Swale Borough Council. If more than 50% of those who vote agree with the FNP, then it will be 'made'. Once made, the FNP will become part of the Development Plan for the town.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the FNP to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the FNP will be undertaken by Swale Borough Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the FNP that would warrant more stringent monitoring over and above that already undertaken by Swale Borough Council.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Faversham Neighbourhood Plan (hereafter referred to as the 'FNP').
- 1.2 The Faversham Neighbourhood Plan is being prepared under the Localism Act 2011⁷ and the Neighbourhood Planning (General) Regulations 2012⁸, and in the context of the Swale Borough Local Plan, also known as 'Bearing Fruits 2031', which was adopted in July 2017.⁹ Due regard is also given to the emerging Local Plan Review¹⁰. The key information relating to the FNP is presented in **Table 1.1** below and the neighbourhood area is depicted in **Figure 1.1** overleaf.

Table 1.1 Key information relating to the Faversham Neighbourhood Plan

Name of Responsible Authority	Faversham Town Council
Title of Plan	Faversham Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	The Faversham Neighbourhood Plan will be used to guide and shape development within the neighbourhood plan.
Timescale	2022 to 2038
Area covered by the plan	Administrative boundary of Faversham (Figure 1.1)
Summary of content	The Faversham Neighbourhood Plan will set out a vision, strategy, and range of policies for the neighbourhood area.
Plan contact points	Adrienne Begent, Clerk, Faversham Town Council Email: adrienne.begent@favershamtowncouncil.gov.uk John Irwin, Town Councillor and Steering Group Chair Email: john.irwin@favershamtowncouncil.gov.uk

⁷ UK Government (2011): 'Localism Act 2011', [online] available to access via [this link](#)

⁸ UK Government (2012): 'The Neighbourhood Planning (General) Regulations 2012', [online] available to access via [this link](#)

⁹ Swale Borough Council (2017): 'Bearing Fruits 2031 The Swale Borough Local Plan', [online] available to access via [this link](#)

¹⁰ Swale Borough Council (2022): 'Local Plan Review', [online] available to access via [this link](#)

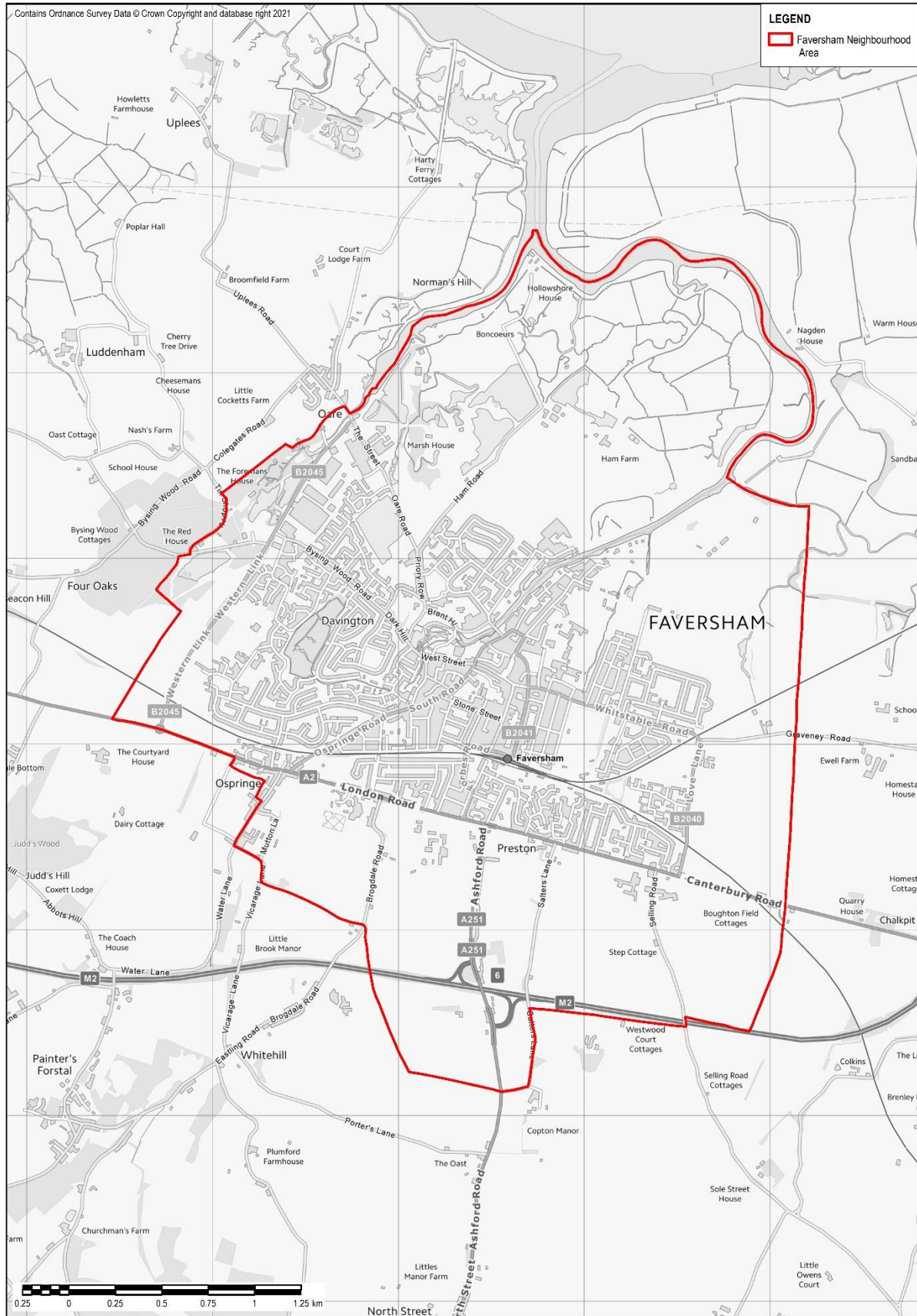


Figure 1.1 The boundary of the Faversham neighbourhood area

SEA screening for the Faversham Neighbourhood Plan

- 1.3 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if both the following apply:
1. the Neighbourhood Plan is being prepared within a neighbourhood area with significant environmental constraints, such as, for example, Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI), or large concentrations of heritage assets; and
 2. the Neighbourhood Plan is likely to allocate sites for development.¹¹
- 1.4 In July 2022, Swale Borough Council advised that in their view an SEA process was likely to be required for the Faversham Neighbourhood Plan. This was given the environmental constraints present in the neighbourhood area and the Council's view that the Neighbourhood Plan (as consulted on) allocated land for development in sensitive locations.
- 1.5 In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

SEA explained

- 1.6 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.7 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the Faversham Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.
- 1.8 Two key procedural requirements of the SEA Regulations are that:
- i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues.
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e. the draft Faversham Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

¹¹ DLUHC (February 2022): Chief Planner's Newsletter, February 2022 "Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening" accessible [here](#)

Structure of this Environmental Report

1.9 This Environmental Report sets out the following:

- The Local Plan context and vision for the FNP.
- The results of SEA Scoping, including consultation responses (and how these have been considered in the Environment Report), key sustainability issues (organised by SEA topic), and the finalised SEA Framework.
- Consideration of reasonable alternatives for the FNP, including appraisal findings and identification of the preferred approach.
- Appraisal of the Regulation 14 version of the FNP.
- The next steps, including plan finalisation and monitoring.

2. Local Plan context and vision for the Faversham Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 The FNP is being prepared in the context of the Swale Borough Local Plan, also known as 'Bearing Fruits 2031', which was adopted July 2017¹². Since the Local Plan was adopted, the Council have been preparing a Local Plan Review (LPR), which will set out the planning framework for the borough for the period up to 2038.¹³ The LPR will cover issues such as housing provision, the economy, retail and town centres, infrastructure provision and the environment. It will also set out policies by which planning applications will be determined, in addition to allocating land for housing, employment and other uses.
- 2.2 The LPR has provided a housing target of 3,500 for the wider Faversham area (including several strategic allocations), which includes a housing target of 200 homes for the neighbourhood area. A further 19 homes have been added to this target from an unmet need in the Faversham Creek Neighbourhood Plan (which is included in the neighbourhood area of the FNP). Therefore, the housing target for the neighbourhood area totals 219 homes. Recent engagement between the neighbourhood group and Swale Borough Council indicate that this target can be considered as a minimum figure.
- 2.3 The Regulation 19 version of the LPR, which went out for consultation between February and April 2021, was withdrawn by the Local Planning Authority (LPA). A new Regulation 18 'Issues and Preferred Options' consultation document went out for consultation between October and November 2021. During this consultation, the Council sought the public's views on development strategy options and possible policy approaches.
- 2.4 According to the Swale Local Development Scheme (2022)¹⁴, which sets out a timetable for preparing the LPR, the LPR will be submitted for examination between February and March 2023. Subsequent to examination, the LPR is due to be adopted in early 2024.

Aims of the Neighbourhood Plan

- 2.5 The FNP has the following aims, informed by community engagement:
 - To promote the vitality and viability of Faversham town centre as a resource for local people and visitors.
 - To support sustainable housing growth to meet the diverse needs of the local community.
 - To create more sustainable live-work patterns, based on neighbourhoods with residential, employment and community facilities in easy walking distance.
 - To promote sustainable transport, cycling and walking.

¹² Swale Borough Council (2017): 'Bearing Fruits 2031 The Swale Borough Local Plan', [online] available to access via [this link](#)

¹³ Swale Borough Council (no date): 'Local Plan Review', [online] available to access via [this link](#)

¹⁴ Ibid.

- To protect Faversham's green spaces and natural environments and ensure environmental quality.
- To promote sustainable design, to complement Faversham's locally distinctiveness and sense of place.
- To preserve or enhance Faversham's heritage and promote heritage-led economic development.

3. What is the scope of the SEA?

Summary of SEA scoping

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives.
- 3.2 Further information, including the context review and baseline information that has supported the development of key sustainability issues and objectives, is presented in **Appendix A**.

Consultation

- 3.3 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”.
- 3.4 In England, the consultation bodies are the Environment Agency, Historic England, and Natural England¹⁵. These authorities were consulted in September – October 2022, alongside the Kent Downs AONB.
- 3.5 The responses received from the Environment Agency and Natural England are detailed in **Table 3.1** below. No responses were received from Historic England or the Kent Downs AONB.

Table 3.1 Scoping consultation responses

Consultation response	How the response was considered and addressed
<p>Environment Agency Planning Advisor (email response received on 29th September 2022)</p>	
<p>As there is a main river (the Swale) running through part of Faversham, we would normally review this scoping report as part of our statutory duties to Local Planning Authorities. However, as this was sent to us directly by yourselves, a private company, we cannot review this in detail without charging for our time. The attached guide will provide you with useful information on what to consider when preparing an Environmental Impact Assessment, within the remit of the Environment Agency.</p>	<p>Comment noted. Attached document relevant to Environmental Impact Assessment rather than SEA. However, the guide has been a useful source of reference during the SEA process.</p>
<p>Natural England Consultations Team (email response received on 27th October 2022)</p>	
<p>At this time, Natural England is not able to fully assess the potential impacts of this plan on statutory nature conservation sites or protected landscapes or, provide detailed advice in relation to this consultation. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice.</p>	<p>Comment noted. Potential impacts to protected landscapes and nature conservation sites has been considered through the appraisal of the Neighbourhood Plan’s policies and proposals. This is presented in Chapter 4 and</p>

¹⁵ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

Consultation response

How the response was considered and addressed

The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the deciding authority to determine whether or not the plan is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the impacts of the plan on the natural environment to assist the decision-making process.

Chapter 5 within the Environmental Report.

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

Comment noted. SEA Screening has been undertaken for the Neighbourhood Plan, confirming the requirement for SEA. This is further discussed within Chapter 1 of this Environmental Report.

- A neighbourhood plan allocates sites for development.
- The neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan.
- The neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result, the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/ or habitats, local wildlife sites or local landscape character, with its own ecological and/ or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/ SEA is necessary.

Comment noted. The baseline information which has informed the SEA process is presented in Appendix A within this Environmental Report. The key sustainability issues and SEA Framework is presented below, in Chapter 3.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/ SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third-party appeal against any screening decision you may make.

This SEA Environmental Report accompanies the Neighbourhood Plan for Regulation 14 consultation. Further comments from Natural England are welcomed.

Key Sustainability Issues

Air quality

- The neighbourhood area contains one Air Quality Management Area (AQMA) – AQMA No 2/ 6 Ospringe extended – which could be negatively impacted as a result of future development. Therefore, it will be important that the FNP addresses how development in proximity to this AQMA will mitigate any negative effects.
- The main pollutant of concern in the neighbourhood area is nitrogen dioxide (NO₂), which is largely linked to emissions from vehicles, particularly in areas which experience congestion. The effects of the FNP in relation to traffic and congestion will be explored further under the transportation SEA topic.

- The FNP presents opportunities to improve accessibility and support public transport and active travel. These opportunities will be explored further within the community wellbeing and transportation SEA topics.

Biodiversity and geodiversity

- Designated sites within or near the neighbourhood area that could be impacted by development include The Swale Special Protection Area (SPA), Ramsar and SSSI, South Bank of the Swale Local Nature Reserve (LNR), and Oare Marshes LNR.
- There are a variety of Biodiversity Action Plan (BAP) priority habitats located within or within proximity to the neighbourhood area, including coastal and floodplain grazing, coastal saltmarsh, mudflats, good quality semi-improved grassland, deciduous woodland, and traditional orchard.
- In terms of the national habitat network, the neighbourhood area contains areas of network enhancement zone 2, network enhancement zone 1 and restorable habitat, as well as smaller areas of habitat restoration-creation, network expansion zone and fragmentation action zone.
- In terms of priority species for Countryside Stewardship targeting, almost the entire neighbourhood area is a priority area for Lapwing and Redshank, and the northern and southern extents of the neighbourhood area are a priority area for Corn Bunting. Whilst not within the neighbourhood area, the area directly to the north of the neighbourhood area is a priority area for Curlew.

Climate change

- Swale Borough Council declared a climate and ecological emergency in June 2019. The purpose of the declaration was to draw attention to the urgent need to reverse the decline in biodiversity in Swale and to take effective action to reduce carbon emissions in the borough.
- Source data from the Department of Energy and Climate Change suggests that Swale has recorded substantially higher per capita emissions than both Kent and England since 2005. Swale has seen a 44% decrease in emissions between 2005 and 2019, which is lower than that seen for Kent (51%) but comparable to that seen for England (43%).
- The transport sector continues to be a key challenge in terms of reducing emissions. The FNP provides opportunities to guide development towards the most accessible locations in the area and require local infrastructure (including walking and cycling infrastructure) improvements where appropriate.
- The FNP should seek to maximise opportunities to support actions in tackling climate change. This may include through encouraging sustainable transport technologies, such as the use of Electric Vehicles (EVs), and using sustainable drainage systems.
- Fluvial flood risk in the neighbourhood area is linked to The Swale, and largely effects the northern extent of the neighbourhood area, whilst surface water flood risk effects small areas across the entire neighbourhood area.

Landscape and townscape

- The Kent Downs AONB lies approximately 600 metres south of the neighbourhood area. It is important that the FNP considers the impact future development will have on the AONB, including the likelihood of disturbance and/ or increased footfall.
- New development has the potential to lead to incremental change in landscape and townscape character, and visual amenity.
- In terms of landscape characterisations, the land around the built-up area of Faversham consists of Clay Farmlands (Stone Arable Farmlands), Marshland (Goodnestone Grasslands and Ham Marshes), Fruit Belt and Mixed Farmland (Faversham and Ospringe Fruit Belt), and Dry Valleys and Downs (Doddington and Newnham Dry Valleys).
- Seven distinct landscape sensitivity assessment areas have been identified around the built-up area of Faversham, the majority of which have a high landscape sensitivity.
- Three local countryside gaps have been identified between Faversham and nearby settlements, which are: Faversham and Ospringe, Faversham and Goodnestone, and Faversham and Oare.

Historic environment

- The neighbourhood area contains a wealth of designated heritage assets, including 345 listed building, four scheduled monuments, and three conservation areas.
- Swale's Heritage Strategy outlines that the Council is committed to developing a list of buildings, structures, landscape features, archaeological sites and parks and gardens of local heritage interest.
- The Kent Historic Environment Record (HER) highlights numerous non-designated heritage assets which provide local historic significance to the neighbourhood area. These sensitivities should therefore be appropriately addressed during the consideration of future growth options for the neighbourhood area.
- It will be important to ensure that future development avoids/ minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure, to the indirect benefit of heritage settings.
- It will also be important to ensure that sensitive development is brought forward in some of the key areas of historic focus within the neighbourhood area, particularly the conservation areas and Faversham Creek, with due consideration given to any appraisals or management plans for these areas.

Land, soil, and water resources

- A substantial portion of the neighbourhood area is underlain by Grade 1 (Excellent) agricultural land/ Best and Most Versatile (BMV) land. Hence, development within the neighbourhood area has the potential to result in the loss of productive agricultural land, and therefore brownfield sites should be prioritised.

- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.
- Part of the neighbourhood area falls within a Zone I (Inner Protection Zone) and Zone II (Outer Protection Zone) Source Protection Zone (SPZ). Given the protection provided by these zones, it is unlikely that any development brought forward by the FNP will have a negative impact on this SPZ.
- The neighbourhood area contains mineral safeguarding areas for sub-alluvial river terrace deposits and brickearth (Faversham – Sittingbourne Area). The latter is important for the production of yellow London stock bricks, and therefore the FNP should seek to protect this resource where possible.

Community wellbeing

- The percentage of residents in the neighbourhood area aged 65 years and older is rising, stressing a need for dwellings appropriate for the aging population, which may include bungalows and assisted living units.
- In terms of deprivation levels, the neighbourhood area contains three Lower layer Super Output Areas (LSOAs) within the 20% most deprived neighbourhoods in the country in terms of the overall IMD. In this respect, the FNP will need to address issues relating to equality and social inclusion.
- Housing affordability is a key concern for the neighbourhood area, and therefore it will be important that the FNP provides a strong policy framework that supports the delivery of affordable housing.
- There is a need for mid-sized dwellings in the neighbourhood area, which includes 3-bedroom and 2-bedroom dwellings.
- The neighbourhood area contains a good range of community assets and infrastructure, which support community vitality and the quality of life of residents. The continued availability of community assets and infrastructure essential for growth within the neighbourhood area.
- The neighbourhood area contains numerous green spaces, including 32 Local Green Space (LGS) designations. It is vital that the FNP provides a policy framework that seeks to continue to protect these important local assets.
- As the requirements of the working population continue to change, particularly in response to the Covid-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.

Transportation

- The neighbourhood area is well served by public transport and has a comprehensive active travel network. In this respect, a heavy reliance on private cars is unlikely to arise as a result of future development. Nevertheless, it is important the FNP directs growth to the most sustainable locations, near public transport nodes/ active travel routes.

- Whilst a high percentage of residents in Faversham travel to work by train, it is recognised that efforts need to be made to encourage the use of public transport, particularly buses, as the use of public transport in Faversham is just below the average for England.
- Congestion is a substantial issue in the neighbourhood area, particularly at key junctions along the M2. Whilst this issue needs to be tackled at the county level, due to the strategic nature of the road, the FNP can help contribute to reducing congestion levels by directing development to the most sustainable locations, making public transport easy to access.
- The recovery from the Covid-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) long-term. This includes an increase in home working, which tends to have a positive impact on transportation in terms of reducing congestion.

SEA Framework

Table 3.2 SEA Framework

SEA topic	SEA objective	Assessment question (will the option/ proposal help to...)
Air quality	Support objectives to improve air quality within and surrounding the neighbourhood area and minimise all sources of air pollution.	<ul style="list-style-type: none"> • Improve air quality at the AQMA in the neighbourhood area? • Implement measures (such as green infrastructure) which will help to support good air quality in the neighbourhood area? • Promote and encourage more sustainable transport options? • Enable sustainable transport infrastructure enhancements? • Encourage development which reduces the need to travel? • Ensure development connects to the existing road network, promoting ease of access and suitably mitigating any potential increases in congestion?
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> • Support the integrity of the designated sites for biodiversity located within and within proximity to the neighbourhood area? • Protect and enhance priority habitats and species? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	Reduce the contribution to climate change made by	<ul style="list-style-type: none"> • Reduce the number of journeys made by private car? • Promote the use of sustainable modes of transport including walking, cycling and public transport?

SEA topic	SEA objective	Assessment question (will the option/ proposal help to...)
	activities within the neighbourhood area.	<ul style="list-style-type: none"> • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources? • Support proposals for EV charging infrastructure?
	Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the neighbourhood area to support adaptation to the potential effects of climate change? • Sustainably manage water runoff and drainage? • Ensure the potential risks associated with climate change are considered through new development in the neighbourhood area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape and townscape	To protect and enhance the character and quality of the immediate and surrounding landscape and townscape.	<ul style="list-style-type: none"> • Seek to protect and enhance the integrity of the Kent Downs AONB? • Protect and/ or enhance local landscape and townscape character, key sensitivities, and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Protect visual amenity and locally important views in the neighbourhood area? • Retain and enhance landscape and townscape features that contribute to the rural setting of the neighbourhood area?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Conserve and enhance buildings, structures, and areas of architectural or historic interest, both designated and non-designated, and their settings? • Protect the integrity and the historic setting of key finds of heritage interest as listed in the Kent HER? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? • Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?
Land, soil, and water resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Avoid the loss of high-quality agricultural land resources? • Promote any opportunities for the use of previously developed land, or vacant/ underutilised land? • Protect the integrity of mineral resources, including mineral safeguarding areas?
	Protect and enhance water quality and use and manage water	<ul style="list-style-type: none"> • Avoid impacts on water quality? • Support improvements to water quality?

SEA topic	SEA objective	Assessment question (will the option/ proposal help to...)
	resources in a sustainable manner.	<ul style="list-style-type: none"> • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling?
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing residents?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Support the key objectives within the Swale Borough Council Transport Strategy to encourage more sustainable transport? • Encourage modal shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements? • Promote improved local connectivity and pedestrian and cyclist movement? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents and the built environment from the road network?

4. Consideration of reasonable alternatives for the FNP

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the Faversham Neighbourhood Plan.

Defining reasonable alternatives

- 4.3 Whilst work on the FNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.
- 4.4 Specifically, there is a need to explore the strategic factors that have a bearing on the establishment of reasonable alternative approaches (i.e., in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the FNP).
- 4.5 In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the Neighbourhood Plan.

Housing numbers to deliver within the neighbourhood area

- 4.6 As noted in **Chapter 2** of this report, the FNP is being prepared in the context of the Swale Borough Local Plan, also known as 'Bearing Fruits 2031', which was adopted in 2017. Since the Local Plan was adopted, the Council have been preparing a Local Plan Review (LPR), which will set out the planning framework for the borough for the period up to 2038.
- 4.7 The LPR identifies a housing target of 3,500 for the wider Faversham area (including several strategic allocations), which includes a housing target of 200 homes for the neighbourhood area. A further 19 homes have been added to this target from an unmet need in the Faversham Creek Neighbourhood Plan (which is included in the neighbourhood area of the FNP). Therefore, the housing target for the neighbourhood area totals 219 homes.
- 4.8 Recent engagement between the neighbourhood group and Swale Borough Council indicate that this target can be considered as a minimum figure.

Initial consideration of site options

4.9 Contributing to the evidence base for the FNP, an independent and objective site assessment process was completed on behalf of the Steering Group.¹⁶ A total of 49 sites were considered in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation. Sites were identified via a local ‘call for sites’¹⁷ exercise along with sites which were put forward in Swale Borough Council’s Strategic Housing Land Availability Assessment¹⁸ (SHLAA).

4.10 Following the site assessment process, a total of four sites were given a ‘green’ rating (i.e., suitable to take forward as a Neighbourhood Plan allocation). A further 27 sites were given an ‘amber’ rating (i.e., potentially suitable sites to take forward as a Neighbourhood Plan allocation, with some minor constraints to development). The sites are shown below in **Figure 4.1**. Further details can be found in the site assessment report accompanying the Regulation 14 version of the FNP.

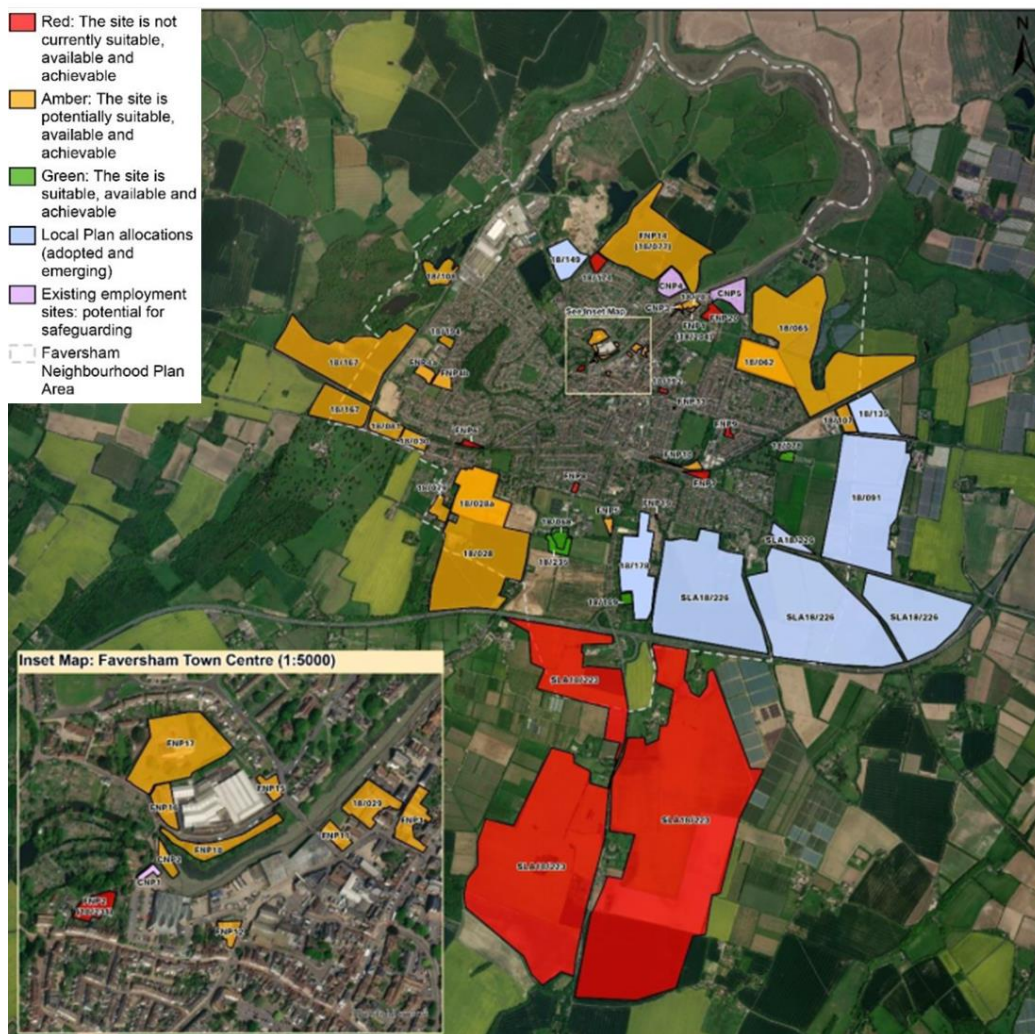


Figure 4.1: Findings of the site assessment

¹⁶ The site assessment report, prepared by AECOM in 2021, contributes to the evidence base for the FNP and accompanies the FNP at Regulation 14 consultation.

¹⁷ Faversham Town Council (2021): [Neighbourhood Plan - Call for Sites](#)

¹⁸ Swale Borough Council (2020): [SHLAA - Final Draft Report](#)

Potential locations to focus the delivery of new homes within the neighbourhood area

4.11 As shown in **Figure 4.1** above, the 31 'green' and 'amber' sites cover several locations within the neighbourhood area. In light of this, the SEA has considered the potential constraints and opportunities associated with broad locations which could be a focus for the delivery of new homes within the neighbourhood area. Following a 'points of the compass' approach, the following broad locations for growth (BLG) were identified (as shown below in **Figure 4.2**):

- **BLG 1:** Land to the north of the town.
- **BLG 2:** Land to the east of the town.
- **BLG 3:** Land to the south of the town.
- **BLG 4:** Land to the west of the town.

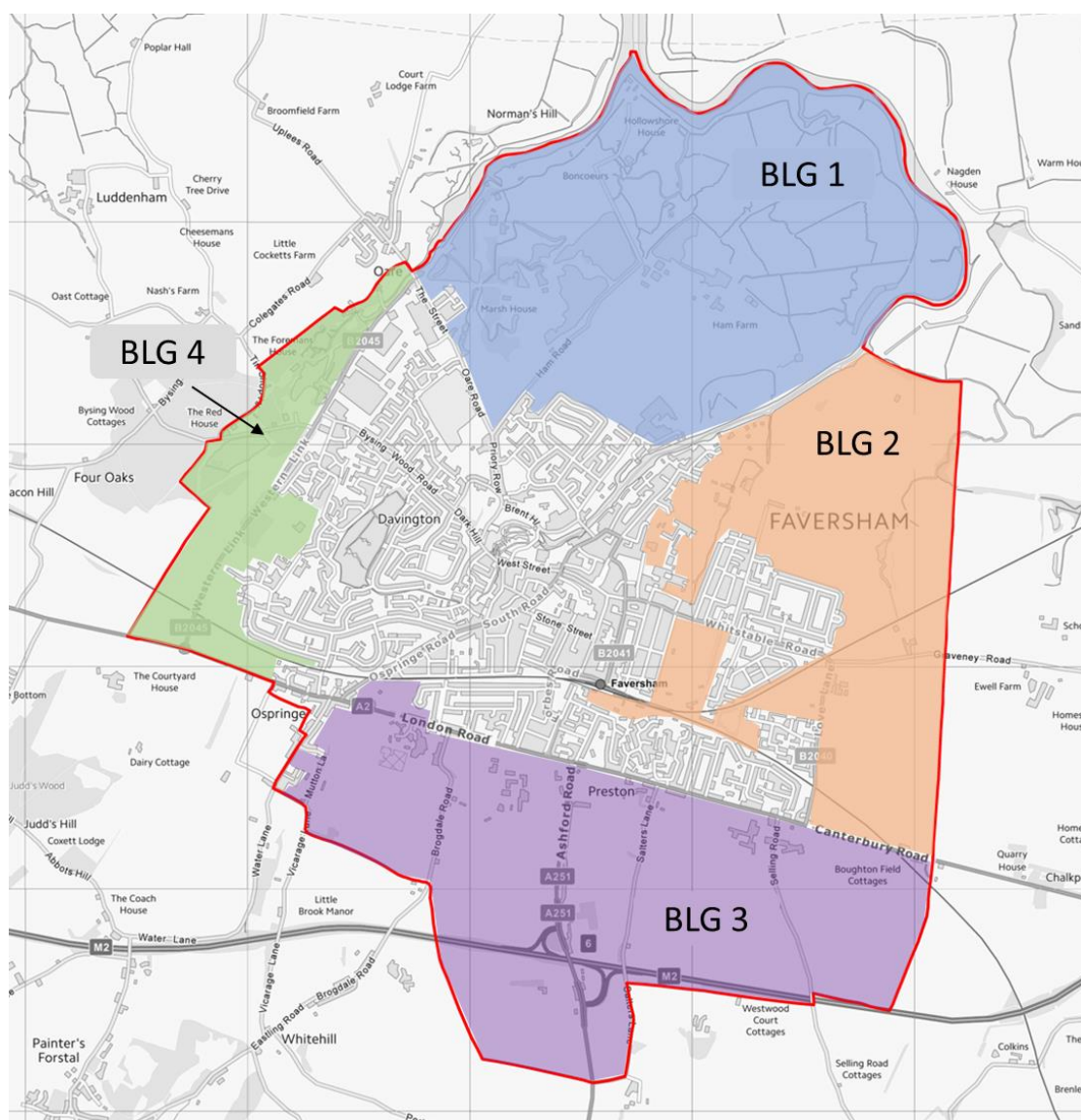


Figure 4.2: BLGs within the neighbourhood area

- 4.12 For each BLG, the SEA has considered the potential constraints and opportunities associated with delivering new homes in these locations. Informed by the SEA topics which have been scoped into the assessment (as explained within **Chapter 3** of this Environmental Report), the appraisal findings are presented below as a commentary of effects.
- 4.13 Sources of information to support the appraisal process included (amongst others): Ordnance Survey mapping; MAGIC Interactive Map¹⁹; the Environment Agency's Flood Risk Maps for England²⁰; Google Earth²¹; interactive maps and documents available to access on Swale Borough Council's webpages²²; national and local planning policy documents; and baseline studies accessible via the FNP website²³.

Appraisal findings

BLG 1 (Land to the north of the town)

- 4.14 BLG 1 is located on the other side of the town from the AQMA along the A2 and performs well in this respect as it is unlikely to exacerbate congestion in this part of the town.
- 4.15 The northern half of BLG 1 intersects with The Swale SPA/ Ramsar/ SSSI. The BLG is also adjacent to the South Bank of the Swale LNR, located to the north of the BLG. In this respect, the types of development which could potentially come forward within this BLG (i.e., residential, rural-residential, and rural non-residential) may exceed the IRZ thresholds for internationally and nationally designated sites. These thresholds range from all planning applications to residential development of 50 units or more/ any residential development of 10 or more houses outside existing settlements/ urban areas. In this respect, consultation with Natural England is likely to be required for any proposals brought forward in these sections of the BLG.
- 4.16 In terms of Biodiversity Action Plan (BAP) Priority Habitats, the northern half of the BLG intersects with a large area of coastal and floodplain grazing marsh. A smaller area of coastal saltmarsh can be found close to the northern boundary of the BLG, whilst a small area of deciduous woodland can be found in the southwestern part of the BLG. In this respect, BLG 1 is heavily constrained by both designated sites for biodiversity and habitats.
- 4.17 The northern half of BLG 1 intersects with Flood Zone 3, with only a small area in the southern portion of the BLG at low risk of flooding from rivers or the sea. However, this area is spotted by isolated areas at medium to high risk of surface water flooding, and in this respect, almost the entire BLG is at risk from either fluvial or surface water flooding, which are key constraints to development within this BLG.
- 4.18 The southwestern third of BLG 1 is classed as having a high landscape sensitivity according to the Swale Landscape Sensitivity Assessment (SLSA)²⁴. Nevertheless, development over such a large area is likely to have a notable impact on the landscape, impacting views into/ out of the town. However, it is

¹⁹ MAGIC (2022): 'Interactive Map', [online] available to access via [this link](#)

²⁰ Environment Agency (2022): 'Flood Map for Planning', [online] available to access via [this link](#)

²¹ Google (2022): 'Google Earth', [online] available to access via [this link](#)

²² Swale Borough Council (various dates of publication): [Local Plan Review - Evidence Pages](#)

²³ Faversham Town Council (2022): [Neighbourhood Plan](#)

²⁴ Swale Borough Council (2019): [Swale Landscape Sensitivity Assessment](#)

recognised that the BLG is at a lower elevation than the main settlement of Faversham, and in this respect, new development within this BLG is less likely to impose upon the town.

- 4.19 In terms of heritage assets, BLG 1 intersects with 14 grade II listed buildings. These are primarily located in the southern half of the BLG; however, one is located in the northern half of the BLG close to its boundary. The BLG also partially intersects with Faversham Conservation Area in the southeast.
- 4.20 Regarding the quality of agricultural land, the northern part of BLG 1 is underlain by land with a low likelihood of best and most versatile (BMV) land (<20% area BMV), whilst the southern part of the BLG is underlain by land with a high likelihood of BMV land (>60% area BMV). As the southern part of the BLG is the only part of the BLG that is likely developable, due to the northern half of the BLG intersecting with Flood Zone 3, development of the BLG will likely result in the loss of productive agricultural land.
- 4.21 The soil type²⁵ in the northern half of the BLG is 'loamy and clayed soil of coastal flats with naturally high groundwater', which has poor drainage, moderate soil fertility, and a medium carbon content. Meanwhile, the soil type in the southern half of the BLG is 'freely draining slightly acid loamy soils', which has good drainage, poor soil fertility, and a low carbon content.
- 4.22 According to the Kent Minerals and Waste Local Plan (KMWLP)²⁶, almost the entire area of the BLG intersects with Mineral Safeguarding Areas (MSAs) for sub-alluvial river terrace deposits and brickearth, which could be a barrier to development due to the protection provided by this designation.
- 4.23 In terms of overall Index of Multiple Deprivation (IMD), BLG 1 falls within the Swale 014A LSOA, which is amongst the 40% least deprived neighbourhoods in the country. When looking at the 'barriers to housing and services' domain in isolation, this LSOA is amongst the 40% most deprived neighbourhoods. In this respect, the physical and financial accessibility of housing and local services in this area is poor, and development could help address this to a degree.
- 4.24 Whilst the BLG borders the built-up area of Faversham, where existing services and facilities are located, the northern half of the BLG remains relatively far away from key transport nodes within the town centre, such as the train station, as well as key services and facilities. In this respect, development at this BLG is likely to result in a degree of reliance on the private car. However, it is noted that the southern part of the BLG is the only part of the BLG that is likely developable, due to the northern half of the BLG intersecting with Flood Zone 3.
- 4.25 Overall, delivering future growth within this BLG is like to have adverse impacts with respect to the biodiversity, climate change, historic environment, and community wellbeing SEA topics. This is primarily linked to its proximity to internationally and nationally protected sites for biodiversity, flood risk zones, heritage designations, and its distance from the town centre.

²⁵ Cranfield Soil and Agrifood Institute (no date): 'Soilscapes', [online] available to access via [this link](#)

²⁶ Kent County Council (2020): 'Kent Minerals and Waste Local Plan 2013-30', [online] available to access via [this link](#)

BLG 2 (Land to the east of the town)

- 4.26 Whilst BLG 2 is located away from the AQMA along the A2, it still borders the A2 (Canterbury Road), and therefore access to part of the BLG may be via the A2. In this respect, development has the potential to contribute to congestion along the A2, with potential to exacerbate existing air quality issues at the AQMA, with negative implications for the health of residents nearby.
- 4.27 The north western corner of BLG 2 intersects with The Swale SPA/ Ramsar/ SSSI. In this respect, the types of development which could potentially come forward within this BLG (i.e., residential, rural-residential, and rural non-residential) may exceed the IRZ thresholds for internationally and nationally designated sites. These thresholds range from all planning applications to residential development of 100 or more houses outside existing settlements/ urban areas. In this respect, consultation with Natural England is likely to be required for any proposals brought forward in these sections of the BLG.
- 4.28 In terms of BAP priority habitats, the northern part of the BLG intersects with areas of coastal and floodplain grazing marsh and good quality semi-improved grassland. In this respect, BLG 2 is heavily constrained by both designated sites for biodiversity and habitats.
- 4.29 Whilst some areas in the northern part of BLG 2 are within Flood Zone 3, part of this area benefits from flood defences, providing a degree of protection from flooding from rivers or the sea. In terms of surface water flood risk, there are several isolated areas at medium to high risk of surface water flooding in the northern and central parts the BLG, however these areas are not extensive and likely avoidable.
- 4.30 The northern half of BLG 2 intersects with an area classed as having a medium-high landscape sensitivity according to the SLSA. New development within this area is likely to have adverse impacts from a landscape perspective. Whilst development in the remaining half of the BLG will likely change the character of the landscape (which, in its current form, comprises areas of greenfield land and open countryside), impacts are less likely to be significant as this half of the BLG is less sensitive from a landscape perspective.
- 4.31 In terms of heritage assets, the BLG intersects with one scheduled monument (The site of St Saviour's Abbey, including the remains of an Iron Age farmstead and Faversham Roman villa), two grade I listed buildings (The parish church of St Mary of Charity and Faversham Abbey Minor Barn), seven grade II listed buildings, and five grade II* listed buildings. These are primarily located within or near the main settlement, in the western half of the BLG. The BLG also partially intersects with Faversham Conservation Area in the northeast, as well as the part of the BLG that extends into the built-up area of Faversham.
- 4.32 Regarding the quality of agricultural land, the BLG is underlain by land with a high likelihood of BMV land (>60% area BMV). In this respect, development of the BLG would result in the loss of productive agricultural land.
- 4.33 The soil type of the BLG is almost entirely 'freely draining slightly acid loamy soils', which has good drainage, poor soil fertility, and a low carbon content.
- 4.34 According to the KMWLP, a significant proportion of the BLG intersects with an MSA for brickearth, as well as a smaller MSA for sub-alluvial river terrace

deposits in the north. This could be a barrier to development due to the protection provided by these designations.

- 4.35 In terms of overall IMD, BLG 1 falls within the Swale 015B LSOA, which is amongst the 30% most deprived neighbourhoods in the country. When looking at the 'living environment deprivation' domain in isolation, this LSOA is amongst the 40% least deprived neighbourhoods. In this respect, development in this area is likely to contribute towards community wellbeing by providing new homes, including affordable homes.
- 4.36 In terms of designated Local Green Space (LGS), the BLG intersects with Faversham Recreation Ground and allotments to the east of Cheney Road. However, it is noted that given the protection offered to these spaces, development would likely not take place in these areas.
- 4.37 Whilst the BLG borders the built-up area of Faversham, where existing services and facilities are located, the north eastern corner of the BLG remains relatively far away from this area. In this respect, development at this BLG is likely to result in a degree of reliance on the private car. However, it is also noted that development in the western part of the BLG would locate growth relatively close to key transport nodes within the town centre, such as the train station, as well as key services and facilities, increasing the likelihood of residents opting to use active travel or public transport to meet their needs.
- 4.38 Overall, delivering future growth within this BLG is like to have adverse impacts with respect to air quality, biodiversity, and historic environment SEA topics. This is primarily linked to its proximity to the A2, internationally and nationally protected sites for biodiversity, and heritage designations.

BLG 3 (Land to the south of the town)

- 4.39 BLG 3 partially intersects with 'AQMA No 2/ 6 Ospringle extended', with access to the area likely to be along the A2 (London Road). In this respect, development of this BLG has potential to exacerbate air quality issues at the AQMA, with negative health implications for existing and new residents. Additionally, development in this BLG will take place in areas with existing air quality issues (affecting those living within any new development areas).
- 4.40 Whilst this BLG does not intersect with any internationally or nationally designated sites for biodiversity, the northern half of the BLG intersects with an IRZ associated with The Swale SPA/ Ramsar/ SSSI. This IRZ applies to any residential development of 100 or more houses outside existing settlements/ urban areas. In this respect, consultation with Natural England is likely to be required for any proposals in the BLG which exceed 100 houses.
- 4.41 BLG 3 intersects with several small areas of traditional orchard and deciduous woodland, primarily located in the centre of the BLG near Ashford Road, but also to the east of Ospringle and west of Selling Road. It is noted that these areas will likely be avoided and not built-on, however development does still have potential to lead to noise and recreational disturbance.
- 4.42 BLG 3 is around 500 metres north of the boundary of the Kent Downs AONB with great potential to impact its setting, especially given the size of the BLG. Whilst the M2 acts as a barrier between the BLG and the AONB to some degree, part of the BLG extends south of the M2. BLG 3 is also in an area

classed as having a high landscape sensitivity according to the SLSA. In this respect, the BLG has potential to significantly impact the local landscape and its setting.

- 4.43 BLG 3 is almost entirely within Flood Zone 1, with only one isolate strip of land within Flood Zone 3, which runs north to south through Ospringe. In terms of surface water flood risk, there are two isolated strips of land at risk of surface water flooding; one covers the same area as the land in Flood Zone 3, and the other runs north to south to the west of Salters Lane.
- 4.44 In terms of heritage assets, the BLG intersects with 10 grade II listed buildings. Most of these are located in the northern half of the BLG, however three are located in the southern half of the BLG to the south of the M2. Notably, the BLG borders multiple grade II and grade II* listed buildings in Ospringe and where Water Lane intersects with the A2 (Ospringe Street/ London Road). The BLG also partially intersects with Faversham and Ospringe Conservation Areas along the northern boundary of the BLG.
- 4.45 Regarding the quality of agricultural land, the BLG is underlain by land with a high likelihood of BMV land (>60% area BMV). In this respect, development of the BLG would result in the loss of productive agricultural land.
- 4.46 The soil type of the BLG is primarily 'freely draining slightly acid loamy soils', which has good drainage, poor soil fertility, and a low carbon content. However, there are areas with 'freely draining lime-rich loamy soils', which has good drainage, moderate soil fertility, and a low carbon content.
- 4.47 A large part of the BLG intersects with Zone 1 (Inner Protection Zone) and Zone II (Outer Protection Zone) of a Source Protection Zone (SPZ). In this respect, development has the potential to groundwater sources. However, it is noted that mitigation measures will likely be in place to prevent this from happening.
- 4.48 According to the KMWLP, approximately half of the BLG intersects with an MSA for brickearth, as well as a smaller MSA for sub-alluvial river terrace deposits in the west near Ospringe. This could be a barrier to development due to the protection provided by these designations.
- 4.49 In terms of overall IMD, BLG 3 falls within three LSOAs: Swale 015F, which is amongst the 30% least deprived neighbourhoods in the country, Swale 014E, which is amongst the 20% least deprived neighbourhoods, and Swale 014F, which is amongst the 20% most deprived neighbourhoods. When looking at the 'barriers to housing and services' domain in isolation, Swale 015F is the most deprived, being amongst the 30% most deprived neighbourhoods. When looking at the 'living environment deprivation' domain in isolation, Swale 014E is the most deprived, being amongst the 50% most deprived neighbourhoods. In this respect, development in this area is likely to contribute towards community wellbeing by providing new homes, including affordable homes.
- 4.50 In terms of designated LGS, the BLG intersects with the Cricket Ground to the south of Faversham Canterbury Road. However, it is noted that given the protection offered to this space, development would likely not take place here.
- 4.51 With respect of the local transport network, BLG 3 is located to the south of London Road/ Canterbury Road, which forms part of the A2 corridor, and to the north of the M2 (intersecting with junction 6). According to the draft Transport

Strategy, whilst this junction generally does not suffer congestion, there are occasional bottlenecks at the junction between the A251 and the A2, which effects the motorway junction and can cause safety issues. In response to this, the Kent Strategic Congestion Management programme has recently delivered improvements to the A2/ A251 junction near Faversham. Nevertheless, development at BLG 3 has potential to worsen congestion at this junction.

- 4.52 In addition to the above, development at this BLG will likely suffer from noise pollution along the A2, whilst also contributing to noise pollution in the Kent Downs AONB, negatively impact the feel and setting of the AONB.
- 4.53 Overall, delivering future growth within this BLG is like to have adverse impacts with respect to air quality, landscape, historic environment, and land, soil and water resources SEA topics. This is because the BLG partially intersects with the AQMA on the A2, is in close proximity to the Kent Downs AONB, contains several designated heritage assets, and intersects with a SPZ.

BLG 4 (Land to the west of the town)

- 4.54 BLG 4 is adjacent to 'AQMA No 2/ 6 Ospringle extended', with access to the southern extent of the BLG likely to be along the A2 (London Road). In this respect, development of this BLG has potential to exacerbate air quality issues at the AQMA, with negative health implications for existing and new residents.
- 4.55 A small part of the northern extent of BLG 4 intersects with The Swale SPA/ Ramsar/ SSSI. In this respect, the types of development which could potentially come forward within this BLG (i.e., residential, rural-residential, and rural non-residential) may exceed the IRZ thresholds for internationally and nationally designated sites. These thresholds range from all planning applications in the northern part of the BLG, to any residential development of 100 or more houses outside existing settlements/ urban areas in the southern part of the BLG. In this respect, consultation with Natural England is likely to be required for any proposals brought forward in these sections of the BLG.
- 4.56 The BLG intersects with large areas of deciduous woodland (Bysing Wood and Oare Gunpowder Works Country Park). In this respect, the BLG is constrained by both designated sites for biodiversity and habitats.
- 4.57 A large part of the northern extent of BLG 4 is within Flood Zone 2/ 3. The same area contains areas at medium to high risk of surface water flooding, largely linked to the lakes in this area. In this respect, a large part of the BLG is unsuitable for development due to fluvial and surface water flood risk.
- 4.58 BLG 4 intersects with an area classed as having a high landscape sensitivity according to the SLSA. The BLG also contains large areas of woodland, the setting of which would be negatively impacted by development.
- 4.59 In terms of heritage assets, there is one large scheduled monument (Oare gunpowder works) in the northern part of the BLG, which takes up approximately one quarter of the area of the BLG. The BLG also contains one grade II listed building, which is situated next to the scheduled monument in the northern part of the BLG. Therefore, new development within the northern part of the BLG has potential to negatively impact the setting of these heritage assets, especially the scheduled monument.

- 4.60 Regarding the quality of agricultural land, the BLG is underlain by land with a high likelihood of BMV land (>60% area BMV). In this respect, development of this BLG would result in the loss of productive agricultural land.
- 4.61 The soil type of the BLG is almost entirely 'freely draining slightly acid loamy soils', which has good drainage, poor soil fertility, and a low carbon content.
- 4.62 According to the KMWLP, a significant proportion of the BLG intersects with an MSA for brickearth, as well as a smaller MSA for sub-alluvial river terrace deposits in the north. This could be a barrier to development due to the protection provided by these designations.
- 4.63 In terms of overall IMD, BLG 4 falls within three LSOAs: Swale 014A, which is amongst the 40% least deprived neighbourhoods in the country, Swale 014C, which is amongst the 20% most deprived neighbourhoods, and Swale 014F, which is also amongst the 20% most deprived neighbourhoods. When looking at the 'barriers to housing and services' domain in isolation, Swale 014C is the most deprived, being amongst the 10% most deprived neighbourhoods. None of the LSOAs are deprived in terms of the 'living environment deprivation' domain. In this respect, development in this area is likely to contribute towards community wellbeing by providing new homes, including affordable homes.
- 4.64 In terms of designated LGS, the BLG intersects with Oare Gunpowder Works Country Park, grassland to the south of Oare where Western Link meets The Street, and a field to the north of Bysing Wood Primary School. However, it is noted that given the protection offered to these spaces, development would likely not take place in these areas.
- 4.65 In terms of transportation, the BLG does not extend too far from the existing built-up area of Faversham, and in this respect, residents should be able to access services and facilities and employment opportunities in the town centre with relative ease. Nevertheless, Faversham Train Station – a key transport node for accessing employment opportunities outside of Faversham – is located approximately 2.4km from the centre of the BLG. Therefore, it is likely that residents will drive to access the train station.
- 4.66 Overall, delivering future growth within this BLG is like to have adverse impacts with respect to air quality, biodiversity, climate change, landscape, and historic environment SEA topics. This is because the BLG is adjacent to the AQMA on the A2, partially intersects with The Swale SPA/ Ramsar/ SSSI, contains large areas of deciduous woodland, wholly intersects with a large scheduled monument, and has a high risk of flooding.

Summary of the appraisal findings

- 4.67 Overall, all four BLGs present a combination of constraints and opportunities which are unique to their location and setting. However, it could be argued that BLG 2 is slightly less constrained than the other three BLGs, as it is only likely to have adverse impacts with respect to three SEA topics: air quality, biodiversity, and historic environment. Meanwhile, BLG 1 and 3 are likely to have adverse impacts with respect to four SEA topics, whilst BLG 4 is likely to have adverse impacts with respect to five SEA topics.
- 4.68 Whilst air quality is a constraint for BLG 2, 3 and 4, it is arguable the biggest issue for BLG 3 as it is the only BLG that intersects with the AQMA on the A2.

This BLG also has the longest boundary with the A2, meaning that a large proportion of development in this area is likely to require access of the A2.

- 4.69 BLG 1, 2 and 3 are all constrained in terms of biodiversity due to varying degrees of overlap with The Swale SPA/ Ramsar/ SSSI. However, BLG 1 is by far the most heavily constrained by the internationally and nationally designated site for biodiversity, which covers over half of the area of this BLG.
- 4.70 Climate change, specifically climate change adaptation, is a significant constraint for both BLG 1 and 4 as both BLGs contain significant areas within Flood Zone 2/ 3. Whilst BLG 2 also contains areas with Flood Zone 2/ 3, these areas are not so widespread as they are in BLG 1 and 4.
- 4.71 Whilst all four BLGs will have some impact on the surrounding landscape, BLG 3 is the most heavily constrained due to its proximity to the Kent Downs AONB. BLG 4 is also constrained with respect to this SEA topic as it contains a significant areas of deciduous woodland, a BAP priority habitat.
- 4.72 All four BLGs contain heritage assets, and in this respect, they are all constrained by the historic environment to some extent. However, it could be argued that BLG 4 is particularly constrained as it contains a large scheduled monument which covers approximately one quarter of the area of the BLG.
- 4.73 In terms of land, soil, and water resources, only BLG 3 is considered to be significantly constrained. This is because it intersects with a large SPZ. In this respect, development in this location has potential to impact groundwater sources, however the protection provided by this designation is noted.
- 4.74 Only BLG 4 is considered to be heavily constrained in terms of the community wellbeing SEA topic. This is because the centre of the BLG is located furthest from Faversham town centre, including the train station, which many residents utilise to access employment opportunities further afield.
- 4.75 Despite these constraints, some of these BLGs have notable opportunities associated with them. Whilst all BLGs perform well in terms of their ability to meet the identified housing need of the neighbourhood area, BLG 2 performs particularly well as it is closest to Faversham town centre, including the train station. Due to this, residents are more likely to walk or cycle to access services and facilities and employment opportunities in the town centre. In this respect, it also performs well concerning the transportation SEA topic.
- 4.76 In addition to the above, BLG 1 performs well by locating development away from the AQMA on the A2, and associated congestion, and the Kent Downs AONB. Meanwhile, BLG 3 performs well by locating development away from The Swale SPA/ Ramsar/ SSSI and associated fluvial flood risk, with only a small area along the BLGs western boundary being within Flood Zone 3. Whilst the western part of BLG 2, which extends into the built-up area of Faversham, intersects with the conservation area and some heritage assets, the remainder of the BLG is relatively unconstrained in terms of the historic environment.

Appraisal of options for the focus of development within the neighbourhood area (greenfield or brownfield site options)

4.77 With respect to the potential focus areas for delivering new homes, the SEA appraisal findings presented above highlight that all four BLGs have constraints to development which would need to be appropriately considered and addressed if proposals were brought forward in these locations.

4.78 In recognition of the availability of brownfield site options within the neighbourhood area (shown in **Figure 4.1** above and discussed in further detail within the site assessment report) and considering that most of the greenfield site options are within the four BLGs, the SEA has considered the relative sustainability merits of taking forward a greenfield first or a brownfield first approach to development.

4.79 The options are as follows:

- **Option A:** take a greenfield first approach to delivering new development within the neighbourhood area.
- **Option B:** take a brownfield first approach to delivering new development within the neighbourhood area.

Approach to the options appraisal process

4.80 The options have been considered against the SEA Framework of objectives and assessment questions developed at SEA scoping. The following information is presented:

- A description of the options appraised (as presented above).
- A rankings diagram showing the sustainability performance of each option with respect to each SEA topic to highlight their relative sustainability merits, with '1' the most favourable ranking as shown by the 'green' shaded areas on the diagram, and '2' the least favourable ranking as shown by the 'red' shaded areas on the diagram. Each SEA topic is represented by an icon on the rankings diagram, for ease of identification; and
- An overview of the likely significant effects (both positive, and negative) of each option. The positive impacts are presented in the 'green' shaded areas on the likely significant effects diagram, and the negative impacts are presented in the 'red' shaded areas on the likely significant effects diagram. The number of positive 'stars' and negative 'exclamation marks' within each shaded area represents the potential impact of the likely significant effects (i.e., minor, moderate, or major).

4.81 The appraisal findings are presented below.

Options for the focus of development within the neighbourhood area



Air Quality



Biodiversity and Geodiversity



Climate Change



Landscape and Townscape



Historic Environment



Land, Soil and Water Resources



Community Wellbeing



Transportation

Ranking

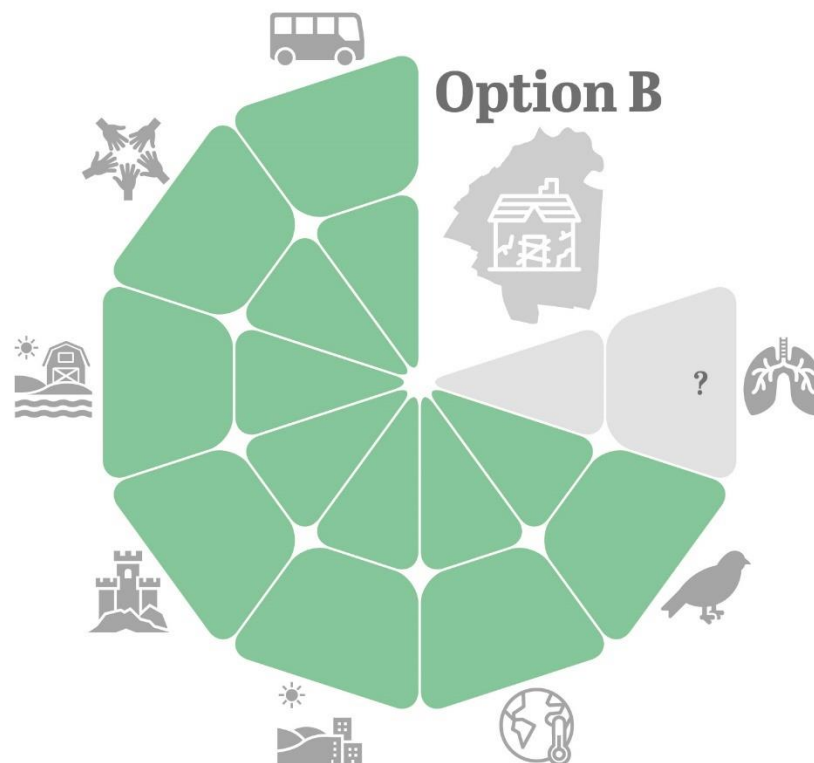
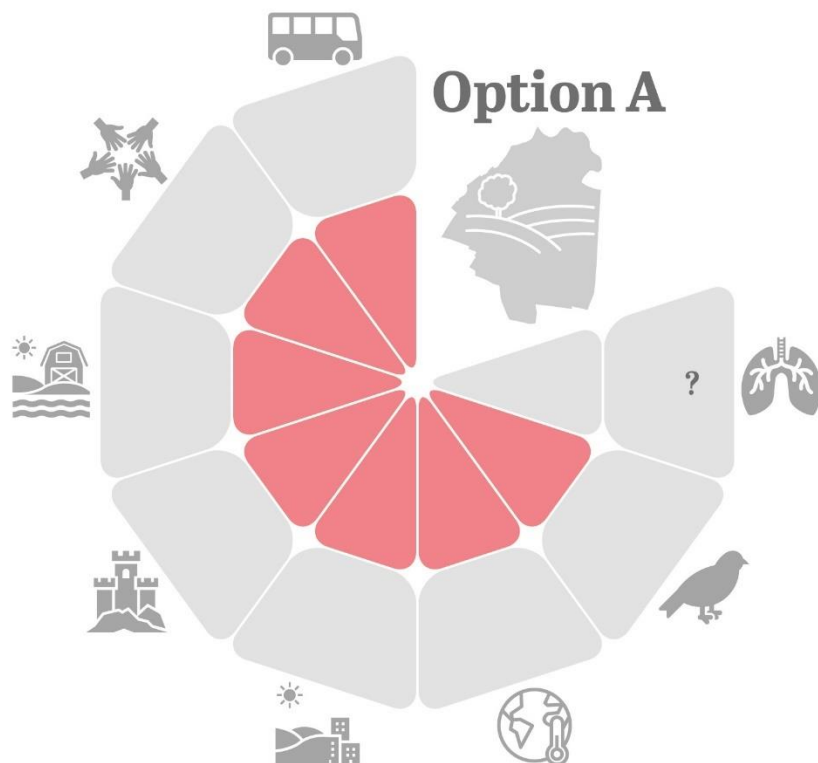


Option A:

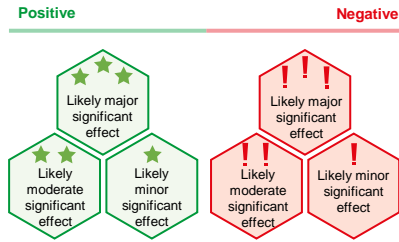
Take a greenfield first approach to delivering new development within the neighbourhood area.

Option B:

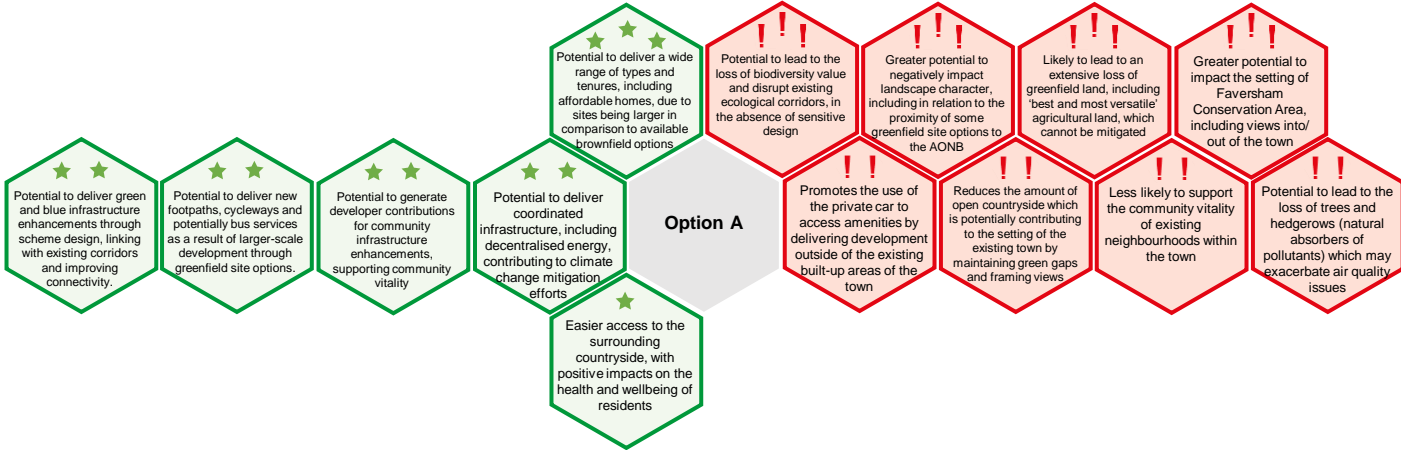
Take a brownfield first approach to delivering new development within the neighbourhood area.



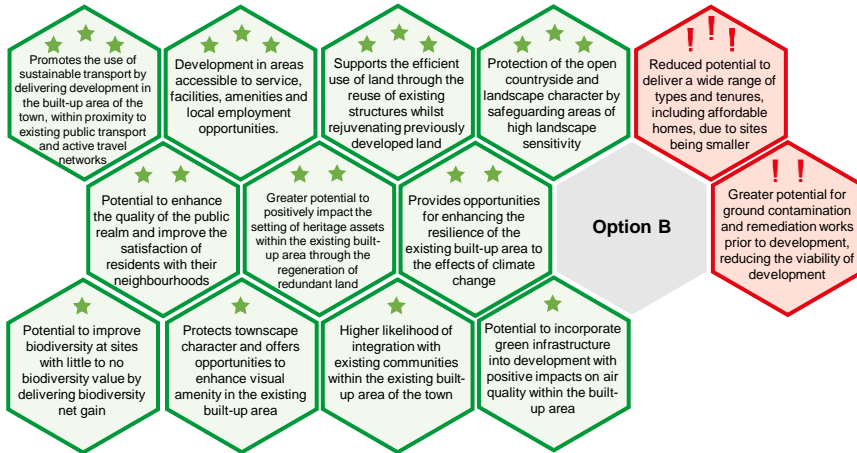
Likely significant effects:



Option A: take a greenfield first approach to delivering new development within the neighbourhood area



Option B: take a brownfield first approach to delivering new development within the neighbourhood area



Appraisal findings

- 4.82 Overall, Option B performs more favourably than Option A, and is ranked the highest under each SEA topic, with the exception of air quality, where uncertainty is noted for both options. The results of the appraisal, organised by SEA topic, are discussed in more detail below.
- 4.83 In terms of air quality, whilst Option A could deliver growth at greenfield sites to the north of the town, away from the existing AQMA on the A2, this would also increase the likelihood of localised air quality issues and congestion. However, it is noted that many of the available greenfield sites are located to the east and south of the town, with potential to exacerbate air quality issues. Furthermore, greenfield development is more likely to lead to the loss of trees and hedgerows (natural absorbers of pollutants) which may exacerbate air quality issues. Meanwhile, brownfield development through Option B will deliver growth closer to services and facilities and public transport hubs in the centre of Faversham, reducing the likelihood of residents driving to meet their needs, with positive implications for air quality. In addition to this, Option B could deliver green infrastructure at brownfield sites which currently lack this, with potential to improve air quality. Nevertheless, it is also recognised that Option B has potential to contribute to air quality issues and congestion in the town centre if residents chose to drive. Hence, uncertainty is noted for both options.
- 4.84 Regarding biodiversity, greenfield development through Option A has potential to lead to the loss of key landscape features of biodiversity value over a large area and has the potential to disrupt existing ecological corridors. However, it is noted that Option A will still be required to deliver biodiversity net gain and has potential to deliver more coordinated green infrastructure enhancements through the design of schemes, linking with existing green and blue corridors within the neighbourhood area. Conversely, Option B has potential to improve biodiversity at brownfield sites with little to no existing biodiversity value, which will likely be delivered due to the requirement to deliver biodiversity net gain. In addition to this, key areas of biodiversity value are largely located outside of the town centre, and in this respect, development at brownfield sites is less likely to have adverse impacts on internationally and nationally designated sites for biodiversity. Therefore, Option B is ranked more favourably than Option A.
- 4.85 In terms of climate change mitigation, Option A has potential to deliver more coordinated infrastructure, due to the larger size of available greenfield sites, including decentralised energy and active travel infrastructure, contributing to a reduction in operational emissions. However, Option A is also likely to lead to a higher dependency on the private car to access services and facilities and employment opportunities in the town centre as most of the greenfield sites are located outside of the town. Meanwhile, brownfield development through Option B has potential to reduce the emissions associated with infrastructure delivery by encouraging development within the most accessible locations in the neighbourhood area, in proximity to local public transport networks. In addition to this, Option B provides opportunities to enhance the resilience of the existing built-up area of Faversham to the effects of climate change through the delivery of green infrastructure as part of scheme design (i.e., integrating sustainable drainage to tackle surface water run-off issues). Option B is also likely to lead a higher uptake of active travel and public transport as it is located

close to existing footpaths, cycleways, and public transport nodes. Due to this, Option B is ranked more favourably than Option A.

- 4.86 Regarding landscape, greenfield development through Option A has potential to negatively impact landscape character, especially in relation to the Kent Downs AONB, by reducing the amount of open countryside surrounding the town, which contributes to the setting and feel of the town. Issues are likely to be more pronounced to the south of the town and the M2, which is approximately 250 metres from the AONB boundary, or within areas of high landscape sensitivity as defined within the Swale Landscape Sensitivity Assessment. Conversely, Option B will safeguard the open countryside surrounding the town from inappropriate development, maintaining important views, and protecting the integrity of the AONB and areas of high landscape sensitivity. Also, Option B, through encouraging development on potentially underutilised areas of brownfield land, has the potential to positively contribute to townscape character and enhance the quality of the public realm. However, this is dependent on the design of the schemes which come forward. Nonetheless, Option B performs more favourably with respect to this SEA topic.
- 4.87 With respect to the historic environment, greenfield development through Option A is more likely to locate development away from Faversham Conservation Area and associated heritage assets and performs well in this respect. However, it is noted that large-scale greenfield development will also impact views into/ out of the town, with potential to negatively impact the setting and significance of the conservation area. Meanwhile, brownfield development through Option B has a greater potential to impact the setting of the conservation area and associated heritage assets within the existing built-up area of Faversham. Nevertheless, brownfield development also provides opportunities to enhance the local townscape character, including the setting of heritage assets, through high-quality redevelopment of sites that may currently be detracting from heritage assets. However, this is dependent on the design of schemes. In light of this, Option B is the preferable option.
- 4.88 In terms of land, soil and water resources, greenfield development through Option A will lead to the permanent loss of greenfield land, including BMV agricultural land, which cannot be mitigated. Conversely, brownfield development through Option B supports the efficient use of land through the reuse of existing structures, whilst rejuvenating previously developed land. Option B also has potential to lead to medium to long-term improvements to water quality and surface water drainage through SuDS. However, it is noted that brownfield development is more likely to involve ground contamination and associated remediation works, which may reduce the viability of bringing forward development at these locations. Nevertheless, development provides an opportunity to improve soil quality at these sites, which can be seen as a positive. In this respect, Option B is ranked highest.
- 4.89 In terms of community wellbeing, development on greenfield land surrounding the town is likely to support the delivery of relatively large schemes which could offer a wide range of housing types and tenures, including affordable homes. It is recognised that larger greenfield sites also have the potential to generate significant contributions for community infrastructure enhancements, which is more readily achievable through Option A. Furthermore, greenfield development at the settlement edge provides easier access to the surrounding

countryside, with positive impacts on the health and wellbeing of residents. Meanwhile, brownfield development through Option B delivers development in areas accessible to existing services and facilities and employment opportunities, supporting their use. Moreover, brownfield development has potential to enhance the quality of the public realm and improve the satisfaction of residents with their neighbourhoods. The significance of the opportunities associated with larger greenfield sites (Option A) is less relevant in the context of this neighbourhood plan, as 1) greenfield sites are coming forward through the emerging Local Plan as strategic site allocations, and 2) a key focus of the neighbourhood plan is to regenerate and rejuvenate the town centre environment. In this respect, Option B is ranked highest.

- 4.90 Finally, in terms of transportation, Option B is ranked more favourably than Option A as it would facilitate development in the existing built-up area of Faversham, close to existing active travel and public transport networks. Whilst the potential for Option A to deliver new infrastructure, including footpaths, cycleways, and connections to the existing bus network, is recognised, this is more readily achievable through Option B.

Appraisal of options for managing the impact of development within the conservation area

- 4.91 Within the site assessment report, heritage considerations are recognised as a key constraint to development, and the primary reason behind the 'amber' rating for some of the sites. This is particularly the case for sites within the town centre which overlap with conservation area boundaries. In this respect, it is acknowledged that some of the site options, in their current form, contribute to the significance of the conservation area. This includes (but is not limited to) in terms of visual amenity, framing nearby listed buildings and providing views to key locations within the conservation area (i.e., Faversham Creek).
- 4.92 In the context of the above and recognising that the Neighbourhood Plan may take a brownfield first approach to delivering new development, the SEA has considered options for managing the impacts of development within the conservation area. This is primarily linked to 1) the significance of the conservation area and the number of available site options within its boundaries (as discussed above), 2) a key focus of the Neighbourhood Plan which is to protect the significance of the historic core of the town (including the Faversham Creek), and 3) the absence of an up-to-date conservation area appraisal which does not necessarily reflect the most current threats to the conservation area (which the Steering Group identify as being linked to the erosion of the heritage significance associated with new development).
- 4.93 The SEA has considered the relative sustainability merits associated with the following options with respect to managing the impacts of development within the conservation area:
- **Option A:** take a policy approach which limits building heights within the conservation area.
 - **Option B:** do not take a policy approach which limits building heights within the conservation area.

- 4.94 The appraisal findings are presented below.

Options for development within the conservation area



Air Quality



Biodiversity and Geodiversity



Climate Change



Landscape and Townscape



Historic Environment



Land, Soil and Water Resources



Community Wellbeing



Transportation

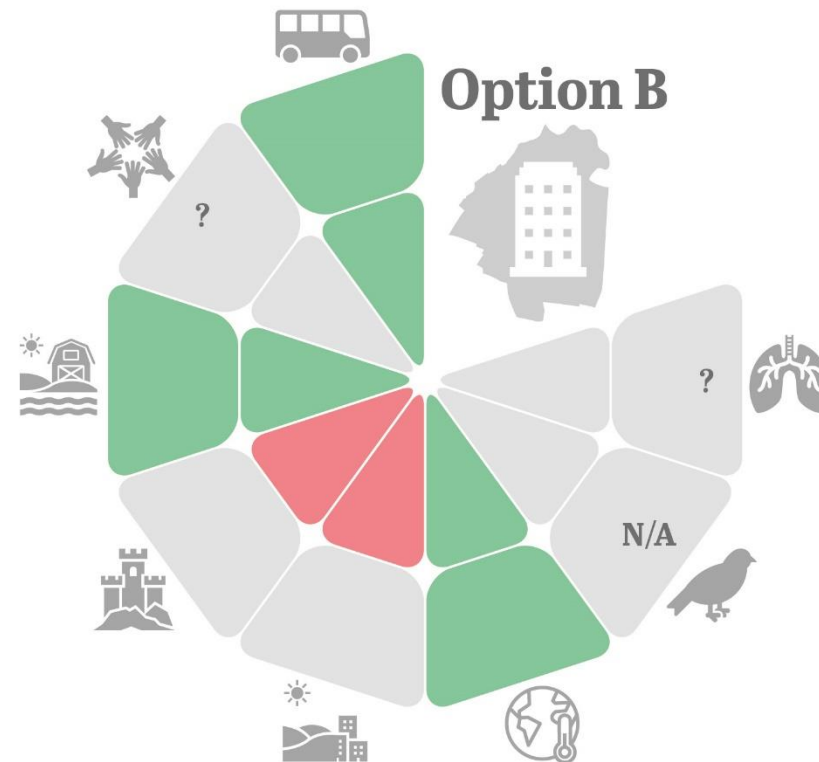
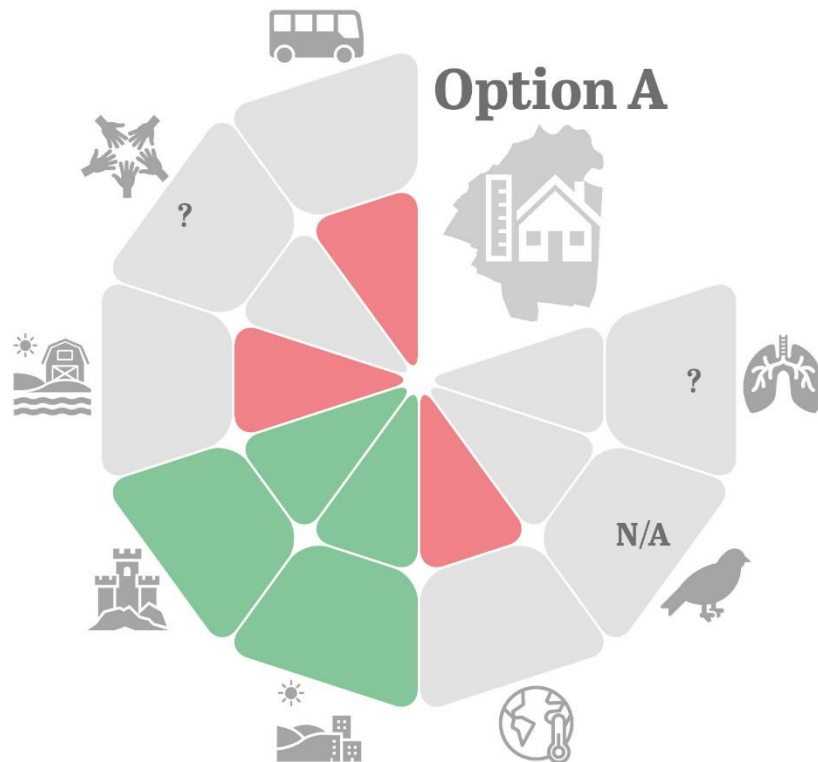


Option A:

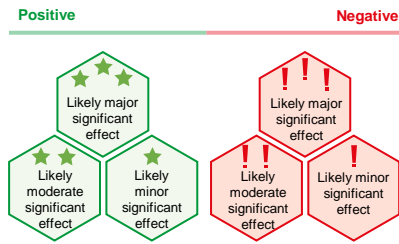
Take a policy approach which limits building heights within the conservation area.

Option B:

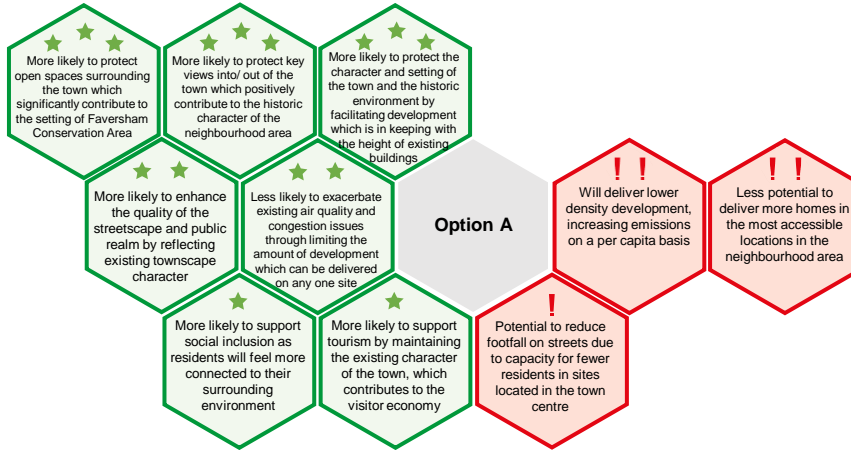
Do not take a policy approach which limits building heights within the conservation area.



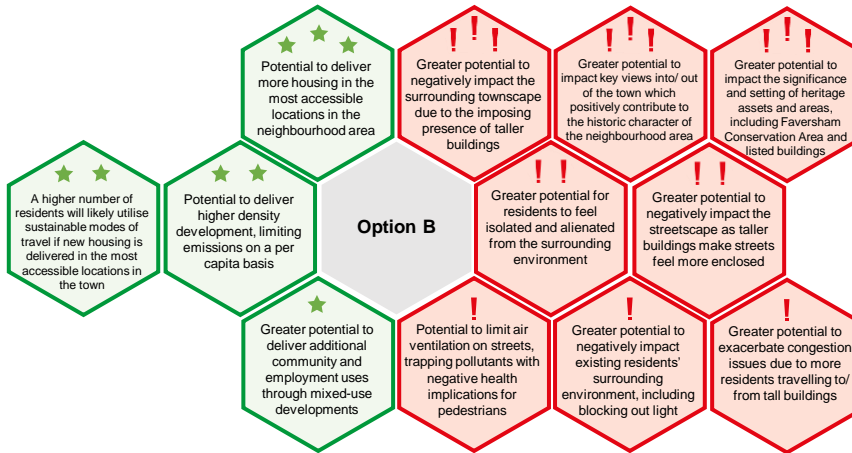
Likely significant effects:



Option A: take a policy approach which limits building heights in the conservation area



Option B: do not take a policy approach which limits building heights within the neighbourhood area



Appraisal findings

- 4.95 Overall, Option B performs slightly more favourably than Option A, however both options have their own merits with respect to certain SEA topics. Option B is ranked highest under the climate change, land, soil and water resources, and transportation SEA topics. Option A is ranked highest under the landscape and townscape and historic environment SEA topics, which are arguably particularly important SEA topics with respect to Faversham. Uncertainty is noted under the air quality and community wellbeing SEA topics, whilst no significant effects are anticipated for the biodiversity and geodiversity SEA topic as this topic is not deemed to be impacted by incremental changes in building height. The results of the appraisal, organised by SEA topic, are further discussed below.
- 4.96 In terms of air quality, limiting building heights through Option A is considered less likely to lead to isolated air quality issues and congestion due to the capacity for fewer residents at each site. Conversely, Option B is more likely to lead to isolated air quality issues and congestion as tall buildings can accommodate more residents, increasing the number of vehicles used in proximity of the site. In addition to this, tall buildings are more likely to limit air ventilation on streets, trapping pollutants, with negative health implications for pedestrians. However, it is noted that by not restricting building heights, Option B has the potential to deliver more housing within proximity to public transport networks, which will, in turn, limit the amount of greenfield land lost to development (and the loss of natural features which absorb pollutants). In this respect, uncertainty is noted for both options.
- 4.97 As mentioned above, no significant effects are anticipated for the biodiversity and geodiversity SEA topic as this topic is not deemed to be impacted by incremental changes in building height.
- 4.98 With respect to climate change mitigation, limiting building heights through Option A will deliver lower density development, increasing emissions on a per capita basis. Conversely, Option B will deliver high density development, limiting emissions on a per capita basis. No significant effects are anticipated in terms of climate change adaptation as a result of limited building heights. In light of this, Option B is ranked more favourably than Option A.
- 4.99 Regarding townscape character, limiting building heights through Option A is considered to protect the character and setting of the town by ensure new buildings remain in keeping with existing buildings. Option A is also more likely to enhance the quality of the streetscape by integrating new development with existing buildings. Conversely, Option B has a greater potential to negatively impact the surrounding townscape due to the imposing presence associated with taller buildings. Option B also has a greater potential to impact key views into/ out of the town as taller buildings are more likely to obscure existing views. Taller buildings are also more likely to negatively impact the streetscape as they make streets feel more enclosed. Considering these points, Option A is ranked more favourably than Option B.
- 4.100 In terms of the historic environment, limiting building heights through Option A is more likely to protect the setting of Faversham Conservation Area and associated heritage assets. This is because, according to the Faversham Conservation Area Character Appraisal, the majority of the buildings found within the conservation area range from single to three stories. Therefore,

limiting the height of buildings within new development at certain locations will ensure that they are in keeping with existing buildings nearby, preserving their historic significance. The Character Appraisal also stresses the importance of views out of/ in to heritage assets within the conservation area, which will be conserved by limiting building heights. Conversely, Option B has a greater potential to negatively impact the setting of the conservation area and associated heritage assets by delivering buildings that are not in keeping with existing buildings, with a greater potential to block important views out of/ in to heritage assets. In this respect, Option A is ranked more favourably than Option B.

- 4.101 Regarding land, soil and water resources, Option B is ranked more favourably than Option A as by not limited building heights, less land will be required to meet the identified housing need. This will reduce the loss of greenfield/ BMV land and is less likely to negatively impact water resources as the total area of hard surfaces is likely to be reduced.
- 4.102 In terms of community wellbeing, limiting building heights through Option A is more likely to support social inclusion as residents will feel more connected to their surrounding environment. Option A is also less likely to negatively impact the surrounding environment for existing residents, and more likely to support continued tourism by maintaining the existing character of the town, which is a key contributor to the visitor economy. However, limiting building heights reduces the potential of this option to deliver more homes in the most accessible locations to services and facilities in the neighbourhood area. In addition to this, Option A has the potential to reduce footfall on streets due to the capacity for fewer residents in sites located in the town centre. Conversely, Option B has a greater potential to deliver additional community and employment uses through mixed-use development. Option B is also more likely to incorporate active frontages on the ground floor of buildings, making streets feel safer for pedestrians. However, residents are more likely to feel isolated and alienated from the surrounding environment when living in taller buildings. Taller buildings also have a greater potential to negatively impact existing residents' surrounding environment, including blocking out light, leading to minor significant negative effects. In light of the reasons presented above, uncertainty is noted for both options.
- 4.103 Finally, in terms of transportation, Option B is ranked more favourable than Option A as fewer sites will be required to meet the identified housing need, meaning that more residents will be able to live close to the town centre where existing services and facilities, employment opportunities and public transport hubs are located. Due to this, a higher number of residents will likely walk or cycle to undertake day-to-day activities within the neighbourhood area.

Developing the preferred approach

Preferred approach in light of the appraisal findings

- 4.104 The preferred approach been informed by the findings of the site assessments undertaken for the FNP, community consultation events, and the SEA findings presented above. Specifically, the Regulation 14 version of the FNP takes a brownfield-first approach to development within the town centre environment, encouraging a limitation of building heights within the conservation area (where appropriate) to retain and protect the significant contribution that the sites make to the conservation area.
- 4.105 It is anticipated that the limitation of building heights will be considered on a site-by-site basis, following an understanding of the contribution that the sites makes to its heritage significance. The SEA recommends that each site allocation is accompanied by a proportionate heritage assessment at the planning application stage to determine the potential impacts of the proposal to the historic environment. This is further discussed within the plan appraisal presented in **Chapter 5** of this Environmental Report.
- 4.106 The Steering Group confirm that the following factors were also prioritised during the identification of site allocations. Specifically, sites should:
- *Have no adverse impact to the setting of existing designated and non-designated heritage assets.*
 - *Stimulate economic regeneration through sensitive and sustainable mixed-use development.*
 - *Encourage the sustainable reuse of previously developed land.*
 - *Have the least environmental or amenity value and avoid development on existing agricultural land.*
 - *Have the potential for community economic, social, and environmental gain.*
 - *Fall within the existing ‘built-up’ boundary of Faversham.*
 - *Be small and medium-sized (up to 1 hectare in size).”*

Choice of sites taken forward as allocations within the Neighbourhood Plan

- 4.107 The FNP allocates 16 brownfield sites within the town. The Town Council (and Steering Group) are also committed to working with Swale Borough Council to identify additional suitable locations for development in the town.
- 4.108 The site allocations are listed below in **Table 4.1** and are further discussed within the plan appraisal section in **Chapter 5** of this Environmental Report.

Table 4.1 Site options taken forward as Neighbourhood Plan allocations

Site ref.	Location	Area (ha)	Current land use	Proposed use
FNP1	Land at New Creek Road	0.15	Industrial building and associated parking	Mixed-use
FNP3	Buildings between Abbey Street and Belvedere Road	0.21	Brownfield	Mixed-use

Site ref.	Location	Area (ha)	Current land use	Proposed use
FNP4	Kiln Court and Osborne Court	2.74	Brownfield – former care home facilities	Residential or hybrid scheme
FNP5	Beaumont Davey Close, Off Ashford Road	0.42	Residential	Residential
FNP10	The Railway Yard, Station Road	0.73	Residential	Residential
FNP11	Chaff House, Junction of Conduit Street/ Bridge Road	0.06	Brownfield	Residential
FNP12	Former White Horse Car Park site, North Lane	0.08	Car Park	Residential
FNP13	Rear access land to Market Inn	0.02	Rear garden	Residential
FNP15	BMM Weston Ltd FNP1b Land at Brent Road	0.09	Redundant factory accommodation	Residential
FNP16	BMM Weston Ltd FNP1c Land at Brent Road	0.16	Redundant factory accommodation	Residential
FNP17	BMM Weston Ltd Parcel 2 Land at Brent Road	1.00	Offices within large grounds with parking	Residential
FNP18	BMM Weston Ltd Parcel 3 Land at Brent Road	0.38	Car park	Residential and commercial
CNP2	Ordnance Wharf	0.1	Former factory site, disused	Mixed-use
CNP3	Former Coach Depot	0.1	Light industrial/ mechanics garage	Mixed-use
18/029	Swan Quay	0.25	Brownfield	Mixed-use
18/079	Queen Court Farmyard, Water Lane	1.7	Farmyard	Residential

4.109 The following site options, despite comprising brownfield land and receiving an amber or green rating within the site assessment process, have not been taken forward as allocations within the FNP:

- Site 18/068 – this site contains one building (i.e., partially brownfield), however it is primarily an area greenfield land.
- Site 18/078 – this site is entirely brownfield land; however, it was withdrawn by the landowner and is therefore no longer available.
- Site 18/108 – this site contains one building (i.e., partially brownfield), however it is primarily an area greenfield land; it is also adjacent to Bysing Wood, which is a Biodiversity Action Plan (BAP) priority habitat (deciduous woodland) and therefore sensitive to disturbance from development.
- Site 18/194 – this site is entirely greenfield land and was only given brownfield status due to its use as a former school ground.

- Site 18/203 – this site is entirely brownfield land; however, the Steering Group have highlighted that it is an important local heritage asset; the existing commercial/ warehouse-style buildings have evolved over time to hospitality/ commercial/ retail units and have become a visitor destination.

4.110 The FNP has taken a pro-active approach in identifying and allocating many of the available brownfield sites within the town centre to meet local housing requirements. In this respect, the FNP has a strong aspiration and focus to revitalise the town centre environment by facilitating the delivery of high-quality design through the regeneration of previously developed land.

4.111 In the wider context, there are several larger greenfield site options surrounding the town which are currently being considered by Swale Borough Council as potential strategic-scale allocations within the emerging Local Plan. It is anticipated that the strategic-scale allocations will deliver the 3,500 new homes for the wider Faversham area, positively contributing towards local needs alongside the delivery of new community assets and infrastructure.

5. Appraisal of the Regulation 14 version of the Neighbourhood Plan

Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the Faversham Neighbourhood Plan. This chapter presents:

- An appraisal of the current version (i.e., the Regulation 14 version) of the FNP under the eight SEA topic headings.
- The overall conclusions at this current stage.

Faversham Neighbourhood Plan policies

5.2 The FNP puts forward 29 policies, grouped under eleven themes, to guide development in the neighbourhood area. Policies were developed following extensive community consultation and evidence gathering. **Table 5.1** below lists these policies.

Table 5.1 FNP policies

Theme	Policies
Faversham Town Centre	FAV1: Faversham Town Centre
Residential Development	FAV2: Housing Development
	FAV3: Residential Mix and Standards
Movement and Sustainable Transport	FAV4: Mobility and Sustainable Transport
	FAV5: Critical Road Junctions
	FAV6: Footpaths, Bridleways and Cycleways
Environment	FAV7: Natural Environment and Landscape
	FAV8: Flooding and Surface Water
	FAV9: Air Quality
Design	FAV10: Sustainable Design and Character
Historic Buildings and Places	FAV11: Heritage
Community Facilities	FAV12: Health, Recreation and Community
Local Green Space	FAV13: Local Green Space
Renewable Energy	FAV14: Local Renewable Energy Schemes
Faversham Creek	FAV15: Faversham Creek – Special Policy Area
	FAV16: Maritime Gateway Heritage Regeneration Area
Site Allocations	FAV17: Swan Quay, Belvedere Road
	FAV18: Queen Court Farmyard, Water Lane
	FAV19: Former Coach Depot, Abbey Street
	FAV20: Ordnance Wharf, Brent Road

Theme	Policies
	FAV21: Fentiman's Yard, New Creek Road
	FAV22: The Railway Yard, Station Road
	FAV23: Chaff House and Car Park, North Lane
	FAV24: Former White Horse Car Park Site, North Lane
	FAV25: BMM Weston Ltd (Parcel 1b), Land at Brent Road and BMM Weston Ltd (Parcel 1c), Land at Brent Road
	FAV26: BMM Weston Ltd (Parcel 2), Land at Brent Road
	FAV27: BMM Weston Ltd (Parcel 3), Land at Brent Road
	FAV28: Former Frank and Whittome Site, Belvedere Road
	FAV29: Other Sites

Approach to this appraisal

- 5.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 5.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 5.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the FNP to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

Plan contents, aims and objectives

- 5.6 As shown in **Table 5.1** above, the FNP includes 29 policies, grouped under eleven themes. The first policy, FAV1 (Faversham Town Centre) seeks to maintain or enhance the town's vitality and viability by supporting employment, recreational, cultural, tourist and other uses to help diversify the town's economy.
- 5.7 Policies FAV2 and FAV3 provide the main focus for housing. FAV2 (Housing Development) outlines the type of development supported by the FNP, whilst FAV3 (Residential Mix and Standards) outlines the desired housing mix and standard required for development within the neighbourhood area.

- 5.8 Transportation is covered by policies FAV4 to FAV6. FAV4 (Mobility and Sustainable Transport) supports sustainable modes of transport, whilst FAV5 (Critical Road Junctions) ensures that development does not severely impact junctions with identified safety and/ or capacity issues. Finally, FAV6 (Footpaths, Bridleways and Cycleways) promotes active travel.
- 5.9 A focus for landscape and biodiversity is policy FAV7 (Natural Environment and Landscape), which covers the protection of green and blue infrastructure, including trees, woodland and hedges, and biodiversity net gain.
- 5.10 Climate change adaptation is considered through policy FAV8 (Flooding and Surface Water), with a focus on flooding, whilst policies FAV10 (Sustainable Design and Character) and FAV14 (Renewable Energy Schemes) cover issues relation to climate change mitigation, including sustainable design and energy.
- 5.11 Air quality is considered through policy FAV9 (Air Quality), which seeks to ensure development does not worsen air quality in the neighbourhood area, particularly at 'AQMA No 2/ 6 Ospringe extended' located on the A2.
- 5.12 Policies FAV10 and FAV11 focus on the historic environment. FAV10 (Sustainable Design and Character) highlights the importance of good design in conserving townscape character, whilst FAV11 (Heritage) supports heritage-led regeneration and the adaptation and reuse of historic buildings and provides protection to non-designated heritage assets, urban archaeological zones, important views, and historic shopfronts.
- 5.13 Community wellbeing is covered by policies FAV12 and FAV13. FAV12 (Health, Recreation and Community) focuses on health and wellbeing, whilst FAV13 (Local Green Space) designates eight Local Green Spaces, which will be protected from future development within the neighbourhood area.
- 5.14 Policies FAV15 and FAV16 focus specifically on Faversham Creek. Both FAV15 (Faversham Creek Policy Area) and FAV16 (Maritime Gateway Heritage Regeneration Area) outline what type of development will be supported here, with a view to encouraging an appropriate mix of development which respects the former uses – preserving and retaining its significance.
- 5.15 Finally, policies FAV17 to FAV29 set out the site allocations – both residential and mixed-use – for the neighbourhood area. The policies take a brownfield-first approach to providing sufficient small and medium site allocations to contribute towards local housing needs, support initiatives for self-build and community-led housing provision and identify special characteristics and development opportunities that can be preserved or enhanced through development proposal on the identified sites. In this respect, the FNP seeks to revitalise the town centre environment by facilitating the delivery of high-quality design through the regeneration of previously developed land.

Air quality

- 5.16 A main concern with respect to air quality in the neighbourhood area is 'AQMA NO 2/ 6 Ospringe extended', which was declared in 2016 due to an exceedance in nitrogen dioxide (NO₂). It is located on the A2 (Ospringe Street/ London Road) where it intersects with the B2040 (Ospringe Road) and Water Lane. Several residential roads also intersect with this part of the A2, which likely contribute to congestion. It is also noted that some vehicles – particularly

HGVs – travelling along this section of the A2 come from outside of the neighbourhood area, and in this respect, measures to reduce traffic and road users within Faversham will only reduce congestion on the A2 to some degree.

- 5.17 In light of the above, the FNP sets out policy FAV9 (Air Quality), which seeks to prevent adverse impacts on local air quality from occurring as a result of any development that may come forward through the FNP. The policy outlines that any development within/ affecting the AQMA must include features to avoid any worsening of air quality or to improve air quality. Furthermore, development that generates additional car journeys should include tree planting or other landscape features which will help improve air quality.
- 5.18 As air quality is closely linked to traffic and congestion, policies FAV4 (Mobility and Sustainable Transport) and FAV6 (Footpaths, Bridleways and Cycleways) will also benefit air quality by supporting a modal shift to more sustainable modes of transport, including walking, cycling and the use of bus and train.
- 5.19 In terms of the site allocations, the FNP allocates 16 brownfield sites primarily within the existing built-up area of Faversham. In this respect, residents are likely to be in walking/ cycling distance of services and facilities, local employment opportunities and key transport nodes. The only exception to this is one site in Ospringe (FAV18) and two sites off the Ashford Road (FAV29). FAV18 (Queen Court Farmyard, Water Lane) is approximately 350 metres from the AQMA on the A2, making it the closest of all the sites. However, it is noted that this site only has capacity for nine homes, and in this respect, it is unlikely to have a notable impact on traffic and congestion in and around the AQMA.

Biodiversity and geodiversity

- 5.20 The neighbourhood area is relatively constrained with respect to biodiversity designations, including internationally, nationally, and locally protected sites for biodiversity, specifically: The Swale SPA/ Ramsar/ SSSI, nearby LNRs, BAP Priority Habitats, and Countryside Stewardship priority areas.
- 5.21 The Regulation 14 version of the FNP is accompanied by a Habitats Regulations Assessment (HRA)²⁷ which has considered in detail the potential impact pathways between the proposed site allocations and internationally designated sites. Changes to the wording of policies FAV7, FAV19 and FAV21 is recommended. Regarding policy FAV7, this relates to the provision of project specific HRAs and contributions to the Bird Wise North Kent Mitigation Strategy. Regarding policies FAV19 and FAV21, this relates to visual and noise disturbance to The Swale SPA/ Ramsar site. Providing that the recommended mitigation measures within the HRA are appropriately reflected within the FNP, no adverse impacts to the integrity of internationally designated sites are expected as a result of the policies and proposals within the FNP.
- 5.22 In terms of the site allocations, the FNP allocates 16 brownfield sites primarily within the existing built-up area of Faversham. In this respect, growth is directed away from areas of biodiversity importance, particularly The Swale SPA/ Ramsar Site/ SSSI in the northern part of the neighbourhood area. These site allocations are also entirely brownfield, meaning that no habitats, including BAP priority habitats, will be lost as a result of development. Development of

²⁷ AECOM (2022): 'Faversham Neighbourhood Plan Report to Inform Habitats Regulations Assessment'

brownfield land also provides the opportunity to improve biodiversity in areas that often have low biodiversity value through the delivery of net gains.

- 5.23 A key policy in the FNP with respect to biodiversity is FAV7 (Natural Environment and Landscape), which seeks to ensure that development has no adverse impacts on green and blue infrastructure in the neighbourhood area. The policy outlines that development must deliver a 20% net gain in biodiversity, and any loss of green/ natural landscape must be mitigated through the provision of green infrastructure, landscaping, planting, and net gains. The policy also states that trees, woodland, and hedges must be retained, or at the very least, replaced using native species.
- 5.24 In support of the above policy, policy FAV3 (Residential Mix and Standards) outlines that residential development should include design and landscape features to promote biodiversity, meeting the requirements of FAV7.
- 5.25 Also of relevance, policy FAV15 (Faversham Creek Policy Area) outlines that development within Faversham Creek must have no adverse impact on the water quality of the Creek, considering impacts on protected sites downstream.
- 5.26 It is noted that pollutants do not only directly affect public health, but also habitats and biodiversity. In this respect, policy FAV9 (Air Quality), which seeks to protect and improve air quality, will be beneficial for biodiversity.

Climate change

- 5.27 Both climate change mitigation and adaptation are key issues for Faversham. This is because CO₂ emissions per capita in Swale have been consistently higher than the averages for Kent and England during the period 2005 to 2019, and fluvial flood risk – linked to Faversham Creek, which forms part of The Swale – is high in the neighbourhood area. Much of the open land in the northern part of the neighbourhood area is within Flood Zone 3, however this area of high fluvial flood risk also extends down into some parts of the built-up area of Faversham. There are also areas of medium/ high risk of surface water flooding throughout the built-up area of Faversham and wider area.
- 5.28 In terms of the site allocations, the FNP allocates 16 brownfield sites primarily within the existing built-up area of Faversham. In this respect, residents are likely to be in walking/ cycling distance of services and facilities, local employment opportunities and key transport nodes. This will have positive impacts in terms of climate change mitigation. However, it is noted that the sites allocated through the FNP are relatively small-scale, and in this respect, they do not have such a great potential to deliver large-scale infrastructure which might support climate change mitigation, including decentralised energy.
- 5.29 In relation to climate change mitigation, policy FAV10 (Sustainable Design and Character) of the FNP supports the use of local or recycled materials, contributing to a reduction in embodied carbon emissions. Superior environmental performance will also be supported, contribution to a reduction in operational carbon emissions. Adding to this, policy FAV14 (Local Renewable Energy Schemes) supports local renewable energy schemes, as long as there are no significant adverse impacts on Faversham's historic and natural environments. This will also contribute to a reduction in emissions.

- 5.30 Policies FAV4 (Mobility and Sustainable Transport) and FAV6 (Footpaths, Bridleways and Cycleways) are also relevant as a large contributor to CO₂ emissions is the release of emissions from vehicles. These policies will help reduce emissions by supporting a modal shift to more sustainable modes of transport, including walking, cycling and the use of bus and train.
- 5.31 Whilst the allocated sites are located away from the large area of land within Flood Zone 3 in the northern part of the neighbourhood area, the sites allocated through policies FAV17, FAV18, FAV19, FAV20, FAV23, FAV24, FAV25 and FAV27 fall within Flood Zone 3, whilst the sites allocated through policies FAV21, FAV26 and FAV28 fall very close to Flood Zone 3. However, as these sites are already areas of developed land, it is unlikely that redevelopment/regeneration of the sites will increase the fluvial flood risk at these locations. Nevertheless, the FNP outlines that flood risk assessments will be required as part of any planning applications, and development is likely to be permitted only where it satisfies the exception test. It is also noted that policy DM21 (Water, Flooding and Drainage) of the Swale Borough Local Plan is also likely to help address flood risk issues in the neighbourhood area.
- 5.32 With further reference to climate change adaptation, policy FAV8 (Flooding and Surface Water) seek to ensure that development is not permitted in areas where it will adversely impact on flood risk. The policy also outlines that development must include sustainable drainage features through landscaping and green infrastructure, whilst hard surfaces must be permeable.
- 5.33 Policy FAV15 (Faversham Creek Policy Area) outlines that development within the Faversham Creek Policy Area must have no adverse impact on the water quality of the Creek, including impacts from surface water or other water discharge, and considering impacts on protected sites downstream.

Landscape and townscape

- 5.34 The most significant landscape feature with potential to be indirectly impacted by future development in the neighbourhood area is the Kent Downs Area of Outstanding Natural Beauty (AONB). The AONB does not intersect with the neighbourhood area, however it is located approximately 600 metres south of its boundary. In this respect, development in Faversham has potential to impact its setting. Whilst the policy framework of the FNP does explicitly mention the Kent Downs AONB, policy ST7 (The Faversham Area and Kent Downs Strategy) in the Swale Borough Local Plan gives due consideration to the AONB. In this respect, local and national policies provide an adequate level of protection to the AONB with respect to FNP policies and proposals.
- 5.35 In terms of the site allocations, the FNP allocates 16 underutilised brownfield sites within the existing built-up areas of Faversham. Hence, development is located away from the Kent Downs AONB and sensitive landscape areas surrounding the built-up area of Faversham, conserving key views into/ out of the town and countryside gaps. Additionally, the site allocations provide opportunities to enhance townscape character through incorporating high-quality and sensitive design through new development proposals. Whilst three sites are located outside of the immediate town centre environment – one in Ospringe (FAV18) and two off the Ashford Road (FAV29) – these are located in areas that have already been developed and are therefore unlikely to have a significant impact on the wider landscape character. The largest of these sites

has capacity for 20 homes, and therefore the scale of development is also relatively small and is unlikely to impose upon the surround landscape.

- 5.36 Regarding the wider Faversham area, the level of development likely to come forward through the emerging Local Plan (totalling approximately 3,500 dwellings) has the potential to significantly impact landscape character. It is anticipated that the sustainability appraisal work completed at the Local Plan level shall identify suitable mitigation measures for any strategic allocations (including detailed design considerations) which should protect and enhance the landscape. This is beyond the scope of the Neighbourhood Plan to address.
- 5.37 In terms of local landscape features, the Swale Landscape Sensitivity Assessment (LSA) identifies the area to the north of the built-up area of Faversham as Clay Farmlands (Stone Arable Farmlands) and Marshland (Goodnestone Grasslands and Ham Marshes). It identifies the area to the south is as Fruit Belt and Mixed Farmland (Faversham and Ospringe Fruit Belt), whilst the area to the west is identified as Dry Valleys and Downs (Doddington and Newnham Dry Valleys). The LSA also assesses the overall landscape sensitivity of seven distinct landscape sensitivity assessment areas surrounding the built-up area of Faversham. It found that all of the assessment areas have a medium/ high landscape sensitivity to residential/ employment development. None of the site allocations are located within these assessment areas.
- 5.38 In response to the above, Policy FAV7 (Natural Environment and Landscape) seeks to protect green and blue infrastructure in the neighbourhood area, including designated landscapes. It highlights that any loss of landscape through development must be counteracting through the provision of green infrastructure, landscaping, and planting. The policy also states that trees, woodland, and hedges must be retained, or replaced if this is not possible.

Historic environment

- 5.39 Faversham is a historic market town and port, which grew around the small navigable waterways of Faversham and Oare in the north of the town. The neighbourhood area contains 345 listed buildings (319 Grade II, 23 Grade II* and three Grade I), four scheduled monuments, and three conservation areas (with Faversham Conservation Area covering most of the town centre environment where the proposed site allocations are located). In terms of non-designated heritage assets, Swale Borough Council is currently developing a list of buildings, structures, landscape features, archaeological sites and parks and gardens of local heritage interest.
- 5.40 Faversham Creek, a historic port and a limb of the Cinque Port of Dover, is a key area of historic focus. The Creek falls entirely within the Faversham Conservation Area and contains over 30 listed buildings and many other heritage assets, including historic townscapes, open spaces, and distinctive views. Given the continuous use of the Creek as a waterway since Roman times, and the importance of the port in the Saxon and medieval periods, there are likely to be important archaeological remains in the area.
- 5.41 With regard to the spatial strategy of the FNP, by allocating 16 brownfield sites primarily within the town centre environment, the FNP has potential to affect the existing character and feel of Faversham. This is especially the case for the

site allocations in Faversham Creek, which are noted above, is a particularly sensitive area. However, it is recognised that the brownfield sites are less likely to positively contribute to the character of the conservation area in their current form. In this context, high-quality regeneration and design through new development areas is more likely to positively impact the contribution that the sites make to the character of the conservation area and nearby heritage designations. Nonetheless, **the SEA recommends** that the site-specific policies also encourage proposals to be accompanied by a proportionate heritage assessment in order to ensure that the potential heritage significance of the site allocations and their surroundings are appropriately considered. This should address any concerns from Historic England with respect to the site allocations. The supporting policy framework, as set out below, will also help ensure that new development protects and enhances the historic environment.

- 5.42 In relation to the above, policy FAV15 (Faversham Creek Policy Area) outlines that development within Faversham Creek must have no significant adverse impact on the creek and its setting. Development must complement the character of the area, including the predominant three-storey building height of buildings, and it must conserve the area's heritage assets and their settings.
- 5.43 Following on from FAV15, policy FAV16 (Maritime Gateway Heritage Regeneration Area) supports the use, reuse and refurbishment of historic buildings and development to provide hospitality, leisure, assembly, recreation, tourism and visitor and community related uses. The policy also outlines that residential development will only be supported where it is part of a mixed-use scheme, meets the requirements of policy FAV15, and complements/ enhances the tourism and visitor potential of the area.
- 5.44 Similarly, policy FAV11 (Heritage) supports heritage-led regeneration and the adaptation and reuse of historic buildings where it preserves or enhances the character/ appearance of conservation areas and listed buildings. The policy also provides protection to non-designated heritage assets, urban archaeological zones, important views, and historic shopfronts.
- 5.45 Also of relevance to this SEA topic is policy FAV10 (Sustainable Design and Character), which outlines that new development must complement the existing townscape character. This will ensure that future development is in keeping with the existing character and feel of Faversham (which indirectly contributes to the setting of heritage assets), which is what draws many residents to live in the area, as well as tourists visiting the area.

Land, soil, and water resources

- 5.46 In terms of the preferred approach within the FNP, by allocating 16 brownfield sites primarily within the existing built-up area of Faversham, the FNP avoids the loss of greenfield/ BMV land. Delivering growth at brownfield sites supports the efficient use of land through the reuse of existing structures whilst rejuvenating previously developed land. Whilst there may be a greater potential for ground contamination on brownfield land, and therefore a need for remediation works prior to development, development provides an opportunity to improve soil quality in these locations, decreasing the likelihood of pollutants in the soil contaminating groundwater sources and nearby waterbodies.

- 5.47 According to the Kent Minerals and Waste Local Plan (KMWLP), the neighbourhood area contains Mineral Safeguarding Areas (MSAs) for sub-alluvial river terrace deposits and brickearth (Faversham – Sittingbourne Area). The prior primarily covers the northern extent of the neighbourhood area, around The Swale, whilst the latter covers smaller areas throughout the neighbourhood area. Notably, the FNP does not deal with excluded matters including mineral extraction, which is covered by the KMWLP. It is also anticipated that the site allocations would not adversely impact the integrity of any mineral resources in the neighbourhood area.
- 5.48 With respect to the protection of the water environment within the neighbourhood area, policy FAV15 (Faversham Creek Policy Area) outlines that development within Faversham Creek must have no adverse impact on the water quality of the Creek, including impacts from surface water or other water discharge, and considering impacts on protected sites downstream.
- 5.49 Only two sites – Beaumont Davey Close and 97-103 Ashford Road, covered in policy FAV29 (Other Sites) – intersect with Zone II of the Groundwater SPZ. Due to the protection provided by this designation, mitigation measures will likely be delivered as part of the development of these sites.

Community wellbeing

- 5.50 The FNP has taken a pro-active approach in identifying and allocating many of the available brownfield sites within the town centre to meet local housing requirements. In this respect, the FNP has a strong aspiration and focus to revitalise the town centre environment by facilitating the delivery of high-quality design through the regeneration of previously developed land. The site allocations will also facilitate new housing within proximity to key services and facilities within the neighbourhood area. Therefore, residents are also more likely to successfully integrate with existing communities in the town, contributing to the wellbeing and quality of life of residents.
- 5.51 The preferred approach been informed by the findings of the site assessments undertaken for the FNP, community consultation events, and the SEA findings. The Town Council (and Steering Group) are also committed to working with Swale Borough Council to identify additional suitable locations for development in the town.
- 5.52 In the wider context, there are several larger greenfield site options surrounding the town which are currently being considered by Swale Borough Council as potential strategic-scale allocations within the emerging Local Plan. It is anticipated that the strategic-scale allocations will deliver the 3,500 new homes for the wider Faversham area, positively contributing towards local needs alongside the delivery of new community assets and infrastructure.
- 5.53 The quality and type of development is a key influence on the quality of life of residents. In terms of the housing mix, policy FAV3 (Residential Mix and Standards) prioritises accommodation suitable for families (3 bedrooms), as well as smaller accommodation (2 bedrooms or less) suitable for first-time buyers, renters or those seeking to downsize, and accommodation suitable for older people and those with limited mobility. It also sets out that the affordable housing provision should comprise 66% affordable rent and 34% affordable

ownership. This is in line with recommendations made in AECOM's Housing Needs Assessment (HNA) for Faversham in June 2022²⁸.

- 5.54 More broadly, Neighbourhood Plan policies and proposals have a strong emphasis on delivering public realm improvements (including through green infrastructure provision) and community infrastructure provision. With a focus on health, policy FAV12 (Health, Recreation and Community) supports the delivery of new recreational and community facilities, including healthcare and sports facilities. The policy highlights the Alexander Centre, Assembly Rooms and Post Office as local community facilities of particular value. In addition to this, policy FAV13 (Local Green Space) designates eight green spaces within the neighbourhood area, which will be protected from development. This will support physical and mental health and wellbeing of the local community.

Transportation

- 5.55 Faversham has a good public transport network, consisting of Faversham Train Station, with direct links to London Victoria and St Pancras, Ebbsfleet, Dover, Rochester, Canterbury and Ramsgate, and several bus services, providing connections to Sittingbourne, Ashford, Whitstable, and Canterbury.
- 5.56 In terms of the local road network, London Road/ Canterbury Road, which is located along the southern boundary of the built-up area of Faversham, forms part of the A2 corridor. This connects Faversham to Sittingbourne to the west and Canterbury to the east. Notably, Swale experiences a high proportion of heavy goods vehicles in the traffic mix of key routes, including the A2. The M2 motorway bypasses the south of the built-up area of Faversham, connecting Faversham to Rochester to the west. In 2019, the length of the M2 between Faversham and Sittingbourne experienced traffic flows of approximately 14,000 vehicles per day. Both Junction 6 and 7 of the M2 suffer from congestion.
- 5.57 In terms of the site allocations, the FNP allocates 16 brownfield sites primarily within the existing built-up area of Faversham. In this respect, residents are likely to be in walking/ cycling distance of services and facilities, local employment opportunities and key transport nodes. This will have positive knock-on effects for both air quality and climate change. However, it is noted that these sites are relatively small in size, and in this respect, associated infrastructure, including the delivery of new footpaths and cycleways, will be limited. In relation to the above, policy FAV5 (Critical Road Junctions) seeks to ensure that development does not severely impact junctions with identified safety and/ or capacity issues, including three junctions along the A2.
- 5.58 In terms of active travel, the neighbourhood area has a substantial Public Right of Way (PRoW) network, including numerous public footpaths and bridleways. A particularly popular walking route is the Saxon Shore Way, a national recreational route which passes through Swale along the North Kent coast and marshes. National Cycling Route 1 also passes through Faversham.
- 5.59 Policy FAV6 (Footpaths, Bridleways and Cycleways) aims to protect and enhance existing footpaths, bridleways, and cycleways, and outlines that developers should provide new footpaths to contribute to the existing network. Also of relevance, policy FAV4 (Mobility and Sustainable Transport) promotes

²⁸ AECOM (2022): 'Faversham Housing Needs Assessment (HNA)', [online] available to access via [this link](#)

sustainable and active travel options by supporting development that provides pedestrian and cycle links to surrounding facilities, secure and covered storage for bicycles, and electric charging points for electric vehicles. The policy highlights the importance of inclusion, stating that these features should accommodate the needs of people with a range of mobilities or impaired vision.

- 5.60 Adding to the above, policy FAV10 (Sustainable Design and Character) outlines that the design and layout of development must prioritise pedestrian convenience, creating a permeable layout. Additionally, the design and layout of development must take account of the needs of people with limited mobility. With a focus on Faversham Creek, policy FAV15 (Faversham Creek Policy Area) outlines that development within Faversham Creek must have no adverse impact on public access to the waterfront and should seek to improve access by linking to existing footpaths and providing moorings.

Conclusions at this current stage

- 5.61 The assessment has concluded that the Regulation 14 version of the FNP is likely to have significant positive effects in relation to the 'Community Wellbeing' SEA topic through delivering housing which contributes towards local needs, by supporting accessibility to services and facilities, enhancing community facilities, and through promoting the regeneration of the town centre environment. This will support social inclusion, the quality of life of residents, and community vitality. Positive effects in relation to the 'Community Wellbeing' SEA topic are also linked to the Plan's promotion of green and blue infrastructure enhancements and encouragement of healthier modes of travel.
- 5.62 The FNP has taken a pro-active approach in identifying and allocating many of the available brownfield sites within the town centre to meet local housing requirements. The Town Council (and Steering Group) are also committed to working with Swale Borough Council to identify additional suitable locations for development in the town.
- 5.63 The FNP is also likely to lead to positive effects in relation to the 'Landscape and Townscape' and 'Land, Soil and Water Resources' SEA topics. These benefits largely relate to the Neighbourhood Plan's emphasis on allocating sites in the existing built-up area of Faversham (i.e., taking a brownfield-first approach to allocating sites), which provides opportunities to enhance the townscape through incorporating high-quality and sensitive design through new development proposals. Importantly, greenfield land surrounding the town is provided with a measure of protection in sensitive locations through the plan's proposals. Policies and proposals within the FNP seek to protect and enhance the relationship between the natural and built environment (i.e., between the town and the open countryside), helping to safeguard the open countryside from inappropriate development.
- 5.64 In relation to the 'Historic Environment' SEA topic, the FNP includes several measures which seek to conserve and enhance both designated and non-designated heritage assets (and their settings). This should help ensure that the design of any new development is in keeping with the existing character and feel of Faversham and the wider neighbourhood area. Additionally, a key focus of the FNP is to rejuvenate the town centre and protect the heritage significance of the conservation area and key areas of the town (including Faversham Creek). The spatial strategy has potential to bring high-quality and

sympathetic redevelopment/ regeneration of brownfield sites in the built-up area of the town. However, it is noted that this is largely dependent on the design and layout of sites, which has not been confirmed yet. In this respect, **the SEA recommends** that the wording of the site-specific policies is enhanced to encourage development proposals to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas. This will ensure that appropriate mitigation is provided to assuage any concerns by Historic England.

- 5.65 Additionally, the FNP will bring positive effects in relation to the 'Biodiversity and Geodiversity' SEA topic through seeking to retain and enhance ecological networks through the design of new development areas, in addition to encouraging net gains. Alongside, the allocation of sites within the existing built-up area of Faversham will facilitate development at further distance from designated sites for biodiversity (most of which are located to the north of the town) and on brownfield land which is likely to have a low biodiversity value in its current form. However, given the approaches taken forward through the FNP will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are less likely to comprise significant positive effects overall. Within the HRA, several recommendations in the form of additional policy wording have been made to ensure that adequate mitigation measures are delivered by developers at the planning application stage. Providing that the recommended mitigation measures within the HRA are appropriately reflected within the FNP, no adverse impacts on the integrity of internationally designated sites are expected as a result of the policies and proposals within the FNP.
- 5.66 Regarding the 'Climate Change' SEA topic, the policy framework of the FNP seeks to deliver sustainable design, local renewable energy schemes and sustainable transport, which will help to minimise the emissions associated with development in the neighbourhood area. Whilst the policy framework also gives due consideration to climate change adaptation, particularly regarding flood risk, several of the site allocations are within or within proximity to areas of Flood Zone 3. In this respect, the FNP requires flood risk assessments as part of any planning applications on these sites to identify and address any concerns. As the sites are existing brownfield sites, it is also acknowledged that the regeneration of currently underutilised areas within the town centre environment also has the potential to incorporate adaptation measures. However, this is dependent on the extent to which these adaptation measures are incorporated into the design of the schemes.
- 5.67 The Neighbourhood Plan will also initiate several beneficial approaches regarding the 'Transportation' and 'Air Quality' SEA topics, given its focus on enhancing the active travel network, including public rights of way and cycle routes, and encouraging sustainable modes of transportation.

6. What are the next steps?

Plan finalisation

- 6.1 This SEA Environmental Report accompanies the FNP for Regulation 14 consultation. Following the close of Regulation 14 consultation, any representations made will be considered by the Steering Group, and the FNP and Environmental Report will be updated as necessary. The updated and final version of the SEA Environmental Report will then accompany the FNP for submission to the Local Planning Authority, Swale Borough Council, for subsequent Independent Examination.
- 6.2 At Independent Examination, the FNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, the FNP will be subject to a referendum, organised by Swale Borough Council. If more than 50% of those who vote agree with the FNP, then it will be 'made'. Once made, the FNP will become part of the Development Plan for the town.

Monitoring

- 6.4 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the FNP to identify any unforeseen effects early and take remedial action as appropriate.
- 6.5 It is anticipated that monitoring of effects of the FNP will be undertaken by Swale Borough Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the FNP that would warrant more stringent monitoring over and above that already undertaken by Swale Borough Council.

Appendix A SEA scoping – Context review and baseline information

A.1 Air quality

Context review

Table A1.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A1.1 Plans, policies and strategies reviewed in relation to air quality

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The Clean Air Strategy	2019
UK plan for tackling roadside nitrogen dioxide concentrations	2017
A Green Future: Our 25 Year Plan to Improve the Environment	2018
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Swale Borough Council Air Quality and Planning – Technical Guidance	2021
Swale Borough Council Air Quality Modelling Report	2020
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF, which predominantly seeks early planning to reduce/ mitigate air quality impacts in development and to take advantage of opportunities to improve air quality. Measures to improve air quality include traffic and travel management and green infrastructure provision. Strategic development is expected to be focused on locations that have or will be provided with high levels of accessibility; supporting both a reduced need to travel and offering a genuine choice of transport modes. Smaller-scale development should consider the potential for cumulative effects in relation to air quality.
- Air Quality Management Areas (AQMAs) are declared in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/or nitrogen oxides.
- To improve air quality across the UK, national strategies have in the last few decades focused on regulatory frameworks, investment by industry in cleaner processes and a shift in the fuel mix towards cleaner forms of energy (largely at point sources). Whilst there are dedicated strategies to reducing roadside emissions (as a significant source of nitrogen dioxide emissions), recent objectives outlined in the Clean Air Strategy seek to recognise wider sources (including smaller contributors and diffuse sources) that contribute to poor air quality.

At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the air quality topic:

- Policy DM6 (Managing transport demand and impact)

Swale Borough Council's Air Quality and Planning – Technical Guidance aims to do the following:

- Explain how air quality is dealt with in planning applications in Swale, providing clarity and consistency of the process for developers, the LPA and local communities.
- Introduce Air Quality Statements (AQS) as part of the planning process and provide template(s) for applicants.
- Explain the standard mitigation requirements expected for all development.
- Set out when an Air Quality Assessment (AQA) is required, how this should be undertaken and how it will be used to determine the air quality impacts of planning applications.
- Explain the emissions mitigation assessment (including damage cost calculations) expected for development with potential air quality impacts.

Swale Borough Council's Air Quality Modelling Report has been prepared to help understand the air quality implications of the Local Plan Review. As part of the evidence base for LPR, it will help inform the choices it makes.

Due regard is also given to the policies and proposals with an air quality focus within the emerging Local Plan Review and the 'made' Faversham Creek Neighbourhood Plan.

Current baseline

In line with the Local Air Quality Management (LAQM) as set out in Section 82 of the Environment Act (1995), Councils are required to assess Air Quality standards within the region on an annual basis. There is currently one AQMA in the neighbourhood area – AQMA No 2/ 6 Ospringe extended – which was declared in 2016 due to an exceedance in nitrogen dioxide (NO₂). This AQMA supersedes and extends the previous AQMA at Ospringe to take account of additional tube monitoring results up the hill as far as the Mount.

The AQMA is located on the A2 (Ospringe Street/ London Road), where it intersects with the B2040 (Ospringe Road) and Water Lane. Several residential roads also intersect with this part of the A2, and in this respect, congestion is likely a key contributor to poor air quality in this area. This will be discussed in more detail under the transportation SEA topic.

Future baseline

Future growth in the neighbourhood area will ultimately affect the levels of traffic and congestion experienced, and in the absence of suitable planning and mitigation this could lead to a deterioration in air quality. However, it is unlikely that this will be significant given that the neighbourhood area is currently well served by public transport and has an extensive active travel network. Nevertheless, suitable mitigation measures should be incorporated into the design of new development areas to mitigate issues relating to air quality.

Positive planning could also be beneficial for air quality through opportunities to improve accessibility, particularly in terms of active travel and encouraging more local walkable journeys and sustainable connections.

A.2 Biodiversity and geodiversity

Context review

Table A2.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A2.1 Plans, policies and strategies reviewed in relation to biodiversity and geodiversity

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Environment Act 2021	2021
UK Biodiversity Action Plan	2007
The Natural Environment and Rural Communities Act	2006
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Swale Biodiversity Action Plan	2016
Swale Green and Blue Infrastructure Strategy	2020
Swale Biodiversity Baseline Report in Preparation for Requirements of the Environment Bill	2020
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF, which highlights that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity. This includes using a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale.
- Support is given through the Framework to establishing coherent ecological networks that are more resilient to current and future pressures. Trees notably make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, and that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards).
- Over the past decade, policy documents (e.g., The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss. The 25 Year Environment Plan places emphasis on improvements to the natural

environment; identifying the need to “replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats”. Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.

- The Environment Act 2021 sets parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Act identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Habitat maps are expected to include recovery and enhancement areas which are or could become of importance for biodiversity.
- At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the biodiversity and geodiversity topic:
 - Policy CP7 (Conserving and enhancing the natural environment – providing for green infrastructure).
 - Policy DM28 (Biodiversity and geological conservation)
 - Policy DM29 (Woodlands, trees and hedges)
 - Policy DM30 (Enabling development for landscape and biodiversity enhancement)
- The Swale Biodiversity Action Plan is intended to provide a sound basis for local actions working in partnership with environmental agencies to conserve, protect and enhance the biodiversity of the Borough.
- The Swale Green and Blue Infrastructure Strategy is intended to guide opportunities for a greener, healthier, more biodiverse and prosperous Borough from the period 2020-2039.
- The Swale Biodiversity Baseline Report presents the results of a mapping exercise to record a biodiversity baseline for the Borough. The purpose is to provide guidance on how the Council can meet the requirements of the Environment Bill, and how these requirements can be incorporated into the Local Plan Review.
- Due regard is also given to the policies and proposals with a biodiversity and geodiversity focus within the emerging Local Plan Review and the 'made' Faversham Creek Neighbourhood Plan.

Current baseline

Internationally designated sites

To ensure the European Directives were operable in the UK after the end of the EU transition period, changes were made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In this respect, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) in the UK no longer form part of the EU Natura 2000 ecological network. Instead, the 2019 Regulations propose the creation of a national site network within the UK territory²⁹. The network comprises

²⁹ DEFRA (2021): 'Policy Paper: Changes to the Habitats Regulations 2017', [online] available to access via [this link](#)

sites already designated under the Nature Directives (i.e., 79/409/EEC and 92/43/EEC), along with any additional sites which are designated under the 2019 regulations. The national site network continues to operate in parallel with other designations and contributes towards the UK's international commitments for protected areas.

The Swale SPA (and Ramsar site), which is a part of the Swale and Medway European Marine Site (EMS)³⁰, intersects the northern extent of the neighbourhood area (**Figure A2.1**). The Swale is an extensive complex of mudflats, saltmarsh and freshwater grazing marsh, an estuarine channel, and areas of shingle, shell and sand beaches and mussel beds.³¹ The saltmarshes and mudflats support a high species diversity of plants and invertebrates, including several nationally rare species. The area is of national importance for various breeding, passage and wintering ducks and waders, and regularly supports internationally important numbers of species of wintering waterbirds.

The European site conservation objectives for The Swale SPA are as follows:

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
 - The extent and distribution of the habitats of the qualifying features.
 - The structure and function of the habitats of the qualifying features.
 - The supporting processes on which the habitats of the qualifying features rely.
 - The population of each of the qualifying features.
 - The distribution of the qualifying features within the site.

Qualifying features of The Swale SPA include:

- A046a *Branta bernicla bernicla*; Dark-bellied brent goose (non-breeding)
- A149 *Calidris alpina alpina*; Dunlin (non-breeding)
- Breeding bird assemblage, and
- Waterbird assemblage.

Whilst not intersecting with the neighbourhood area, Blean Complex SAC lies approximately 6 kilometres east of the neighbourhood area.

Nationally designated sites

Sites of Special Scientific Interest (SSSI) are protected by law to conserve their wildlife or geology. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

Similar to the above, The Swale SSSI intersects the northern extent of the neighbourhood area (**Figure A2.1**). Whilst not intersecting with the neighbourhood area, Church Woods, Blean SSSI is located approximately 5 kilometres east of the

³⁰ Natural England (2014): 'European Site Conservation Objectives for The Swale SPA (UK9012011)', [online] available to access via [this link](#)

³¹ Ramsar (2007): 'The Swale', [online] available to access via [this link](#)

neighbourhood area, whilst Ellenden Wood SSSI is located approximately 6.5 kilometres east of the neighbourhood area.

Locally designated sites

Local Nature Reserves (LNRs) are a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by principal local authorities. They are places with wildlife or geological features that are of special interest locally, offering people opportunities to study or learn about nature or simply enjoy it.

Whilst there are no LNRs within the neighbourhood area, South Bank of the Swale LNR is adjacent to the northern boundary of the neighbourhood area, on the eastern side of Faversham Creek. Moreover, Oare Marshes LNR is located approximately 200 metres north of the neighbourhood area, on the western side of Faversham Creek. Notably, these two sites overlap The Swale SPA (and Ramsar site) and SSSI.

Priority habitats and species

There are a variety of Biodiversity Action Plan (BAP) priority habitats located within or within proximity to the neighbourhood area, including coastal and floodplain grazing, coastal saltmarsh, mudflats, good quality semi-improved grassland, deciduous woodland, and traditional orchard (**Figure A2.1**).

A spatial dataset is available that describes the geographic extent and location of Habitat Networks³² for 18 priority habitats based primarily, but not exclusively, on the Priority Habitat Inventory. The Priority Habitat Inventory³³ is a spatial dataset that describes the geographic extent and location of Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance. This inventory replaces Natural England's previous separate BAP habitat inventories. Additional data has also been added in relation to habitat restoration-creation, restorable habitat, plus fragmentation action, and network enhancement and expansion zones.

Much of the built-up area of Faversham is covered by Network Enhancement Zone 2, which is land connecting existing patches of primary and associated habitats which is less likely to be suitable for creation of the primary habitat. Meanwhile, to the north and south of the settlement there are areas of Network Enhancement Zone 1, which is land connecting existing patches of primary and associated habitats which is likely to be suitable for creation of the primary habitat.

There is also a significant area of Restorable Habitat to the north of the settlement, which are areas of land, predominantly composed of existing semi-natural habitat, where the primary habitat is present in a degraded or fragmented form, and which are likely to be suitable for restoration. This is in addition to smaller areas of Habitat Restoration-Creation (areas where work is underway to either create or restore the primary habitat), Network Expansion Zone (land beyond the Network Enhancement Zones with potential for expanding, linking/ joining networks across the landscape), and Fragmentation Action Zone (land within Enhancement Zone 1 that connects existing patches of primary and associated habitats which are currently highly fragmented and where fragmentation could be reduced by habitat creation).

³² Data.gov.uk (2021): 'Habitat Networks (England)', [online] available to access via [this link](#)

³³ Data.gov.uk (2022): 'Priority Habitat Inventory (England)', [online] available to access via [this link](#)

Countryside Stewardship (CS)³⁴ provides financial incentives for farmers, woodland owners, foresters and land managers to look after and improve the environment. Priority areas for CS measures are identified where the habitats of particular species need improving.

With regard to the neighbourhood area, almost the entire area is a priority area for Lapwing and Redshank, and the northern and southern extents of the neighbourhood area are a priority area for Corn Bunting. Whilst not within the neighbourhood area, the area directly to the north of the neighbourhood area is a priority area for Curlew.

Future baseline

Habitats and species will potentially face increasing pressures from future development within the neighbourhood area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The FNP presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of new development to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the neighbourhood area.

³⁴ Gov.uk (2020): 'Countryside Stewardship', [online] available to access via [this link](#)

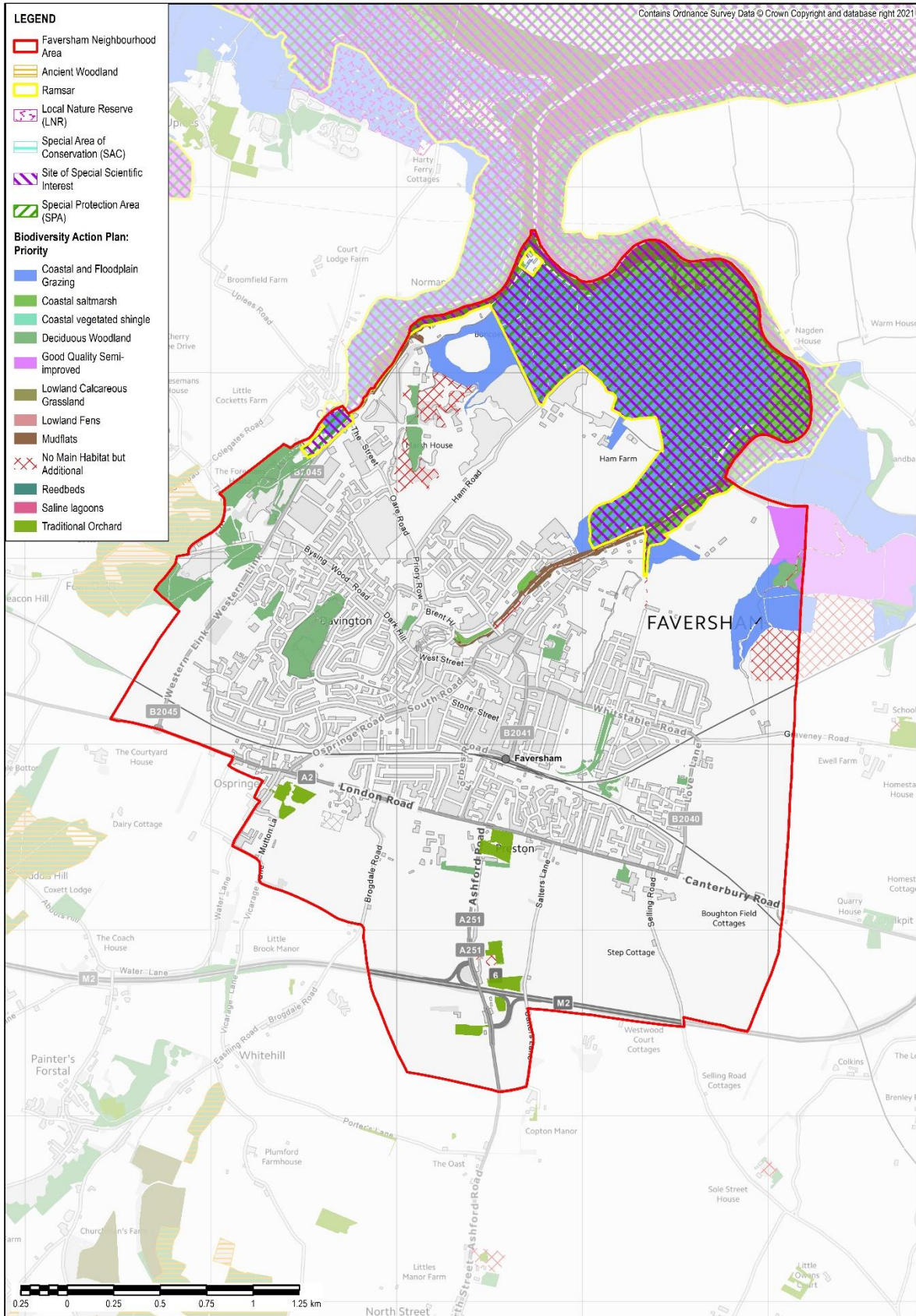


Figure A2.1 Internationally and nationally designated sites for biodiversity and BAP priority habitats within and near the neighbourhood area

A.3 Climate change

Context review

Table A3.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A3.1 Plans, policies and strategies reviewed in relation to climate change

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
UK Climate Change Act	2008
UK (second) National Adaptation Programme 2018 to 2023	2018
The Clean Air Strategy	2019
Clean Growth Strategy	2019
UK Sixth Carbon Budget	2020
25-Year Environment Plan	2019
National Infrastructure Assessment	2018
UK Climate Change Risk Assessment	2017
Flood and Water Management Act	2010
National Flood and Coastal Erosion Risk Management Strategy	2020
Historic England Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency	2018
Historic England Our Climate Change Strategy	2022
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Swale Borough Council Climate and Ecological Emergency Action Plan	2020
Swale Borough Council Level 1 Strategic Flood Risk Assessment	2020
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas (GHG) emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion.
- The Clean Growth Strategy, Clean Air Strategy and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan,

which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.

- At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the climate change topic:
 - Policy DM19 (Sustainable design and construction)
 - Policy DM20 (Renewable and low carbon energy)
 - Policy DM21 (Water, flooding and drainage)
- Swale Borough Council declared a climate and ecological emergency in June 2019.³⁵ The purpose of the declaration was to draw attention to the urgent need to reverse the decline in biodiversity in Swale and to take effective action to reduce carbon emissions in the borough. The declaration sets the goals for carbon emissions from the council's operations to be carbon neutral by 2025 and for the borough to be carbon neutral by 2030. Since the declaration, the Council has drawn up a Climate and Ecological Emergency Action Plan. The Action Plan sets out ten key actions, which are as follows:
 1. Retro-fit Swale House to cut carbon emissions (e.g. extra insulation, triple glazing, heat pump, solar PV).
 2. Replace the Council's fleet vehicles with electric vehicles.
 3. Revise procurement strategy to embed the climate and ecological emergency into all procurement decisions.
 4. Prior to the adoption of the Local Plan Review, use a planning condition based on a 50% improvement over current building regulations, ratcheting to 75% and 100% improvement by 2025 and 2028 respectively, as the basis for negotiation with developers through preapplication and planning application negotiations.
 5. Eliminate single-use plastic from council operations wherever possible.
 6. Tree planting on council land (target; 148,100 trees or 60 acres of woodland) to offset 20% of council emissions.
 7. Install EV charging points across the borough.
 8. Improve facilities and incentives for walking and cycling.
 9. Bulk buying scheme for solar PV installations paid-for by residents (in partnership with KCC).
 10. Fuel and water poverty outreach service to reduce fuel and water bills for vulnerable residents.

³⁵ Swale Borough Council (2020): 'Climate and Ecological Emergency', [online] available to access via [this link](#)

- Swale Borough Council’s Level 1 Strategic Flood Risk Assessment (SFRA) has been prepared to provide comprehensive and supporting evidence for the Local Plan Review. The SFRA provides flood risk evidence and a long-term strategy to support the management and planning of development, protect the environment, deliver infrastructure, and promote sustainable communities within the area. It also supports the selection of site allocations in the Local Plan Review and provides information and guidance to be used in the preparation of Flood Risk Assessments in support of site-specific planning applications.
- Due regard is also given to the policies and proposals with a climate change focus within the emerging Local Plan Review and the ‘made’ Faversham Creek Neighbourhood Plan.

Current baseline

Contribution to climate change

In June 2019, the government committed to reaching ‘net zero’ carbon emissions by 2050. Carbon dioxide (CO₂) emissions from the built environment are monitored and recorded at the local authority level.

Figure A3.1 indicates that CO₂ emissions per capita (t) in Swale have been consistently higher than those for Kent during the period 2005 to 2019. Notably, emissions peaked in 2010 in Swale. The rate of decline in emissions between 2005 and 2019 has been lower in Swale (44%) compared to Kent (51%), but comparable to England (43%).

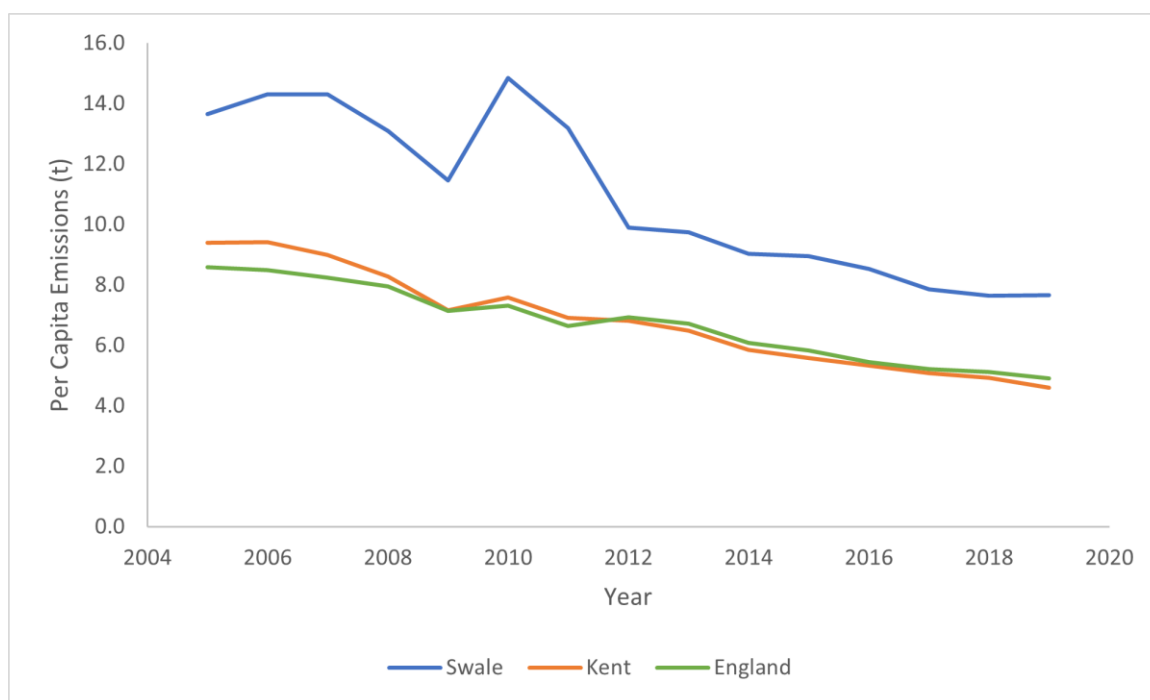


Figure A3.1 CO₂ emissions per capita during the period 2005 to 2019

Road transport is the largest emitter of greenhouse gas (GHG) emissions, with cars contributing 55% of UK domestic transport emissions (68 Metric tonnes CO₂ equivalent (MtCO₂e)) in 2018. Whilst the neighbourhood area is well served by public transport, and has a good active travel network, residents still rely on private cars to meet some of their needs.

The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

At present, there are six fast or rapid charging locations within the neighbourhood area. This includes one at Morrisons, one at the Tesco Superstore, one in Central Car Park, and three at the Premier Inn³⁶.

Effects of climate change

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team.³⁷ UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the South East during the period 2020 to 2039 compared to the period 1981 to 2000 are likely to be as follows:

- A central estimate of increase in annual mean temperatures of between 0.3°C and 1.5°C.
- A central estimate of change in mean precipitation of 0 to +8% in winter and 0 to -5% in summer.

As a result of these changes, the neighbourhood area will likely face increasing risks related to climate change, including:

- Increased incidence of heat related illnesses and deaths during summer, which is particularly poignant in light of the record-breaking temperatures seen in summer 2022.
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g., skin cancer, cataracts).
- Increased risk of injuries and deaths due to the number of storm events.
- Effects on water resources from climate change, such as the hosepipe bans seen in summer 2022, including the first such ban in Wales for more than 30 years; regarding the neighbourhood area, South East Water introduced a ban in Kent and Sussex in August 2022.³⁸
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including vulnerability to 1:100-year floods.
- A need to upgrade flood defences.

³⁶ Zap Map (2020): 'Map', [online] available to access via [this link](#)

³⁷ Met Office (no date): 'UK Climate Projections (UKCP)', [online] available to access via [this link](#)

³⁸ South East Water (2022): 'Temporary Use Ban', [online] available to access via [this link](#)

- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased drought and flood related problems.
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood risk

The neighbourhood area lies within the White Drain and Lakes operational catchment³⁹, however no rivers run through the neighbourhood area.

As shown in **Figure A3.2** overleaf, fluvial flood risk in the neighbourhood area is linked to Faversham Creek, which forms part of The Swale, a tidal channel of the Thames estuary, with much of the northern extent of the neighbourhood area falling within Flood Zone 3. This area of high fluvial flood risk primarily covers land outside of the settlement boundary of Faversham. However, there is a strip of land in Flood Zone 3 that extends through the settlement, running above the B2040 (Ospringe Road/ South Road/ North Lane) towards Ospringe in the southwest. There is another strip of land in Flood Zone 3 that extends south past St Mary of Charity Primary School towards the playing field and bowling green, and another that extends west through Oare Gunpowder Works Country Park towards Bysing Wood.

As shown in **Figure A3.3** overleaf, areas of high to low surface water flood risk are scattered throughout the entire neighbourhood area. Areas particularly at risk of surface water flooding include: Bysing Wood, the wooded area to the west of The Knowle, Stonebridge Pond, land running to the east of St Mary of Charity Primary School, Whitstable Road, land to the north of London Road where it meets Water Lane, Water Lane, Mount Field, and land running to the west of Salters Lane.

³⁹ Environment Agency (2022): 'White Drain and Lakes Operational Catchment', [online] available to access via [this link](#)

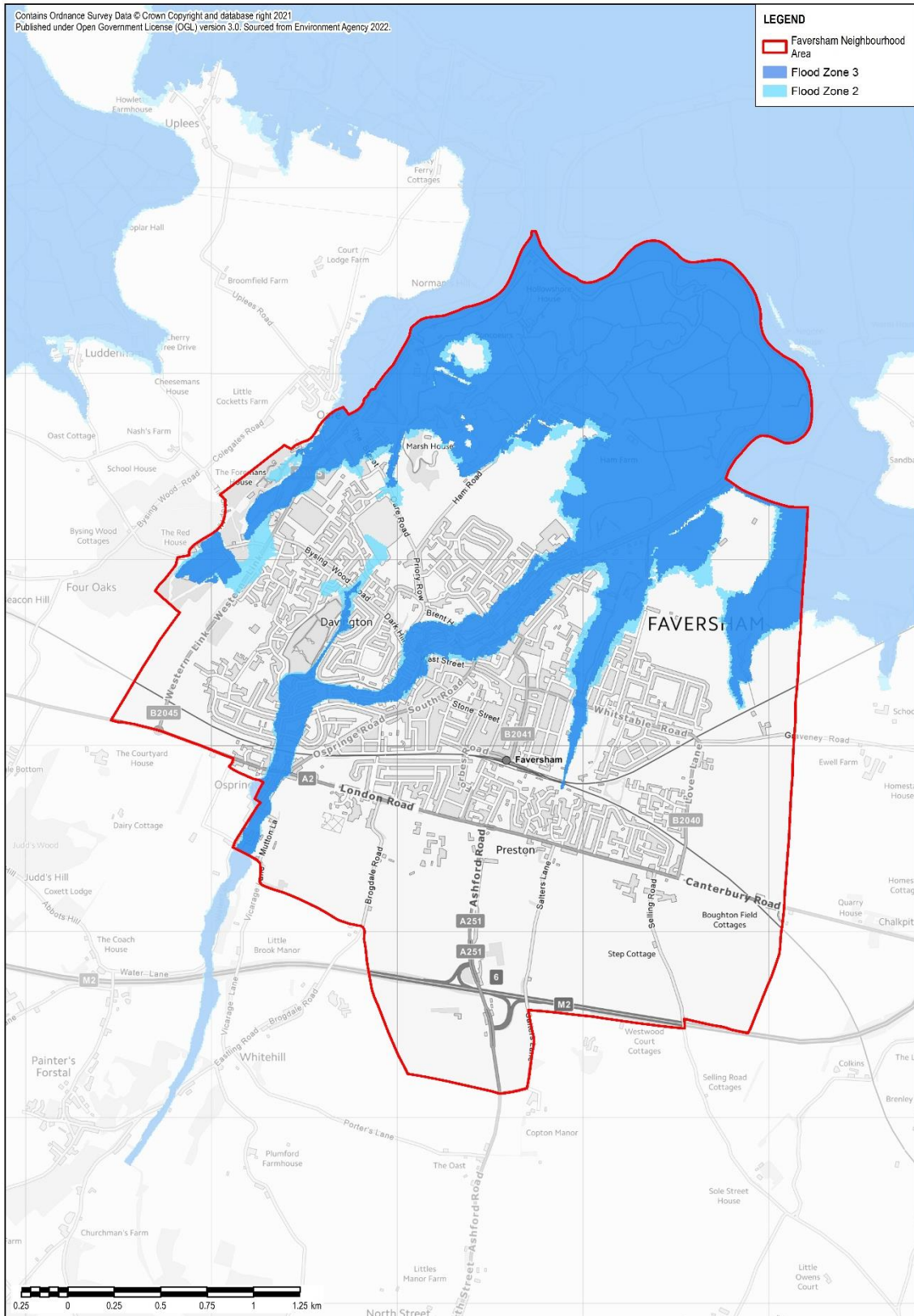
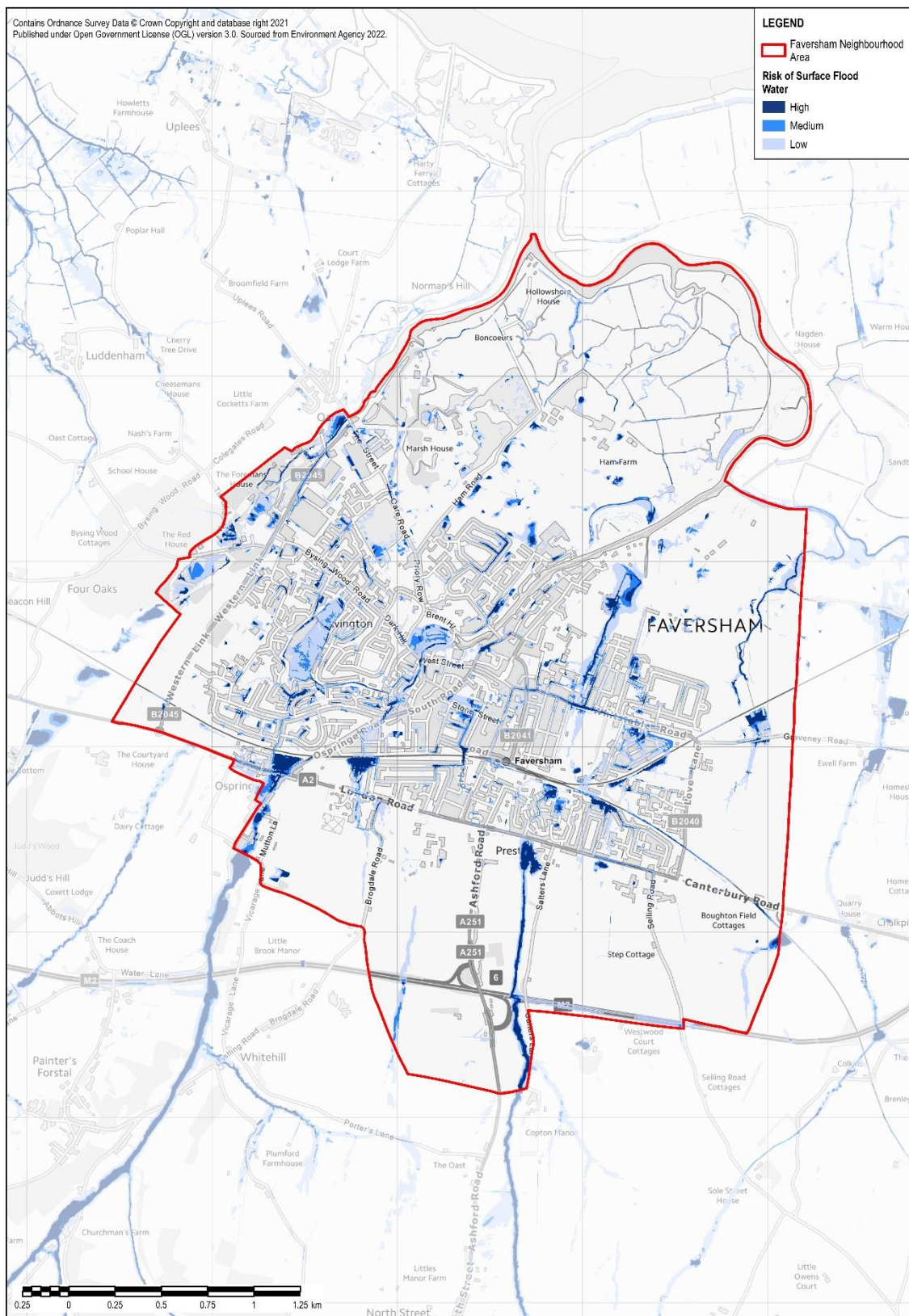


Figure A3.2 Fluvial flood risk in the neighbourhood area



Future baseline

In terms of climate change contribution, CO₂ emission per capita generated in the neighbourhood area may continue to decrease alongside the wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, it is noted that an increase in the built footprint of the neighbourhood area would contribute to increases in the absolute levels of CO₂ emissions.

Climate change has the potential to increase the occurrence of extreme weather events in the neighbourhood area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

A.4 Landscape

Context review

Table A4.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A4.1 Plans, policies and strategies reviewed in relation to landscape

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
The National Design Guide	2019
National Model Design Code	2021
The Kent Downs AONB Management Plan 2021-2026	2021
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Swale Important Local Countryside Gaps	2021
Swale Landscape Sensitivity Assessment	2019
Swale Local Landscape Designations	2018

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land, and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.

- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.
- At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the landscape topic:
 - Policy CP7 (Conserving and enhancing the natural environment – providing for green infrastructure)
 - Policy DM18 (Local green spaces)
 - Policy DM24 (Conserving and enhancing valued landscapes)
 - Policy DM25 (The separation of settlements – Important Local Countryside Gaps)
 - Policy DM29 (Woodlands, trees and hedges)
 - Policy DM30 (Enabling development for landscape and biodiversity enhancement)
 - Policy DM36 (Area of high townscape value)
- The Swale Important Local Countryside Gaps study contains an independent review of the land around the settlements of Faversham and Teynham. It provides an evidence base on the role these areas play in providing a sense of separation between settlements; safeguarding the open and undeveloped character of the land; and guarding against coalescence.
- The Swale Landscape Sensitivity Assessment provides a robust and up-to-date evidence base and assessment to inform the appropriate scale, form and location of future development to minimise harm to landscape and the setting of settlements. By assessing and mapping the relative sensitivity of different landscapes, the study provides a tool for informing landscape change.
- The Swale Local Landscape Designations paper presents a full review of the landscape across the borough to provide evidence to underpin a robust set of Local Landscape Designations (LLDs) to inform landscape policies in the Local Plan Review.
- Due regard is also given to the policies and proposals with a landscape focus within the emerging Local Plan Review and the 'made' Faversham Creek Neighbourhood Plan.

Current baseline

Nationally protected landscapes

The Kent Downs Area of Outstanding Natural Beauty (AONB) is located approximately 600 metres south of the neighbourhood area (**Figure A4.1**). An AONB is a designated exceptional landscape whose distinctive character and natural beauty are precious enough to be safeguarded in the national interest.⁴⁰

⁴⁰ Landscape for Life (no date): 'The National Association for Areas of Outstanding Natural Beauty', [online] available to access via [this link](#)

The Kent Downs AONB Management Plan 2021-2026⁴¹ states that the principles and goals of sustainable development are key to the management of the Kent Downs. Whilst the surrounding urban areas have expanded considerably, innovative management techniques and policy approaches have successfully addressed the pressures and opportunities presented by growth to the landscapes of the AONB. Through landscape scale restoration, conservation and enhancement the Kent Downs has played a key role in mitigating and balancing any negative environmental impacts of the significant growth that Kent has (and continues to) experienced.

⁴¹ Kent Downs (2021): 'The Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026', [online] available to access via [this link](#)

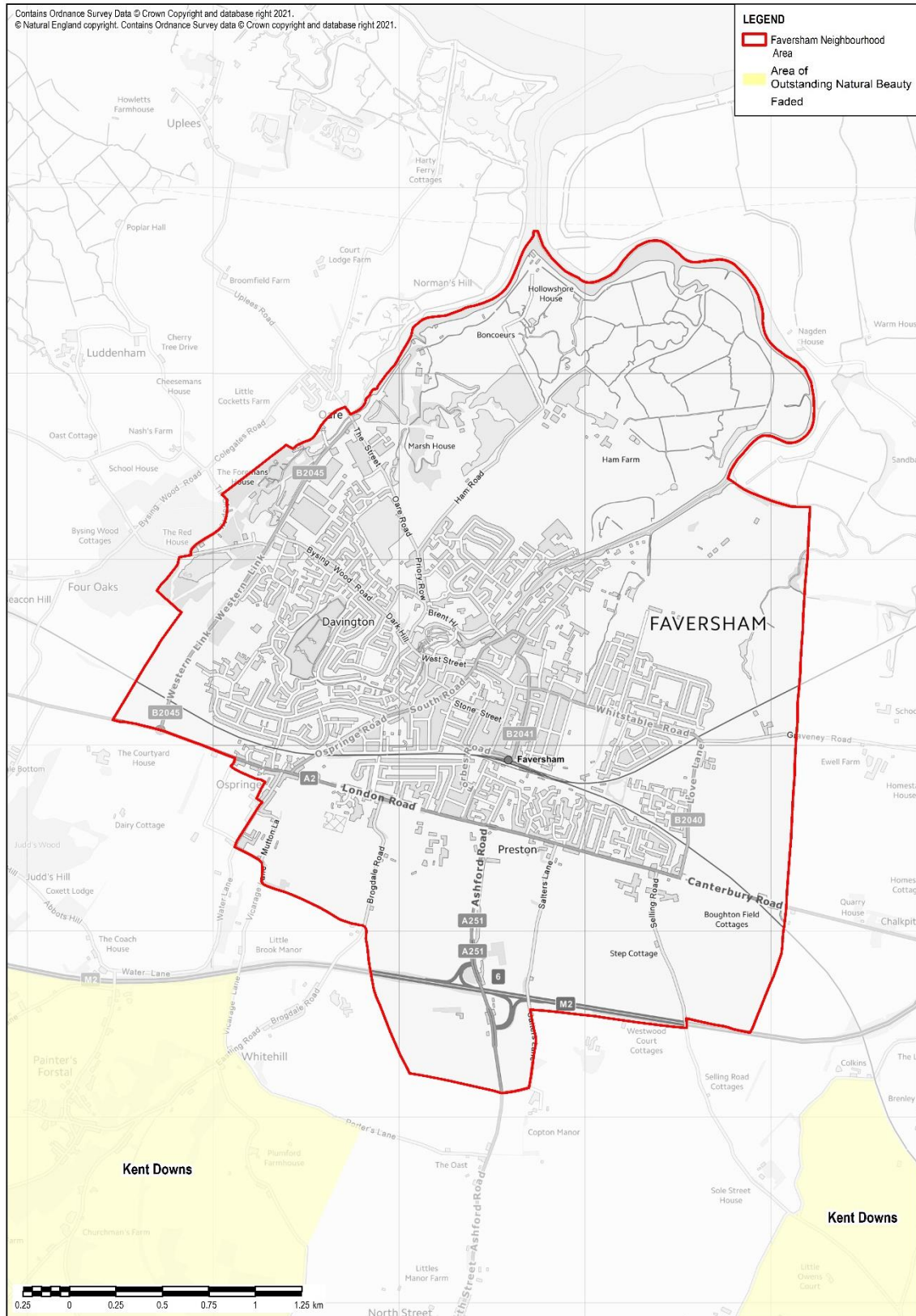


Figure A4.1 Nationally protected landscapes near the neighbourhood area

Local landscape and townscape character

Landscape and townscape character play an important role in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape and townscape character can help identify the likely significance of effects of change resulting from development, including the potential loss of visual and amenity value. Assessments often provide indications of the overall landscape sensitivity and landscape capacities for key areas.

The Swale Landscape Sensitivity Assessment (LSA) identifies landscape characterisations across the borough. The area to the north of the built-up area of Faversham is characterised as Clay Farmlands (Stone Arable Farmlands) and Marshland (Goodnestone Grasslands and Ham Marshes). The area to the south is characterised as Fruit Belt and Mixed Farmland (Faversham and Ospringe Fruit Belt), whilst area to the west is characterised as Dry Valleys and Downs (Doddington and Newnham Dry Valleys).

The LSA also assesses the overall landscape sensitivity (**Table A4.2**) of seven distinct landscape sensitivity assessment areas within Faversham (**Figure A4.2**), which are described as follows:

- FM1, FM2, FM3 – the gently undulating fruit belt and arable farmlands to the south and east.
- FM4 – the wooded dry valley at Syndale with mixed farmlands and parkland to the west and south west.
- FM5 – the rolling arable farmlands to the north west.
- FM6 – an area of flat arable farmland and gravel works bordering the marshlands to the north.
- FM7 – a small area of flat arable farmland and sewage works bordering the marshlands to the northwest.

Table A4.2 Overall landscape sensitivity of the seven distinct landscape sensitivity assessment areas surrounding the built-up area of Faversham

Assessment Area	Overall Landscape Sensitivity to Residential	Overall Landscape Sensitivity to Employment
FM1	Medium	Medium
FM2	High	High
FM3	High	High
FM4	High	High
FM5	High	High
FM6	High	High
FM7	Medium-High	Medium-High

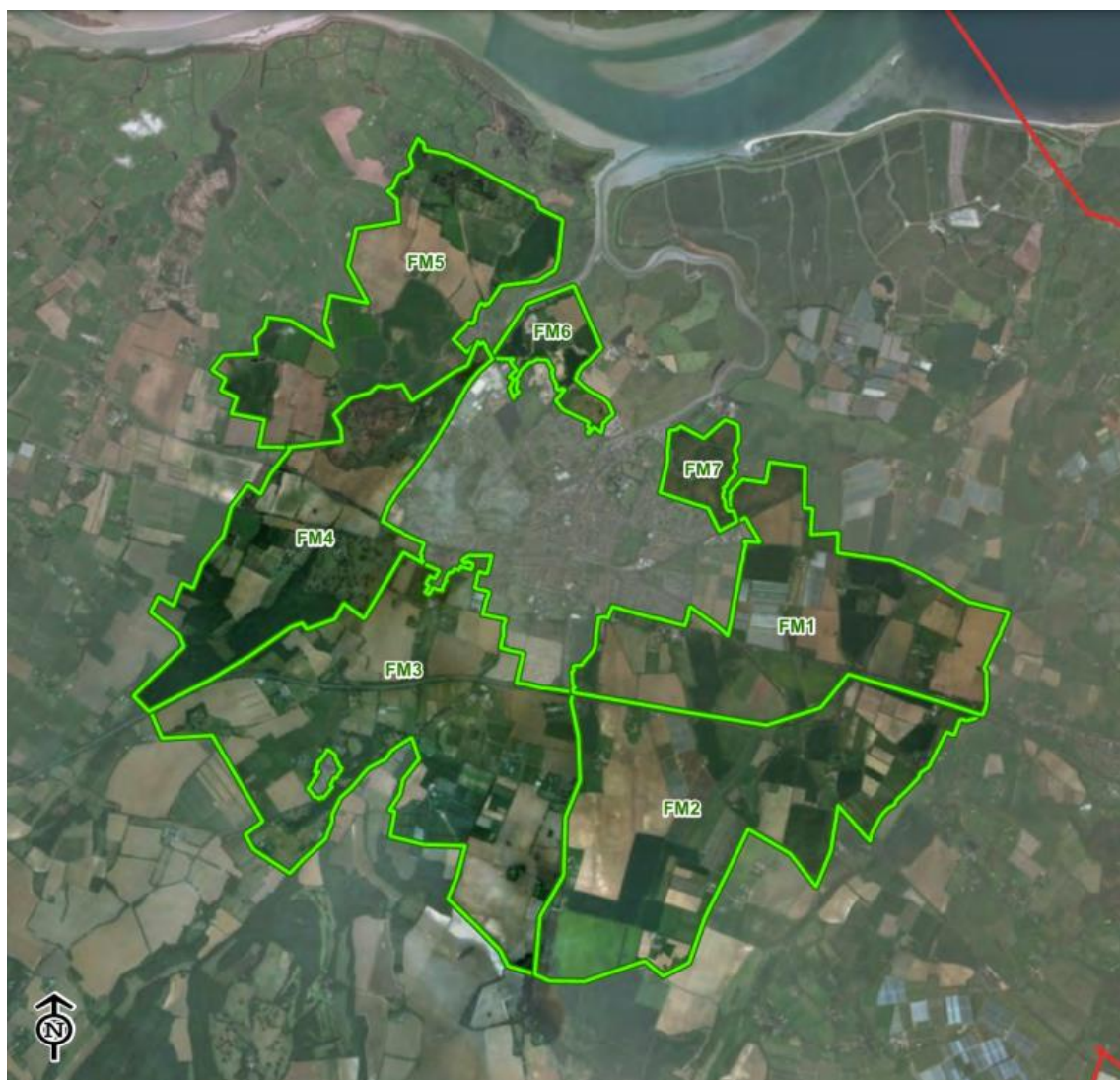


Figure A4.2 The seven landscape sensitivity assessment areas surrounding the built-up area of Faversham

In respect of the above, much of the area surrounding the built-up area of Faversham has a high landscape sensitivity, with the exception of assessment area FM1 to the east of Faversham, which has a medium landscape sensitivity.

Countryside gaps

Faversham is a historic market town and port, which grew around the small navigable waterways of Faversham and Oare in the north of the town. Unusually for the area, Faversham developed separately to the Canterbury-London route (now the A2). Although the town has since expanded to the A2 and beyond in the south, the original settlement pattern is still legible.

The Swale Important Local Countryside Gaps study identifies three countryside gaps between Faversham and nearby settlements, which are: Faversham and Ospringe, Faversham and Goodnestone, and Faversham and Oare.

Although historically distinct and separate settlements, the expansion of Faversham in the 20th century has resulted in coalescence between the south of Faversham and the north of Ospringe. However, the open space on either side of the A2 from the King George V Recreation Ground and fields, as well as views looking down the sloping land to the roofscapes of Ospringe, provide a sense of distinct settlements,

despite the small distance. Public rights of way ZF11 and ZF15 run through the gap, and users of these paths have a perception of travelling between settlements, particularly because there is limited intervisibility between Faversham and Ospringe in the gap.

Faversham and Goodnestone are separate and distinct, with the modern residential edge of the market town contrasting with the small historic hamlet at Goodnestone, which is perceived as part of the wider rural area. The area between Faversham and Goodnestone is in varied agricultural use, with areas of fruit growing, arable and pasture. There is limited development within the gap area; whilst there are some scattered farm buildings, these do not compromise the sense of undeveloped land within the gap. Oast houses at School Farm and along Head Hill contribute to the rural landscape character, as do the extant hop fields and mature cherry orchards, which provide a distinctive rural setting to the immediate east of Faversham.

Faversham and Oare, despite having a small distance between them, have a distinct and separate identity and character, with Oare being a distinct rural village on the western side of the creek, in contrast to the large market town of Faversham to the east. The land between Faversham and Oare contains Oare Road/ The Street, Oare Creek, wetlands and valley slope to the east and wetland meadow to the west. Oare Creek and the associated sloping valley provides an undeveloped setting to Oare, and a clear landscape boundary between the village of Oare and the edge of Faversham. There is some enclosure on the Faversham side of Oare Creek by trees and scrub, which also screens the industrial development/ tip site.

Tree preservation orders

Implemented by Local Planning Authorities (LPAs), Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering amenity, the LPA will likely take into consideration the following criteria⁴²:

- **Visibility:** the extent to which the trees or woodlands can be seen by the public.
- **Individual, collective, and wider impact:** considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

Spatial data on TPOs within the neighbourhood area is not available. However, it is likely that there are several TPOs present.

Visual amenity

It is useful to note that the views across the neighbourhood area are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

With regard to the countryside gap between Faversham and Ospringe, the dry nailbourne valley east of Water Lane provides a sense of enclosure concerning views from the road, which is reinforced by overhanging trees and hedgerows on Vicarage Lane and Mutton Lane. Views in the north of the area from footpath ZF11

⁴² GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via [this link](#)

are open, with the edge of Ospringe visible to the west down the valley slope. Views from bridleway ZF15 to the north and south-east are also open, with the new settlement edge of Faversham clearly visible. However, development to the east of Brogdale Road is largely screened by roadside vegetation. Despite their proximity, there are limited views from the southeastern boundary of Faversham to Ospringe across the undeveloped rural landscape. From the gap, views between settlements emphasize the distinction of Ospringe, with views of the roofscape extending south along the minor valley in contrast to the more modern edge of Faversham.

With regard to the gap between Faversham and Goodnestone, high hedgerows along Graveney Road, Whitstable Road and Head Hill Road limit views between the edge of Faversham and Goodnestone. A hop field south of School Farm also provides a strong rural screening element close to the expanding edge of Faversham. The recent eastward expansion of Faversham means that there are some views to development from this area, including along footpath ZR495 (Swale Heritage Trail), reinforcing the need for a countryside gap.

With regard to the gap between Faversham and Oare, the large commercial warehouses on the western industrial edge of Faversham are visible from Oare, and do not contribute positively to the visual character of the village. However, the warehouses do not occupy the whole of the view to the east, and the sloping valley sides of Oare Creek between the settlements provides an undeveloped foreground. There are longer views across Oare Creek and the marshes to the north east, which are critical to the rural character and setting of Oare. Of particular importance are the views from the east where the village and St Peter's Church can be seen perched on the old coastline above open valley slopes. The new residential development of Faversham Lakes is also visible in places and further reinforces the need for the gap designation.

Future baseline

New development has the potential to lead to incremental changes in landscape and townscape character and quality in and around the neighbourhood area. In the absence of the FNP, more speculative development may come forward within the open countryside or countryside setting, which could place increased pressure on the rural environments within the neighbourhood area. This may negatively impact upon the landscape and townscape features which contribute to the distinctive character of the area, in particular the unique qualities of the Kent Downs AONB.

However, locally distinctive landscape and townscape features, characteristics and special qualities can be protected, managed, and enhanced through the FNP. New development that is appropriately designed and landscape-led has the potential to support the area's inherent landscape character and quality. This may, for example, include regeneration and brownfield development that improves the town setting (although this is dependent on the availability of such land within the neighbourhood area), delivering green infrastructure improvements and/ or new recreational opportunities and enhanced framing of key views.

A.5 Historic environment

Context review

Table A5.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A5.1 Plans, policies and strategies reviewed in relation to the historic environment

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
The National Design Guide	2019
National Model Design Code	2021
Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management	2019
Historic England Advice Note 3: The Setting of Heritage Assets	2017
Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	2016
Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans	2015
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
A Heritage Strategy for Swale 2020-2032	2020
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
 - The historic environment is a shared resource.
 - Everyone should be able to participate in sustaining the historic environment.
 - Understanding the significance of places is vital.
 - Significant places should be managed to sustain their values.
 - Decisions about change must be reasonable, transparent, and consistent.
 - Documenting and learning from decisions are essential.
- The significance of places is the key element which underpins the conservation and enhancement of the historic environment. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building, an archaeological site, or a larger historic area such as a whole village or landscape.
- The FNP will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and

decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. The NPPF supports the use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.

- As set out in the NPPF, it should be ensured that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code. Design Codes can set out a necessary level of detail in sensitive locations, for example, with heritage considerations, and they can set out specific ways to maintain local character.
- Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes, and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.
- Historic England's Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of relevance for the FNP is the emphasis on the importance of:
 - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/or views contribute to the significance of heritage assets.
 - Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals and management plans.
 - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.
- In addition to conserving the historic environment, the FNP should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.
- At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the historic environment topic:
 - Policy CP8 (Conserving and enhancing the historic environment)
 - Policy DM32 (Development involving listed buildings)
 - Policy DM33 (Development affecting a conservation area)
 - Policy DM34 (Scheduled monuments and archaeological sites)
 - Policy DM35 (Historic parks and gardens)
 - Policy DM36 (Area of high townscape value)
- Swale's Heritage Strategy provides a framework for the designation, conservation, management and physical and economic regeneration of Swale's historic buildings and areas, including designated historic parks and gardens.

- Due regard is also given to the policies and proposals with a historic environment focus within the emerging Local Plan Review and the 'made' Faversham Creek Neighbourhood Plan.

Current baseline

Historic character of Faversham

As mentioned in the previous section, Faversham is a historic market town and port, which grew around the small navigable waterways of Faversham and Oare in the north of the town. Faversham was an important settlement in the Saxon period and became a member of the Cinque Port Confederation in the 11th century as a limb of Dover. Much of the heritage of Faversham is still intact, and the town is covered by several conservation areas.

Faversham Creek, a historic port and a limb of the Cinque Port of Dover, is a key area of historic focus. The Creek falls entirely within the Faversham Conservation Area and contains over 30 listed buildings and many other heritage assets, including historic townscapes, open spaces and distinctive views. Its significance lies not only in the built environment, but also in the Creek's unique character and sense of place. Given the continuous use of the Creek as a waterway since Roman times, and the importance of the port in the Saxon and medieval periods, there are likely to be important archaeological remains in this area, making it particularly sensitive to development.

Designated heritage assets and areas

The neighbourhood area's main landmarks include: The Parish Church of St Mary of Charity (Grade I listed building), Church of St Catherine (Grade II* listed building), Church of St Mary Magdalene (Grade I listed building), The Guildhall (Grade II* listed building), Almshouses (Grade II listed building); The training Ship Hasarde (Grade II* listed building), and The Maison Dieu (Grade II* listed building and scheduled monument).

Including the assets listed above, the neighbourhood area contains a total of 349 designated heritage assets, which are discussed in more detail below and presented in **Figure A5.1** at the end of this section.

Listed buildings

Listed buildings are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990⁴³.

According to the National Heritage List for England, the neighbourhood area contains 345 listed buildings; this includes 319 Grade II listed buildings, 23 Grade II* listed buildings, and three Grade I listed buildings.

The Grade I listed buildings in the neighbourhood area are:

- Faversham Abbey Minor Barn
- The Parish Church of St Mary of Charity
- Church of St Mary Magdalene

⁴³ Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available to access via [this link](#)

The Grade II* listed buildings in the neighbourhood area are:

- Faversham Abbey Major Barn
- Memorials to the victims of the 1916 Faversham Munitions Explosion
- Arden's House
- Fremlins Offices (including east wing and billiard room)
- Abbey Farmhouse
- Medieval stables at Abbey Farm
- The Training Ship Hasarde
- 121, West Street
- Cooksditch
- 1, The Market Place
- The Guildhall
- 5 and 6, The Market Place
- The Masonic Hall
- 81, Abbey Street
- 87 to 92, Abbey Street
- Gillett's Granaries
- Church of St Catherine
- Davington Priory
- 15, Ospringe Street
- The Maison Dieu Museum
- Barn to the North of Queen Court Farmhouse
- 84, Abbey Street
- Queen Court Farmhouse and Outbuildings

Scheduled monuments

The Ancient Monuments and Archaeological Areas Act (1979) allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled Monuments are nationally designated sites which are protected under the Act.

There are four scheduled monuments in the neighbourhood area, which are:

- The site of St Saviour's Abbey, including the remains of an Iron Age farmstead and Faversham Roman villa
- Chart gunpowder mills
- Oare gunpower works
- The Maison Dieu, a 16th century house incorporating part of a medieval hospital

Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁴⁴.

Faversham Conservation Area covers much of the built-up area of Faversham, whilst the much smaller Preston-next-Faversham Conservation Area covers a small area on the edge of Faversham where Salters Lane intersects with the A2 (Canterbury Road). Approximately half of Ospringe Conservation Area, which spans a significant stretch of Water Lane up to the A2 (Ospringe Street), intersects with the southwest corner of the neighbourhood area.

Conservation area appraisals are available for all three conservation areas⁴⁵, which provide a background on the history of these areas, as well as the key sites that make up the conservation areas. These essential sources of evidence will be reviewed in further detail during the next stages of the SEA process when considering the potential impacts of the FNP's proposals to these designations.

Notably, the neighbourhood area also borders Syndale Conservation Area to the southwest, and Whitehill Conservation Area is located approximately 900 metres to the southwest of the neighbourhood area. In this respect, future development in the neighbourhood area has the potential to impact the setting of these conservation areas due to their proximity to its boundary.

Registered parks and gardens

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance.

There are no registered parks and gardens in the neighbourhood area, however Mount Ephraim Grade II listed park and garden lies approximately 3 kilometres east of the neighbourhood area.

Locally important heritage assets

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work, or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

Swale's Heritage Strategy outlines that the Council is committed to developing a list of buildings, structures, landscape features, archaeological sites and parks and gardens of local heritage interest in partnership with Kent County Council, the Borough's local amenity societies, and any other interested parties or relevant parties such as the Kent Gardens Trust. The Council recognize that in developing such a list, a clearly defined set of criteria for selection and inclusion will be required,

⁴⁴ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via [this link](#)

⁴⁵ Swale Borough Council (no date): 'Swale's Conservation Areas', [online] available to access via [this link](#)

and there would also be benefit in providing supporting information on significance to assist with ongoing/ future conservation management. In addition to the above, the Council will also commit to positively considering suggestions for possible new conservation areas and areas of high townscape value.

A detailed search of the Heritage Gateway⁴⁶ produces 1,239 records within the neighbourhood area. In addition to the 349 designated heritage assets discussed above, this includes non-statutory designations, including 623 records listed under the Kent Historic Environment Record (HER).

During the subsequent stages of the SEA process (where appropriate, and subject to the availability of such information), the Kent HER will be reviewed in greater detail to determine the potential impacts to non-designated heritage features resulting from the provisions within the FNP.

Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register⁴⁷. The Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. None of the designated heritage assets within the neighbourhood area are listed on the Register.

It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the neighbourhood area are at risk.

Encouraging and facilitating improvements to the condition of heritage assets within the neighbourhood area (wherever practicable) is recognised as an opportunity for the FNP.

Future baseline

New development areas in the neighbourhood area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the neighbourhood area, there may be opportunity for new development to enhance the historic setting of the settlements within the area, support historic landscape character and better reveal assets' heritage significance.

⁴⁶ Heritage Gateway (2021): 'Quick Search', [online] available to access via [this link](#)

⁴⁷ Historic England (2021): 'Heritage at Risk', [online] available to access via [this link](#)

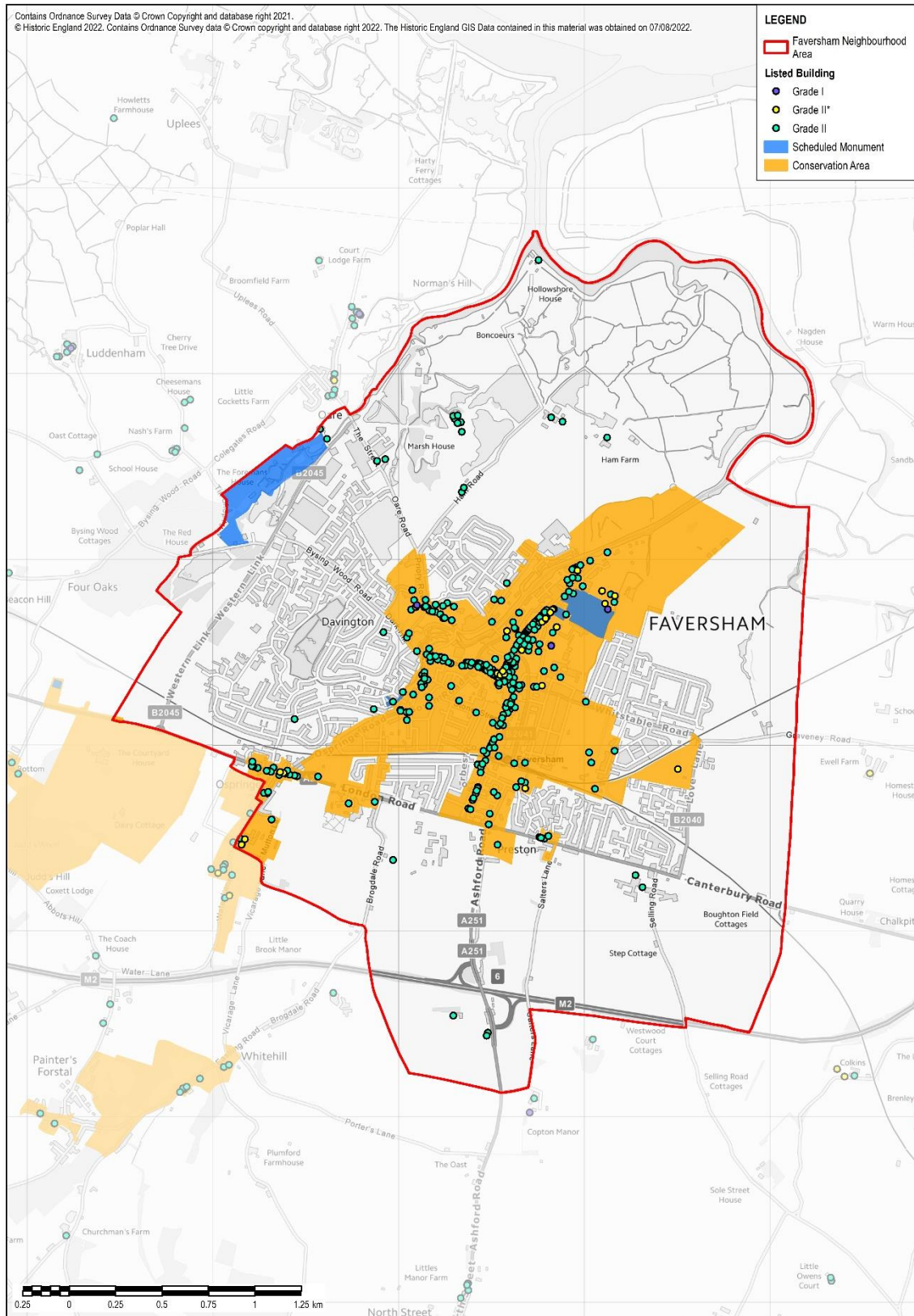


Figure A5.1 Designated heritage assets within and surrounding the neighbourhood area

A.6 Land, soil and water resources

Context review

Table A6.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A6.1 Plans, policies and strategies reviewed in relation to land, soil and water resources

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
Safeguarding our Soils: A strategy for England	2009
Future Water: The government's water strategy for England	2011
Water for Life	2011
The National Waste Management Plan	2013
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Kent Minerals and Waste Local Plan 2013-30	2020
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services. Furthermore, the NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably, and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero-waste economy.
- At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the land, soil and water resources topic:
 - Policy CP7 (Conserving and enhancing the natural environment – providing for green infrastructure)

- Policy DM21 (Water, flooding and drainage)
- Policy DM31 (Agricultural land)
- The Kent Minerals and Waste Local Plan 2013-30 describes the overarching strategy and planning policies for mineral extraction, importation and recycling, and the waste management of all waste streams that are generated or managed in Kent. It also describes the spatial implications of economic, social and environmental change in relation to strategic minerals and waste planning. The Plan identifies and sets out the following subjects for the period up to, and including, the year 2030:
 - The long-term spatial vision and strategic objectives for Kent's minerals and waste.
 - The delivery strategy for minerals and waste planning that identifies how the objectives will be achieved in the plan period.
 - Two areas where strategic mineral and waste development is likely to occur.
 - The Development Management (DM) policies that will be used when the County Council makes decisions on planning applications.
 - The framework to enable annual monitoring of the policies within the Plan.
- Due regard is also given to the policies and proposals with a land, soil, and water resources focus within the emerging Local Plan Review and the 'made' Faversham Creek Neighbourhood Plan.

Current baseline

Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality BMV agricultural land.

As shown in **Figure A6.1**, the neighbourhood area is predominantly underlain by Grade 1 (Excellent) agricultural land.⁴⁸ Only a small area in the northern extent of the neighbourhood area is underlain by Grade 4 (Poor) agricultural land. Similarly, in terms of BMV land, there is a high likelihood of BMV land (over 60% area BMV) underlying much of the neighbourhood area, and only a small area in the north has a low likelihood of BMV land (less than 20% area BMV).⁴⁹ Therefore, future development within the neighbourhood area has potential to result in the loss of productive agricultural land, which cannot be mitigated.

⁴⁸ Natural England (2010): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to access via [this link](#)

⁴⁹ Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land -Strategic scale map London and the South East (ALC019)', [online] available to access via [this link](#)

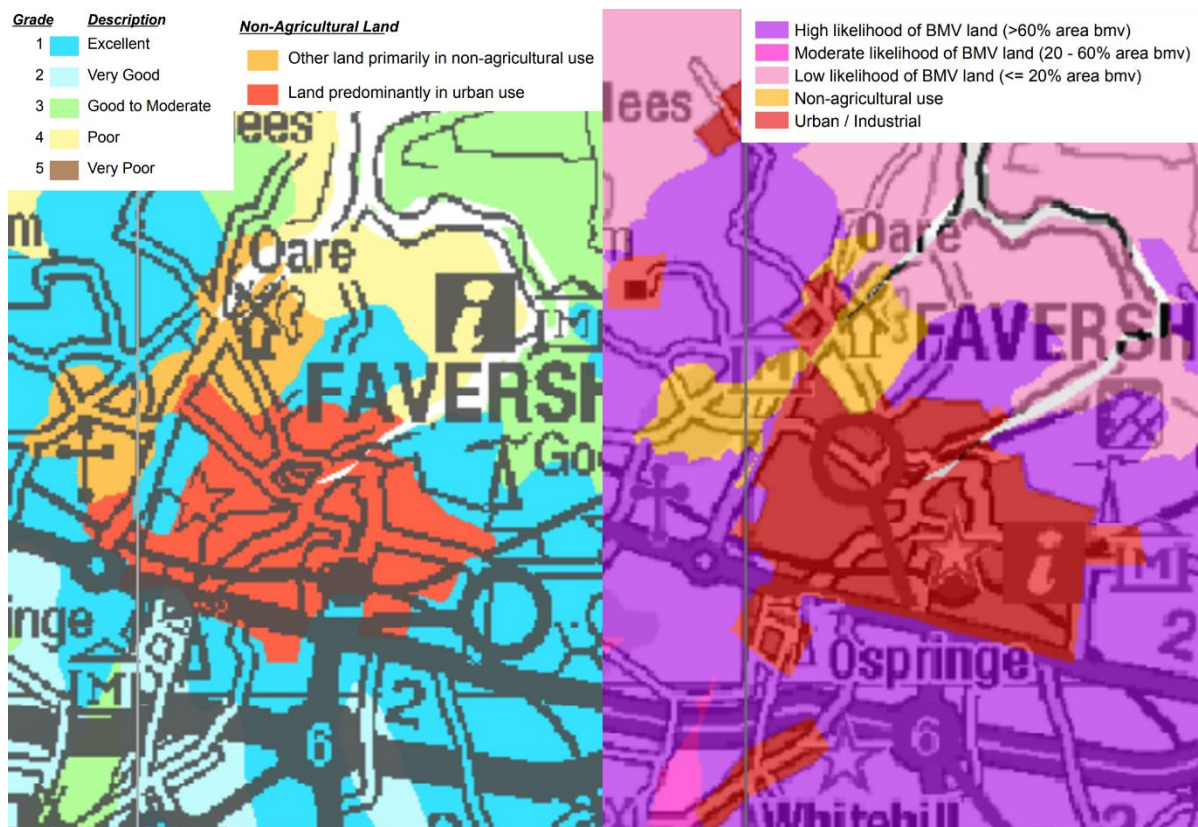


Figure A6.1 ALC and BMV agricultural land in the neighbourhood area

Water resources and quality

South East Water provides the water service for the neighbourhood area, whilst Southern Water provides the sewerage service.

According to South East Water’s Water Resources Management Plan (WRMP)⁵⁰, the neighbourhood area falls within the Ashford Water Resource Zone (WRZ) 8. The WRMP has allocated a risk score for each of their WRZs based on the scale and complexity of risk in supply, demand, and options. The Ashford WRZ8 received one of the highest complexity scores, indicating a high level of risk and uncertainty. Notably, this WRZ has the highest proportion of agricultural volume of all South East Water’s WRZs (26.5% of the agricultural water use from their supply is in this zone).

The neighbourhood area is located within the White Drain and Lakes operational catchment, however there are no water bodies within the neighbourhood area. However, The Swale, a tidal channel of the Thames estuary, falls within the northern extent of the neighbourhood area.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply⁵¹. Part of the neighbourhood area falls within a Zone I (Inner Protection Zone) and Zone II (Outer Protection Zone) SPZ. This area spans the central southern extent of the neighbourhood area, beginning at the top of North Lane, to the west of St Mary of Charity Church, and extending south past the M2.

⁵⁰ South East Water (2019): ‘Water Resources Management Plan 2020 to 2080’, [online] available to access via [this link](#)

⁵¹ GOV.UK (2017): ‘Groundwater Protection’, [online] available to access via [this link](#)

Nitrate Vulnerable Zones (NVZs)⁵² denote areas at risk from agricultural nitrate pollution. The neighbourhood area does not fall within an NVZ.

Mineral resources

Mineral Safeguarding Areas (MSAs) cover areas of known mineral resources that are of sufficient value to warrant protection for future generations. MSAs ensure that such resources are adequately and effectively considered in land-use planning decisions so that they are not needlessly sterilised.

According to the Kent Minerals and Waste Local Plan, the neighbourhood area contains MSAs for sub-alluvial river terrace deposits and brickearth (Faversham – Sittingbourne Area). The prior primarily covers the northern extent of the neighbourhood area, around The Swale, whilst the latter covers smaller areas throughout the neighbourhood area.

The Faversham area is the original source of yellow London stock bricks. At the time of writing this report, Kent only has one operational brickworks near Sittingbourne, which is supplied by brickearth extracted from sites in the Sittingbourne to Faversham area. Brickearth extracted from another site in north Kent provides the raw materials for a brickworks in East Sussex. National planning policy requires the provision of a stock of permitted reserves of at least 25 years for brick clay. Therefore, there is a need to ensure sufficient reserves are available to provide brickearth for these two brickworks so that the yellow London stock bricks can continue to be manufactured.

Future baseline

Given the presence of BMV land across much of the neighbourhood area, new development areas have the potential to result in the permanent loss of productive agricultural land. In this respect, the FNP should seek to retain greenfield land and make best use of brownfield sites for development. It is important to note that this is dependent on the availability of such sites.

Future development has the potential to affect water resources and quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the neighbourhood area and wider area. It will be important for new development to avoid impacts on water quality and to contribute to reducing consumption and improving efficiency.

A.7 Community wellbeing

Context review

Table A7.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

⁵² GOV.UK (2021): 'Nitrate Vulnerable Zones', [online] available to access via [this link](#)

Table A7.1 Plans, policies and strategies reviewed in relation to community wellbeing

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
National Planning Practice Guidance – Healthy and Safe Communities	2019
The 25 Year Environment Plan	2018
Health Equity in England: The Marmot Review 10 Years On	2020
Planning for Sport Guidance	2019
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Swale Borough Council Settlement Hierarchy Study	2020
Swale Borough Council Retail and Leisure Needs Assessment	2018
Swale Borough Council Housing Market Assessment	2020
Swale Borough Council Gypsy and Traveller and Travelling Showperson Accommodation Assessment	2018
Open Spaces and Play Area Strategy 2018-2022	2017
Swale Borough Council Local Green Spaces	2021
Swale Borough Council Playing Pitch Strategy 2015-2025	2015
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.
- The NPPF recognises the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity which contribute to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated through the 25-year Environment Plan.
- The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined.
- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 ‘planning-for-sport’ principles.
- At the local level, the following policies within the Swale Borough Local Plan (‘Bearing Fruits 2031’) directly relate to the community wellbeing topic:

- Policy ST2 (Development targets for jobs and homes 2014-2031)
 - Policy CP1 (Building a strong, competitive economy)
 - Policy CP3 (Delivering a wide choice of high-quality homes)
 - Policy CP5 (Health and wellbeing)
 - Policy CP6 (Community facilities and services to meet local needs)
 - Policy CP7 (Conserving and enhancing the natural environment – providing for green infrastructure)
 - Policy DM8 (Affordable housing)
 - Policy DM10 (Gypsy and Traveller sites)
 - Policy DM17 (Open space, sports and recreation provision)
 - Policy DM18 (Local green spaces)
- Swale’s Settlement Hierarchy Study reviews the existing settlement hierarchy by auditing the current provision of services and facilities in the Borough’s settlements and recommending whether it should be taken forwards as is or re-structured. It places Faversham in tier two of the settlement hierarchy, under ‘Secondary Towns’.
 - Swale’s Retail and Leisure Needs Assessment explores retail and commercial leisure need over the plan period of the Local Plan Review (2022 to 2038) and provides an up-to-date review of the performance of the town centres in the Borough.
 - Swale’s Housing Market Assessment provides a robust and up-to-date evidence base that enables an understanding of the Borough’s current and future housing needs over the plan period of the Local Plan Review.
 - Swale’s Gypsy and Traveller and Travelling Showperson Accommodation Assessment analyses the latest available evidence to identify the accommodation needs of Gypsies and Travellers, Travelling Showpeople, and houseboat dwellers from across the Borough.
 - Swale’s Open Spaces and Play Area Strategy sets out how the Council plans to protect, manage and enhance its open spaces over the period 2018-2022. Swale’s Local Green Spaces report identifies potential new local green space designations, and reconsiders existing ones, in light of the Local Plan Review. Swale’s Playing Pitch Strategy provides a clear, strategic framework for the maintenance and improvement of existing playing pitches and ancillary facilities over the period 2015-2025.
 - Due regard is also given to the policies and proposals with a community wellbeing focus within the emerging Local Plan Review and the ‘made’ Faversham Creek Neighbourhood Plan.

Current baseline

Population and age structure

The population of the neighbourhood area stood at 19,316 at the time of the 2011 census.⁵³ According to 2020 estimates, the population of the parish has increased

⁵³ City Population (no date): ‘Faversham’, [online] available to access via [this link](#)

by 4.6% to 20,204, however the upcoming release of the 2021 census data will provide a more accurate picture of the current population. Also according to 2020 estimates, 21.2% of the population is aged 0-17 years, 56.7% is aged 18-64 years, and 22.1% is aged 65 years and over.

Whilst 2021 census data for Faversham is yet to be released, data for Swale has been released⁵⁴ and provides an up-to-date picture of the population and age structure in the borough. The population has increased by 11.7%, from 135,800 in 2011 to 151,700 in 2021, which is higher than the increase for the South East (7.5%) and England (6.6%). There has been an increase of 27.3% in people aged 65 years and over, which is high compared to the 8.3% increase in people aged 15-64 and 9.4% increase in children aged under 15 years.

In respect of the above, Swale has an aging population. Notably, Office of National Statistics (ONS) figures⁵⁵ suggest that there will be an additional 7.5 million people aged 65 years and over in the UK in 50 years' time.

Index of multiple deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability, and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - 'Geographical Barriers': relating to the physical proximity of local services
 - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment Deprivation:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - 'Indoors Living Environment' measures the quality of housing.

⁵⁴ ONS (2022): 'How the population changed in Swale: Census 2011', [online] available to access via [this link](#)

⁵⁵ ONS (2021): 'Overview of the UK population: January 2021', [online] available to access via [this link](#)

- ‘Outdoors Living Environment’ measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
 - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)⁵⁶ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The neighbourhood area falls within 12 LSOAs (**Figure A7.1**), which are ranked as follows according to the overall IMD:

- **Swale 014A** – amongst the 40% least deprived neighbourhoods in the country.
- **Swale 014B** – amongst the 30% least deprived neighbourhoods in the country.
- **Swale 014C** – amongst the 20% most deprived neighbourhoods in the country.
- **Swale 014E** – amongst the 20% least deprived neighbourhoods in the country.
- **Swale 014F** – amongst the 20% most deprived neighbourhoods in the country.
- **Swale 015A** – amongst the 50% most deprived neighbourhoods in the country.
- **Swale 015B** – amongst the 30% most deprived neighbourhoods in the country.
- **Swale 015C** – amongst the 40% least deprived neighbourhoods in the country.
- **Swale 014D** – amongst the 30% least deprived neighbourhoods in the country.
- **Swale 015D** – amongst the 10% most deprived neighbourhoods in the country.
- **Swale 015E** – amongst the 40% least deprived neighbourhoods in the country.
- **Swale 015F** – amongst the 30% least deprived neighbourhoods in the country.

⁵⁶ DCLG (2019): ‘Indices of Deprivation Explorer’, [online] available to access via [this link](#)

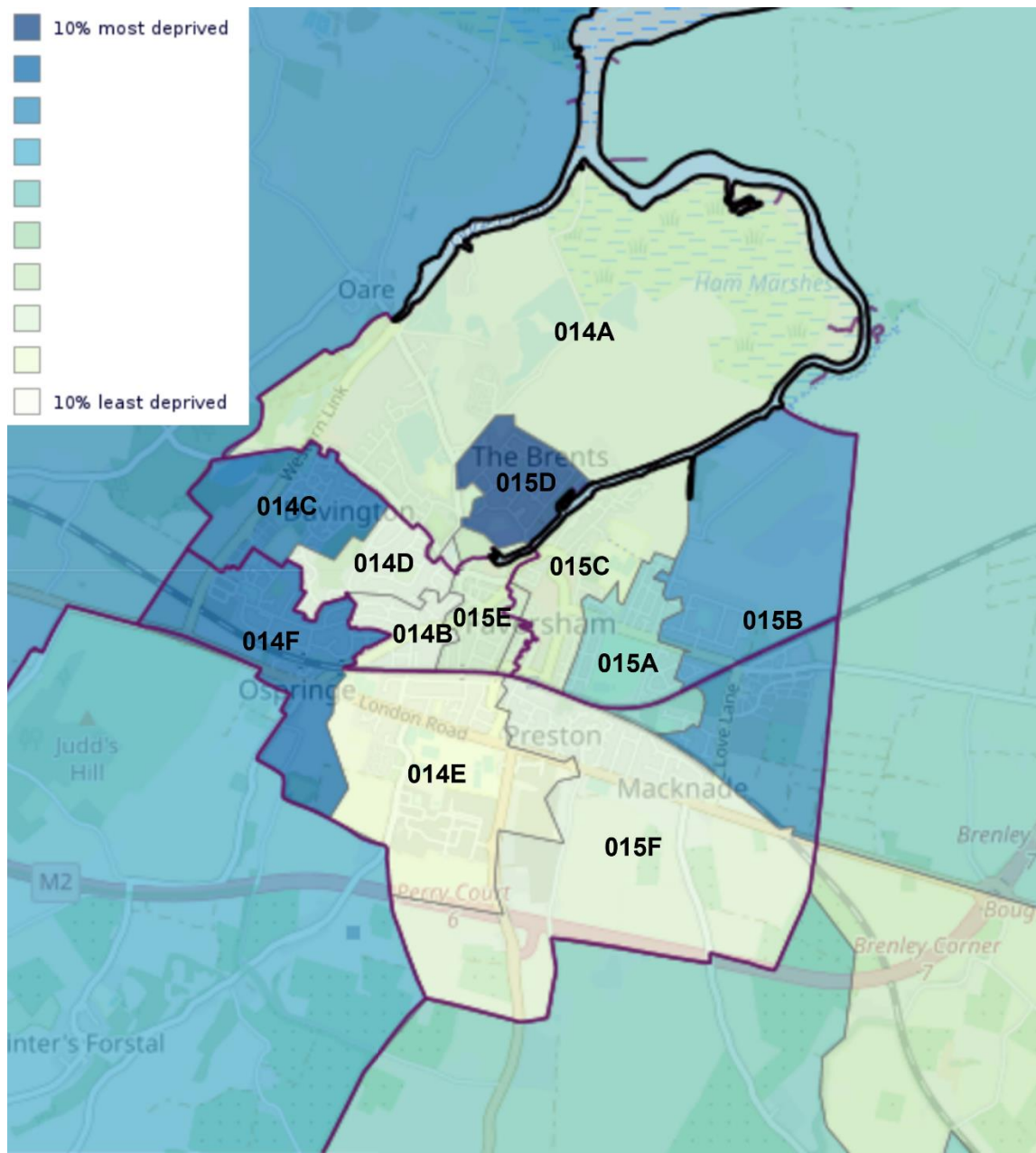


Figure A7.1 LSOAs within the neighbourhood area, ranked according to the overall IMD

In terms of the ‘Barriers to Housing and Services’ domain, Swale 014C ranks the lowest, and is amongst the 10% most deprived neighbourhoods in the country. This suggests that the physical and financial accessibility of housing and local services in this part of the neighbourhood area is poor.

In terms of the ‘Living Environment Deprivation’ domain, Swale 015C and Swale 015E rank the lowest, and are amongst the 20% most deprived neighbourhoods in the country. This suggests that the quality of the local environment in this part of the neighbourhood area is poor.

Housing tenure and affordability

In terms of completions between 2010 and 2021 in the neighbourhood area, out of a total of 883 dwellings, 172 were affordable (19.5%). Of the affordable dwellings, two were for social rent, 133 for affordable rent, 12 for other rent, and 25 as affordable

home ownership products. House prices have risen consistently in the area over the last decade from a median of £165,000 in 2012 to a median of £300,000 in 2021, marking a very substantial growth rate of 82%. Lower quartile house prices have grown from £135,000 in 2012 to £236,000 in 2021, marking a growth rate of 75%.

AECOM produced a Housing Needs Assessment (HNA) for Faversham in June 2022.⁵⁷ The assessment found that 1,225 affordable homes should be delivered in Faversham over the plan period, or 77 affordable homes per annum. When applying the affordable rent/ affordable home ownership split of 66.2% to 33.8% from the Strategic Housing Market Assessment (SHMA) for Swale Borough Council, this amounts to 811 affordable rented homes and 414 affordable home ownership homes, or 51 affordable rented homes per annum and 26 affordable home ownership homes per annum.

Housing type and size

In terms of housing type, the majority of dwellings in the neighbourhood area are terraced, followed by semi-detached, with the smallest proportion of dwellings being detached. Although terraced dwellings are also dominant across Swale, this is observed to a much greater extent in Faversham. In terms of flats, although the neighbourhood area has a greater proportion than Swale, there is a significantly lower proportion than across England.

In terms of housing size, the majority of dwellings in the neighbourhood are 3-bedroom homes, followed by 2-bedroom and then 1-bedroom. Between 2011 and 2021, the proportion of smaller to mid-sized dwellings grew whilst the proportion of the smallest and largest dwellings fell. The proportion of 2-bedroom dwellings in the neighbourhood area is significantly higher than the proportion across Swale. However, the proportion of 3-bedroom dwellings is lower than the proportion across Swale.

The AECOM model suggests that the 2038 target mix for the neighbourhood area should have a greater proportion of dwelling sizes of mid-size properties. It suggests the mix should remain dominated by 3-bedroom dwellings, followed by 2-bedroom dwellings. In order to reach the target mix, it is recommended that a variety of sizes be delivered, with a focus on 3 and 2-bedroom dwellings because of their affordability benefits, combined with the recent supply of larger homes in recent housing developments.

Community assets and infrastructure

The neighbourhood has a range of community assets and infrastructure, including a railway station, several bus stops, churches, schools, museums, a cinema and a wide array of shops and restaurants. Markets are held on Tuesdays, Fridays and Saturdays every week on Market Place.

Green infrastructure networks

Access to the nation's gardens, parks, woodlands, and rivers have played a huge part in helping people through the pandemic. Almost nine in ten adults surveyed in England reported that being in nature makes them very happy and nearly three quarters of adults were concerned about biodiversity loss in England⁵⁸. The

⁵⁷ AECOM (2022): 'Faversham Housing Needs Assessment (HNA)', [online] available to access via [this link](#)

⁵⁸ Natural England (2020): 'People and Nature Survey', [online] available to access via [this link](#)

research also revealed the importance of local parks and green spaces to the nation’s mental and physical wellbeing.

The neighbourhood area has numerous green spaces, with a particular large space in the northern extent of the neighbourhood area and lies in close proximity to the Kent Downs AONB to the south. In terms of designated Local Green Space (LGSs), Swale’s Local Green Spaces document identifies 32 LGSs in Faversham. Some of these green spaces are playgrounds or areas of grassland that are important places where residents can take a break from the urban environment, walk their dogs, play games with their children, or just socialise with friends and family. Multiple use areas, such as Oare Gunpowder Works Country Park, fulfil both recreational and biodiversity needs.

Future baseline

As the population of the neighbourhood area continues to age, this could potentially negatively impact upon the future vitality of the local community in certain parts of the area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g., size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies throughout the FNP. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

The importance of local services and facilities, and access to open green spaces and recreational areas has been further highlighted through the ongoing pandemic. These factors are more likely to be appropriately considered and addressed through planned development rather than unplanned development.

The Covid-19 pandemic has also changed the way people work and shop. For many people, working from home is likely to continue to form part of a more flexible approach.

A.8 Transportation

Context review

Table A8.1 below presents the most relevant documents identified in the policy review for the purposes of the FNP.

Table A8.1 Plans, policies and strategies reviewed in relation to transportation

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The Transport Investment Strategy – Moving Britain Ahead	2017
The Swale Borough Local Plan (Bearing Fruits 2031)	2017
Draft Swale Borough Council Transport Strategy 2022-2037	Not yet published
Swale Highway Model	2020
Swale Borough Council Infrastructure Delivery Plan	2021
Swale Borough Local Plan Issues and Preferred Options (Regulation 18)	2021
Faversham Creek Neighbourhood Plan Referendum Version	2017

The key messages emerging from the review are summarised below:

- The FNP will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of plan-making and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliability of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.
- At the local level, the following policies within the Swale Borough Local Plan ('Bearing Fruits 2031') directly relate to the transportation topic:
 - Policy CP2 (Promoting sustainable transport)
 - Policy DM6 (Managing transport demand and impact)
 - Policy DM7 (Vehicle parking)
- The draft Swale Borough Council Transport Strategy will help transform Swale into a more sustainable borough which supports growth without harming the local environment. The Strategy's overall vision is to:

“Deliver a sustainable transport network in Swale that creates an attractive, green and vibrant borough. The transport strategy will enable and encourage people to travel sustainably and actively, nurture healthy lifestyles, create less polluted places and upgrade the transport network to meet the boroughs needs.”
- The Strategy has six overarching objectives which will help it meet this aim, which are:
 - **Objective 1** – to promote active and sustainable travel enabling residents to take up these modes.
 - **Objective 2** – to reduce and mitigate the impact of poor air quality related to transport whilst striving for net zero.
 - **Objective 3** – to improve the journey time reliability and resilience across the transport network.
 - **Objective 4** – to support the economic growth and development projected in the Local Plan Review.
 - **Objective 5** – to consider the needs of all users across the transport network.
 - **Objective 6** – to substantially reduce all road casualties and progress towards zero killed and seriously injured (KSI) casualties.

- The Swale Highway Model was developed to test the traffic impacts of both new developments and transport infrastructure across Swale. Following the Local Plan Option Test (2019), the model has been used to support the assessment of the Local Plan Review with a set of new development assumptions and mitigation measures.
- Swale's Infrastructure Delivery Plan (IDP) establishes what additional infrastructure and service needs are required to support the level of development proposed in the Local Plan Review over the period to 2038. The IDP will help ensure that the identified additional infrastructure and service needs are delivered in a timely, co-ordinated and sustainable way.
- Due regard is also given to the policies and proposals with a transportation focus within the emerging Local Plan Review and the 'made' Faversham Creek Neighbourhood Plan.

Current baseline

Rail network

Faversham railway station is on the Chatham Main Line, with direct links to London Victoria (1 hour 15 minutes) and St Pancras (1 hour 10 minutes), Ebbsfleet, Dover, Rochester, Canterbury, and Ramsgate. The station and all trains that call at it are operated by Southeastern. The railway station is located close to the centre of the built-up area of Faversham, off Station Road.

According to 2011 census data, 6.9% of journeys to work in Swale are by rail, which is higher than the average for England. However, in Faversham, this figure is even higher with 10.2% of residents travelling to work by train.

Notably, step free access is provided at all stations in Swale other than Faversham, which has a degree of step free access. Step free access is vital to ensuring all people, regardless of mobility are able to access rail services.

Bus network

The neighbourhood area is served by several bus routes that provide connections to Sittingbourne, Ashford, Whitstable, and Canterbury. The main operators in the area are Stagecoach (route 3, X3 and 666), Chalkwell (routes 662, 664 and 666) and Regent Coaches (route 660).

The draft Transport Strategy highlights that the use of public transport in Faversham is just below the average for England.

Road network and congestion

London Road/ Canterbury Road, which is located along the southern boundary of the built-up area of Faversham, forms part of the A2 corridor. This connects Faversham to Sittingbourne to the west and Canterbury to the east.

The M2 motorway bypasses the south of the built-up area of Faversham, connecting Faversham to Rochester to the west. In 2019, the length of the M2 between Faversham and Sittingbourne experienced traffic flows of approximately 14,000 vehicles per day.

Junction 6 of the M2 is located just south of Faversham, connecting the motorway with the A251 (Ashford Road), which connects with the A2 to the north, and to the

south it routes towards Ashford. According to the draft Transport Strategy, whilst this junction generally does not suffer congestion, there are occasional bottlenecks at the junction between the A251 and the A2, which effects the motorway junction and can cause safety issues. In response to this, the Kent Strategic Congestion Management programme has recently delivered improvements to the A2/ A251 junction near Faversham.

Junction 7 of the M2, also known as Brenley Corner, is located to the east of Faversham. This junction connects the M2 with the A2 and the A299 (Thanet Way). The draft Transport Strategy highlights that this junction suffers from congestion at peak times, particularly along the eastern A2 arm. Highways England are currently seeking developer contributions towards an improvements scheme in this location.

Notably, Swale experiences a high proportion of heavy goods vehicles in the traffic mix of key routes, including the A2. The road network in Swale is such that the A2 provides the only reasonably practical east-west link to certain parts of the borough, including between Sittingbourne and Faversham.

Several junctions within Faversham town centre also experience heavy congestion, especially during peak times in the morning and evening when people are commuting to/ from work and school.

Regarding levels of commuting, as a smaller settlement, Faversham experiences a high proportion of out-commuting (46%), of which many are travelling to Canterbury. According to 2011 census data, Faversham has one of the lowest levels of residents driving to work, with more residents choosing to travel by train as discussed above. Also according to 2011 census data, the central part of the built-up area of Faversham has a lower level of car ownership when compared to the average for Swale.

Commencing in September 2020, a 20 miles per hour (mph) limit was trialed in Faversham for 17 months as part of plans to increase walking and cycling. This scheme is one of various active travel initiatives to encourage more cycling and walking in the wake of the Covid-19 pandemic in Kent, funded by the Government's active travel fund. Studies that show 20mph schemes encourage healthier transport choices such as walking and cycling, and they can increase levels of walking and cycling by about a fifth. The 20mph limit was made permanent following the success of the trial.⁵⁹

In terms of parking, Faversham contains five car parks, with nearly 500 spaces. Car parks are situated within walking distance of the town centre, occupying prime locations. There is a Controlled Parking Zone (CPZ) in Faversham, which gives preference to residents who purchase permits.

Public rights of way

Walking and cycling has become increasingly important since the onset of the Covid-19 pandemic, which is partially due to an increase in free time as a result of home working.

The neighbourhood area has a substantial Public Right of Way (PRoW) network, including numerous public footpaths and bridleways.⁶⁰ These routes allow residents

⁵⁹ Kent Online (2022): 'Permanent 20mph speed limit introduced across Faversham following trial', [online] available to access via [this link](#)

⁶⁰ Kent County Council (no date): 'Public Rights of Way Map', [online] available to access via [this link](#)

who live within the built-up area of Faversham to access the surrounding countryside within and outside of the neighbourhood area.

A particularly popular walking route is the Saxon Shore Way, a national recreational route which passes through Swale along the North Kent coast and marshes. The route runs for 257 kilometres from Gravesend to Hastings and passes through Faversham. In addition to this, guided walks are organised in Faversham town centre to encourage visitors.

In terms of cycle paths, National Cycling Route 1 passes through Faversham, partly following the route of the A2. The overall route connects Dover and the Shetland Islands.

The draft Transport Strategy highlights that walking and cycling rates in Faversham are higher than the averages for Swale and England. Specifically, 2.9% of residents in Faversham cycle to work according to 2011 census data. This figure may have increased since the onset of the Covid-19 pandemic, which can be confirmed once 2021 census data is released.

Future baseline

Given that the neighbourhood area is relatively well served by public transport and active travel infrastructure, growth in the area is less likely to contribute to an increase in the reliance on the private vehicle for travel. However, new development still has the potential to increase traffic and cause congestion within the neighbourhood area, especially if it is located away from the train station, bus stops or active travel routes.

There might be opportunities to improve public transport within the neighbourhood area to facilitate more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

