

Sustainability Appraisal for the Swale Local Plan

Scoping Report Update

Draft

Prepared for:
Swale Borough Council
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Quality information

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1. Introduction

1.1. Background

- 1.1.1. AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of the emerging Swale Borough Local Plan (SBLP). Swale Borough is located in Kent, South East England. The borough boundary is depicted in **Figure 1-1**.
- 1.1.2. As part of preparing the Local Plan for Swale, the SA is being undertaken as a statutory requirement under Section 19 of the Planning and Compulsory Purchase Act 2004, and it incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'). The SA ensures that environmental, social, and economic considerations are integrated into the plan-making process from the outset, helping to promote sustainable development and assess reasonable alternatives.
- 1.1.3. The SA is being undertaken in accordance with relevant national guidance, including the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG). It is an iterative process that informs the development of the Local Plan and supports its legal compliance and soundness.

Figure 1-1: Swale Borough Boundary



1.2. Planning Policy Context

- 1.2.1. The National Planning Policy Framework (NPPF) provides an overarching framework for development in England. It sets out the Government's planning policies for England and how these are expected to be applied. It is supported by planning practice guidance, which is a suite of policy papers covering a broad range of topics, including SEA.
- 1.2.2. The revised NPPF has now been published following the consultation period that ended in September 2024. The new framework includes significant reforms aimed at boosting housing supply and supporting sustainable growth. One of the key changes is the reintroduction of mandatory housing targets, which now require an increased number of dwellings in Swale Borough.
- 1.2.3. The Government requires all Councils to revisit their Local Plans every five years and Swale Borough Council are in the process of reviewing the current Swale Local Plan (Bearing Fruits), which was adopted in July 2017.¹ The SBLP will set out the planning framework for the borough for the period to 2042 and 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.

1.3. SA Explained

- 1.3.1. Sustainability Appraisal (SA) is a mechanism for assessing and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development and fulfilling the requirements for Strategic Environmental Assessment (SEA).
- 1.3.2. The aim of the SA will be to inform plan-making both directly (i.e. through structured, systematic and evidence-based analysis), and indirectly (by providing stakeholders with information on potential plan impacts and so facilitating effective consultation).
- 1.3.3. Undertaking SA will help ensure consistency in the development and evaluation of the SBLP.

¹ Swale Borough Council (2017). '*Bearing Fruits 2031: The Swale Borough Local Plan*' can be accessed through [this link](#).

Strategic Environmental Assessment (SEA)

- 1.3.4. SA and SEA are very similar assessment processes. SEA was established at the international level, whilst SA was established at the national level. SEA is undertaken to meet the requirements of the Environmental Assessment of Plans and Programmes (England) Regulations 2004 ('the SEA Regulations'),² which transposes into national law the EU Strategic Environmental Assessment (SEA) Directive. It applies to many different types of plan documents. SA is a legal requirement for Local Development Plans under Section 19(5) of the Planning and Compulsory Purchase Act 2004. SA usually incorporates SEA to deliver a single assessment process that avoids repetition in the local development plan evidence base.
- 1.3.5. In line with the regulations, there are two key steps for SA / SEA:
- 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; and
 - A report (the 'Environmental Report') is published for consultation alongside the draft plan which presents an assessment of the draft plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

Sustainability Appraisal and Habitats Regulations Assessment

A separate Habitats Regulations Assessment (HRA) is also being undertaken for the Local Plan. While it is a distinct workstream, its conclusions will be taken into account within the SA process to ensure consistency and alignment across assessments.

² UK Government (2004). 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed through [this link](#).

1.4. Scoping

1.4.1. A key procedural requirement of the SEA Regulations is to present a scope for the SA, so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.

1.4.2. Developing the draft scope for the SA as presented in this Scoping Report has involved the following steps:

- Exploring the policy context for the Plan and SA to summarise the key messages arising;
- Establishing the baseline for the SA (i.e., the current and future situation in the area in the absence of the Plan) to help identify the Plan's likely significant effects;
- Identifying particular problems or opportunities ('issues') that should be a particular focus of the SA; and
- Considering this information, developing an SA framework comprising SA Objectives and assessment questions, which can then be used as a guiding framework for the subsequent assessment.

1.4.3. The scope is explored and presented under a series of key environmental themes as follows:

- Accessibility (Community Infrastructure)
- Air Quality and Noise
- Biodiversity
- Climate Change Adaptation
- Climate Change Mitigation
- Communities and Health
- Economy and Employment
- Historic Environment
- Homes
- Landscape
- Soils and Natural Resources

- Transport
- Water

1.4.4. The selected SA themes incorporate the 'SEA topics' suggested by Schedule 2(6) of the SEA Regulations.³ These were refined to reflect a broad understanding of the anticipated scope of plan effects. The discussion of the scoping information for each theme is presented in **Chapters 2 to 14**, and the proposed SA framework is brought together as a whole in **Chapter 15**. Each proposal within the SBLP will be assessed consistently using this Framework.

³ UK Government (2004). '*The Environmental Assessment of Plans and Programmes Regulations 2004*' can be accessed through [this link](#).

2. Accessibility (Community Infrastructure)

2.1. Focus of Theme

2.1.1. This theme focuses on identifying accessible locations in the borough with sustainable transport links, essential services, and inclusive infrastructure.

2.2. Policy Context

2.2.1. **Table 2-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 2-1: Plans, Policies and Strategies Reviewed in Relation to Accessibility (Community Infrastructure)

Document Title	Year of Publication
National	
<u>10-Year Infrastructure Strategy</u>	2025
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Building for Life / Building for a Healthy Life</u>	2020
<u>Planning Practice Guidance</u>	various
<u>Planning and Infrastructure Bill</u>	emerging
Local	
<u>Swale Built Facility Assessment and Strategy</u>	2024
<u>Swale Borough Infrastructure Delivery Plan</u>	2020

2.2.2. The key messages emerging from the review are summarised below:

- The 10-Year Infrastructure Strategy will provide a long-term vision for national infrastructure planning, with a focus on economic growth, environmental sustainability, and social well-being. It emphasises the integration of housing, transport, digital connectivity, and public services to create more resilient and accessible communities;

- The SBLP will need to have regard for the principles set out in the NPPF, which seek to retain and enhance access to community services and facilities such as educational facilities and open spaces. The NPPF recognises the benefits of having a range of local provision to support community needs, in addition to the benefits of creating cohesive communities in safe environments where the fear of crime (and crime itself) does not undermine resident quality of life. This contributes to ensuring settlement and community identities are protected. The NPPF is complimented by Planning Policy Guidance, which offers practical guidance on how local planning authorities should implement the NPPF's policies;
- The Government's Levelling Up and Regeneration Act seeks to reduce regional inequalities and promote economic growth and opportunities in less prosperous areas. It has been designed to address regional disparities, stimulate economic development, and enhance infrastructure and community well-being in order to create a more balanced and inclusive nation;
- The emerging Planning and Infrastructure Bill is designed to speed up planning approvals and infrastructure delivery, particularly for housing and transport projects. It includes provisions to encourage brownfield redevelopment and to ensure that new housing developments are supported by necessary infrastructure, such as roads, schools, and healthcare facilities;
- Building for a Healthy Life is a design framework that promotes high-quality housing developments with a focus on connectivity, community integration, and sustainability. It encourages developments that prioritise pedestrian-friendly streets, access to public transport, and the inclusion of green and blue infrastructure (such as parks and waterways). The framework also emphasises the importance of social spaces and local facilities, ensuring that new housing developments foster a sense of community;
- The Swale Built Facility Assessment and Strategy (2024) sets out a vision to help residents lead healthier, more active lives by offering the right activities in accessible, affordable, and good-quality spaces. The Council aims to improve physical activity levels, reduce health inequalities, and ensure facilities are flexible, locally available, and fit for future needs; and

- The Swale Borough Infrastructure Delivery Plan (IDP) establishes what additional infrastructure and service needs are required to support the development in 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.

2.3. Baseline Summary

Current Baseline

Facilities and Services

- 2.3.1. Swale Borough is located on the north coast of Kent in South East England. It encompasses the towns of Sittingbourne, Faversham, and the Isle of Sheppey (including Sheerness), offering a blend of rural, coastal, and urban environments. The borough provides a wide range of services and facilities, including healthcare, education, recreational spaces, and community amenities.
- 2.3.2. According to Kent County Council's education website 'KELSI', Swale is home to 61 educational institutions, including nursery schools, special schools, and pupil referral units.⁴ This comprises:
- 49 primary schools (including 33 academies – the highest figure in Kent);
 - Nine secondary schools (all academies); and
 - Three special educational needs (SEN) schools.
- 2.3.3. Further education is available locally at Sheppey College, located in Sheerness.⁵
- 2.3.4. Specialist training and supported employment opportunities are provided by Bemix, a local programme operating within the borough.⁶
- 2.3.5. Healthcare services in Swale include multiple GP practices, community health centres, and minor injury units. More comprehensive care is available at Sittingbourne Memorial Hospital, Sheppey Community Hospital, Faversham Cottage Hospital, and the DMC Community Dermatology Service.⁷

⁴ KELSI (2025). 'Facts and Figures 2025' can be accessed through [this link](#).

⁵ KFE (no date). 'Our Colleges' can be accessed through [this link](#).

⁶ Kent County Council (no date). 'Specialist colleges and training providers' can be accessed through [this link](#).

⁷ NHS (no date). 'Hospitals near Sittingbourne' can be accessed through [this link](#).

- 2.3.6. Swale also offers a broad range of other amenities and community facilities, including public parks, libraries, leisure centres, retail areas, cafés, and entertainment venues. These are primarily concentrated in the borough's larger settlements.

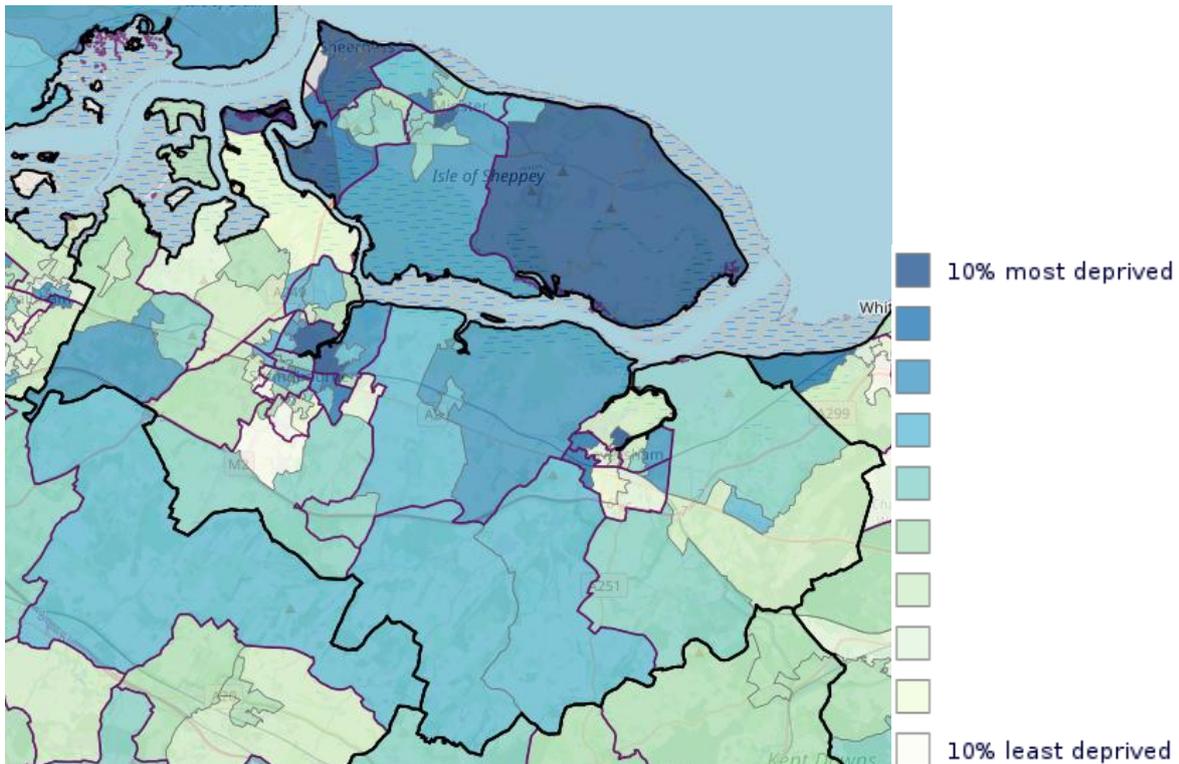
Barriers to Essential Services

- 2.3.7. The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation, combining seven different domains. Of particular relevance to the Accessibility (Community Infrastructure) SA theme is the Barriers to Housing and Services domain, which addresses the physical and financial accessibility of housing and local services. It includes indicators such as housing affordability, household overcrowding, and distance to essential services such as GP surgeries and schools.
- 2.3.8. Lower Super Output Areas (LSOAs)⁸ are designed to improve the reporting of small-area statistics in England and Wales. These are standardised geographic units intended to be as consistent as possible, with each LSOA typically containing between 1,000 and 1,500 people. Within this context, the borough spans 85 LSOAs. In relation to the IMD 2019, LSOAs are ranked out of 32,844 in England and Wales, with a rank of 1 indicating the most deprived area.
- 2.3.9. **Figure 2-1** shows the ranking of Swale Borough's LSOAs for the Barriers to Housing and Services domain, while **Table 2-2** provides additional details on the LSOAs within Swale Borough that fall within the 50% most deprived, or worse, areas.
- 2.3.10. An analysis of this data reveals mixed trends regarding the barriers to housing and services domain within the borough. Just over half of Swale Borough's LSOAs are ranked within the 50% most deprived, or worse, LSOAs. Higher levels of deprivation are found in the borough's larger settlements (Sittingbourne and Faversham) along with most of the Isle of Sheppey. Given that these areas are generally well-connected and accessible, the deprivation scores are likely to reflect housing-related factors (such as affordability and overcrowding) rather than physical access to essential services. In contrast, the more rural regions in the borough's western and eastern extents generally report less deprivation under this domain.

⁸ The Indices of Deprivation Explorer can be accessed through [this link](#).

2.3.11. As Swale Borough continues to grow, ensuring that residents can easily access essential services such as healthcare, education, and retail will remain a priority. While mainland areas of the borough generally experience fewer accessibility issues, higher levels of deprivation in certain LSOAs highlight challenges in reaching services, particularly in more peripheral areas (including the Isle of Sheppey). Addressing these disparities through targeted improvements in public transport coverage, digital accessibility, and local service provision will help reduce barriers and improve overall accessibility across the borough.

Figure 2-1: Barriers to Housing and Services IMD Domain⁹



⁹ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Table 2-2: LSOAs in Swale Borough Ranked Within 50% Most Deprived or Worse for the Barriers to Housing and Services IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	11
40% Most Deprived	7
30% Most Deprived	11
20% Most Deprived	4
10% Most Deprived	12
Total	45 (out of 85)

Transport and Connectivity

- 2.3.12. Swale benefits from strong transport connectivity, with key road links including the M2 and A249, which connect the borough to the wider Kent region and London. The rail network serves major towns such as Sittingbourne, Faversham, and Sheerness, with direct services to London. The borough is actively promoting sustainable transport, with walking and cycling initiatives supported by both Swale Borough Council and Kent County Council, including local infrastructure plans in Faversham. Public transport plays an important role in mobility, with rail stations and bus services linking communities across the borough and beyond.
- 2.3.13. For further detail on transport infrastructure in Swale Borough, see **Chapter 14**.

Future Baseline

- 2.3.14. Following the UK government's target for a carbon-neutral future, Swale Borough is likely to see further expansion in EV charging points to accommodate the growing number of electric vehicles. This includes potential initiatives to enhance the availability of charging infrastructure in both public and private spaces.
- 2.3.15. As digital infrastructure improves, ensuring equal access to digital services (e.g., online healthcare appointments, remote education) will become increasingly important. Addressing digital accessibility, especially for older residents and those with disabilities, will be a priority.

2.4. Key Issues

2.4.1. Considering the policy context and baseline information, the following key issues (constraints and/ or opportunities) are identified in relation to accessibility:

- High levels of deprivation in certain parts of Swale create barriers to housing and services. Targeted interventions in these areas, such as improved transport and service provision, will help address these challenges;
- The SBLP provides an opportunity to identify an active travel network across the borough and focus efforts/investments towards improving this;
- With increasing reliance on digital services (e.g., online healthcare, remote education), ensuring equal access to digital infrastructure for all residents, including older and disabled groups, is important for reducing inequality in service access; and
- New housing and employment developments should be well-integrated with existing transport and service networks, reducing travel distances and enhancing accessibility for residents.

2.5. SA Objective

2.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to accessibility (community infrastructure):

Improve accessibility to essential services and facilities across the borough

2.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...identify priority measures that will improve active travel networks in future growth?
- ...reduce inequalities in access to essential services across Swale Borough, particularly in its most deprived areas?
- ...connect new housing and employment areas with healthcare, education, and community facilities?
- ...enhance digital connectivity and inclusion to ensure all residents can access online services and opportunities?

3. Air Quality

3.1. Focus of Theme

3.1.1. This theme focuses on air pollution, in particular: sources of air pollution, air quality hotspots, and areas known to exceed objectives for air quality.

3.2. Policy Context

3.2.1. **Table 3-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 3-1: Plans, Policies and Strategies Reviewed in Relation to Air Quality

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>The Environmental Targets (Fine Particular Matter) (England) Regulations 2023</u>	2023
<u>Environment Act</u>	2021
<u>The Clean Air Strategy</u>	2019
<u>A Green Future: Our 25 Year Plan to Improve the Environment</u>	2018
<u>UK plan for tackling roadside nitrogen dioxide concentrations</u>	2017
Local	
<u>Swale 2025 Air Quality Annual Status Report</u>	2025
<u>Swale Air Quality Action Plan (2023-2028)</u>	2023

3.2.2. The key messages emerging from the review are summarised below:

- The SBLP will be required to be in general conformity with the NPPF, which seeks early planning to reduce/ mitigate air quality impacts in development and 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;

- The SBLP will also be required to be in general conformity with the Environment Act 2021, which introduces the need for the Secretary of State to set an annual mean particulate matter (PM2.5) level target. This links to the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, which sets out to ensure annual PM2.5 concentrations are equal to or less than 10 micrograms per cubic metre by the 31 December 2040;
- The Clean Air Strategy outlines how the government will tackle all sources of air pollution. The strategy proposes goals to cut public exposure to particulate matter pollution and outlines required action to meet these goals. Furthermore, it seeks to recognise wider sources that cause poor air quality, such as diffuse sources and smaller contributors. The proposed measures include new legislation and local powers to act in areas with air pollution issues. The Air Quality Action Plan for Swale Borough (2023-2028) seeks to reflect this strategy on a more localised scale;
- The 25 Year Environment Plan establishes how the government will expand net gain approaches to include air quality improvements, such as planting more trees in urban areas and changing fuel supplies. In particular, 'Goal 1 Clean air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' directly relate to the air quality SA theme;
- The UK plan for tackling roadside nitrogen dioxide is an air quality plan focused on bringing nitrogen dioxide (NO₂) within statutory limits in the quickest time possible. The plan identifies that improving air quality and reducing carbon emissions is also important and wants to position the UK at the forefront of vehicle innovation by making motoring cleaner;
- Local authorities are required to monitor air quality across the borough, report regularly to Defra and act where nationally set levels and limits of pollutants are likely to be exceeded under Section 82 of the Environment Act (1995). Monitoring is undertaken to assess levels of nitrogen dioxide, sulphur dioxide, ozone, benzene, and particulates. Where exceedances exist, areas are declared as air quality management areas (AQMAs) and local authorities are required to produce an air quality action plan (AQAP) to improve air quality in the area. Under Schedule 11 in the Environment Act (2021), a local authority must identify any parts of its area in which it appears air quality standards or objectives are not likely to be achieved within the relevant period.

- Local authorities must also identify relevant sources of emissions that are considered partly or wholly responsible for failing to achieve air quality standards or objectives in the area. As such, the Swale 2025 Air Quality Annual Status Report (ASR) for 2025 is the last available report for the borough; fulfilling the requirements of the local air quality management (LAQM) as set out in Section 82 of the Environment Act (1995).

3.3. Baseline Summary

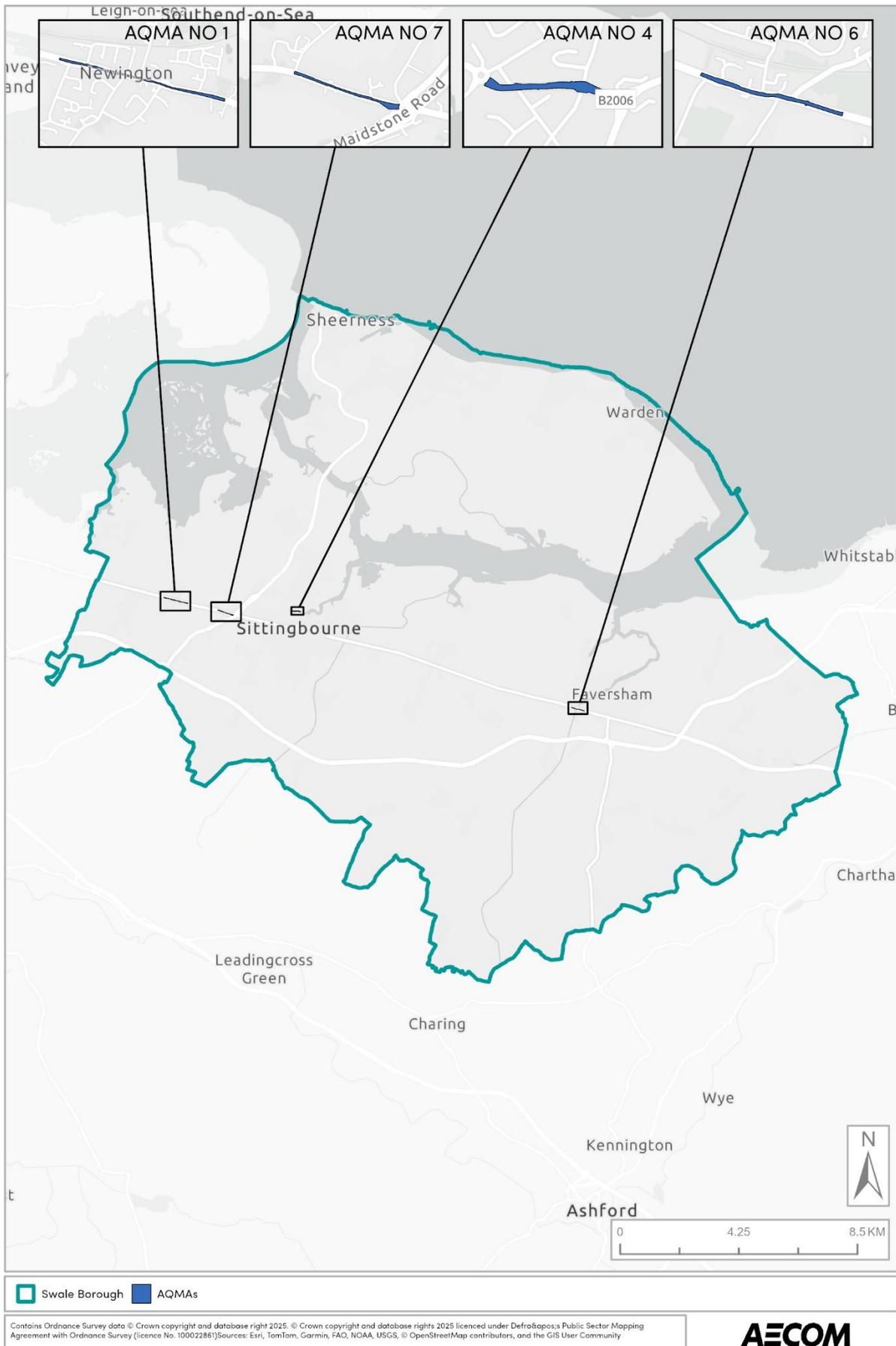
Current Baseline

Air Quality Management Areas

- 3.3.1. Air Quality Management Areas (AQMAs) are declared by councils 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.
- 3.3.2. As shown in **Figure 3-1**, Swale Borough contains four AQMAs, all monitoring concentrations of NO₂ and PM₁₀ (24-hour mean):
- AQMA 1: Newington, (A2 / High St), declared in 2009 for NO₂ exceedances;
 - AQMA 6: the Mount, declared in May 2016 for NO₂ exceedances. Formerly known as AQMA 2, Ospringe Street, Faversham (A2/Ospringe).
 - AQMA 4: St Paul's Street, Milton, Sittingbourne (B2006), declared in January 2013 and amended in October 2020, for NO₂ and PM₁₀ exceedances, respectively; and
 - AQMA 7: Keycol Hill, declared October 2020, for NO₂ exceedances.
- 3.3.3. It should be noted that the following two AQMAs were revoked in September 2025 due to consecutive years of compliance:
- East Street AQMA (declared in January 2013, for NO₂ exceedances);
 - Teynham AQMA (declared in December 2015, for NO₂ exceedances).
- 3.3.4. The main source of air pollution in Swale is from vehicle emissions. The borough has the largest automatic monitoring network in Kent - three automatic stations and 80 NO₂ diffusion tubes.

- 3.3.5. Regarding PM₁₀, the latest Air Quality Annual Status Report for Swale Borough (for 2025) (ASR) notes that there has been a steady improvement in NO₂ concentrations in the borough over the past 6 to 7 years. These air quality improvements are predominantly due to the replacement of older vehicles in the vehicle fleet with newer vehicles that meet stricter emissions standards, and more recently, the uptake of electric vehicles.
- 3.3.6. The ASR also reveals that latest monitoring has shown all three automatic stations (and 67 diffusion tubes) did not exceed the National Air Quality Objective for both NO₂ and PM₁₀ objectives.
- 3.3.7. In line with Local Air Quality and Management guidance (LAQM), the Environmental Health team for Swale Borough Council will be recommending the revocation of Teynham and East Street AQMAs.
- 3.3.8. In terms of localised sources of air quality pollution, Swale's road network comprises a mix of residential streets, local roads, and major transport corridors. While much of the borough is served by smaller local routes, key strategic roads include the A2 and A249, which facilitate significant traffic movements between Sittingbourne, Faversham, the Isle of Sheppey, and neighbouring areas such as Maidstone and Medway. The borough also connects to the M2 motorway, providing access to wider regional and national networks. Additionally, a number of other A and B roads (including the A299, A2500, A251, B2005, and B223) contribute to localised emissions from road traffic and associated air quality pressures.
- 3.3.9. Swale Borough is served by several railway lines forming part of the Southeastern rail network. The Chatham Main Line runs east-west through the borough, connecting Faversham and Sittingbourne with destinations such as Medway, Canterbury, Dover, and London. The Sheerness Line branches north from Sittingbourne to the Isle of Sheppey, serving Kemsley, Swale Halt, and Sheerness-on-Sea. These rail routes can contribute to localised air quality impacts.

Figure 3-1: AQMAs in Swale Borough



Industry

- 3.3.10. In addition to transport, industrial processes can be a significant source of air pollution, particularly in urban areas. Emissions can include particulate matter (PM₁₀ and PM_{2.5}), nitrogen oxides (NO_x), sulphur dioxide (SO₂), and volatile organic compounds (VOCs), depending on the nature of the process.
- 3.3.11. Within Swale, industrial emissions may arise from manufacturing and processing facilities, energy generation sites, waste management and treatment operations, and port-related activities, particularly around Sittingbourne, Faversham, and the Isle of Sheppey. The Port of Sheerness and surrounding industrial estates, including logistics, storage, and vehicle handling operations, are also notable contributors to localised emissions. Further detail is provided in **Chapter 13**.

Construction and Demolition

- 3.3.12. Construction and demolition activities are also a common source of dust and fine particulates, especially during earthworks, site preparation, and materials handling. Emissions from non-road mobile machinery (NRMM) also contribute to local NO_x and PM levels. In areas of the borough undergoing rapid development, multiple construction sites can also lead to cumulative air quality impacts.
- 3.3.13. Dust from construction and demolition is usually coarse (PM₁₀), but fine fractions (PM_{2.5}) are also generated and can remain airborne longer, affecting health and visibility. Controls to mitigate air quality adverse impacts from construction and demolition is regulated through Construction Environmental Management Plans (CEMPs) for major sites.

Aggregates

- 3.3.14. Kent County Council's list of aggregate sites identifies the presence one Secondary and Recycled Aggregate Site in Swale - Faversham Quarry.¹⁰
- 3.3.15. The handling, storage, processing, and transport of aggregates and minerals (such as sand, gravel, and crushed rock) are associated with the release of coarse and fine dust particles, particularly from loading/unloading, screening, and crushing operations. Dust can travel beyond site boundaries without appropriate suppression measures.

¹⁰ Kent County Council (no date). 'Minerals and waste sites in Kent' can be accessed through [this link](#).

- 3.3.16. To manage these emissions, aggregate sites are required to implement dust management plans. These typically include measures such as wheel washing, road cleaning, and material covering, to minimise the spread of dust and reduce adverse impacts on local air quality.

Future Baseline

- 3.3.17. The growth associated with future development within the borough has the potential for adverse effects on air quality in the short to medium term, due to construction activities and increased levels of traffic and associated pollutants. Although, in line with higher level planning policy, future development should contribute towards improving air quality, supporting opportunities to improve accessibility, particularly in terms of the use of sustainable modes of transport (including active travel modes, working from home and electric vehicle use).
- 3.3.18. The adoption of low-emission vehicles and policies to reduce car dependency are expected to play a significant role in improving air quality over the long term.

3.4. Key Issues

- 3.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to the air quality SA theme:
- There are four active AQMAs in Swale; however, recent monitoring data indicates that all are currently recording pollutant levels below national air quality objectives, suggesting improvements in local air quality;
 - Road traffic remains the primary source of air pollution in the borough, with strategic routes such as the A2, A249, and M2 contributing to localised emissions, particularly in areas with high traffic volumes and congestion;
 - Industrial activities, including those associated with the Port of Sheerness and surrounding estates, continue to contribute to emissions, requiring ongoing monitoring and mitigation;
 - Construction and demolition activities, especially in areas of planned growth, can lead to short-term increases in dust and fine particulates, with cumulative impacts where multiple sites are active concurrently;
 - Processing operations and construction activities are associated with the release of coarse and fine dust particles, necessitating effective site-level dust management to prevent off-site impacts; and

- Future development may temporarily increase air pollution through construction and traffic-related emissions, but also presents opportunities to embed sustainable transport, active travel, and low-emission technologies into planning and infrastructure.

3.5. SA Objective

3.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to air quality:

Improve air quality, reduce air pollution and reduce exposure to air pollution

3.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...reduce key pollutant emissions, particularly nitrogen dioxide (NO₂) and particulate matter (PM₁₀/PM_{2.5})?
- ...ensure that new development, particularly housing in or near AQMAs, is supported by infrastructure improvements that minimise exposure to poor air quality?
- ...promote a shift to low- and zero-emission vehicles and sustainable transport modes?
- ...minimise traffic congestion and encourage active travel and public transport use?
- ...prevent or mitigate adverse air quality impacts from construction, industrial, and aggregate activities?
- ...support compliance with, or improvement beyond, national air quality standards across the borough?

4. Biodiversity

4.1. Focus of Theme

4.1.1. This theme focuses on nature conservation designations, habitats, and species within and surrounding the borough.

4.2. Policy Context

4.2.1. **Table 4-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 4-1: Plans, Policies and Strategies Reviewed in Relation to Biodiversity

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Natural England Green Infrastructure Framework</u>	2023
<u>Environmental Improvement Plan</u>	2023
<u>Environment Act 2021</u>	2021
<u>UK Post-2010 Biodiversity Infrastructure Framework</u>	2012
<u>The Natural Choice: securing the value of nature (Natural Environment White Paper)</u>	2011
<u>Biodiversity Infrastructure 2020 Strategy</u>	2011
<u>The Natural Environment and Rural Communities Act</u>	2006
<u>UK Biodiversity Infrastructure Action Plan</u>	1994
Local	
<u>Swale Climate and Ecological Emergency Action Plan</u>	2025
<u>Swale & Ure Drainage Board Biodiversity Action Plan 2025 - 2030</u>	2025
<u>Kent Environment Plan</u>	2025
<u>Kent and Medway Shoreline Pollution Emergency Plan</u>	2023
<u>Swale Green and Blue Infrastructure (GBI) Strategy</u>	2020
<u>Kent Nature Partnership Biodiversity Strategy</u>	2020
<u>Medway Estuary and Swale (MEAS) Flood and coastal Erosion Risk Management (FCERM)</u>	2019
<u>Kent Local Nature Recovery Strategy</u>	emerging

4.2.2. The key messages emerging from the review are summarised below:

- The Local Plan will need to consider the principles set out in the NPPF, which indicate that planning policies and decisions should protect and enhance sites of value for biodiversity. Plans should also identify, map, and safeguard components of wider ecological networks, promote positive action for priority habitats and species, and pursue opportunities to secure biodiversity net gains. The NPPF also states that if development causes substantial harm and cannot be avoided, adequately mitigated, or compensated, then planning permission should be refused;
- The Natural England Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. The framework's ultimate goal aims to help increase the amount of green cover in England to 40% in urban residential areas;
- The Environment Act makes provision for biodiversity gain to be a condition of planning permission in England, in addition to creating biodiversity gain site registers and biodiversity credits. It recognises there is a duty to conserve and enhance biodiversity and encourages the identification of suitable areas through biodiversity reports and local nature recovery strategies. Furthermore, habitat maps are expected to include recovery and enhancement areas which are currently, or could become, important for biodiversity;
- The NPPF also supports the establishment and enhancement of habitat networks and green infrastructure to allow for more resilience to current and future pressures for biodiversity;
- Building on the 25 Year Environment Plan (2018), the Environmental Improvement Plan (2023) sets out how the Government will work with landowners, communities and businesses to deliver goals to restore nature, reduce environmental pollution, and increase the national prosperity;
- Over the past decade, policy (for example, The Natural Environment White Paper: 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 Swale Climate and Ecological Emergency Action Plan (2025) outlines seven focus areas to guide the borough toward net-zero emissions, emphasising collaboration and community transformation. It highlights the potential for stronger communities, a green economy, and improved public health through climate and ecological action;
- The Kent Environment Plan sets out Kent County Council's strategy to address climate change, pollution, and biodiversity loss. It focuses on six goals (ranging from reducing carbon emissions and adapting to climate impacts to protecting natural assets and promoting a circular economy) aiming to deliver environmental improvement alongside sustainable economic growth;
- The Swale & Ure Drainage Board Biodiversity Action Plan (2025-2030) sets out targeted conservation actions for habitats and species the Board can influence, particularly those in aquatic and riparian environments. It establishes measurable objectives and integrates biodiversity into all aspects of water level management, maintenance, and operational decision-making;
- The Kent and Medway Shoreline Pollution Emergency Plan (2023) supports biodiversity protection by coordinating rapid responses to pollution incidents that threaten coastal habitats and species. It ensures effective planning, trained personnel, and inter-agency collaboration to minimise ecological harm and safeguard sensitive shoreline environments;
- The Swale Green and Blue Infrastructure Strategy (2020-2039) recognises green and blue spaces as important ecosystems for both people and wildlife, guiding opportunities to enhance biodiversity across the borough. It supports habitat protection, community engagement, and nature-based improvements, particularly in areas of international ecological importance such as Swale's coastline and woodlands;
- The Kent Nature Partnership Biodiversity Strategy (2020-2045) sets out a long-term vision to restore, maintain, and create thriving habitats across Kent's terrestrial, freshwater, intertidal, and marine environments. It aligns with national ambitions in the Government's 25 Year Environment Plan, aiming to leave the natural environment in a better state for future generations;

- The Medway Estuary and Swale Flood and Coastal Risk Management Strategy (2019) sets out a long-term approach to sustainably managing tidal defences and coastal risks in the area. It aims to protect people, property, designated habitats, and agricultural land over the next 100 years through adaptive and resilient flood management;
- The emerging Kent & Medway Local Nature Recovery Strategy will identify priority areas for habitat creation and enhancement to maximise benefits for biodiversity and the wider environment. It will support the delivery of biodiversity net gain, inform local planning, and guide investment and land management decisions to accelerate nature recovery across the region.

4.3. Baseline Summary

Current Baseline

Internationally Important Sites

- 4.3.1. There are many internationally designated biodiversity sites located within Swale and within a 10 km radius of its boundary.(see **Figure 4-1**):

Special Areas of Conservation

- Blean Complex. Located in the east of the borough. Designated for its oak-hornbeam woodland habitat, a rare and ecologically valuable forest type in south-east England. The site supports diverse flora and fauna, including the nationally important heath fritillary butterfly, and benefits from traditional coppice management.
- North Downs Woodlands. Located approximately 3.6 km south-west of the borough.
- Queendown Warren. Located approximately 4.0 km south of the borough.
- Wye & Crundale Downs. Located approximately 5.4 km south of the borough.
- Tankerton Slopes And Swalecliffe. Located approximately 5.6 km north-east of the borough.
- Essex Estuaries. Located approximately 6.7 km north of the borough.
- Stodmarsh. Located approximately 8.3 km east of the borough.
- Peters Pit. Located approximately 9.2 km west of the borough.

Special Protection Areas

- The Swale. Located in central and western parts of the borough. Designated for its internationally important wetland supporting populations of non-breeding waterbirds, including dark-bellied brent goose and dunlin, as well as its rich breeding and wintering bird assemblages.
- Medway Estuary & Marshes. Located in the west of the borough. Designated for its internationally important wetland supporting populations of breeding and non-breeding waterbirds, including species such as dark-bellied brent goose, pied avocet, and little tern.
- Thames Estuary & Marshes. Located approximately 0.5 km west of the borough.
- Foulness (Mid-Essex Coast Phase 5). Located approximately 6.7 km north of the borough.
- Benfleet and Southend Marshes. Located approximately 6.7 km north of the borough.
- Thanet Coast & Sandwich Bay. Located approximately 6.8 km north-east of the borough.
- Stodmarsh. Located approximately 8.3 km east of the borough.

RAMSAR Sites

- The Swale. Located in central and western parts of the borough. Designated for its internationally important wetland supporting populations of non-breeding waterbirds, including dark-bellied brent goose (*Branta bernicla bernicla*) and dunlin (*Calidris alpina alpina*), as well as its rich breeding and wintering bird assemblages.
- Medway Estuary & Marshes. Located in the west of the borough. Located in the west of the borough. Designated for its internationally important wetland supporting populations of breeding and non-breeding waterbirds, including species such as dark-bellied brent goose, pied avocet, and little tern.
- Thames Estuary & Marshes. Located approximately 0.5 km west of the borough.
- Foulness (Mid-Essex Coast Phase 5). Located approximately 6.7 km north of the borough.

- Benfleet And Southend Marshes. Located approximately 6.7 km north of the borough.
- Thanet Coast & Sandwich Bay. Located approximately 6.8 km north-east of the borough.
- Stodmarsh. Located approximately 8.3 km east of the borough.

Nationally Important Sites

- 4.3.2. Sites of Special Scientific Interest (SSSI) are nationally important sites for wildlife and / or geological conservation.
- 4.3.3. There are six SSSI and two National Nature Reserves (NNR) within Swale (see **Figure 4-2**):

Sites of Special Scientific Importance

- Queendown Warren SSSI. Located in the west of the borough. Designated for its species-rich chalk grassland and ancient woodland, supporting two nationally rare plant species and an outstanding assemblage of orchids and other flora. Condition of units during last survey: 100% favourable.
- Purple Hill SSSI. Located in the west of the borough. Designated for its herb-rich chalk grassland, scrub, and woodland, supporting a nationally rare plant species and a diverse range of chalk downland flora. The site is notable for its orchid diversity, including man, fragrant, and pyramidal orchids, and for hosting the rare Kentish milkwort. Condition of units during last survey: 64% favourable; 36% unfavourable-recovering.
- Church Woods, Blean SSSI. Located in the east of the borough. Designated for its extensive broadleaved woodland on London Clay, which supports a nationally rare species, the heath fritillary butterfly, and an outstanding assemblage of invertebrates. Condition of units during last survey: 100% favourable.
- The Swale SSSI. Located on the borough's northern coastline. Designated for its extensive freshwater grazing marshes, mudflats, and saltmarshes, which support internationally important populations of wintering and breeding wildfowl and waders. Condition of units during last survey: 98% favourable; 2% unfavourable-no change.
- Sheppey Cliffs and Foreshore SSSI. Located on the borough's northern coastline. Designated for its exceptional geological features, representing one of Britain's most important Palaeogene fossil sites.

- Medway Estuary and Marshes SSSI. Located on the borough's northern coastline. Designated for its extensive intertidal habitats, including mudflats, saltmarshes, and grazing marshes, which support internationally important populations of wintering and breeding birds. Condition of units during last survey: 54% unfavourable-recovering; <1% unfavourable-no change; 46% unfavourable-declining; <1% destroyed.

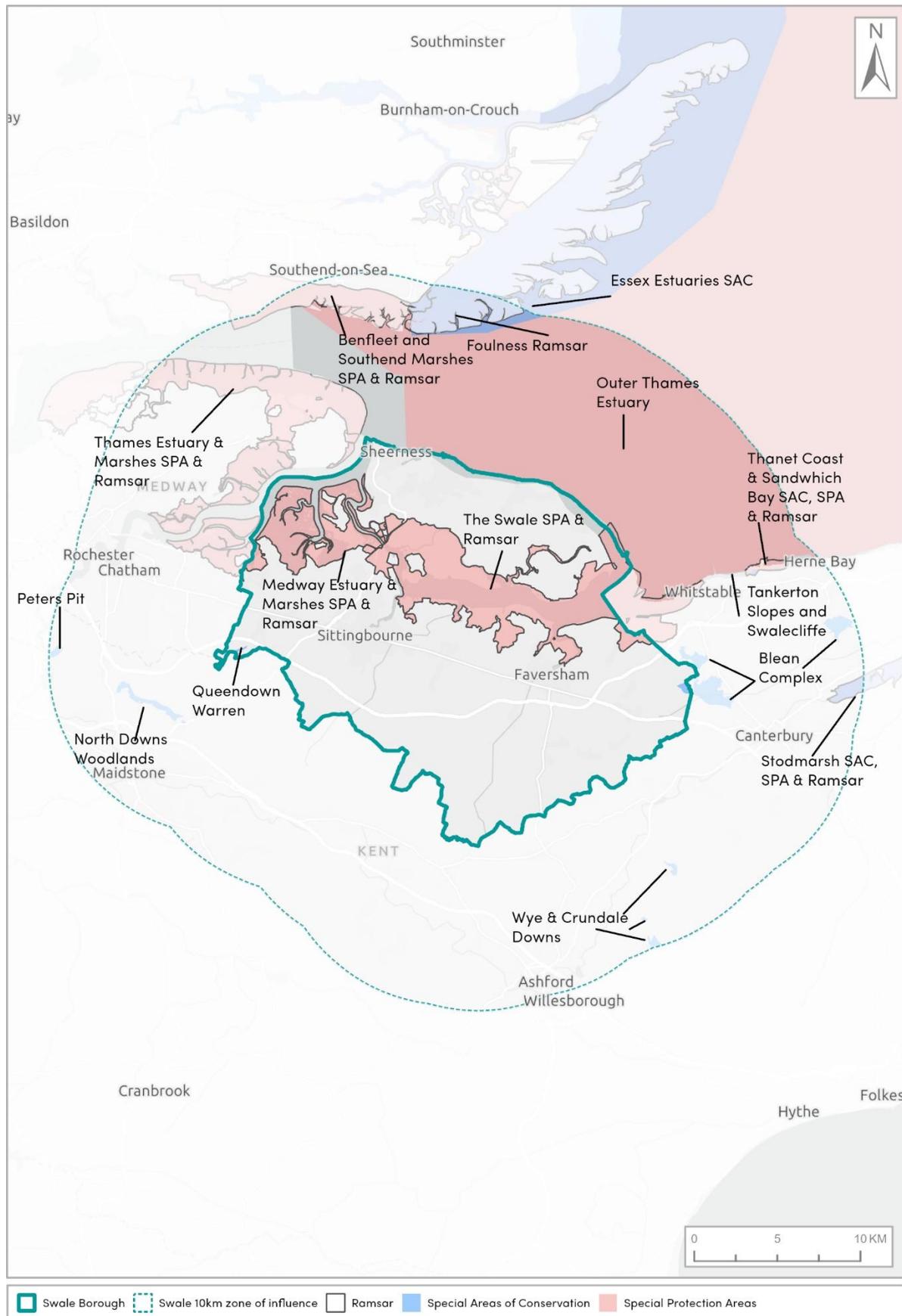
National Nature Reserves

- Blean Woods. Located in the east of the borough. Designated for its extensive ancient broadleaved woodland, which supports a rich diversity of flora and fauna, including the nationally rare heath fritillary butterfly.
- Elmley. Located centrally in the borough. Designated for its extensive coastal grazing marsh, which supports large populations of wintering wildfowl and breeding waders.
- The Swale. Located on the borough's northern coastline. Designated for its coastal grazing marsh of high ecological value, supporting significant populations of waterfowl and other wetland species.

4.3.4. There are 12 other SSSI and one NNR within 5 km of the borough boundary.

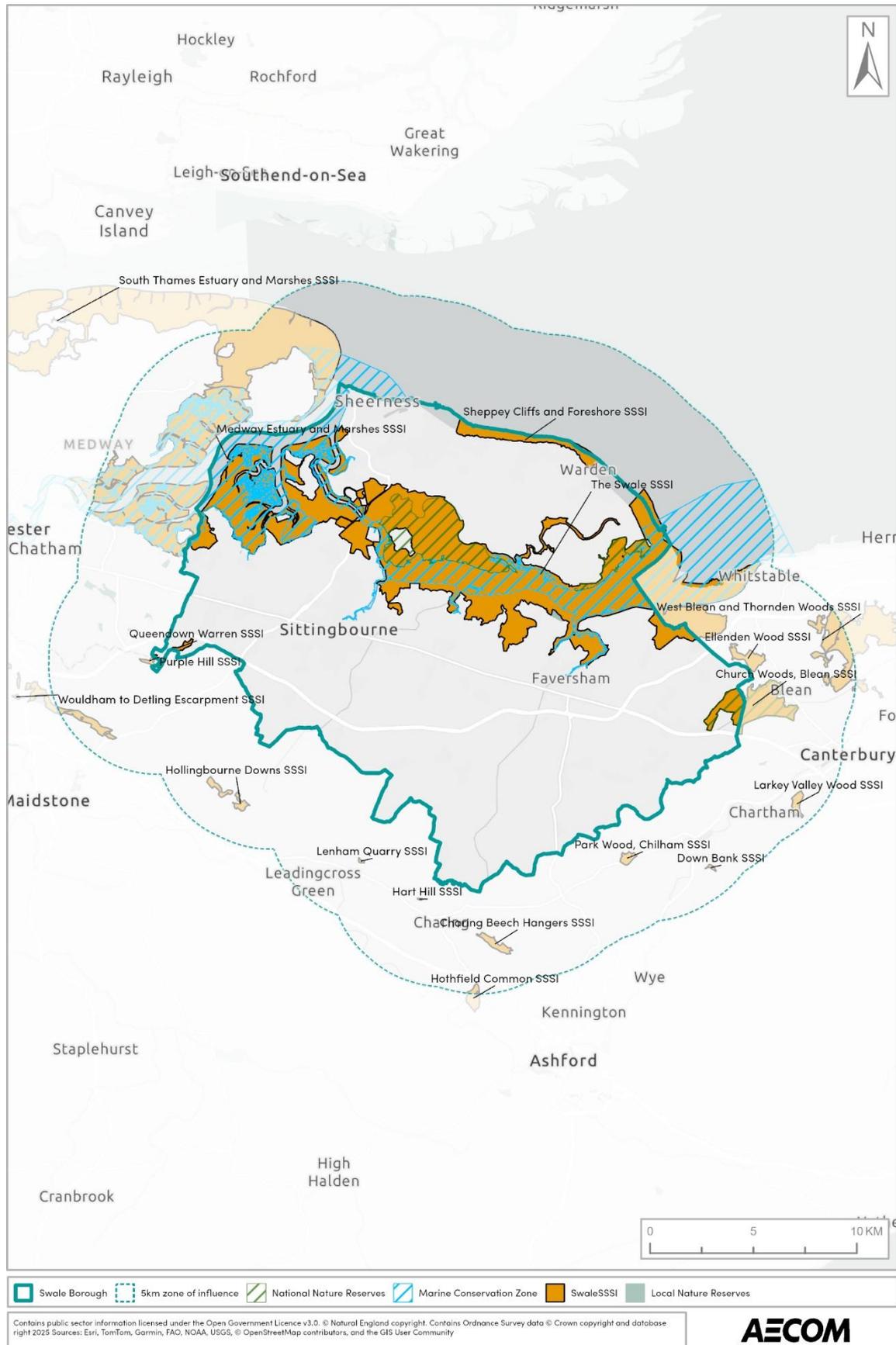
4.3.5. SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset that map zones around each SSSI according to their sensitivities. They specify the types of development that have the potential to have adverse impacts at a given location, and thresholds of development which indicate a need to consult Natural England. In this respect, there are areas of the borough that overlap with IRZs for development types expected to be brought forward in the SBLP; therefore, consultation with Natural England may be required for any applications that come forward in these locations.

Figure 4-1: International Designations for Biodiversity Conservation in Swale



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Figure 4-2: National Designations for Biodiversity Conservation in Swale Borough



Locally Important Sites

- 4.3.6. Local Nature Reserves (LNRs) are designated to conserve locally significant natural habitats, species, and geological features. They provide accessible green spaces for community enjoyment, education, and engagement, while also serving as valuable sites for local ecological research and conservation efforts.
- 4.3.7. There are three LNRs in Swale Borough (see **Figure 4-3**):
- South Bank Of The Swale. Located in the east of the borough.
 - Queendown Warren. Located in the west of the borough.
 - Oare Marshes. Located in the east of the borough.
- 4.3.8. There are also six LNRs within 2 km of the borough.
- 4.3.9. Kent's locally important places for wildlife are recognised as Local Wildlife Sites (LWS) (a non-statutory designation). Over 500 LWS have been identified across Kent. According to the adopted Swale Local Plan (2017) there are 36 LWS in Swale. It is possible that this figure has grown since 2017 with the addition of new sites. Kent's Wildlife Trust website provides a map of the county's LWS.¹¹
- 4.3.10. The adopted Local also notes that there are also 13 Roadside Nature Reserves in Swale. These have been identified through the Road Verge Project (a partnership between Kent County Council, Kent Highways and Kent Wildlife Trust) because they contain rare or threatened habitats or species.

Ancient Woodland

- 4.3.11. Ancient woodland takes hundreds of years to establish. It is considered important for its wildlife (often including rare and threatened species), and soils. Ancient woodland includes land that has been wooded continuously since at least 1600 AD. This means the following is included under its designation:
- Ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration; and

¹¹ Kent Wildlife Trust (2025). 'Local Wildlife Sites' can be accessed through [this link](#).

- Plantations on ancient woodland sites - replanted with conifer and broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi.¹²
- 4.3.12. Within the borough there are around 200 ancient woodland sites, with many other sites located adjacent to the borough's border (see **Figure 4-3**).¹³ Swales's ancient woodland sites are mostly found in the south of the borough, and include:
- 141 sites of ancient & semi-natural woodland.
 - 57 sites of ancient replanted woodland.

¹² GOV.UK (2022). 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' can be accessed through [this link](#).

¹³ Defra (no date). 'Magic' can be accessed through [this link](#).

Figure 4-3: Local Nature Reserves and Ancient Woodland in Swale



Priority Habitats and Species

- 4.3.13. The borough is interspersed with a range of Biodiversity Action Plan (BAP) Priority Habitats,¹⁴ as shown in **Figure 4-4**.
- 4.3.14. In the northern part of Swale, BAP Priority Habitats are predominantly coastal, including, but not limited to, coastal saltmarsh, reedbeds, mudflats, and coastal and floodplain grazing marsh. This pattern reflects the area's proximity to the Thames Estuary and the English Channel.
- 4.3.15. In central and southern parts of the borough, inland habitats such as deciduous woodland and occasional wood-pasture and parkland dominate. These habitats occur in smaller, fragmented patches than in the north, where large areas are covered by BAP designations.
- 4.3.16. The Kent and Medway Biological Records Centre (KMBRC)¹⁵ contains archives of protected and notable species within Swale, including those species protected by the Wildlife and Countryside Act 1981¹⁶ and under Section 41 of the Natural Environment and Rural Communities Act 2006. The BAP Priority Habitats and ecological designations, as well as non-priority habitats, within and surrounding the borough support important populations of protected species.
- 4.3.17. The Swale Biodiversity Baseline Report¹⁷ notes that these habitats collectively support a diverse range of species, including nationally and locally important populations of birds, invertebrates, and plants. Coastal habitats in the north provide important feeding and roosting areas for overwintering and migratory birds, while inland woodlands and parkland in the south offer breeding sites and shelter for mammals, bats, and woodland specialists. The combination of coastal and inland habitats contributes to Swale's overall ecological richness and underpins its role as a key area for biodiversity within Kent.

National Habitat Network

- 4.3.18. The National Habitat Network (NHN) is a set of maps that work to help identify areas for future habitat creation and restoration at a landscape scale (see **Figure 4-5**).¹⁸

¹⁴ Defra (no date). 'Magic' can be accessed through [this link](#).

¹⁵ The Kent and Medway Biological Records Centre website can be accessed through [this link](#).

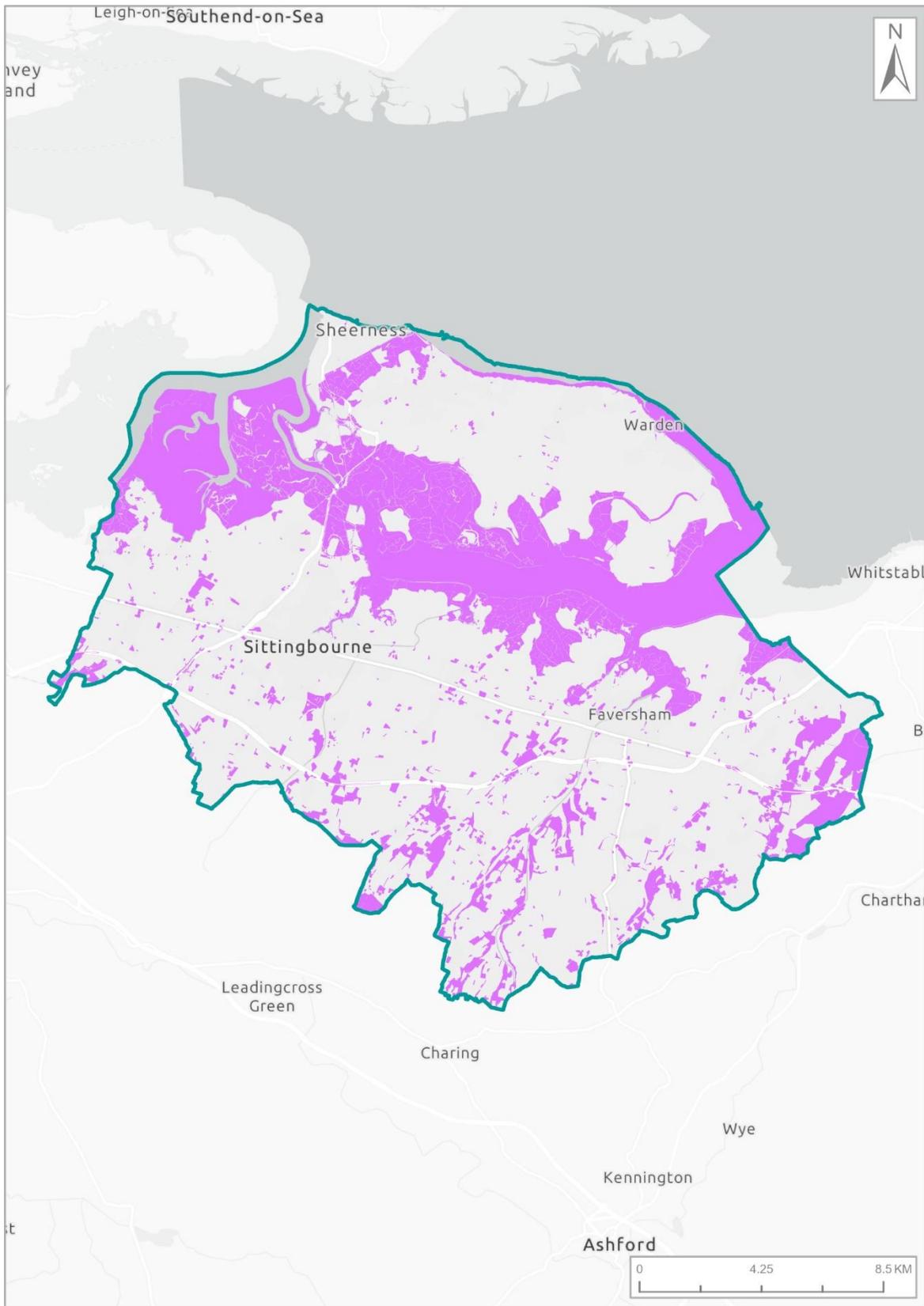
¹⁶ UK Government (1981) 'The Wildlife and Countryside Act 1981' can be accessed through [this link](#).

¹⁷ Kent Wildlife Trust (2020). 'Swale Biodiversity Baseline Report' can be accessed through [this link](#).

¹⁸ Natural England (2020). 'National Habitat Network Maps' can be accessed through [this link](#).

- 4.3.19. The majority of Swale falls within NHN designations, reflecting its importance for habitat connectivity and restoration. In the northern part of the borough, large areas are identified as restorable habitat, alongside Network Enhancement Zones 1 (deemed most suitable for habitat recreation supporting the primary habitat) and 2 (most suitable for new habitats and green infrastructure), with some sections classified as Network Expansion Zones (identified as a suitable location for connecting and linking up habitats across a landscape through new habitat creation). Central and southern areas of the borough contain extensive coverage of Network Enhancement Zone 1, highlighting opportunities to strengthen and link existing habitats through targeted restoration and management.

Figure 4-4: Priority Habitats in Swale Borough

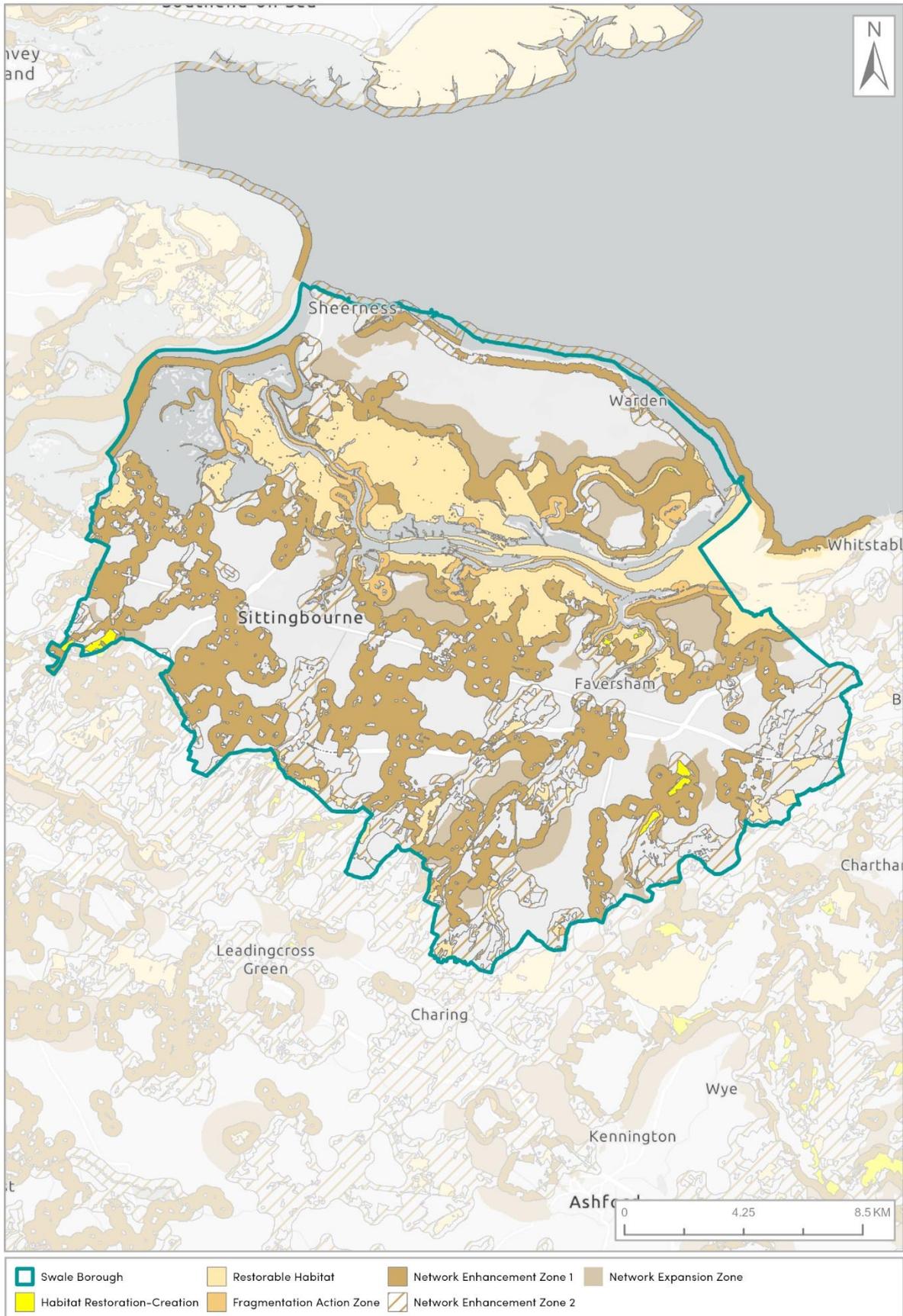


Swale Borough Priority Habitats Inventory

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Figure 4-5: National Habitat Network in Swale Borough



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Wildlife Corridors

- 4.3.21. Wildlife corridors are linear features which connect significant areas of wildlife habitat helping to mitigate some of the adverse ecological effects of habitat fragmentation. These corridors enable the movement and dispersal of species between Swale Borough's many sites of high biodiversity value (including SSSIs, LNRs, and LWSs, as well as priority and non-priority habitats).
- 4.3.22. Swale's Green and Blue Infrastructure Strategy (2020) notes that a key wildlife corridor in the borough is the Saxon Shore Way, a long distance route along the coast which is predominantly off-road. Through Swale, the Saxon Shore Way follows The Swale, passing by creeks, mudflats, saltmarshes and the Oare Marshes Nature Reserve, internationally important for its bird life.

Future Baseline

- 4.3.23. Habitats and species will potentially face increasing pressures from future development within the borough, 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.
- 4.3.24. The SBLP 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, extend and enhance important habitats, but also 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 borough.

4.4. Key Issues

4.4.1. Considering the policy context and baseline information, the following key issues (constraints and/ or opportunities) are identified in relation to biodiversity and green/ blue infrastructure:

- New development through the SBLP may result in direct or indirect impacts on the integrity of SPAs, SACs, and Ramsar sites within and around the borough. Development proposals should assess and mitigate potential impacts on these designations, such as The Swale SPA/Ramsar site, Medway Estuary & Marshes SPA/Ramsar site, and Thames Estuary & Marshes SPA/Ramsar site;
- The borough contains several SSSIs and NNRs. New development may affect the integrity of these sites if located nearby. Additionally, much of the borough overlaps with SSSI IRZs for development types likely to come forward through the SBLP, indicating a need for consultation with Natural England;
- Development could impact LNRs, LWSs, and Roadside Nature Reserves, which provide important habitats and accessible green spaces for communities and ecological research;
- The borough contains a range of BAP Priority Habitats (including coastal saltmarsh, reedbeds, grazing marsh, and ancient woodland) and designated wildlife corridors. These habitats support protected and notable species. Development may lead to habitat loss and fragmentation, weakening ecological networks and reducing species movement; and
- The SBLP presents an opportunity to deliver and coordinate biodiversity net gain through development location, design and management. This includes creating new habitats, improving connectivity, restoring degraded areas, and strengthening green and blue infrastructure networks to support ecological resilience and climate adaptation.

4.5. SA Objective

4.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to biodiversity:

Maintain, create and enhance the extent and quality of biodiversity habitats and networks within and surrounding the borough, and protect species and species diversity

4.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...avoid or mitigate adverse impacts on internationally and nationally designated sites (e.g., SACs, SPAs, Ramsar, SSSIs) and their integrity?
- ...protect and enhance locally important sites such as LNRs, LWSs, and ancient woodlands?
- ...prevent habitat loss, fragmentation, and degradation, maintaining or improving connectivity through wildlife corridors and ecological networks?
- ...promote biodiversity net gain by encouraging habitat creation, restoration, and enhancement in development proposals?
- ...support the conservation of priority habitats and protected species?

5. Climate Change Adaptation

5.1. Focus of Theme

5.1.1. This theme focuses on the expected effects of climate change, including flood risk, overheating, and climate change adaptation.

5.2. Policy Context

5.2.1. **Table 5-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 5-1: Plans, Policies and Strategies Reviewed in Relation to Climate Adaptation

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>UK Climate Change Risk Assessment</u>	2022
<u>The National Design Guide</u>	2021
<u>National Model Design Code</u>	2021
<u>National Infrastructure Assessment</u>	2021
<u>Net Zero Strategy: Build Back Greener</u>	2021
<u>UK Sixth Carbon Budget</u>	2020
<u>National Flood and Coastal Erosion Risk Management Strategy</u>	2020
<u>Heat Networks: Building a Market Framework</u>	2020
<u>The Clean Air Strategy</u>	2019
<u>Clean Growth Strategy</u>	2019
<u>25-Year Environment Plan</u>	2019
<u>UK (second) National Adaptation Programme 2018 to 2023</u>	2018
<u>How Local Authorities Can Reduce Emissions and Manage Climate Change Risk</u>	2012
<u>Flood and Water Management Act</u>	2010
<u>UK Climate Change Act</u>	2008
Local	
<u>Swale Climate and Ecological Emergency Action Plan</u>	2025

Document Title	Year of Publication
<u>Kent Environment Plan</u>	2025
<u>Kent Local Flood Risk Management Strategy</u>	2024
<u>Kent and Medway Shoreline Pollution Emergency Plan</u>	2023
<u>Swale Green and Blue Infrastructure (GBI) Strategy</u>	2020
<u>Swale Borough Council Level 1 Strategic Flood Risk Assessment</u>	2020
<u>Medway Estuary and Swale (MEAS) Flood and coastal Erosion Risk Management (FCERM)</u>	2019
<u>Swale Surface Water Management Plan</u>	2012
<u>River Medway and Swale Estuary Shoreline Management Plan</u>	2010

5.2.2. The key messages emerging from the review are summarised below:

- The SBLP 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 deliver long-term resilience, including through reuse, regeneration, and conversion;
- The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities...

- ...The evidence report contains six priority risk areas requiring additional action between 2017 and 2022, see below:
 - Flooding and coastal change risks to communities, businesses, and infrastructure.
 - Risks to health, well-being, and productivity from high temperatures.
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
 - Risks to natural capital, including terrestrial, coastal, marine, and freshwater ecosystems, soils, and biodiversity.
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants, and animals.
- Following the publication of each Change Risk Assessment, the Government must lay out its objectives, policies, and proposals to address the climate change risks and opportunities. The second National Adaptation Programme (NAP2, 2018-2023), setting out these objectives, policies, and proposals, was published in 2018. The ASC is required by the Act to assess the NAP and present progress reports. The most recent report was published in 2019, concluding that climate change adaptation needs to be addressed at a national scale and the Government's response to date has not been successful;
- The National Design Guide (NDG) and the National Design Code address how the Government recognises "well-designed places" including opportunities for climate change measures. Notably the NDG defines what constitutes a well-designed place using ten characteristics under three themes of climate, character, and community. Under the climate theme, homes and buildings should be functional, healthy, and sustainable, resources should be efficient and resilient, and buildings should be made to last;
- The National Infrastructure Assessment is published every five years and analyses the UK's long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure;
- The Clean Growth Strategy, Clean Air Strategy, Net Zero 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;
- The Flood and Water Management Act was introduced in 2010 as a response to the need to develop better resilience to climate change. The Act requires better management of flood risk, creating safeguards against rises in surface water drainage charges, and protecting water supplies for consumers. Good flood and coastal risk management is further outlined through the National Flood and Coastal Erosion Risk Management Strategy (2020). At a local scale, the Swale Borough Council Level 1 Strategic Flood Risk Assessment (2020) provides understanding of flood risk within the borough to inform planning decisions and ensure sustainable development;
- The Committee of Climate Change's 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk' emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities;
- The Swale Climate and Ecological Emergency Action Plan (2025) outlines seven focus areas to guide the borough toward net-zero emissions, emphasising collaboration and community transformation. It highlights the potential for stronger communities, a green economy, and improved public health through climate and ecological action;

- The Kent Environment Plan sets out Kent County Council's strategy to address climate change, pollution, and biodiversity loss. It focuses on six goals (ranging from reducing carbon emissions and adapting to climate impacts to protecting natural assets and promoting a circular economy) aiming to deliver environmental improvement alongside sustainable economic growth;
- The Kent Local Flood Risk Management Strategy (2024-2034) sets out how the council, as Lead Local Flood Authority, will manage flood risks from surface runoff, groundwater, and ordinary watercourses. It strengthens collaboration between authorities, improves understanding of flood risk, and builds on lessons from previous strategies to enhance resilience across the county;
- The Kent and Medway Shoreline Pollution Emergency Plan provides a coordinated framework for responding to coastal pollution incidents. It defines roles and responsibilities, emergency contacts, operational requirements, and training needs, while consolidating shoreline access, sensitivity data, and booming plans to protect Kent and Medway's coastal environment;
- The Swale Green and Blue Infrastructure Strategy (2020-2039) emphasises the role of green and blue spaces in strengthening climate resilience. It promotes nature-based solutions to manage climate impacts, enhance biodiversity, and protect ecologically significant areas such as Swale's coastline and woodlands, while engaging communities in adaptation efforts;
- The Medway Estuary and Swale Flood and Coastal Risk Management Strategy sets out the Environment Agency's long-term plan to manage tidal defences and coastal erosion sustainably over the next century. It aims to protect communities, property, habitats, and farmland while balancing environmental, technical, and economic considerations in partnership with local stakeholders;
- The Swale Surface Water Management Plan investigates local flood risks from surface runoff, groundwater, and ordinary watercourses. Led by Kent County Council in partnership with other authorities, it identifies priority areas, proposes mitigation options, and sets out an action plan to reduce flood risk and improve resilience across Swale; and

- The Medway Estuary and Swale Shoreline Management Plan (SMP) provides a high-level framework for managing risks from coastal change in a sustainable way. It sets long-term policies to protect people, property, and the natural and historic environment, forming part of the national strategy for flood and coastal defence.

5.3. Baseline Summary

Current Baseline

Flood Risk

- 5.3.1. As shown in **Figure 5-1**, Swale Borough faces significant flood risk due to its coastal location and tidal influences from the Swale tidal channel and Medway estuaries. Most of the northern half of the borough lies within Flood Zone 3, including the main settlements of Sheerness, Sittingbourne, and Faversham, making them particularly vulnerable to tidal flooding.
- 5.3.2. Swale also experiences significant surface water flood risk, linked to its coastal geography and network of drainage channels (see **Figure 5-2**). High-risk hotspots include the Isle of Sheppey, east of Goodnestone, east of Teynham, and east of Newington, while the main settlements of Sheerness, Sittingbourne, and Faversham also face varying degrees of surface water flooding. These vulnerabilities highlight the need for targeted drainage improvements and resilience measures to manage future flood impacts.

Figure 5-1: Fluvial / Coastal Flood Risk in Swale

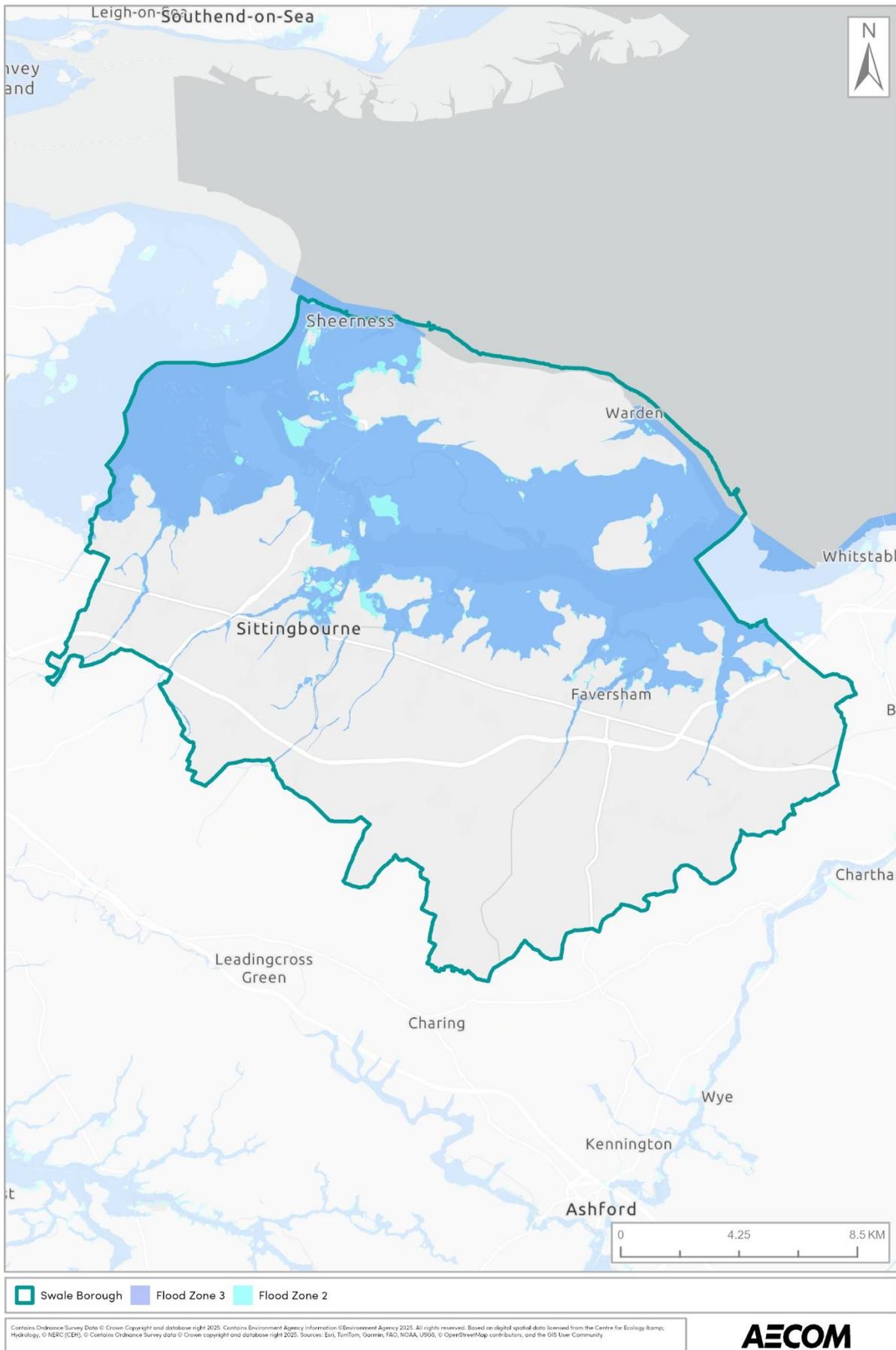
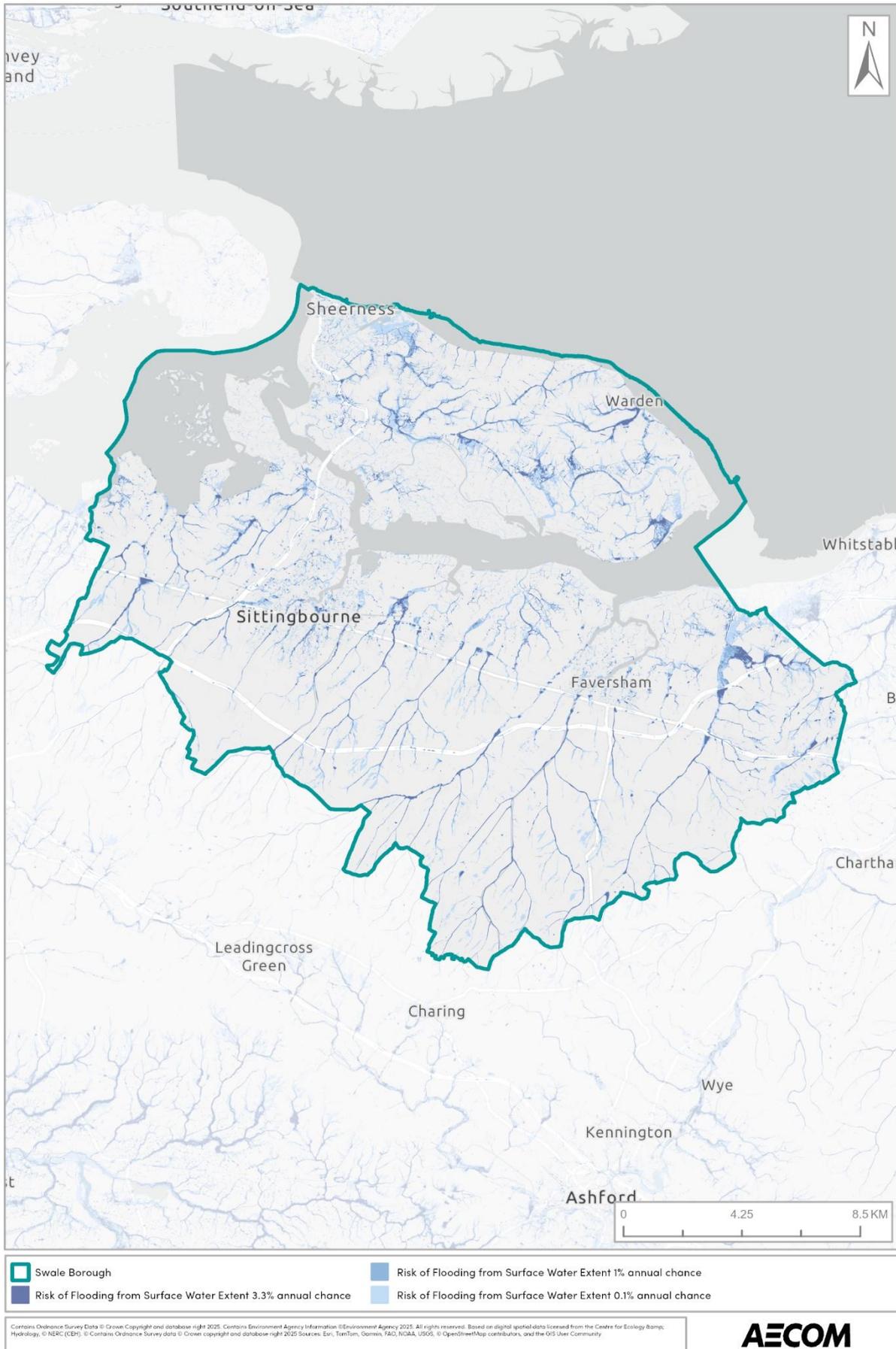


Figure 5-2: Surface Water Flood Risk in Swale



Overheating

- 5.3.3. Overheating refers to situations where indoor temperatures exceed comfortable and healthy levels, often resulting in discomfort, health risks, and increased energy consumption. In the context of climate change, overheating is becoming an increasingly significant issue, particularly in urban areas of the borough, where the combined effects of higher temperatures, reduced green spaces, and increasing urban density can exacerbate the problem. Urban heat islands (UHI) are particularly evident in areas with high population density, where concrete, asphalt, and other materials absorb and retain heat.
- 5.3.4. Adaptation measures are important to manage these risks. Guidance from Kent County Council and partners highlights practical steps such as improving shading, enhancing ventilation, and incorporating green infrastructure to cool urban environments.¹⁹ Initiatives like the Cool Towns and Cool Neighbourhoods projects (with Kent County Council as an associated partner) demonstrate how nature-based solutions and community-led interventions can reduce heat stress at neighbourhood scale. Local planning and design standards should embed these principles to ensure new developments and retrofits are resilient to future heat extremes.

Future Baseline

Impacts of Climate Change

- 5.3.5. Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team. 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.
- 5.3.6. As highlighted by the research, the effects of climate change for the South East by 2040 in a 'medium emissions' (RCP4.5) scenario are likely to be as follows:²⁰
- An increase in winter mean temperature of 1°C and an increase in summer mean temperature of 2°C; and
 - A change in winter mean precipitation up to +10% and summer mean precipitation up to -10%.

¹⁹ Kent County Council (no date). 'Kent's changing climate' can be accessed through [this link](#).

²⁰ Met Office (2019) 'Climate change projections over land' can be accessed through [this link](#).

5.3.7. Resulting from these changes, a range of risks exist for the borough, including:

- Effects on water resources, such as a reduction in availability of groundwater for extraction and a need to increase capacity of wastewater treatment plants and sewers;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding and a need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
- Health impacts, including increased risk of respiratory and cardiovascular illnesses during heatwaves, higher vulnerability among elderly and low-income populations, and mental health impacts associated with extreme weather events;
- Effects on the significance of designated and non-designated heritage assets;
- Increased demand for air-conditioning; and
- Heat stress related issues with infrastructure due to increased temperature.

5.4. Key Issues

5.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to climate change adaptation:

- Parts of the borough face high risks of fluvial, coastal and surface water flooding due to nearby waterbodies. This poses a significant constraint for future development, especially in Swale Borough's main urban areas and this will be a significant consideration in developing the spatial strategy for the plan. Development must consider the requirements of the NPPF for sequential and exception testing alongside the risks and necessary flood mitigation measures;
- Increases in the built footprint of the borough has the potential to exacerbate flood risk issues;

- Climate change may reduce groundwater availability in summer and increase surface water flooding in winter, stressing drainage systems and water quality. Effective water management solutions, like sustainable drainage systems, will be needed to mitigate these risks;
- Following national trends, extreme heat events are likely to occur more frequently in the future in Swale Borough. In addition to this, drought is likely to become an increasing issue in summer. In this respect, climate change resilience strategies should form an integral part of the emerging SBLP policy framework; and
- Higher temperatures and flooding increase risks to public health, particularly in dense urban areas. Vulnerable populations will need better access to cooling and flood protection.

5.5. SA Objectives

5.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objectives and assessment questions in relation to climate change adaptation:

Increase resilience to the potential effects of climate change, including flood risk

5.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...avoid or reduce flood risk from tidal, fluvial, and surface water sources, particularly in vulnerable urban centres?
- ...incorporate sustainable drainage and water management systems to mitigate increased flood and drought risks?
- ...help reduce overheating by protecting and expanding green infrastructure and increasing permeable surfaces?
- ...support climate-resilient design and infrastructure to safeguard public health, especially for vulnerable populations?

6. Climate Change Mitigation

6.1. Focus of Theme

6.1.1. This theme focuses on activities in the borough that contribute to climate change mitigation, including mitigating the borough's emissions, and developing renewable energy infrastructure.

6.2. Policy Context

6.2.1. **Table 2-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 6-1: Plans, Policies and Strategies Reviewed in Relation to Climate Change Mitigation

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>UK Climate Change Risk Assessment</u>	2022
<u>The National Design Guide</u>	2021
<u>National Model Design Code</u>	2021
<u>National Infrastructure Assessment</u>	2021
<u>Net Zero Strategy: Build Back Greener</u>	2021
<u>UK Sixth Carbon Budget</u>	2020
<u>Heat Networks: Building a Market Framework</u>	2020
<u>The Clean Air Strategy</u>	2019
<u>Clean Growth Strategy</u>	2019
<u>25-Year Environment Plan</u>	2019
<u>UK National Adaptation Programme 2018 to 2023</u>	2018
<u>How Local Authorities Can Reduce Emissions and Manage Climate Change Risk</u>	2012
<u>UK Climate Change Act</u>	2008
Local	
<u>Swale Climate and Ecological Emergency Action Plan</u>	2025
<u>Kent Environment Plan</u>	2025
<u>Swale Electric Vehicle Strategy (2022-2030)</u>	2022

Document Title	Year of Publication
<u>Swale Green and Blue Infrastructure (GBI) Strategy</u>	2020
<u>Kent and Medway Energy and Low Emissions Strategy</u>	2020
<u>Kent Renewable Energy Action Plan (Update)</u>	2017

6.2.2. The key messages emerging from the review are summarised below:

- The SBLP 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, 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 emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion;
- The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action between 2017 and 2022, see below:
 - Flooding and coastal change risks.
 - Risks to health, well-being, and productivity from high temperatures.
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
 - Risks to natural capital, including terrestrial, coastal, marine, and freshwater ecosystems, soils, and biodiversity.
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants, and animals.
- Following the publication of each Change Risk Assessment, the Government must lay out its objectives, policies, and proposals to address the climate change risks and opportunities...

- ...The second National Adaptation Programme (NAP2, 2018-2023), setting out these objectives, policies, and proposals, was published in 2018. The ASC is required by the Act to assess the NAP and present progress reports. The most recent report was published in 2019, concluding that climate change adaptation needs to be addressed at a national scale and the Government's response to date has not been successful. The Sixth Carbon Budget, required under the Climate Change Act, is the legal limit of UK net greenhouse gas emissions and requires the country to reduce emissions by 78% by 2035 relative to 1990 levels. This puts the country on track to achieve net-zero emissions by 2050 at the latest;
- The National Design Guide (NDG) and the National Design Code address how the Government recognises "well-designed places" including opportunities for climate change measures. Notably the NDG defines what constitutes a well-designed place using ten characteristics under three themes of climate, character, and community. Under the climate theme, homes and buildings should be functional, healthy, and sustainable, resources should be efficient and resilient, and buildings should be made to last;
- The National Infrastructure Assessment is published every five years and analyses the UK's long-term economic infrastructure needs to create a strategic vision and recommendations. The baseline report states that climate change will increase pressures on all sectors, including economic infrastructure;
- The Clean Growth Strategy, Clean Air Strategy, Net Zero 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;

- The Department for Business, Energy and Industrial Strategy released a framework for heat networks which includes proposals to increase access to renewable heat sources and achieve a net zero target by 2050;
- The Committee of Climate Change's 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk' emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities;
- The Swale Climate and Ecological Emergency Action Plan (2025) outlines seven focus areas to guide the borough toward net-zero emissions, emphasising collaboration and community transformation. It highlights the potential for stronger communities, a green economy, and improved public health through climate and ecological action;
- The Kent Environment Plan sets out Kent County Council's strategy to address climate change, pollution, and biodiversity loss. It focuses on six goals (ranging from reducing carbon emissions and adapting to climate impacts to protecting natural assets and promoting a circular economy) aiming to deliver environmental improvement alongside sustainable economic growth;
- The Swale Electric Vehicle Strategy (2022) highlights the growing demand for electric vehicles and outlines how Swale Borough Council will support the transition through well-planned, accessible charging infrastructure;
- The Swale Green and Blue Infrastructure Strategy (2020–2039) highlights the role of green and blue spaces in reducing carbon emissions and supporting climate change mitigation. It promotes nature-based solutions that absorb carbon, enhance biodiversity, and protect key ecological areas such as Swale's coastline and woodlands, while encouraging community involvement in sustainable practices;
- The Kent and Medway Energy and Low Emissions Strategy (2020) sets out a countywide approach to tackling the climate emergency by reducing carbon emissions and promoting clean energy. It calls for collective action from residents, businesses, and public bodies to deliver sustainable growth, improve air quality, and address fuel poverty while positioning Kent as a leader in low-carbon innovation; and

- The updated Kent Renewable Energy Action Plan revises the county's energy and emissions baseline and assesses future demand scenarios. It reviews current renewable and Combined Heat and Power capacity, explores deployment potential, and sets out actions to accelerate renewable energy growth and reduce carbon emissions across Kent and Medway.

6.3. Baseline Summary

Current Baseline

Climate Emergency

- 6.3.1. Swale Borough Council declared a climate emergency in June 2019, setting the borough on a pathway towards carbon neutrality by 2045. Since the climate emergency was confirmed in Swale, a new Climate Change Action Plan has been adopted to enable the Council to meet these commitments.

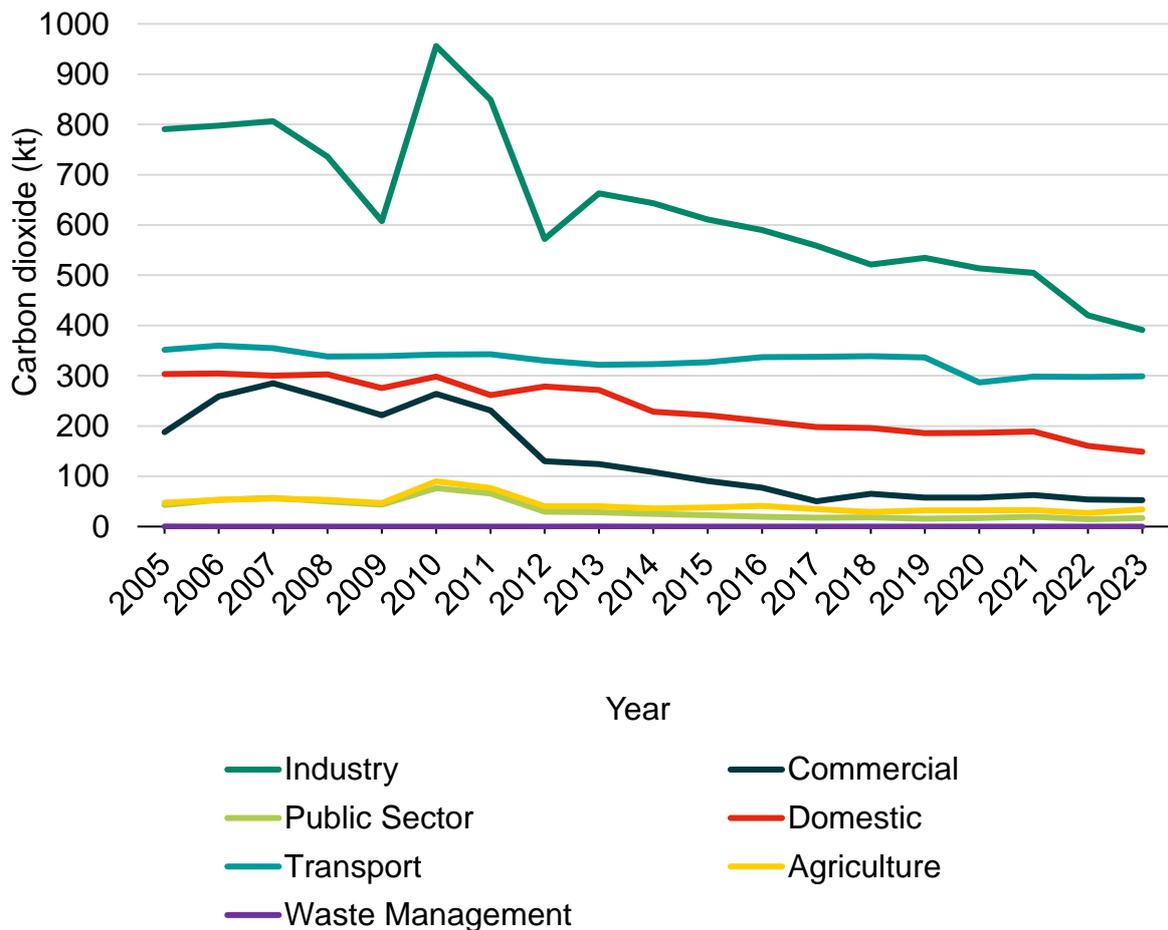
Contribution to Climate Change

- 6.3.2. The Climate Change Act 2008 (2050 Target Amendment) Order of 2019 requires carbon dioxide (CO₂) emissions from the built environment to be monitored and recorded at the local authority level. The CO₂ emissions shown in **Figure 6-1** and **Figure 6-2** are derived from data supplied by the Department for Business, Energy, and Industrial Strategy.²¹
- 6.3.3. Beginning with **Figure 6-1**, it shows that throughout the observed period, the majority of Swale Borough's territorial CO₂ emissions originated from three key sectors: industry, transport, and domestic.
- 6.3.4. Despite significant reductions in emissions over the years, the industry sector has consistently been the largest contributor in Swale, likely influenced by activities such as shipping and manufacturing.
- 6.3.5. Transport emissions are the second-largest source of CO₂ in Swale. Emissions remained relatively stable until 2019, after which there was a notable drop (likely due to reduced travel during the COVID-19 pandemic). By 2021, emissions had begun to rise again, though they remained below the 2018 levels.

²¹ Department for Business, Energy and Industrial Strategy (2025). 'UK local authority and regional carbon dioxide emissions national statistics: 2005-2023' can be accessed through [this link](#). Table 1.2.

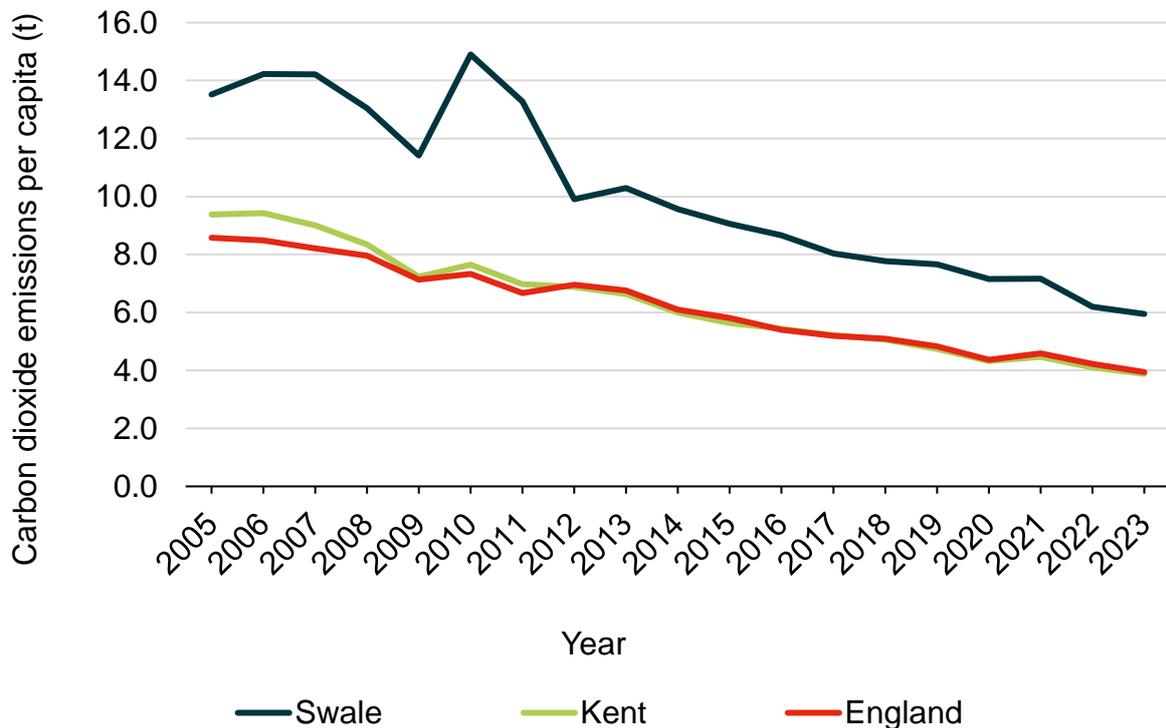
6.3.6. In 2005, domestic emissions were relatively high, but have since declined significantly, nearly halving by 2023. This reduction is largely attributed to the decarbonisation of the national grid and increased energy efficiency in homes.

Figure 6-1: Local Authority Territorial Carbon Dioxide Emissions Estimates Within the Scope of Influence of Swale Borough 2005-2023 (kt CO₂e)



6.3.7. **Figure 6-2** indicates that since 2013, CO₂ emissions per capita in Swale have remained around 50% higher than the averages for Kent and England. This difference may be attributed to the borough’s industrial activity, including sectors such as manufacturing and logistics which are associated with Medway Port.

Figure 6-2: Territorial Carbon Dioxide Emissions per Capita (in Tons) for Swale Borough, and the Whole of England (2005-2023)



Renewable Energy

- 6.3.8. Electric Vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be ‘zero-emission vehicles’ (ZEVs) if powered by renewable electricity. As of July 2025, there were 124 public electric charging devices in Swale Borough.²² This figure is the third highest of all the districts and boroughs in Kent.
- 6.3.9. In terms of renewable energy, the Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority.²³ The most recent data (to 2024) shows that Swale Borough has a total of 3,548 renewable energy (electricity) installations (the majority of which are photovoltaics), amounting to a total renewable electricity capacity of 809.6 MW.

²² HM Gov (2025) ‘Electric vehicle charging infrastructure statistics: July 2025’ can be accessed through [this link](#) Table 1a.

²³ DBEIS (2025) ‘Renewable electricity by local authority, 2014 to 2024’ can be accessed through [this link](#). LA-Sites 2024. LA-Capacity 2024.

Energy Efficiency

- 6.3.10. Swale faces significant challenges in improving the energy efficiency of its housing stock. With approximately 55,000 homes, the borough has one of the highest rates of inadequate loft insulation in Kent, affecting an estimated 30,000 properties.²⁴ In addition, 10,000 solid wall homes and 17,500 with empty cavities present further barriers to effective insulation due to the cost and complexity of retrofit works.
- 6.3.11. Comprehensive insulation across all homes in Swale could cost between £64 million and £151 million, but would deliver substantial benefits: an estimated £8 million in annual energy bill savings for residents and a reduction of 33,000 tonnes of CO₂ emissions per year.²⁴
- 6.3.12. Swale Borough Council has already taken steps to address energy efficiency through initiatives like the Rushenden Retrofit Programme on the Isle of Sheppey. Funded by the Community Energy Savings Programme, this national demonstrator project aims to achieve at least 40% carbon savings in both private and social housing. Phase one has delivered retrofit measures to over 60 homes, including external wall insulation, replacement glazing, new boilers, heating systems, and solar panels. Monitoring equipment has been installed to evaluate energy use and behavioural changes post-retrofit.²⁴

Future Baseline

Renewable Energy Uptake

- 6.3.13. In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted.
- 6.3.14. With regard specifically to transport emissions, 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)²⁵, it is assumed that ULEV uptake will increase rapidly in the coming decade and aside from Heavy Goods Vehicles (HGVs), many more vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

²⁴ Kent County Council (no date). 'Kent Environment Strategy Briefing Note Swale' can be accessed through [this link](#).

²⁵ HM Gov (2018) 'The Road to Zero – Next steps towards cleaner road transport and delivering our Industrial Strategy' can be accessed through [this link](#).

6.4. Key Issues

6.4.1. Considering the policy context and baseline information, the following key issues (constraints and/ or opportunities) are identified in relation to climate change mitigation:

- Swale Borough Council declared a climate emergency in 2019, with a target of carbon neutrality by 2045, reinforcing the need to embed climate action in the SBLP;
- The borough's CO₂ emissions are primarily from the industry, transport, and domestic sectors. While emissions have declined, industry and transport remain significant sources, underscoring the need for targeted reductions for these sectors;
- Expanding EV infrastructure is needed to support the transition to electric mobility;
- Increasing renewable energy installations, such as solar panels and wind turbines, is important to reduce reliance on fossil fuels and lower overall CO₂ emissions in the borough; and
- The energy efficiency of Swale's housing stock is below average, requiring targeted action through the SBLP to support retrofit programmes and low-carbon building standards.

6.5. SA Objectives

6.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objectives and assessment questions in relation to climate change mitigation:

Mitigate climate change by increasing decarbonisation, with a focus on industry, transport and the built environment, increasing efficiency and reducing energy use

6.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...guide Swale Borough towards carbon neutrality by 2045 through strong emissions reductions?
- ...ensure new developments achieve high energy efficiency with monitored performance?
- ...accelerate uptake of low-carbon heating?

- ...expand EV charging infrastructure to support the shift to electric vehicles?
- ...increase renewable energy generation?
- ...promote sustainable transport options that reduce transport emissions?

7. Communities and Health

7.1. Focus of Theme

7.1.1. This theme focuses on promoting health, wellbeing, and safety by addressing healthcare access, health inequalities, road safety, crime prevention, and the quality of the living environment.

7.2. Policy Context

7.2.1. **Table 7-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 7-1: Plans, Policies and Strategies Reviewed in Relation to Health, Wellbeing and Safety

Document Title	Year of Publication
National	
<u>10 Year Health Plan for England</u>	2025
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Streets for a Healthy Life: A companion guide to building for a Healthy Life</u>	2022
<u>Building for a Healthy Life</u>	2020
<u>Health Equity in England: The Marmot Review 10 Years On</u>	2020
<u>Planning for Sport Guidance</u>	2019
<u>The 25 Year Environment Plan</u>	2018
<u>Healthy High Streets</u>	2018
<u>Spatial Planning for Health: An evidence resource for planning and designing healthier places</u>	2017
<u>Health and Social Care Act</u>	2012
<u>Planning Practice Guidance</u>	various
Local	
<u>Swale Community Safety Plan 2025/26</u>	2025
<u>Empowering You in Swale (2024-2027)</u>	2024
<u>Kent and Medway Integrated Care Strategy (2023-2028)</u>	2023
<u>We Care Strategy (2023 to 2028)</u>	2023

Document Title	Year of Publication
<u>Swale Green and Blue Infrastructure (GBI) Strategy</u>	2020

7.2.2. The key messages emerging from the review are summarised below:

- The 10 Year Health Plan is part of the government's health mission to build a health service fit for the future. It sets out how the government will reinvent the NHS through three shifts:

- hospital to community.
- analogue to digital.
- sickness to prevention.

To support the scale of change needed, the Plan outlines that the government will ensure the NHS is ready to deliver these three shifts at pace:

- through a new operating model.
 - by ushering in a new era of transparency.
 - by creating a new workforce model with staff genuinely aligned with the future direction of reform.
 - through a reshaped innovation strategy.
 - by taking a different approach to NHS finances.
- The Government's Levelling Up and Regeneration Bill seeks to reduce regional inequalities and promote economic growth and opportunities in less prosperous areas. It has been designed to address regional disparities, stimulate economic development, and enhance infrastructure and community well-being in order to create a more balanced and inclusive nation;
 - The SBLP will need to have regard for the principles set out in the NPPF, which seek to retain and enhance access to community services and facilities such as educational facilities and open spaces. The NPPF recognises the benefits of having a range of local provision to support community needs, in addition to the benefits of creating cohesive communities in safe environments where the fear of crime (and crime itself) does not undermine resident quality of life. This contributes to ensuring settlement and community identities are protected;
 - 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...

- ...which illustrate how well-designed places that are beautiful, healthy, greener, enduring, and successful can be achieved in practice;
- The NPPF highlights the role of development plans in helping to deliver access to high quality open spaces and opportunities for sport and physical activity, therefore contributing to the health and wellbeing of communities. The health benefits of access to nature, green spaces and green infrastructure are further reiterated in the 25-year Environment Plan, which has a particular focus on the physical and mental wellbeing benefits that the environment provides.;
- 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 for the poorest 10% of women;
- 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;
- In 2017 Public Health England (PHE) published '*Spatial Planning for Health: An evidence resource for planning and designing healthier places*'. The review provides guidance on the role of the built and natural environment in shaping health impacts. The review also explores the impacts of neighbourhood design, provision of housing, transport and the natural environment on public health. Although PHE has since been replaced by the UK Health Security Agency and the Office for Health Improvement and Disparities, the guidance remains a relevant reference for planning and public health;
- In 2018 PHE produced a 'Healthy High Streets' briefing which highlights how health inequalities can be addressed in the design of the built environment. Additionally, 'Building for a Healthy Life' guidance (and its companion 'Streets for a Healthy Life') helps local council applications focus more on active travel, air quality and biodiversity;
- The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions;

- The Swale Community Safety Plan 2025/26 sets out how the Community Safety Partnership will address local safety priorities. Updated annually, it uses strategic assessments and stakeholder input to respond to emerging issues and legislative changes, ensuring actions reflect community needs;
- The Empowering You in Swale Strategy sets priorities for community development to tackle inequalities and improve residents' lives. It focuses on partnership working, skills, health, sustainability, and innovative projects to support communities facing challenges such as the cost of living, housing, and fuel crises;
- The Kent and Medway Integrated Care Strategy (2023-2028) sets out a collaborative approach to improving health and wellbeing across the region. It addresses health inequalities by tackling wider determinants such as housing, education, environment, and employment, and commits system partners to work together for better outcomes than any one organisation could achieve alone;
- The NHS We Care Strategy (2023-2028) sets out four key ambitions to transform community health services and tackle inequalities exposed by the pandemic. Co-designed with patients, carers, and staff, it focuses on improving care quality, aligning with system partners, and driving change through the power of community-based healthcare; and
- The Swale Green and Blue Infrastructure Strategy (2020-2039) recognises green and blue spaces as vital for community health and wellbeing. It sets out opportunities to create healthier, more connected environments through nature-based improvements, urban greening, and safe routes, while fostering partnerships to deliver sustainable projects that enhance quality of life for residents.

7.3. Baseline Summary

Current Baseline

Population Growth

- 7.3.1. Swale's population was 151,700 in 2021, an increase of 11.7% from around 135,800 in 2011. This growth rate is higher than the South East average (7.5%) and England overall (6.6%).²⁶
- 7.3.2. Growth has been most pronounced among older age groups, with residents aged 65 years and over increasing by 27% between 2011 and 2021, compared to 8% growth for those aged 15-64 and 9% growth for those under 15 years. This trend reflects an ageing population.

Health

- 7.3.3. Life expectancy for males in Kent (dashboard data was not available at the Swale level) during the period 2021-2023 was 79.3 years. For females, it was higher, at 83.3 years. Life expectancy for both sexes has remained relatively stable compared to a decade earlier, although life expectancy for males has dropped slightly since 2017-2019 (when it was 79.8). Despite this, Swale's figures remain broadly comparable to national averages.²⁷
- 7.3.4. In the 2021 Census, 80% of Swale's residents recorded their general health as 'good' or 'very good'.²⁸ This is slightly lower than county and national averages, which both were recorded as 82%.
- 7.3.5. Office for Health Improvement and Disparities maintain the Fingertips website, which provides health profiles for each local authority area in England, including Swale. The latest Health Profile for Swale summarises various datasets produced over recent years. **Table 7-2** provides a high-level review of Swale's performance compared to England for the 35 indicators measured (see the Fingertips for further detail).²⁹

²⁶ ONS (2022). 'How the population changed in Swale: Census 202' can be accessed through [this link](#).

²⁷ OHID (2023). 'Health Inequalities Dashboard' can be accessed through [this link](#).

²⁸ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Table TS037.

²⁹ Office for Health Improvement and Disparities (no date). 'Fingertips - Swale Borough Local Authority Health Profile' can be accessed through [this link](#).

7.3.6. Overall, Swale performs similarly to or better than the national average for most indicators. However, the borough performs worse for:

- Life expectancy at birth (Male, 3 year range);
- Estimated dementia diagnosis rate;
- Under 18s conception rate;
- Year 6 prevalence of obesity (including severe obesity) (10-11 yrs);
- Average Attainment 8 score: and
- Overall deprivation score (IMD 2019).

Table 7-2: Health Summary for Swale Borough

Indicator Category (Number of Indicators)	Significantly Better than England (Better 95%)	Not Significantly Different (Similar)	Significantly Worse (Worse 95%)
Life expectancy and causes of death (8)	0	7	1
Injuries and ill health (5)	2	2	1
Behavioural risk factors (5)	1	4	0
Child health (4)	0	2	2
Inequalities (4)	0	3	1
Wider determinants of health (6)	4	1	1
Health protection (3)	2	1	0
Total	9	21	6

- 7.3.7. The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation, combining seven different domains. Of particular relevance to the Health, Wellbeing and Safety SA theme are:
- **Health deprivation and disability:** the risk of premature death and the impairment of quality of life through poor physical or mental health;
 - **Crime:** the risk of personal and material victimisation at the local level; and
 - **Living environment:** the quality of the local environment, categorised into 'indoors living environment' to measure the quality of housing and 'outdoors living environment' to measure indicators like air quality and road traffic accidents.
- 7.3.8. **Figure 7-1** shows the ranking of Swale Borough's LSOAs for the Health and Disability domain, while **Table 7-3** provides additional details on the LSOAs within Swale Borough that fall within the 50% most deprived, or worse, areas.
- 7.3.9. Analysis indicates Swale performs poorly in the Health and Disability domain, with 60% of its LSOAs within the 50% most deprived nationally, including five in the bottom 10%. Higher levels of deprivation are concentrated on the Isle of Sheppey, Faversham, and Sittingbourne.

Figure 7-1: Health and Disability IMD Domain³⁰

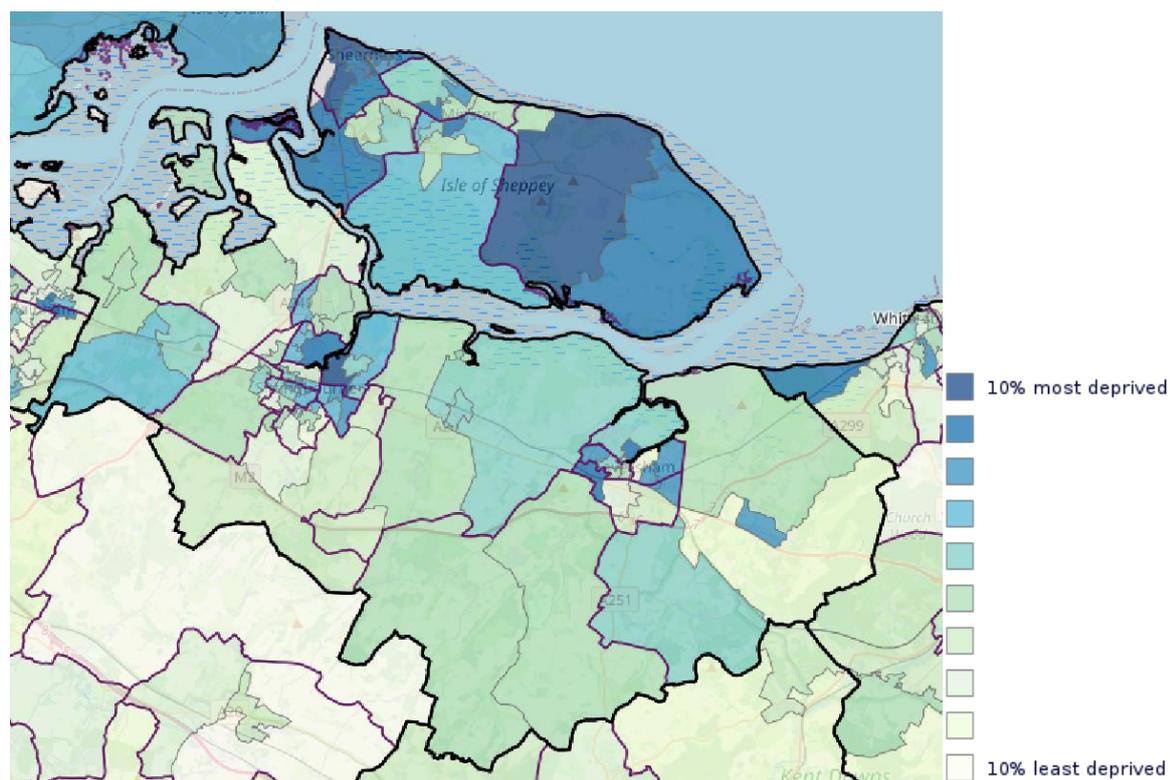


Table 7-3: LSOAs in Swale Borough Ranked Within 50% Most Deprived or Worse for the Health and Disability IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	14
40% Most Deprived	10
30% Most Deprived	9
20% Most Deprived	13
10% Most Deprived	5
Total	51 (out of 85)

³⁰ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

- 7.3.10. The Government recently published a draft Outcomes Framework for Local Government, which includes a focus on health metrics.³¹ Regard can be given to those of most relevance moving forward in the SA. Also, consideration can be given to two recent publications from the Town and Country Planning Association and Royal Town Planning Institute, respectively, dealing with the links between local plan-making and health.^{32,33} Those publications both include a considerable emphasis on gathering data that can then be used to inform local plan-making.

Healthcare Facilities

- 7.3.11. Access to primary care services in Swale is a significant concern. A 2025 report by Healthwatch Kent and Diversity House found that Swale has the worst GP-to-patient ratio in the UK, with one GP for every 3,300 patients.³⁴ This shortage has led to difficulties in accessing timely care, particularly for vulnerable groups. The report also highlighted disparities in healthcare experiences based on geography, culture, and ethnicity.
- 7.3.12. Looking ahead, Swale's ageing population is likely to place further pressure on healthcare infrastructure. Older residents typically have more complex and long-term health needs, including chronic disease management, mobility support, and social care services. This demographic shift will require continued investment in both physical healthcare facilities and the workforce, with a particular focus on geriatric care and integrated community services.

Road Safety

- 7.3.13. The Department for Transport provides information on the number and nature of casualties sustained as a result of road traffic accidents reported in Great Britain's roads, with the latest available data coming from 2023.³⁵

³¹ GOV.UK (2025). 'Local Government Outcomes Framework: Call for feedback' can be accessed through [this link](#).

³² Tcpa (2024). 'Planning for healthy places – a guide on embedding health in Local Plans and planning policy in England' can be accessed through [this link](#).

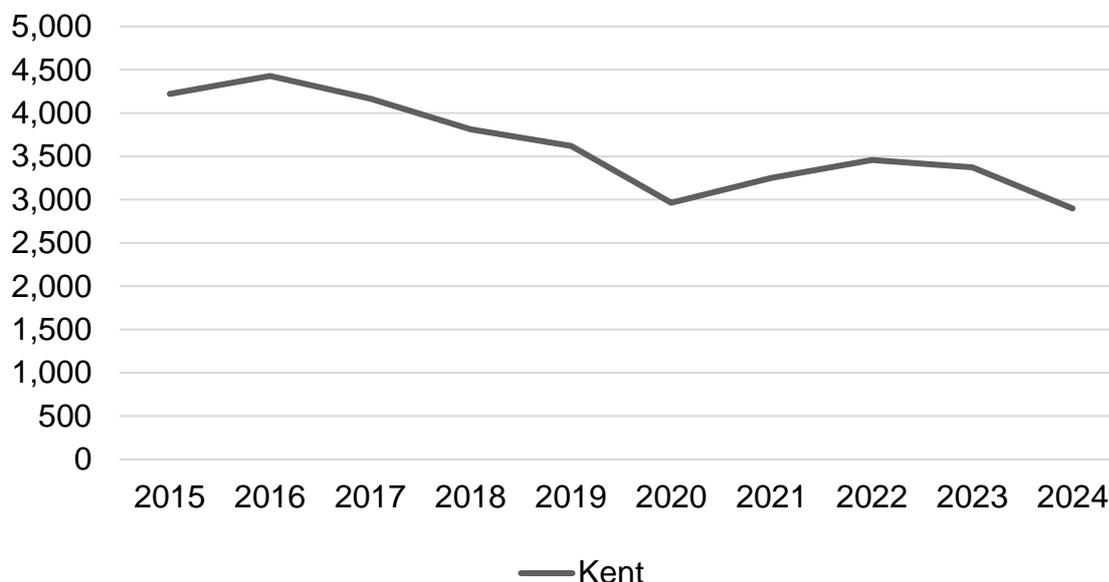
³³ RTPI (2024). 'Project: Local plans and health' can be accessed through [this link](#).

³⁴ Diversity House (2022). 'Access To Healthcare : Looking At Health Inequalities In Swale' can be accessed through [this link](#).

³⁵ Department for Transport (2023). 'Number and rates of reported road collisions by severity and local authority, Great Britain, 10 years up to 2023' can be accessed through [this link](#). [See Sheet RAS0403]

7.3.14. Over the last 10 years, there has been a downward trend in reported road collisions (all types) in Kent (see **Figure 7-2**)³⁶, reflecting a wide range of factors including road improvement schemes, improved vehicle safety, and national and local measures to improve the training and skills of road users and their compliance with traffic laws.

Figure 7-2: Road Collisions in Kent (All Severities)(2015-2024)



Crime

7.3.15. Swale experiences a slightly higher level of crime compared to other districts in Kent and across England. According to ONS, the overall crime rate in Swale for the year ending March 2025 was 96.5 crimes per 1,000 residents, which is higher than the average crime rate across similar local authority areas (including the average for Kent).³⁷

7.3.16. The most commonly reported crimes in Swale (as of February 2024) were:³⁸

- Violence and sexual offences;
- Anti-social behaviour; and
- Criminal damage and arson.

³⁶ Data for Swale was not available.

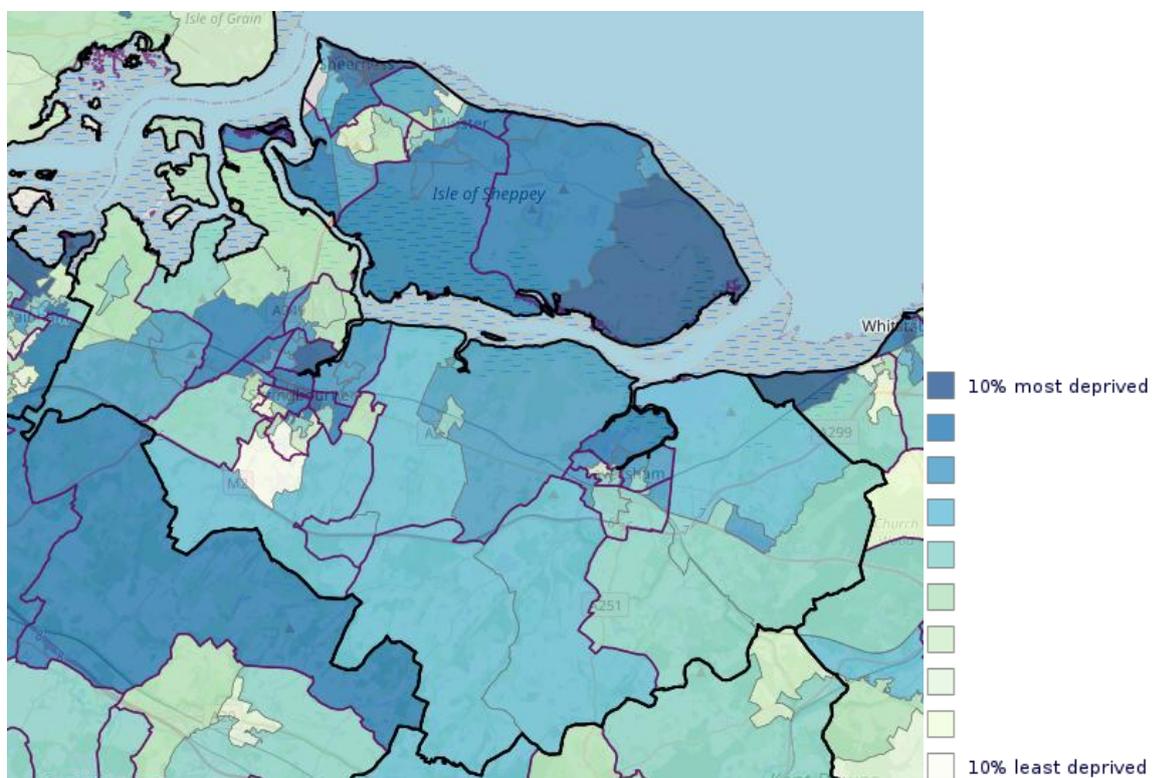
³⁷ Police.UK (2025). 'Compare your area' can be accessed through [this link](#).

³⁸ Police-uk.org (2024). 'Swale Crime Data, Postcodes, Wards, Map' can be accessed through [this link](#).

7.3.17. The Crime domain of the Index of Multiple Deprivation measures the risk of personal and material victimisation at local level, drawing on indicators such as recorded violence, burglary, theft, and criminal damage. **Figure 7-3** shows the ranking of Swale’s LSOAs for the Crime domain, while **Table 7-4** provides additional details on the LSOAs within Swale that fall within the 50% most deprived areas.

7.3.18. 80% of the LSOAs in Swale Borough fall within the 50% most deprived nationally for crime, with eight LSOAs ranked in the 10% most deprived. The presence of multiple LSOAs in the most deprived category indicates a need for targeted interventions to address crime and its underlying causes in these areas.

Figure 7-3: Crime IMD Domain³⁹



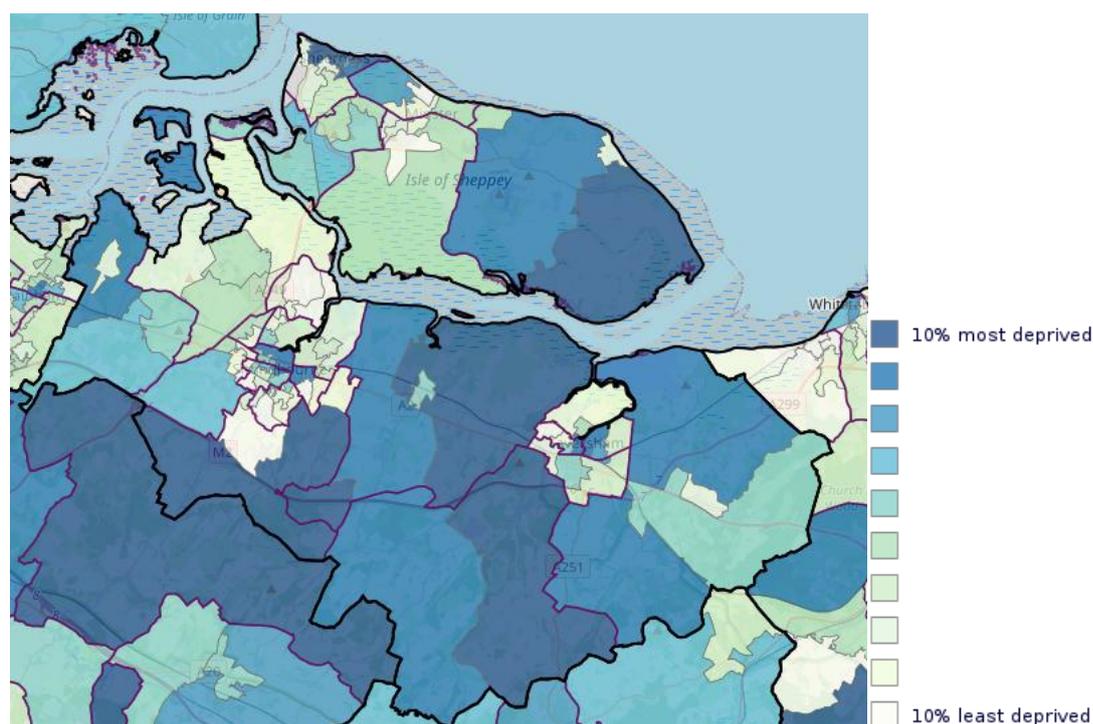
³⁹ Ministry of Housing, Communities & Local Government (2019). ‘Indices of Deprivation: 2019 and 2015’ can be accessed through [this link](#).

Table 7-4: LSOAs in Swale Borough Crime IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	16
40% Most Deprived	6
30% Most Deprived	22
20% Most Deprived	16
10% Most Deprived	8
Total	68 (out of 85)

Living Environment

- 7.3.19. The Living Environment domain measures the quality of the local environment, combining data on housing condition and wider environmental factors. It includes indicators such as indoor housing quality, air quality, and road traffic accidents. **Figure 7-4** shows the ranking of Swale's LSOAs for the Living Environment domain, while **Table 7-5** provides additional details on the LSOAs within Swale that fall within the 50% most deprived, or worse, areas.
- 7.3.20. Swale generally performs well in this domain, with 60% of its LSOAs among the 50% least deprived nationally, though pockets of deprivation remain, primarily in the east of the Isle of Sheppey and rural central and southern areas.

Figure 7-4: Living Environment IMD Domain⁴⁰**Table 7-5: LSOAs in Swale Borough Living Environment IMD Domain**

Decile	Most Deprived Indices
50% Most Deprived	10
40% Most Deprived	4
30% Most Deprived	3
20% Most Deprived	12
10% Most Deprived	7
Total	34 (out of 85)

⁴⁰ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Green Infrastructure

- 7.3.21. Improving access to greenspace are increasingly being recognised as an important asset for supporting health and wellbeing. This ‘natural capital’ can help local authorities address local issues that they face, including improving health and wellbeing, managing health and social care costs, reducing health inequalities, improving social cohesion and taking positive action to address climate change.⁴¹
- 7.3.22. Swale Borough Council has acknowledged the importance of green infrastructure through its Green and Blue Infrastructure Strategy, which guides opportunities for a greener, healthier, more biodiverse and prosperous borough.
- 7.3.23. Swale benefits from a good supply of open green spaces and rivers, particularly in the peripheral areas of the borough. Many of these are accessible via the local public footpath network, including Public Rights of Way (PROW) (see **Chapter 13**), which are managed by Kent County Council to ensure safe and sustainable access for walking, cycling, and horse riding.
- 7.3.24. Three sites in Swale currently hold Green Flag status (the national benchmark for well-managed parks and green spaces):⁴²
- Milton Creek Country Park
 - Oare Gunpowder Works Country Park
 - Faversham Recreation Ground

Future Baseline

- 7.3.25. As the borough’s population grows, pressure on local services and those in surrounding authorities will increase. This underscores the need to retain existing community facilities and secure new or upgraded infrastructure where possible in future development.
- 7.3.26. An ageing population will continue to strain social care services, particularly for older adults with long-term conditions. Health inequalities may persist, especially in deprived areas. Without targeted interventions addressing chronic illness, mental health, and obesity, improvements in life expectancy could slow.

⁴¹ PHE (2020); ‘*Improving access to greenspace*’ can be accessed through [this link](#).

⁴² Swale Borough Council (2025). ‘*Award winning green spaces*’ can be accessed through [this link](#).

- 7.3.27. Development will likely increase road traffic volumes, raising accident risks, particularly for pedestrians and cyclists. Enhancing active travel infrastructure and networks will be important for safer, more sustainable transport.
- 7.3.28. Crime patterns may shift with population growth and socio-economic change, with theft and violent crime remaining concerns. Higher crime rates could persist unless community safety initiatives, youth engagement programmes, and policing strategies address root causes. Applying 'designing out crime' principles (such as improved street lighting, active frontages, natural surveillance, and well-maintained public spaces) will be important in the emerging SBLP.
- 7.3.29. Environmental pressures will grow as Swale urbanises, affecting air quality, noise, and access to green space. Maintaining and expanding parks and open spaces will be vital for public health, social cohesion, and climate resilience. Poorer air quality may become more pronounced in densely developed areas, making sustainable urban planning critical.

7.4. Key Issues

- 7.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to health, wellbeing and safety:
- Population growth will increase demand for healthcare, housing, education, and community facilities, requiring coordinated infrastructure planning;
 - A significant rise in older residents will drive demand for social care, specialist services, and dementia support;
 - Deprivation hotspots, particularly on the Isle of Sheppey and parts of Sittingbourne and Faversham, continue to experience poorer community and health outcomes;
 - Swale's GP-to-patient ratio is among the worst nationally, creating barriers to timely healthcare and exacerbating inequalities;
 - Violent crime, anti-social behaviour, and theft remain concentrated in deprived areas, impacting wellbeing and perceptions of safety;
 - Maintaining and enhancing parks, open spaces, and waterways is important for health, wellbeing, biodiversity, and climate resilience.

7.5. SA Objective

7.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to communities and health:

Promote and protect health, wellbeing, and safety by ensuring access to healthcare, reducing health inequalities, improving road safety, enhancing green infrastructure, and creating safe and sustainable communities

7.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...improve access to healthcare services and facilities for all residents?
- ...reduce health inequalities, particularly in deprived areas?
- ...support physical and mental health outcomes across different population groups?
- ...address key health challenges such as obesity and long-term conditions?
- ...enhance road safety, particularly for pedestrians, cyclists, and vulnerable road users?
- ...strengthen social cohesion and community wellbeing?
- ...reduce crime rates, particularly in hotspot areas?
- ...address residents' fear of crime?

8. Economy and Employment

8.1. Focus of Theme

8.1.1. This theme focuses on improving Swale Borough's economic well-being by supporting diverse employment opportunities, enhancing workforce skills, and addressing challenges like qualification gaps and the changing nature of work.

8.2. Policy Context

8.2.1. **Table 8-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 8-1: Plans, Policies and Strategies Reviewed in Relation to Economy and Employment

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Get Britain Working White Paper</u>	2024
<u>Planning Practice Guidance</u>	various
<u>Invest 2035: UK Industrial Strategy Green Paper</u>	emerging
Local	
<u>Kent and Medway Economic Framework</u>	2024
<u>Empowering You in Swale</u>	2024
<u>Swale Corporate Plan</u>	2023
<u>Framing Kent's Future 2022-2026</u>	2022
<u>Swale Workforce Strategy 2020 to 2025</u>	2020
<u>Swale Economic Improvement Plan</u>	2020

8.2.2. The key messages emerging from the review are summarised below:

- The National Planning Policy Framework (NPPF) (supported by Planning Practice Guidance) sets out the Government's planning policies for England and how these are expected to be applied. The 2024 revision emphasises the importance of aligning planning policies with economic growth objectives. It encourages local authorities to identify and support sectors crucial for modern economies, such as laboratories, gigafactories, data centres, digital infrastructure, and logistics...

- ...by facilitating appropriate development in these areas, the NPPF aims to stimulate economic activity and create employment opportunities. It requires that Local Plans should:
 - Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
 - Support existing business sectors;
 - Plan for new or emerging sectors;
 - Flexibility to accommodate needs not anticipated;
 - Identify priority areas for economic regeneration;
 - Facilitate flexible working practices;
 - Policies should avoid protecting land for employment where there is no reasonable prospect of a site being used for the allocated employment use; and
 - Planning policies should support economic growth in rural areas.
- The Get Britain Working White Paper, published in 2024, focusses on policies to increase employment and improve workforce skills. It is aimed at supporting economic recovery and addressing barriers to work, outlining actions to tackle unemployment, promote job creation, and ensure that individuals have the skills needed by industries to boost productivity and workforce participation.
- The emerging Invest 2035: UK Industrial Strategy Green Paper outlines plans for the future of the UK's industrial base, focusing on innovation, investment, and skills. While still emerging, its goal is to support economic growth by encouraging investment in key sectors such as manufacturing, digital, and green technologies;
- The Kent & Medway Economic Framework (2024) aims to build a productive, sustainable and inclusive economy by enabling innovative businesses, widening opportunities, and unlocking talent. It focuses on resilient infrastructure and vibrant places to attract investment, create jobs, and strengthen long-term economic growth;
- The Empowering You in Swale Strategy sets priorities for community development to tackle inequalities and improve residents' lives. It focuses on partnership working, skills, health, sustainability, and innovative projects to support communities facing challenges such as the cost of living, housing, and fuel crises;

- The Swale Corporate Plan (2023–2027) aims to boost the local economy by using Levelling-Up and Shared Prosperity funds for regeneration, supporting town centre development, and implementing a Property Asset Strategy to increase income. It also focuses on skills development, an Economic Development Strategy, and sustainable transport solutions to create jobs and strengthen economic resilience;
- Framing Kent's Future (2022–2026) prioritises levelling up the county's economy, improving skills, and reducing inequalities to boost employment opportunities. It also focuses on infrastructure investment and digital connectivity, creating the conditions for business growth and a stronger workforce;
- The Swale Workforce Strategy (2020-2025) focuses on ensuring the council has the right people with the right skills to deliver services effectively. By analysing current and future workforce needs, it supports economic resilience through a skilled, adaptable workforce that underpins local employment and service delivery; and
- The Swale Economic Improvement Plan (2020-2023) focused on raising Swale's profile, attracting investment, and improving infrastructure to drive economic growth. While the plan period has now ended, its priorities (supporting local businesses and enhancing skills) remain relevant for sustaining jobs and competitiveness in the borough.

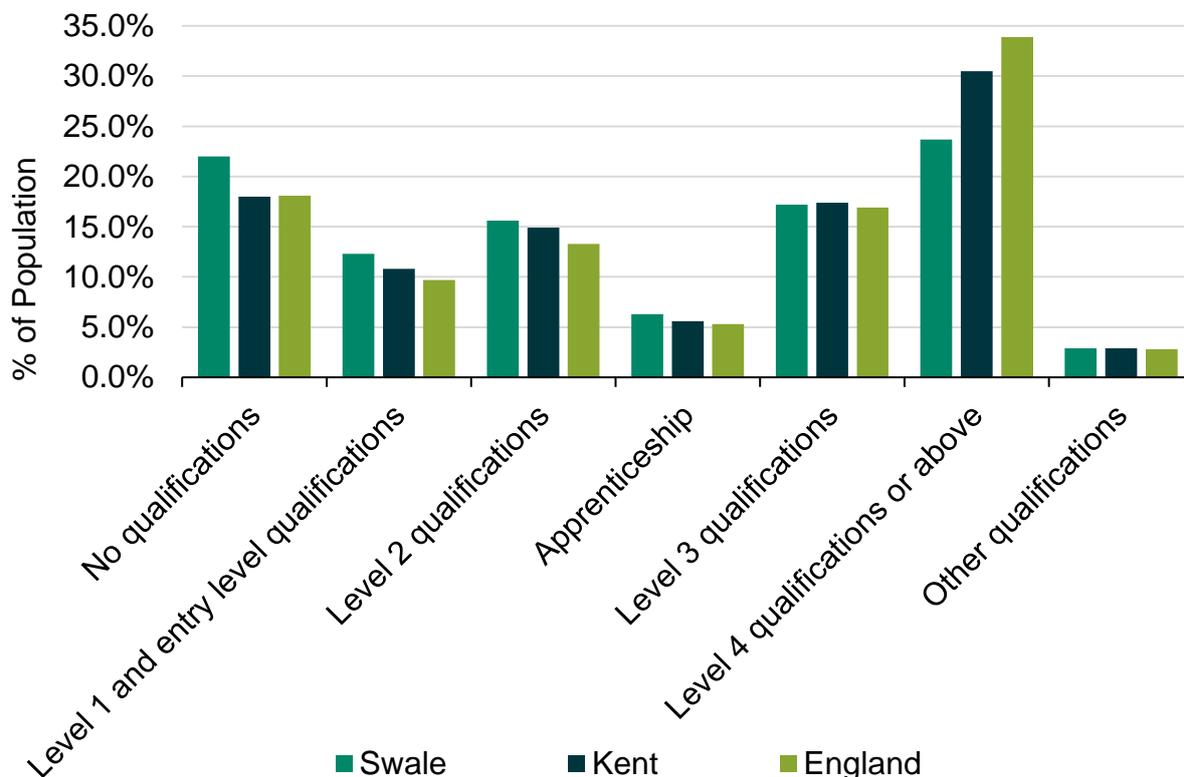
8.3. Baseline Summary

Current Baseline

Qualifications

- 8.3.1. Swale Borough's population is generally less qualified compared to regional and national rates. In the borough, only 24% of residents aged 16 and above having at least a Level 4 Qualification, as shown in **Figure 8-1**. This is lower than the regional (31%) and national (34%) comparators. There are also slightly more people in the borough that have no qualifications (22%) compared to the regional and national averages (both 18%).
- 8.3.2. The relatively lower levels of qualifications in Swale may have implications for local economic growth and employment opportunities. A workforce with fewer higher-level qualifications may limit the borough's ability to attract certain high-value industries and knowledge-based businesses. Conversely, sectors that require lower formal qualifications, such as skilled trades and administrative roles, may remain dominant within the local economy.

Figure 8-1: Highest Level of Qualification in Swale Borough (2021)⁴³



8.3.3. The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation, combining seven different domains. Of particular relevance to the Economy and Employment SA theme are:

- **Education, skills, and training:** the lack of attainment and skills in the population;
- **Employment:** the proportion of the working-age population involuntarily excluded from the labour market, including those who want to work but cannot; and
- **Income:** the proportion of the population experiencing a deprivation relating to low income.

8.3.4. **Figure 8-2** shows the ranking of Swale Borough’s LSOAs for the Education, Skills and Training domain, while **Table 8-2** provides additional details on the LSOAs within Swale Borough that fall within the 50% most deprived, or worse, areas.

⁴³ Nomis (2021). ‘Query Data’ can be accessed through [this link](#). See Table TS067.

- 8.3.5. An analysis of this data reveals significant educational deprivation in Swale. Over 70% of the borough's LSOAs rank within the 50% most deprived areas nationally for education, skills, and training, with 22 of these in the bottom 10%. The most deprived areas are concentrated on the Isle of Sheppey and northern parts of the mainland, including Faversham and Sittingbourne. This indicates the need for both broad policy measures to improve education and targeted interventions in the most affected areas.

Figure 8-2: Education, Skills and Training IMD Domain⁴⁴

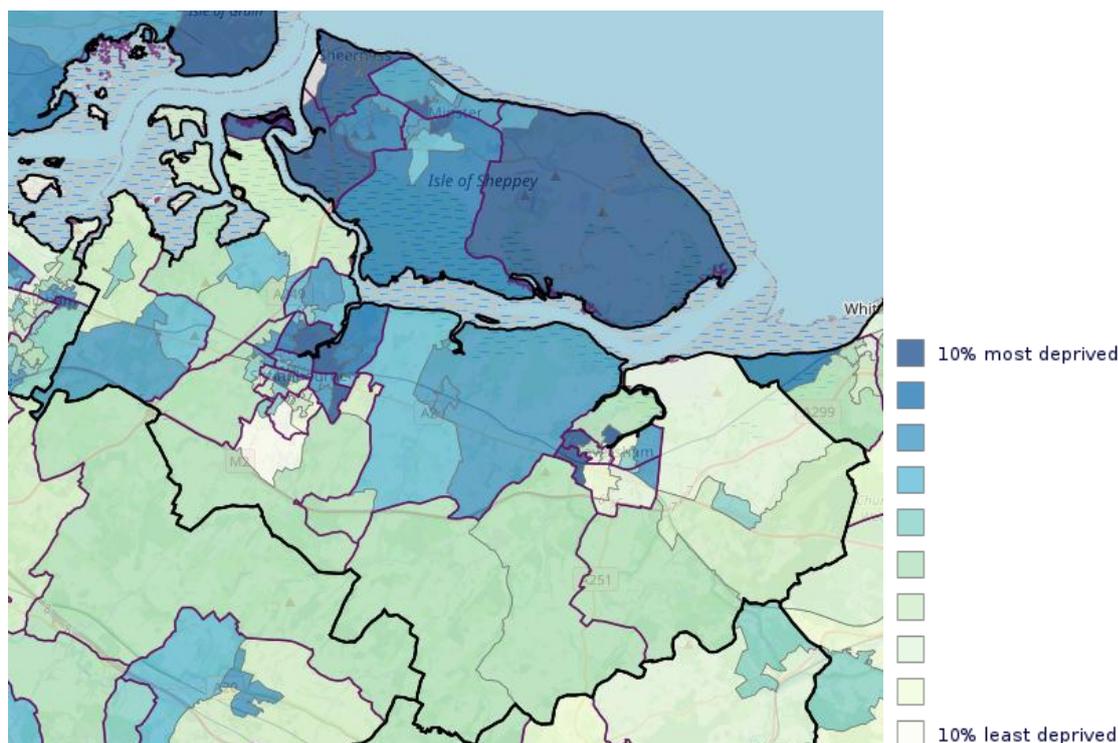


Table 8-2: LSOAs in Swale Borough Ranked Within 50% Most Deprived or Worse for the Education, Skills and Training IMD Domain

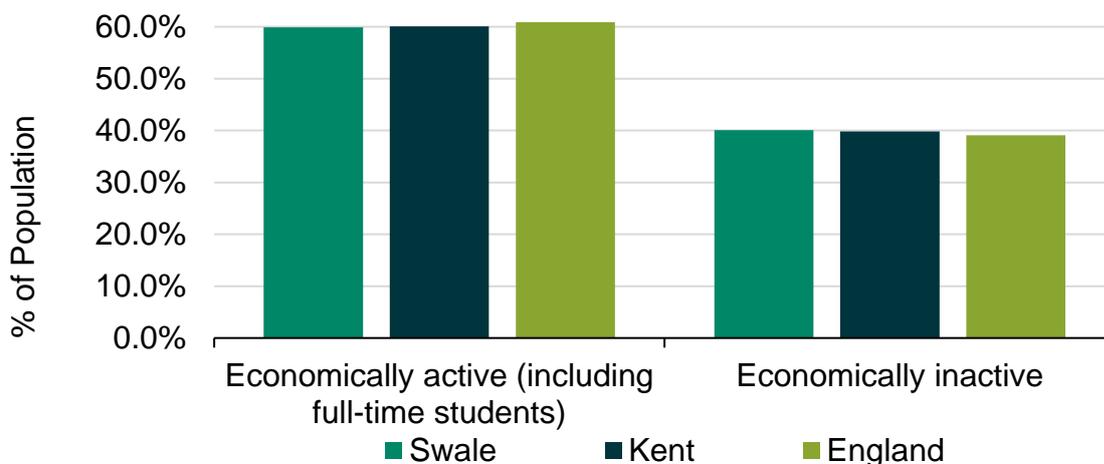
Decile	Most Deprived Indices
50% Most Deprived	6
40% Most Deprived	9
30% Most Deprived	51
20% Most Deprived	14
10% Most Deprived	22
Total	61 (out of 85)

⁴⁴ Ministry of Housing, Communities & Local Government (2019). 'Indices of Deprivation: 2019 and 2015' can be accessed through [this link](#).

Economic Activity Rates

- 8.3.6. As **Figure 8-3** illustrates, economic activity rates in Swale are broadly in line with regional and national comparators, with 59% of the population economically active compared to 60% in the South East and 61% nationally.
- 8.3.7. Swale’s Economic Improvement Plan (EIP) notes that the borough’s economy has experienced growth in recent years, reflected in increased activity and job availability across the borough. However there are still challenges to the local economy, including a low ratio between jobs and working age population and below-average workplace earnings.⁴⁵ The EIP emphasises the need to diversify Swale’s economic base, particularly by supporting Small and Medium Enterprises, the visitor economy, and underrepresented sectors such as creative industries and professional services. It also highlights the importance of improving job quality, addressing the skills gap, and promoting sustainable growth that aligns with environmental priorities.

Figure 8-3: Economic Activity Rates in Swale Borough (2021) ⁴⁶



- 8.3.8. The Employment domain measures the proportion of the working-age population excluded from the labour market due to unemployment, sickness, disability, or caring responsibilities. It reflects the availability of and access to secure employment opportunities. **Figure 8-4** shows the ranking of Swale Borough's LSOAs for the Employment domain, while **Table 8-3** provides additional details on the LSOAs within Swale Borough that fall within the 50% most deprived, or worse, areas.

⁴⁵ Swale Borough Council (2020). 'Swale Economic Improvement Plan' can be accessed through [this link](#).

⁴⁶ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Table TS066.

8.3.9. Employment deprivation mirrors educational deprivation, with 67% of Swale’s LSOAs ranking within the 50% most deprived areas nationally for employment, including 15 in the bottom 10%.

Figure 8-4: Employment IMD Domain⁴⁷

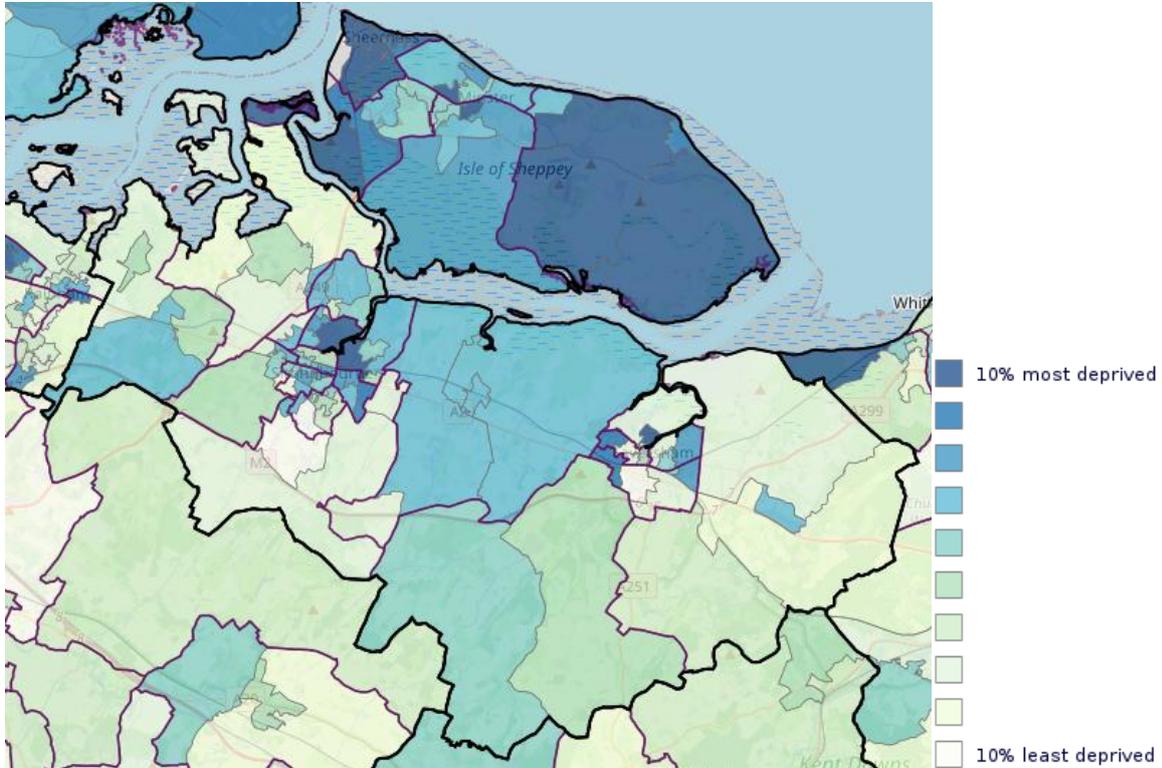


Table 8-3: LSOAs in Swale Borough Ranked Within 50% Most Deprived or Worse for the Employment IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	12
40% Most Deprived	17
30% Most Deprived	21
20% Most Deprived	6
10% Most Deprived	15
Total	57 (out of 85)

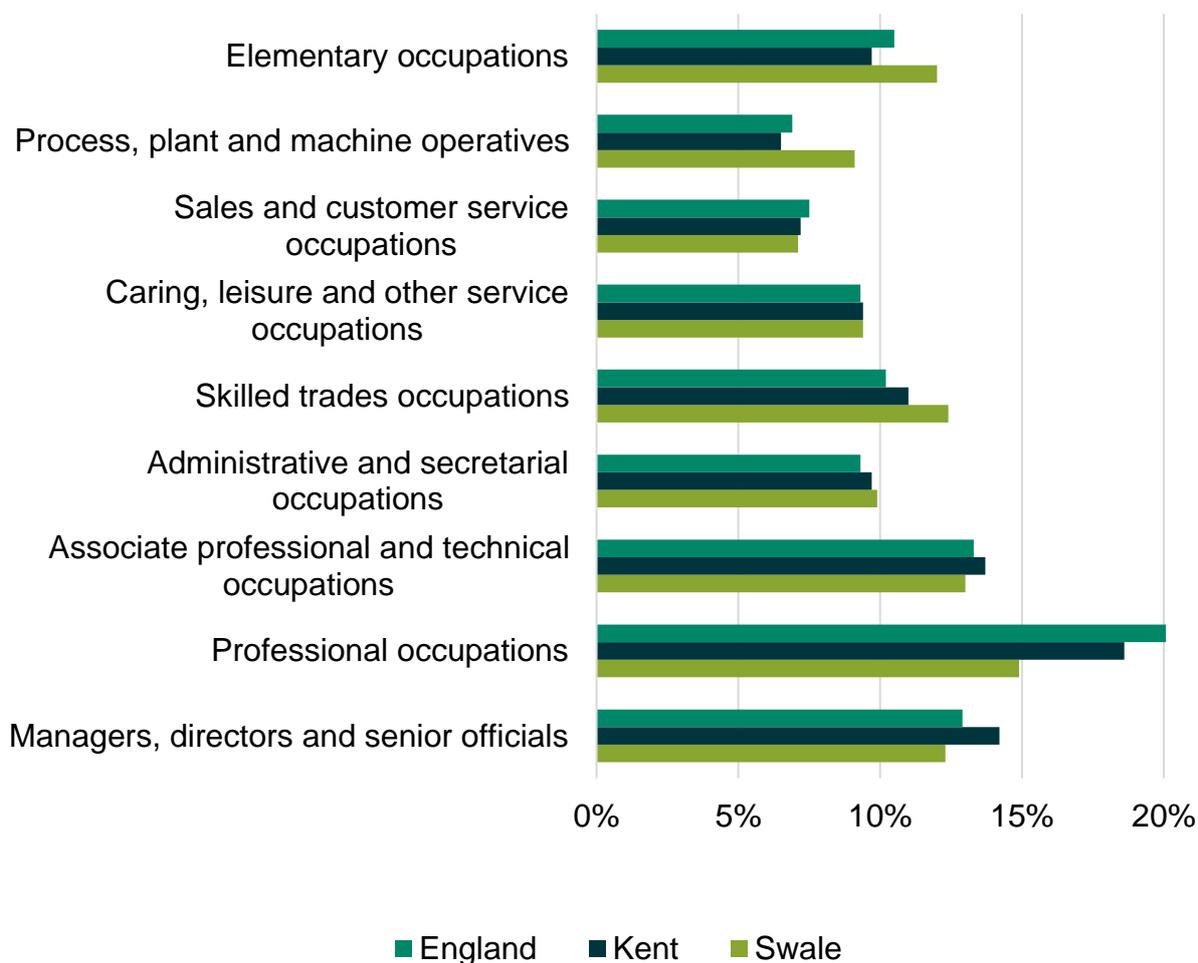
⁴⁷ Ministry of Housing, Communities & Local Government (2019). ‘Indices of Deprivation: 2019 and 2015’ can be accessed through [this link](#).

Occupation

8.3.10. **Figure 8-5** highlights the occupation of working-age residents in Swale.

8.3.11. Occupational data shows Swale has slightly higher shares in elementary occupations (12%) and process, plant and machine operatives (9%) compared to Kent and England averages. Skilled trades are also marginally higher. In contrast, professional occupations account for only 15% of employment, which is lower than Kent (19%) and England (20%). The remaining categories are broadly similar to regional and national patterns. Overall, Swale’s employment structure leans towards traditional trades and operational roles, with fewer professional and technical positions.

Figure 8-5: The Occupation of Residents Aged 16 and Over In Employment (2021)⁴⁸



⁴⁸ Nomis (2021). ‘Query Data’ can be accessed through [this link](#). See Table TS063.

Income

8.3.12. The Income domain of the Index of Multiple Deprivation measures the proportion of the population experiencing deprivation related to low income. It captures those in receipt of income-related benefits and tax credits, reflecting the extent of financial hardship within an area. **Figure 8-6** shows the ranking of Swale Borough’s LSOAs for the Income domain, while **Table 8-4** provides additional details on the LSOAs within Swale Borough that fall within the 50% most deprived, or worse, areas.

8.3.13. Income deprivation is significant, with 68% of Swale’s LSOAs ranking within the 50% most deprived areas nationally, and 16 of these in the bottom 10%. Areas such as the Isle of Sheppey, Faversham, and Sittingbourne experience the highest levels of financial hardship.

Figure 8-6: Income IMD Domain

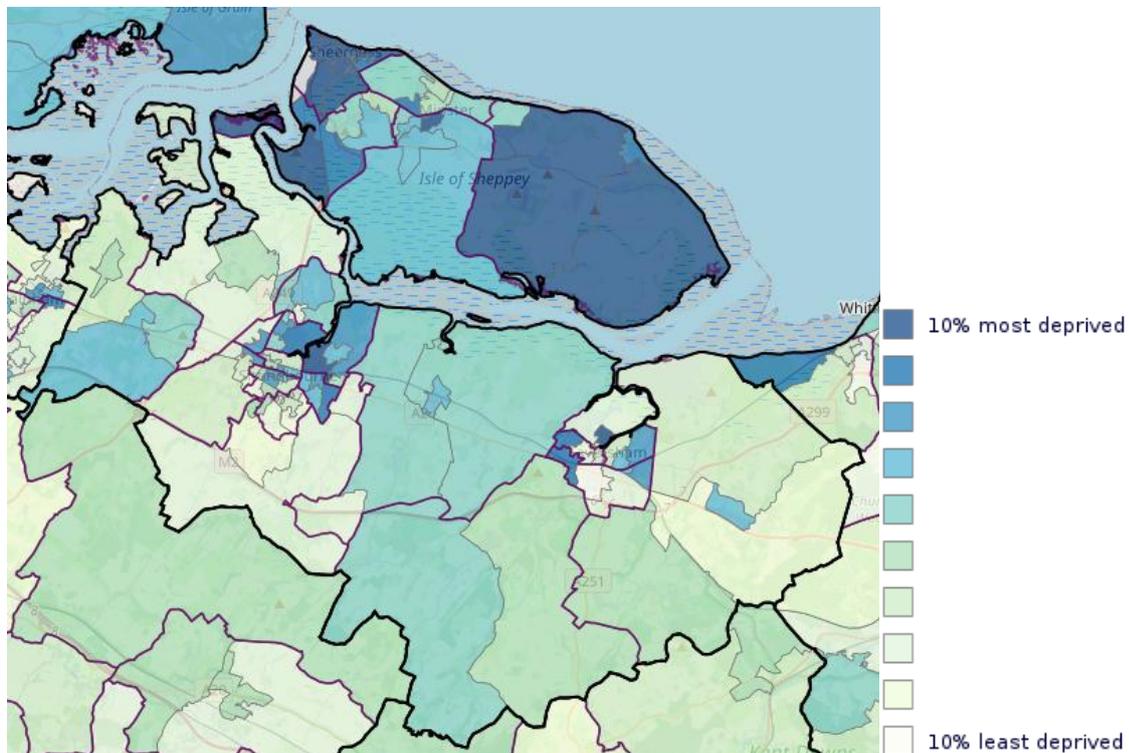


Table 8-4: LSOAs in Swale Borough Ranked Within 50% Most Deprived or Worse for the Income IMD Domain

Decile	Most Deprived Indices
50% Most Deprived	14
40% Most Deprived	13
30% Most Deprived	9
20% Most Deprived	12
10% Most Deprived	16
Total	58 (out of 85)

Barriers to the Local Economy

- 8.3.14. Swale's EIP notes that the borough faces infrastructure constraints that affect economic performance. There is a need for improved broadband connectivity, sustainable transport options, and investment in town centres to support economic activity and adapt to changing patterns of work.⁴⁹
- 8.3.15. The EIP sets out four priorities for Swale's economy: raising Swale's profile, securing investment and infrastructure, supporting local businesses, and improving skills. Actions include promoting Swale's assets to attract investment and grow the visitor economy, ensuring sufficient employment land supply, and encouraging modal shift through walking, cycling, and sustainable transport. Support for start-ups and SMEs is also important to creating a more diverse and resilient economy, alongside measures to improve the availability of co-working and grow-on space. Addressing skills deprivation is a key focus, with ambitions to enhance further and higher education provision and strengthen employer engagement in training and apprenticeships.

Future Baseline

- 8.3.16. Without significant investment in skills and higher education, Swale is likely to maintain a higher proportion of workers in elementary occupations, process and plant operatives, and skilled trades, while continuing to have fewer professional roles compared to national averages. This could influence the types of businesses attracted to the borough, with an emphasis on sectors requiring lower-to-mid-level skills.

⁴⁹ Swale Borough Council (2020). 'Swale Economic Improvement Plan' can be accessed through [this link](#).

- 8.3.17. The ongoing shift towards homeworking, self-employment, and home-based businesses is likely to shape Swale economic landscape during the SBLP period. As remote and hybrid working models become more embedded, there may be increased demand for co-working spaces, digital infrastructure, and local business hubs. This trend could provide opportunities for economic diversification and support a more resilient local economy, particularly if emerging industries such as digital services, creative industries, and technology-based enterprises are encouraged.
- 8.3.18. As housing and employment land are allocated, it will be important to ensure developments provide access to varied job opportunities and skills training initiatives to bridge qualification gaps and support a balanced, future-proof economy.

8.4. Key Issues

- 8.4.1. Considering the policy context and baseline information, the following key issues (constraints and/ or opportunities) are identified in relation to economy and employment:
- Fewer residents in Swale Borough have higher-level qualifications compared to regional and national averages, which may place reliance on in-commuting to fill high-skilled jobs and growth industries located in the borough;
 - Significant educational and employment deprivation is concentrated in areas such as the Isle of Sheppey, Faversham, and Sittingbourne, highlighting the need for targeted interventions;
 - The borough's employment structure shows slightly higher shares in elementary occupations and process, plant and machine operatives, with fewer professional roles than Kent and England, indicating a reliance on manual and operational work and associated workspaces;
 - Income deprivation affects a large proportion of the borough, with over two-thirds of LSOAs ranking within the 50% most deprived nationally;
 - Infrastructure constraints (including limited broadband connectivity, transport challenges, and town centre decline) act as barriers to economic performance and adaptation to changing work patterns;
 - Out-commuting remains high due to a low ratio of jobs to working-age population and below-average workplace earnings, reinforcing the need to create more local job opportunities and more competitive economic opportunities;

- The rise of homeworking and self-employment will increase demand for digital infrastructure, co-working spaces, and local business hubs; and
- Ensuring sufficient employment land supply based on evidenced needs is important to support a diverse economy.

8.5. SA Objective

8.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to employment and economy:

Support a productive, diverse and resilient economy that provides opportunities for all

8.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...improve skills and qualifications among residents to support access to higher-skilled jobs?
- ...create diverse, well-paid, and locally accessible employment opportunities across the borough?
- ...support growth sectors and address existing and future skills gaps through training and education initiatives?
- ...enable flexible working through investment in digital infrastructure and adaptable workspaces?
- ...protect and enhance employment land?

9. Historic Environment

9.1. Focus of Theme

9.1.1. This theme focuses on designated and non-designated heritage assets and features (including archaeology) and their setting.

9.2. Policy Context

9.2.1. **Table 9-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 9-1: Plans, Policies and Strategies Reviewed in Relation to Historic Environment

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Historic England: Heritage and Climate Change</u>	2022
<u>Historic England Advice Note 11: Local Planning and the Historic Environment</u>	2022
<u>Historic England Advice Note 4: Tall Buildings Advice Note</u>	2022
<u>The National Design Guide</u>	2019
<u>Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management</u>	2019
<u>The 25 Year Environment Plan</u>	2018
<u>Historic England Good Practice Advice: The Setting of Heritage Assets</u>	2017
<u>Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</u>	2016
<u>Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans</u>	2015
<u>Enterprise and Regulatory Reform Act</u>	2013
<u>Ancient Monuments and Archaeological Areas Act 1979</u>	1979
<u>Planning (Listed Buildings and Conservation Areas) Act 1990</u>	1990

Document Title	Year of Publication
<u>Historic Buildings and Ancient Monuments Act</u>	1953
Local	
<u>Kent Heritage Conservation Strategy</u>	2022
<u>A Heritage Strategy for Swale</u>	2020

9.2.2. 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;
 - Heritage is a finite and non-renewable resource that should be conserved for the benefit of present and future generations;
 - Decisions about change must be reasonable, transparent, and consistent; and
 - Documenting and learning from decisions is essential.⁵⁰
- 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 Local Plan will be required to be in general conformity with the NPPF, which ultimately encourages the conservation and enhancement of 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;

⁵⁰ Historic England: Conservation Principles, Policies and Guidance

- The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should recognise the wider social, cultural, economic and environmental benefits that conservation can bring;
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, reflecting the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings and conservation areas;
- Additionally, 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;
- A number of Acts provide the statutory framework for protecting the historic environment, all of which are relevant to Local Plan-making. The Ancient Monuments and Archaeological Areas Act 1979 establishes protection for scheduled monuments and designated archaeological areas, while the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out duties for local planning authorities in relation to listed buildings and conservation areas. The Historic Buildings and Ancient Monuments Act 1953 underpins the state's powers to acquire, preserve, and provide grants for historic properties, forming part of the wider legislative background. More recent changes were introduced by the Enterprise and Regulatory Reform Act 2013, which reformed aspects of heritage consent, including heritage partnership agreements and listed building consent orders. The Levelling-up and Regeneration Act 2023 brings reforms to the planning system, including changes to Local Plan preparation and environmental assessment, which affect how historic environment considerations are addressed;
- 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 Environmental Improvement Plan and National Design Guide;

- Historic England’s Advice Notes, Good Practice Advice, and Climate Change strategy provide further guidance in relation to the conservation and enhancement of the historic environment. Of particular relevance for the Local Plan 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;
 - Advising on mitigating, managing risks, and adapting to challenges posed by climate change;
 - Recognising the value of implementing controls through Local Plans, conservation area appraisals and management plans; and
 - 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.
- The Kent Heritage Conservation Strategy (2022) sets out a vision to conserve, enhance, and promote Kent’s rich heritage for public benefit. Its five strategic aims focus on improving historic environment advice, conserving KCC assets, raising awareness, achieving financial sustainability, and addressing the climate emergency; and
- The Swale Heritage Strategy (2020-2032) sets out a vision for valuing and conserving heritage assets while addressing risks from development and climate change. Its five priorities focus on conservation, sustainable growth, local distinctiveness, tourism integration, and raising awareness of heritage’s cultural and social benefits.

9.3. Baseline Summary

Current Baseline

Listed Buildings

9.3.1. Listed buildings are designated heritage assets, of national importance, which are protected through the Planning (Listed Buildings and Conservation Areas) Act 1990.⁵¹ To assess the historic environment, the National Heritage List for England, provided by Historic England,⁵² has been utilised. There are a total of 1,440 listed buildings in the borough:

- 1,310 Grade II;
- 93 Grade II*
- 37 Grade I.

9.3.2. A hotspot map for listed buildings in the borough is presented in **Figure 9-1**.

Scheduled Monuments

9.3.3. In England, scheduled monuments are nationally important archaeological sites or historical building designated and protected by Historic England under the Ancient Monuments and Archaeological Areas Act 1979.⁵³ There are 24 scheduled monuments in Swale, including prehistoric burial sites, Roman remains, and medieval fortifications.

9.3.4. Scheduled monuments are shown in **Figure 9-2**.

Conservation Areas

9.3.5. Conservation areas are places of historical or architectural importance protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Stricter planning rules apply, requiring permission for demolitions, significant alterations, or new developments to preserve their character.

9.3.6. Swale Borough has 51 conservation areas (see **Figure 9-2**), each with their own distinct historical character and identity.⁵⁴ These include market towns such as Faversham, rural villages, and coastal settlements.

⁵¹ UK Government (1990) '*Planning (Listed Buildings and Conservation Areas) Act*' can be accessed through [this link](#).

⁵² Historic England (no date) '*National Heritage List for England – Search the List – Advanced Search*' can be accessed through [this link](#).

⁵³ Ancient Monuments and Archaeological Areas Act (1979) can be accessed through [this link](#).

⁵⁴ Swale Borough Council (no date). '*Conservation Areas*' can be accessed through [this link](#).

9.3.7. Fourteen conservation areas currently lack published appraisals, indicating a gap in baseline information. These include:

- Baldesmere;
- Doddington and Newnham;
- Eastling;
- Hernhill;
- Newington Church;
- Newington High Street;
- Newington Newington Manor;
- Painter's Forstal;
- Selling;
- Sheldwich;
- Stalisfield Green;
- Staplestreet;
- Throwley Forstal; and
- Whitehill.

Registered Parks and Gardens

9.3.8. Registered parks and gardens are designated areas of special historic interest in the UK, recognised for their significant landscape design, historical associations, or horticultural value. These sites are listed on the Register of Historic Parks and Gardens, maintained by Historic England, to ensure their preservation and protection for future generations. Swale has four Grade II registered parks and gardens (see **Figure 9-2**).

Heritage at Risk

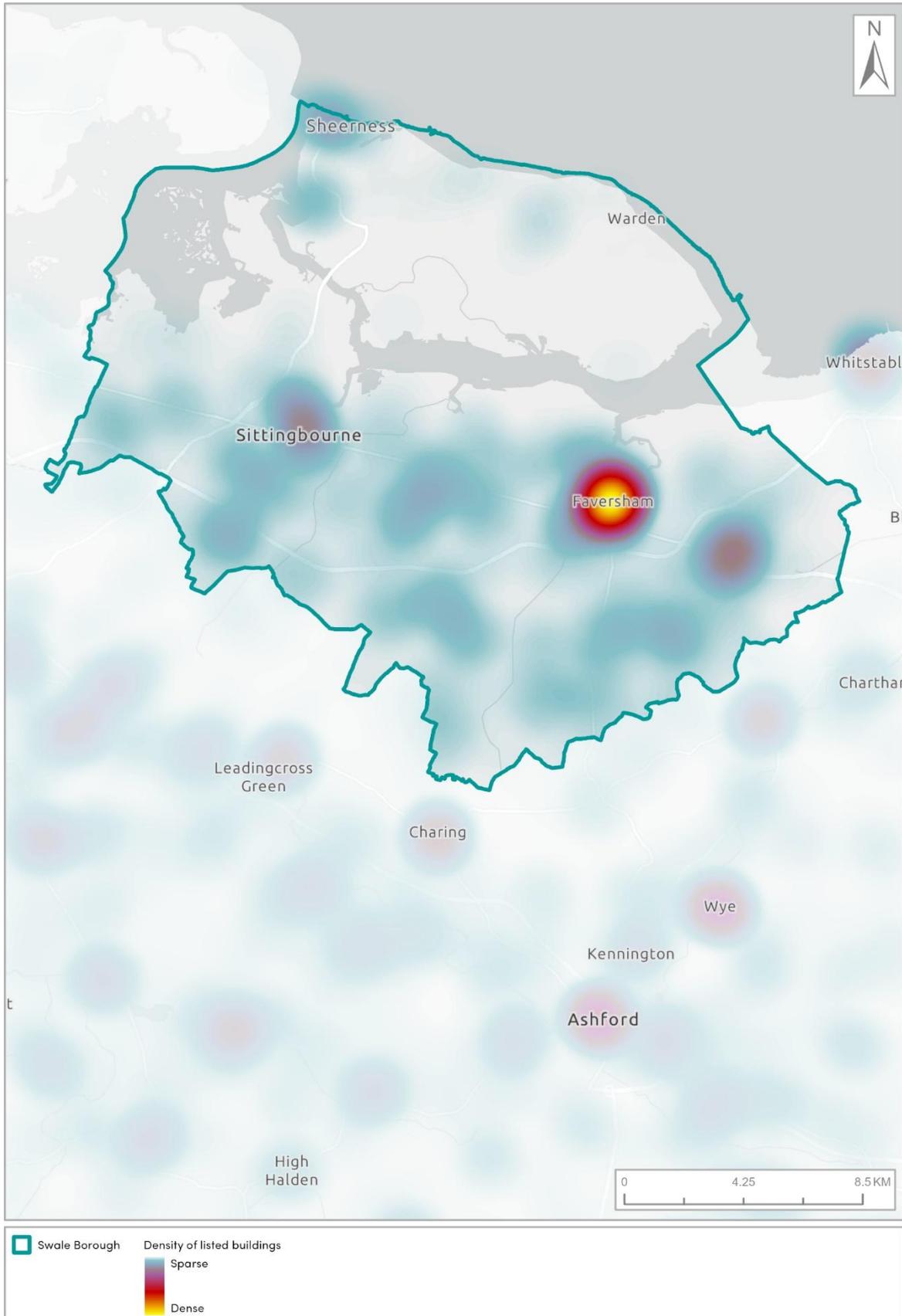
9.3.9. According to the latest Heritage at Risk register (2024), 15 of Swale's heritage designations are known to be at risk⁵⁵ of being lost due to neglect, decay, or inappropriate development. This highlights vulnerability and the need for proactive management. The 'at risk' assets are listed in **Table 9-2**.

⁵⁵ Historic England (2024) '*Heritage at Risk 2024 Registers*' can be accessed through [this link](#).

Table 9-2: Swale's Heritage at Risk (2024)

Asset Type	Asset Name	Grade	Condition
Conservation Area	Milton Regis High Street		Poor
Conservation Area	Sheerness: Royal Naval Dockyard & Bluetown, Sheerness		Very bad
Conservation Area	Sheerness: Marine Town, Sheerness		Fair
Conservation Area	Sittingbourne High Street		Very bad
Conservation Area	Cellar Hill and Greenstreet, Lynsted with Kingsdown / Teynham		Poor
Listed Building	The Boat Store, Sheerness Dockyard, Sheerness	I	Very bad
Listed Building	Former Working Mast House, 26, Jetty Road, Sheerness Dockyard, Sheerness	II*	Poor
Listed Building	Church of St Giles, Church Road, Tonge	I	Poor
Listed Building	Church of St Peter and St Paul, Water Lane, Ospringe	II*	Poor
Conservation Area	Sheerness: Mile Town, Sheerness		Poor
Conservation Area	Upchurch		Poor
Listed Building	Church of St Peter, Church Road, Oare	I	Poor
Conservation Area	Newington High Street, Newington		Poor
Listed Building	Parish Church of the Holy Trinity, North Street, Milton Regis, Sittingbourne.	I	Poor
Scheduled Monument	Sheerness Defences, Swale, Sheerness		Very bad

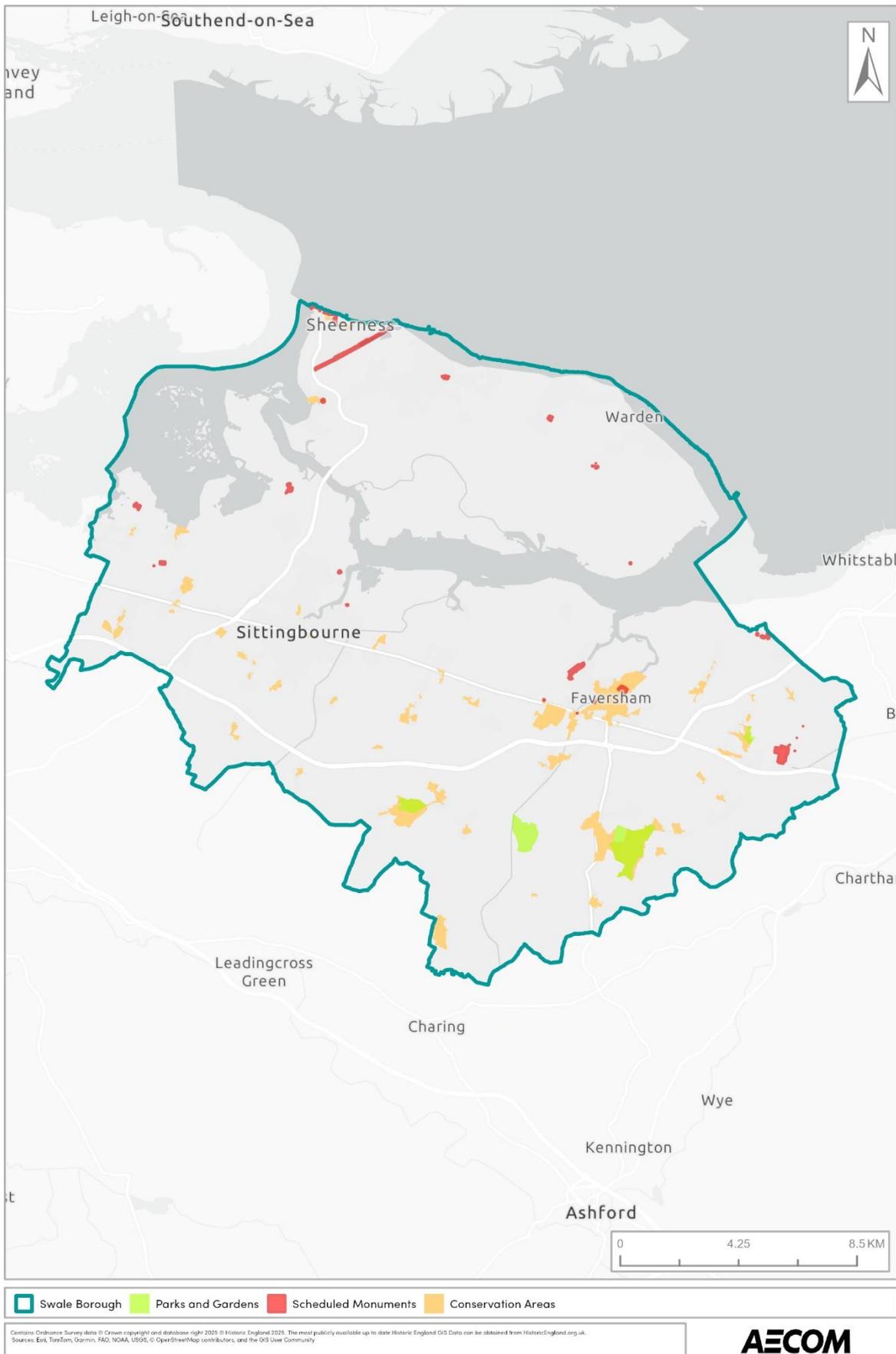
Figure 9-1: Listed Building Hotspot Map for Swale



Contains Ordnance Survey data © Crown copyright and database right 2025 © Historic England 2025. The most publicly available up to date Historic England GIS Data can be obtained from [HistoricEngland.org.uk](https://historicengland.org.uk). Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community



Figure 9-2: Designated Historic Environment Assets in Swale



Locally Important Heritage Features

- 9.3.10. It is noted that not all of the borough's historic environment features are subject to statutory designations and non-designated features contribute a large part of what people interact with on a day-to-day basis. Although not designated, many buildings and areas are of historic interest and are important to local communities.
- 9.3.11. As of October 2025, Swale Borough's Local Heritage List comprises 150 assets.⁵⁶
- 9.3.12. The Kent Historic Environment Record (HER) identifies important and distinctive structures or features that positively contribute to the local sense of place and distinctiveness of the county. Following a high-level review of HER website⁵⁷, there are over 6,500 documented local records returned when the term 'Swale' is input in the search bar. During the subsequent stages of the SA process, the HER and Swale Borough Council's Local Heritage List shall be explored in further detail to consider the potential impacts associated with the SBLP proposals on these assets.

Archaeological Significance

- 9.3.13. Information in this section is drawn from the Swale Heritage Strategy 2020-2032.⁵⁸
- 9.3.14. Swale has an exceptionally rich and varied archaeological resource, reflecting its strategic location at the mouth of the Thames and Medway rivers and its role as a conduit for people and trade between the continent and London. Archaeological evidence spans the entire period of human habitation, from Palaeolithic flint tools to 20th-century defence structures, and includes buried remains, earthworks, landscape features, and wrecks along the coastline.
- 9.3.15. A summary of Swale's archaeology through the ages is provided below:
- **Prehistoric Period:** Palaeolithic flint tools have been found in brickearth and gravel deposits. Neolithic and Bronze Age activity is evidenced by camps, ritual monuments, and burial sites, including extensive enclosures discovered at Kingsborough Manor on the Isle of Sheppey. Iron Age remains include hilltop earthworks at Perry Wood near Selling;

⁵⁶ Swale Borough Council (2025). 'Local Heritage List' can be accessed through [this link](#).

⁵⁷ Kent County Council (2025) 'Search' can be accessed through [this link](#).

⁵⁸ Swale Borough Council (2020). 'A Heritage Strategy for Swale' can be accessed through [this link](#).

- **Roman Period:** The borough's Roman landscape is particularly significant. The main Roman road (Watling Street) ran through Swale along the present A2 corridor, accompanied by roadside settlements at Ospringe/Syndale (the reputed site of Durolevum), Newington, and Radfield. Numerous villa sites, pottery production areas, saltworking sites in marshlands, and burial grounds have been recorded. A recent major discovery at Newington revealed a Roman road, industrial area, and a Romano-Celtic temple;
 - **Anglo-Saxon Period:** Rich cemeteries with grave goods have been found, notably the Kings Field cemetery at Faversham and sites at The Meads, Bobbing;
 - **Medieval Period:** Archaeology illustrates the origins of historic towns and villages, including Faversham and Milton as port towns and Queenborough as a planned medieval town with its castle mound still visible. Moated sites such as Castle Rough (Milton) and Sayes Court (Harty) are scheduled monuments; and
 - **Post-Medieval and Modern:** Defence heritage is extensive, including 18th-century forts, the Sheerness Lines, and First World War anti-invasion defences forming part of the Chatham Land Front. Aviation archaeology is nationally significant, with remains of early aerodromes at Eastchurch and Leysdown, linked to the pioneers of flight and later military use. Industrial archaeology includes dispersed remains of the gunpowder industry around Faversham, papermaking sites in Sittingbourne, and brickmaking landscapes across the northern borough.
- 9.3.16. Swale is also rich in marine archaeology, with foreshore and offshore areas containing archaeological remains. Submerged landscapes, hulks of barges, and wrecks such as the Second World War munitions ship USS Richard Montgomery lie along the coast. Dead Man's Island near Queenborough exposes 19th-century graves, and the unique Saxon boat discovered at Graveney Marsh in 1970 is now held by the National Maritime Museum.

Future Baseline

- 9.3.17. Whilst designated and non-designated assets will continue to be afforded protection under the provisions of the NPPF and the Local Plan, it is recognised that future development has the potential to negatively affect historic character and settings, detract from historic settlement qualities and disrupt valued viewpoints; being susceptible to insensitive design and layout in new development.

- 9.3.18. Climate change threatens heritage assets through extreme weather, rising sea levels, and erosion. Increased rainfall and humidity can accelerate material decay, while coastal sites risk permanent loss. Sustainable conservation strategies, like improved drainage and digital documentation, are important to protecting historic sites for the future.

9.4. Key Issues

- 9.4.1. Considering the policy context and baseline information, the following key issues (constraints and/ or opportunities) are identified in relation to historic environment:

- Swale Borough has a range of designated and non-designated historic assets. These must be protected from inappropriate development that could damage their historic character or settings, ensuring that future developments do not negatively impact these assets;
- Fourteen conservation areas lack published appraisals, creating gaps in baseline information;
- Fifteen heritage assets are recorded as being at risk, highlighting the need for proactive intervention and long-term conservation strategies;
- Non-designated heritage assets, including those on the Local Heritage List and recorded in the Kent HER, make a significant contribution to local character and sense of place; these require consideration in planning decisions;
- Swale's archaeological resource is exceptionally rich and varied, spanning from the Palaeolithic to the modern era, including nationally significant discoveries such as the Romano-Celtic temple at Newington. Development proposals should safeguard archaeological remains and ensure appropriate investigation and recording;
- Climate change poses a growing threat to heritage assets through flooding, coastal erosion, and accelerated material decay, particularly for assets in low-lying marshland and coastal areas;
- Future development could erode historic settlement patterns, disrupt valued views, and harm the setting of heritage assets if not carefully managed. This is particularly relevant in Faversham, a historic main town with significant heritage value and strong transport connectivity, where growth pressures may create tensions between development needs and heritage conservation;

- Planning for future growth through the SBLP will support the minimisation of impacts on heritage assets. It can also seek opportunities for public realm improvements, and accessibility improvements which can indirectly benefit access to and enjoyment of the historic environment; and
- Sustainable conservation strategies, such as improved drainage systems and digital documentation, are important for safeguarding Swale Borough's historic assets amidst future development.

9.5. SA Objective

9.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to the historic environment:

Protect, conserve and enhance the historic environment, heritage assets and their setting within the borough

9.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...protect and conserve designated and non-designated heritage assets from harm or inappropriate development?
- ...respect and enhance the character, setting, and integrity of conservation areas and historic viewpoints?
- ...safeguard archaeological sites?
- ...address climate change risks to heritage through sustainable conservation and adaptation measures?
- ...promote public access, awareness, and enjoyment of the borough's historic environment?

10. Homes

10.1. Focus of Theme

10.1.1. This theme focuses on meeting housing needs, including affordable housing, housing mix (size, type, and tenure), and specialist accommodation needs.

10.2. Policy Context

10.2.1. **Table 10-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 10-1: Plans, Policies and Strategies Reviewed in Relation to Homes

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Homes England Strategic Plan 2023 to 2028</u>	2023
<u>Long-Term Plan for Housing</u>	2023
<u>The National Housing Federation's Vision for a Long-Term Housing Strategy</u>	2023
<u>Planning Policy for Traveller Sites</u>	2023
<u>10-Year Infrastructure Strategy</u>	emerging
Local	
<u>Kent and Medway Housing Strategy (2025–2030)</u>	2025
<u>Swale Housing, Homelessness and Rough Sleeping Strategy (2023-2027)</u>	2023

10.2.2. The key messages emerging from the review are summarised below:

- The NPPF sets out the government's planning policies for England and provides a framework within which local plans should be prepared. It emphasises sustainable development, efficient use of land, and delivering a sufficient supply of homes. The latest reforms to the NPPF aim to refine planning policies to better support housing supply and infrastructure needs, contributing to the government's ambition of delivering 1.5 million new homes;

- Levelling-up and Regeneration Act 2023 introduces reforms to accelerate the planning system, strengthen local democracy, and support regeneration. It aims to enable the delivery of new homes and infrastructure, aligning with the government's levelling-up agenda;
- The Homes England Strategic Plan 2023 to 2028 outlines Homes England's mission to increase housing supply, support affordable housing, and ensure sustainable development across England;
- Long-Term Plan for Housing sets out a vision for housing delivery, focusing on regeneration, urban densification, and the provision of high-quality, safe, and affordable homes in areas with high growth potential;
- National Housing Federation's Vision for a Long-Term Housing Strategy presents recommendations from housing experts and associations on delivering a long-term housing strategy, emphasising the importance of affordable housing and community well-being;
- The emerging 10-Year Infrastructure Strategy outlines the government's approach to delivering infrastructure projects over the next decade, ensuring that housing development is supported by necessary transport, utilities, and social infrastructure;
- The Planning Policy for Traveller Sites (2023) sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community;
- The Kent and Medway Housing Strategy (2025-2030) seeks to accelerate housing delivery and improve affordability while ensuring homes are safe, sustainable, and resilient to climate risks. It prioritises plan-led growth, infrastructure investment, and tackling homelessness to create healthy, secure communities; and
- The Swale Housing, Homelessness and Rough Sleeping Strategy (2023 - 2027) focuses on delivering affordable homes, preventing homelessness early, and reducing time in temporary accommodation. It also aims to improve private housing conditions and provide support for vulnerable households through partnerships and targeted initiatives.

10.3. Baseline Summary

Current Baseline

Population

- 10.3.1. As noted in **Chapter 7**, Swale's population was 151,700 in 2021, an increase of 11.7% from around 135,800 in 2011. This growth rate is higher than the South East average (7.5%) and England overall (6.6%).⁵⁹
- 10.3.2. Growth has been most pronounced among older age groups, with residents aged 65 years and over increasing by 27% between 2011 and 2021, compared to 8% growth for those aged 15-64 and 9% growth for those under 15 years. This trend reflects an ageing population and has implications for future housing needs.

Housing Stock (Type and Size)

- 10.3.3. The 2021 Census identifies 60,495 households in Swale. Semi-detached houses make up the largest proportion at 34%, followed by terraced houses at 30%, detached houses at 24%, and flats at 10%, with 2% in other types.
- 10.3.4. In terms of size, Swale's housing stock is predominantly medium-to-large properties: 46% are three-bedroom homes, 26% two-bedroom, 20% four or more bedrooms, and 9% one-bedroom.
- 10.3.5. Following national trends, demand for smaller homes is likely to increase due to demographic changes, including more single-person households and an ageing population.

Tenure and Affordability

- 10.3.6. Homeownership is the dominant tenure, with 67% of households owning their homes (outright or with a mortgage).⁶⁰ Private renting accounts for 18%, social renting for 13%, and shared ownership for 1%. These rates are broadly consistent with Kent but show higher ownership and lower rental compared to national averages.

⁵⁹ ONS (2022). 'How the population changed in Swale: Census 202' can be accessed through [this link](#).

⁶⁰ Nomis (2021). 'Query Data' can be accessed through [this link](#). See Table TS054.

- 10.3.7. The average house price in Swale was £292,000 in July 2025, up from £285,000 in July 2024.⁶¹ Detached homes averaged £480,000, semi-detached £312,000, terraced £249,000, and flats £154,000. Prices are lower than the South East average (£382,000) but still high relative to local incomes. House prices and private rents have risen faster than local incomes, widening the affordability gap for many households.
- 10.3.8. Private rents have also risen in Swale, averaging £1,105 per month in August 2025, an annual increase of 8%. These trends highlight a growing affordability gap for first-time buyers and lower-income households.

Housing Growth and Planned Development

- 10.3.9. Population growth has driven housing demand, and the SBLP will identify allocations to meet future needs. The major growth areas are likely to be focused on Sittingbourne, the Isle of Sheppey, and Faversham. Strategic priorities include balancing development with infrastructure capacity and environmental constraints, particularly in sensitive rural and coastal areas.

Infrastructure and Services

- 10.3.10. Swale Borough benefits from a range of infrastructure and services supporting its residential communities. The borough's transport network includes road and rail connections facilitating commuter access to central London and neighbouring areas. Essential services such as schools, healthcare facilities, and recreational amenities are distributed throughout the borough, contributing to residents' quality of life.

Homelessness

- 10.3.11. Homelessness is associated with severe poverty and is a social determinant of health. It often results from a combination of events such as relationship breakdown, debt, and adverse experiences in childhood and through ill health.
- 10.3.12. In April 2024, Swale Borough Council declared an Affordable Housing Emergency, reporting 1,859 households on the housing register in 2024/25, with high demand for affordable rented homes.⁶² The council's strategy prioritises early intervention, reducing temporary accommodation, and partnership working to prevent homelessness.

⁶¹ ONS (2025). 'Housing prices in Swale' can be accessed through [this link](#).

⁶² Swale Borough Council (2025). 'Affordable Housing Emergency – Update' can be accessed through [this link](#).

- 10.3.13. Although dated, the 2018 Homelessness Review found that parental eviction and loss of private tenancies accounted for half of all cases.⁶³ Rising housing costs, limited affordable options, and Local Housing Allowance rates below market rents have made private renting inaccessible for many low-income households, increasing demand for temporary accommodation and costs to the council.

Specialist Housing Need

- 10.3.14. The ageing population will increase demand for specialist housing and care provision. The Housing Review (2018) noted that provision for specialist accommodation in Swale is much lower than recommended. The council aims to increase housing suitable for older people, including well-designed single-level homes and extra care schemes, subject to Kent County Council's commissioning priorities.

Gypsy and Traveller

- 10.3.15. Swale's Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2022/23) identifies that in 2023 there were 232 pitches across 87 sites and one Travelling Showperson's yard with one plot.⁶⁴
- 10.3.16. The assessment indicates that there is an overall need for 114 additional Gypsy and Traveller pitches across Swale Borough over the period 2022/23 to 2037/38.
- 10.3.17. To meet this need, the Council could regularise unauthorised sites and expand or intensify existing sites, potentially delivering 72-78 authorised pitches between 2023-2028, and four pitches from turnover, meeting short-term requirements and leaving a longer-term need for 34 pitches.

⁶³ Swale Borough Council (2019). '*Housing, Homelessness & Rough Sleeping Strategy (2019-2023)*' can be accessed through [this link](#).

⁶⁴ Swale Borough Council (2023). '*Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2022/23*' can be accessed through [this link](#).

Future Baseline

- 10.3.18. The population in Swale is projected to continue growing over the plan period, driven by net migration and natural change. Estimates suggest the borough could reach around 178,000 residents by the 2043, with the most significant growth among older age groups.⁶⁵ The population aged 75 and over is expected to rise sharply, increasing demand for downsizer-friendly homes, accessible housing, and specialist accommodation such as extra care and care homes. This demographic shift will require housing policies that address both affordability and adaptability for an ageing population.
- 10.3.19. The SBLP is likely to deliver an increased level of growth, reflecting government housing targets and local growth pressures. Delivery will focus on strategic allocations in Sittingbourne, the Isle of Sheppey, and Faversham, alongside smaller sites across the borough.
- 10.3.20. The construction of new housing developments in Swale Borough will put increased pressure on local services, including schools, healthcare facilities, public transport, and emergency services. As the population grows, existing infrastructure may struggle to meet rising demand, leading to overcrowded GP surgeries, longer waiting times at hospitals, and insufficient school places for children. Additionally, increased road traffic and higher usage of public transport could strain an already busy network. To ensure sustainable growth, investment in upgrading and expanding these essential services must accompany new housing developments.

10.4. Key Issues

- 10.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to housing:
- Swale Borough's population grew by 11.7% between 2011 and 2021, outpacing regional and national averages. Continued growth will increase pressure on housing supply, affordability, and infrastructure;
 - Swale Borough Council declared an Affordable Housing Emergency in April 2024, highlighting the urgent need for more affordable options, including social rent, shared ownership, and low-cost private rental properties;

⁶⁵ ONS (2019). 'National population projections: 2018-based' can be accessed through [this link](#).

- The housing stock is dominated by medium-to-large homes, while demographic trends (such as an ageing population and more single-person households) are driving demand for smaller properties;
- Planned housing growth must be supported by investment in schools, healthcare, transport, and digital infrastructure to avoid service strain and congestion;
- The over-75 population is projected to rise significantly, increasing demand for downsizer-friendly homes and specialist accommodation, including extra care and assisted living;
- Homelessness remains a major challenge in the borough, with 1,859 households on the housing register in 2024/25 and high demand for affordable rented homes, highlighting the need for proactive prevention and support services; and
- There is an identified need for 114 additional Gypsy and Traveller pitches by 2037/38. Many existing pitches are on unauthorised or tolerated sites, requiring regularisation and suitable site allocations in the SBLP.

10.5. SA Objective

10.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to the housing:

Support the delivery of a range of housing to meet identified needs, with a focus on improving affordability for those most in need

10.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...increase the supply of affordable and accessible housing for all residents, including lower-income and vulnerable groups?
- ...deliver a balanced housing mix that meets the needs of different household types, including smaller homes and specialist housing for older people?
- ...address homelessness and provide appropriate accommodation for Gypsy and Traveller communities?
- ...ensure that housing growth is supported by adequate infrastructure, services, and community facilities?

11. Landscape

11.1. Focus of Theme

11.1.1. This theme focuses on designated/ protected landscapes within or near to the borough, as well as landscape character, landscape quality, and visual amenity.

11.2. Policy Context

11.2.1. **Table 11-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 11-1: Plans, Policies and Strategies Reviewed in Relation to Landscape

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Protected Landscapes Targets and Outcomes Framework</u>	2024
<u>Environmental Improvement Plan</u>	2023
<u>National Model Design Code</u>	2021
<u>The National Design Guide</u>	2019
Local	
<u>Kent Downs National Landscape Management Plan 2021-2026</u>	2021
<u>Swale Green and Blue Infrastructure (GBI) Strategy</u>	2020
<u>River Medway and Swale Estuary Shoreline Management Plan</u>	2010

11.2.2. The key messages emerging from the review are summarised below:

- The SBLP 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 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 Protected Landscapes Targets and Outcomes Framework sets out a shared, non-statutory ambition for all 44 of England's Protected Landscapes, including National Parks and National Landscapes. It establishes targets for these areas to contribute to national environmental and climate commitments, including the 30by30 goal to protect 30% of land and sea for nature by 2030. The framework is designed to be embedded within Protected Landscape management plans, ensuring consistent and effective delivery of nature recovery, climate resilience, and public access objectives across these designated areas;
- The Environmental Improvement 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;
- The National Model Design Code states that all design codes should include a landscape and open space strategy that incorporates the existing natural features and new structural elements. It recognises that landscapes can be major drivers in the design process;
- Management plans for National Landscapes (NLs) within, and in proximity of, the National Park should influence policies in the SBLP. A management plan has been made for Kent Downs NL, which contains aims and objectives for the conservation and enhancement of the NL;
- The Swale Green and Blue Infrastructure Strategy (2020-2039) recognises green and blue spaces as important ecosystems and landscape features for both people and wildlife, guiding opportunities to enhance biodiversity across the borough. It supports habitat protection, community engagement, and nature-based improvements, particularly in areas of international ecological importance such as Swale's coastline and woodlands; and
- The Medway Estuary and Swale SMP provides a high-level framework for managing risks from coastal change in a sustainable way. It sets long-term policies to protect people, property, and the natural and historic environment, forming part of the national strategy for flood and coastal defence.

11.3. Baseline Summary

Current Baseline

Nationally Protected Landscapes

- 11.3.1. There is one nationally protected landscape within Swale: Kent Downs, covering large areas in the south of the borough. The NL is characterised by rolling chalk hills, ancient woodlands, and picturesque valleys. The landscape also features historic sites such as medieval churches, ancient pathways like the Pilgrims' Way and traditional Kentish villages.⁶⁶
- 11.3.2. There are no other NLs within 10 km of the borough's boundary.

National Character Areas

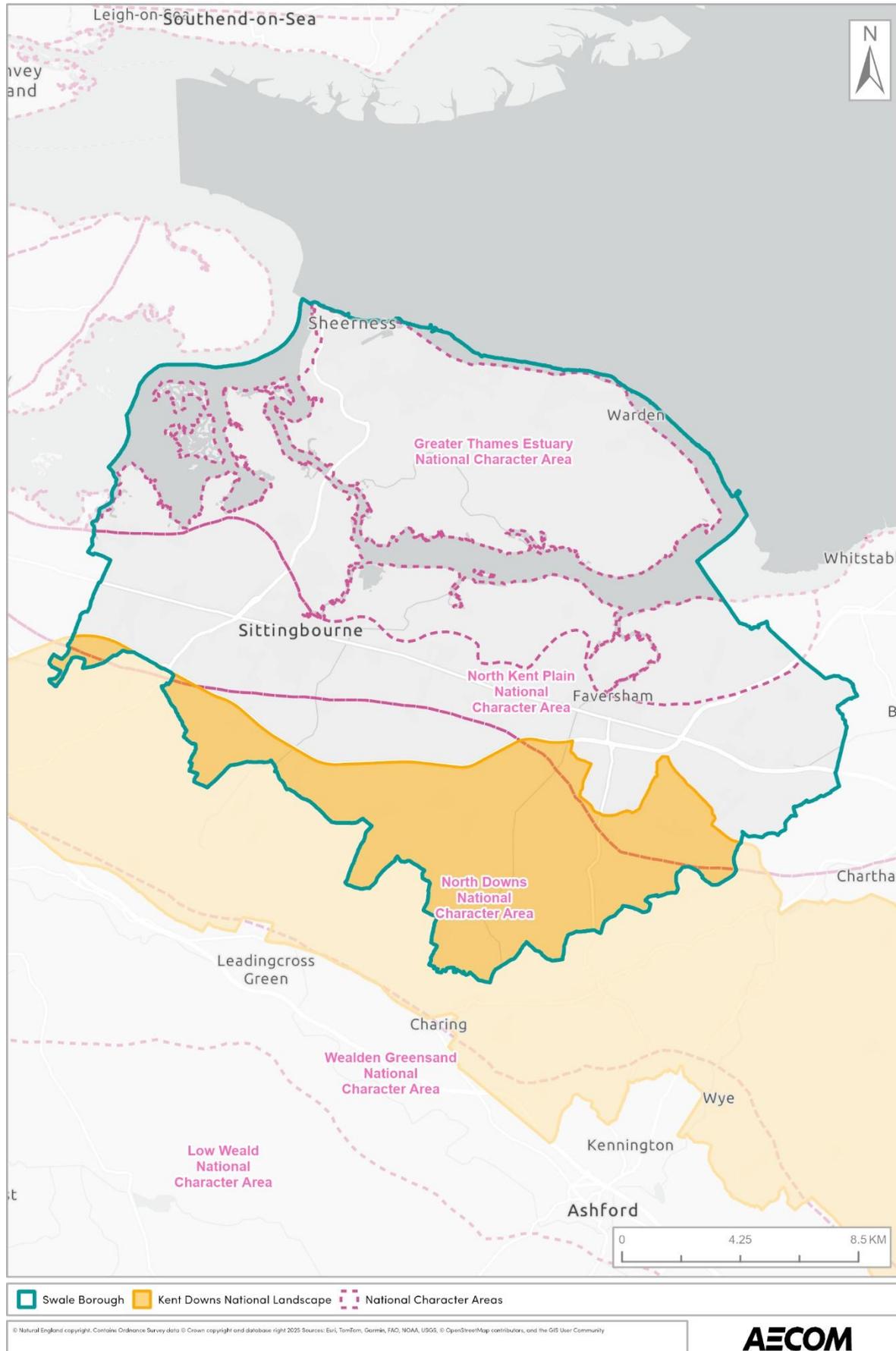
- 11.3.3. Swale is covered by three National Character Areas (see **Figure 11-1**):
- Greater Thames Estuary (NCA81): Located in the northern third of the borough, covering Swale's mainland northern coast and the Isle of Sheppey. The NCA is a remote, low-lying coastal landscape of estuaries, mudflats, salt marshes, and reclaimed marshland stretching from the North Sea inland along the Thames. Environmental opportunities for the NCA include:
 - Conserve coastal habitats and processes: Maintain and enhance the remote coastal landscape and its internationally important habitats by addressing climate change, coastal squeeze, and supporting natural coastal dynamics.
 - Support sustainable land management: Work with landowners to improve biodiversity, geodiversity, soil and water quality, and climate resilience, while preserving the area's agricultural productivity and historic character.
 - Protect estuarine tranquillity and heritage: Conserve the estuary's peaceful character by enhancing coastal habitats and safeguarding its distinctive historic and geological features, while promoting responsible recreation.
 - Guide sustainable development: Promote development that respects local character, integrates green infrastructure, supports ecosystem services, and protects key habitats and heritage features.

⁶⁶ Kent Downs (no date). 'What is special about the Kent Downs?' can be accessed through [this link](#).

- North Kent Plain (NCA 113): Running through the borough's central belt, encompassing the towns of Sittingbourne and Faversham. The NCA is a low, open, and fertile agricultural landscape between the Thames Estuary and Kent Downs, known for its arable farming, fruit-growing heritage, and scattered ancient woodlands. Environmental opportunities for the NCA include:
 - Sustain farmed landscapes and heritage: Maintain the historic, farmed character of the landscape by enhancing ecological networks, supporting biodiversity and geodiversity, improving soil and water quality, and preserving traditional fruit-growing practices that reinforce Kent's identity as the Garden of England.
 - Manage coastal change: Support natural coastal processes and sustainable management to protect landscape character, enhance biodiversity, reduce flood risk, and create opportunities for habitat and recreation.
 - Conserve and connect woodlands: Protect and manage ancient semi-natural woodlands, expand broadleaved woodland where appropriate, and improve habitat connectivity to support biodiversity and recreational use.
 - Enhance urban character and green infrastructure: Protect urban heritage and character while planning new green spaces and corridors to support development, enhance local distinctiveness, and deliver social and environmental benefits.
- North Downs (NCA 119): Located in the southern third of the borough, partially overlapping with the Kent Downs NL. The NCA is a scenic chalk landscape stretching from Surrey to Dover, marked by traditional villages, ancient lanes, and distinctive architecture, with much of the area designated for its outstanding natural beauty. Environmental opportunities for the NCA include:
 - Conserve rural character and heritage: Manage and enhance the North Downs' historic landscape, settlement patterns, and cultural landmarks while protecting its tranquillity for future generations.
 - Enhance and manage woodlands: Restore and sustainably manage diverse woodlands for biodiversity, cultural value, recreation, and climate resilience, while supporting local timber and biomass markets.
 - Promote sustainable farming: Support mixed farming and protect semi-natural habitats like chalk grassland through sustainable practices that benefit the environment and maintain food production.
 - Deliver multifunctional green space: Plan for well-managed green infrastructure in urban and fringe areas to provide social, environmental, and economic benefits while reinforcing local landscape character.

- 11.3.4. The ecosystem services provided by the three NCAs should be protected, including food provision, water availability, regulating soil erosion, regulating soil quality, regulating water quality, sense of place / inspiration, sense of history, recreation, biodiversity, and geodiversity.

Figure 11-1: National Landscapes and National Character Areas in Swale



Swale Local Landscape Designations

- 11.3.5. In support of the SBLP, a Local Landscape Designation review report was published.⁶⁷ The report highlights the rich and varied landscapes of Swale and provides a summary of the borough's landscape context.
- 11.3.6. At the county level, Swale contains three Areas of High Landscape Value (Kent Level), which are considered strategic landscape assets:
- The lower dip slope to the north of the National Landscape and associated dry valleys - North Kent Downs;
 - The marshlands along the Swale's coastal edge forming part of the North Kent Marshes SLA extending across the Borough boundaries; and
 - Blean Woods in the east forming part of the wider complex of ancient woodland in Canterbury District.
- 11.3.7. At the borough level, four Areas of High Landscape Value (Swale Level) have been identified as locally important strategic assets:
- Tonge and Luddenham;
 - Iwade, Newington and Lower Halstow;
 - Boughton Street, Hernhill, Dargate and Staplestreet; and
 - Sheppey Court and Diggs Marshes.
- 11.3.8. These designated areas are illustrated in Figure 1.1 of the Local Landscape Designation Review.⁶⁷
- 11.3.9. In addition to these designations, the Swale Landscape Character and Biodiversity Appraisal identifies 42 individual Landscape Character Areas across the borough, reflecting the diversity and complexity of Swale's landscape.⁶⁸
- 11.3.10. This landscape evidence provides a valuable baseline for understanding the sensitivity of different areas to change, and supports the assessment of potential environmental effects within the SA.

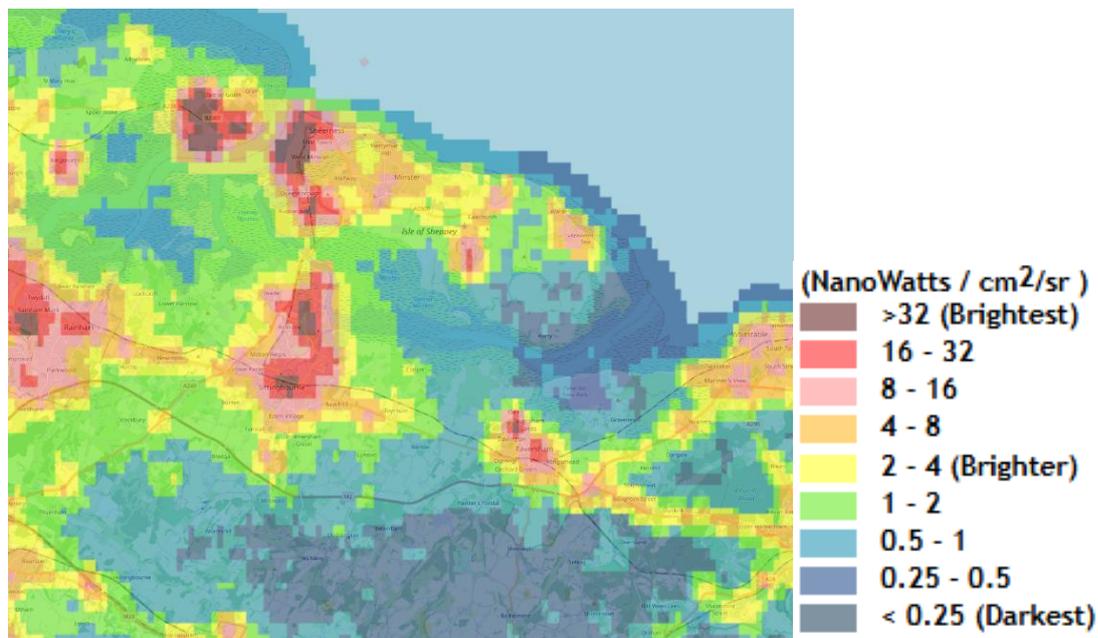
⁶⁷ LUC (2018). 'Swale Local Landscape Designations - Review and recommendations' can be accessed through [this link](#).

⁶⁸ Jacobs (2011). 'Swale Landscape Character and Biodiversity Appraisal' can be accessed through [this link](#).

Dark Skies and Tranquillity

- 11.3.11. Tranquillity is an established component of landscape character, recognised in planning guidance and case law as contributing to the quality and enjoyment of rural areas. Tranquil areas typically exhibit low levels of visual intrusion, artificial lighting, and noise, supporting biodiversity, recreation, and cultural heritage. Dark skies are similarly valued for their ecological benefits and contribution to sense of place, with national guidance encouraging minimisation of light pollution.
- 11.3.12. Light pollution affects the sense of remoteness and tranquillity for which the area is valued. In 2016, Campaign to Protect Rural England (CPRE) produced an interactive map depicting the level of light pollution and dark skies in Britain.⁶⁹ As shown in **Figure 11-2**, the borough's least tranquil areas are concentrated along major transport corridors (the M2, A2, A249, and A299) and around urban centres such as Sittingbourne, Faversham, and Sheerness. These areas experience high levels of traffic, lighting, and built development, reducing opportunities for quiet recreation and dark skies. In contrast, the most tranquil zones occur in Swale estuary and parts of the North Kent Downs, where open landscapes, limited development, and low light levels prevail.
- 11.3.13. Development in less tranquil areas of the borough may have limited additional impact, whereas proposals affecting the coastal areas or rural downs could significantly erode these qualities.

Figure 11-2: Swale Tranquillity Map⁶⁹



Source: CPRE

⁶⁹ CPRE (2016). 'England's Light Pollution and Dark Skies' can be accessed through [this link](#).

11.3.14. A further study conducted by CPRE in 2023 suggests that areas of ‘severe’ light pollution have been documented in several locations in the borough (including Sheerness, Faversham and Lower Halstow), based on the number of stars visible to the naked eye in the night sky.⁷⁰ The study does not discuss results on a local scale, however concluded that around three quarters of people living in the UK have an obscured view of the night sky.

Local Countryside Gaps

11.3.15. A review of Local Countryside Gaps around Sittingbourne, Upchurch and Sheerness was published in 2025.⁷¹ The report assessed six designated gaps in Swale (see Figure 1.1 of the review), using criteria including: existing settlement identity and pattern; landscape character; visual character; gap extent; boundary defensibility; and potential for enhancement.

11.3.16. Most gaps were found to fully meet the criteria for continued designation. In contrast, the gap between Sittingbourne and Bobbing (SG6) was recommended for removal due to its dominance by transport infrastructure and lack of rural character.

11.3.17. The findings offer important context for understanding how future development might affect the character and function of the borough’s landscapes, and will help inform the assessment of spatial options and environmental effects within the SA.

Local Views

11.3.18. It is useful to note that views of and across the borough are also an important factor to consider in the planning process, as the scale, height, and mass of development can ultimately impact on important views. Changes like development and landscape change can see these important views and vistas degraded overtime. The emerging LWNP may designate locally important viewpoints to provide additional protection to these assets.

Tree Preservation Orders

11.3.19. A Tree Preservation Order (TPO) is a legal measure used by local planning authorities to protect specific trees, groups of trees, or woodlands from being cut down, topped, lopped, uprooted, or otherwise damaged without prior consent. TPOs are typically placed on trees that offer significant amenity value to the local environment. Similar protections are afforded trees within designated conservation areas.

⁷⁰ CPRE (2023). ‘*Star Count 2023*’ can be accessed through [this link](#).

⁷¹ LUC (2025). ‘*Swale Important Local Countryside Gaps*’ can be accessed through [this link](#).

11.3.20. Swale contains a number of TPOs across the borough, reflecting the value placed on its trees and woodlands for their contribution to local character, biodiversity, and landscape quality.

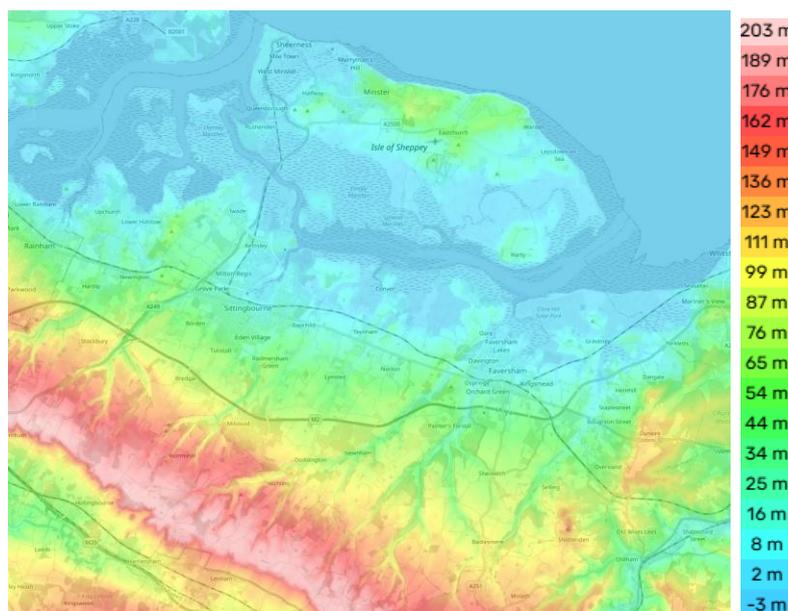
Topography

11.3.21. In terms of the Swale Borough’s topography, the borough’s landscape transitions from hilly terrain in the south to flatter, lower-lying areas in the north.

11.3.22. The southern parts of the borough are characterised by rolling hills and elevated ground. Moving north, the elevation gradually decreases, with areas like Sittingbourne and Faversham sitting at a moderate level. The terrain continues to flatten towards the north of the borough, towards the coastal landscapes.

11.3.23. It is therefore recognised that any future growth within the southern area of the borough is likely to be relatively elevated in the landscape in comparison to the surrounding areas.

Figure 11-3: Topography of Swale Borough⁷²



Future Baseline

11.3.24. Urban growth in Swale is likely to change the landscape, particularly due to its rural areas and green spaces. New developments could place pressure on the surrounding countryside, including areas of high environmental value. Considered site selection and design will be necessary to maintain the borough’s rural character and prevent the erosion of important green spaces.

⁷² Topographic-map.com (2025). ‘Home’, available through [this link](#).

- 11.3.25. New development has the potential to lead to incremental changes in landscape quality within and surrounding the borough. This could place increased pressure on Swale's designated landscapes. Development also has the potential to disrupt views to and from Swale Borough, especially if built in the south of the borough.
- 11.3.26. Climate change may alter Swale Borough's landscape, with potential adverse effects anticipated on its green spaces, historic assets, local wildlife, and agricultural land.
- 11.3.27. Coordinated delivery of green infrastructure, recreational spaces, and any regeneration opportunities could support landscape enhancements in the borough. The SBLP therefore presents an opportunity to plan for development in a way which minimises landscape impacts and maximises improvement/ enhancement to the landscape resource where possible.

11.4. Key Issues

- 11.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to the landscape SA theme:
- The Kent Downs NL requires safeguarding from inappropriate development, including within its setting, to maintain its scenic quality, cultural heritage, and ecosystem services;
 - Development should respect the distinct characteristics of the Greater Thames Estuary, North Kent Plain, and North Downs National Character Areas, including their biodiversity, agricultural heritage, and sense of place;
 - Areas of High Landscape Value (Kent and Swale levels) and the 42 Landscape Character Areas are sensitive to change and should be considered in spatial planning;
 - Tranquillity and dark skies are vulnerable to light pollution and visual intrusion; development near transport corridors may have limited additional impact, but proposals affecting marshlands or rural downs could significantly erode these qualities;
 - Local countryside gaps remain important for preventing settlement coalescence and preserving rural character;
 - Existing Tree Preservation Orders and conservation area protections should be maintained to safeguard amenity value and biodiversity;

- Elevated areas in the south are more visually prominent, requiring careful design to avoid adverse landscape impacts;
- Expansion of settlements could threaten green spaces and natural features, requiring careful site selection and design to maintain rural character; and
- Climate change may impact Swale Borough's green spaces, historic assets, agricultural land, and biodiversity. Planning for climate resilience, including habitat restoration and green infrastructure, is essential for maintaining landscape quality.

11.5. SA Objective

11.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to landscape:

Protect and enhance the character and quality of the landscape, including green infrastructure corridors

11.5.2. The following questions will help assess how well each option supports the SA objective. Will the Option help to:

- ...conserve nationally and locally designated landscapes, including the Kent Downs NL and Areas of High Landscape Value?
- ...respect the distinctive features and character of the Greater Thames Estuary, North Kent Plain, and North Downs National Character Areas?
- ...preserve tranquillity and dark skies, avoiding significant increases in noise or light pollution?
- ...integrate and promote green infrastructure, including tree planting, parks, and natural corridors, to support biodiversity, recreation, and climate resilience?

12. Soils and Natural Resources

12.1. Focus of Theme

12.1.1. This theme focuses on the quality of soil resources the extent of mineral resources in the borough, and includes consideration of related issues such as waste management, landfill sites, and the redevelopment of brownfield land.

12.2. Policy Context

12.2.1. **Table 12-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 12-1: Plans, Policies and Strategies Reviewed in Relation to Soils and Natural Resources

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>The 25 Year Environment Plan</u>	2018
<u>Safeguarding our Soils: A strategy for England</u>	2009
Local	
<u>Kent Minerals and Waste Local Plan (2024–2039)</u>	2025
<u>Kent Mineral Sites Plan</u>	2020
<u>Swale Contaminated Land Strategy</u>	2010

12.2.2. The key messages emerging from the review are summarised below:

- The SBLP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources; 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 NPPF places a requirement on mineral planning authorities to prepare an annual Local Aggregate Assessment (LAA), which reports on the demand for and supply of aggregates in their area. The relevant LAA for Swale Borough is Kent's 11th Local Aggregate Assessment (2023);

- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, 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 waste plan which seeks to identify measures being taken to move towards a zero-waste economy;
- The Kent Minerals and Waste Local Plan (2024-2039) reaffirms a commitment to sustainable resource management and climate action, promoting a circular economy and near elimination of landfill. It safeguards mineral supply chains and wharves while ensuring extraction and waste practices minimise carbon impacts and protect landscapes, biodiversity, and communities;
- The Kent Mineral Sites Plan identifies specific locations for quarrying essential minerals to support growth, ensuring extraction is managed without causing unacceptable harm to communities or the environment. It also promotes site restoration for recreational use and biodiversity, balancing resource provision with landscape and ecological protection;
- The Swale Contaminated Land Strategy (2021-2026) sets out how the council will identify and manage land posing unacceptable risks to health or the environment, following DEFRA statutory guidance. It promotes a proportionate, evidence-based approach to investigations and remediation, while supporting residents and guiding developers on contamination issues.

12.3. Baseline Summary

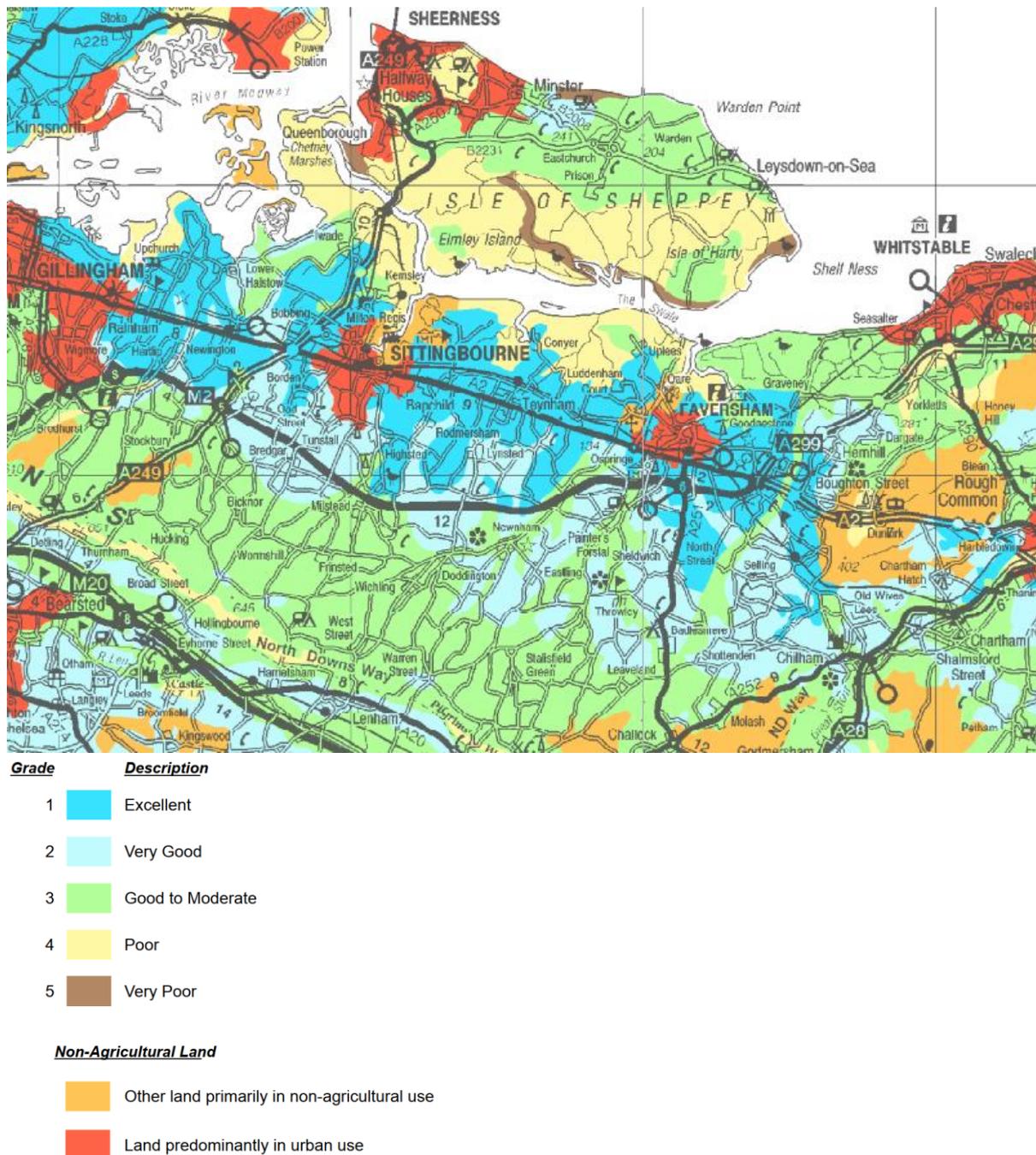
Current Baseline

Agricultural Land

- 12.3.1. 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 are of poorer quality.
- 12.3.2. As shown in **Figure 12-1**, the borough is underlain by a range of ALC grades, with a majority of higher-grade land.

- 12.3.3. Grade 1 (Excellent) and Grade 2 (Very Good) land is concentrated across the central belt of the borough, with some additional Grade 2 land also present in the northern part of the Isle of Sheppey.
- 12.3.4. The southern areas of the borough are largely underlain by Grade 3 (Good to Moderate) land, which also covers much of the northern half of the Isle of Sheppey. It should be noted that, in the absence of detailed ALC surveys, it is not possible to distinguish between sub-grade 3a land (Best and Most Versatile) and sub-grade 3b land (not BMV).
- 12.3.5. Remaining areas of the borough comprise a mix of Grade 4 (Poor), Grade 5 (Very Poor), and land in urban use.
- 12.3.6. Therefore, development in many parts of the borough could result in the loss of high-quality agricultural land, with an element of uncertainty at this stage. It will be important to protect the higher quality agricultural land from future development and promote the use of previously developed land where possible.

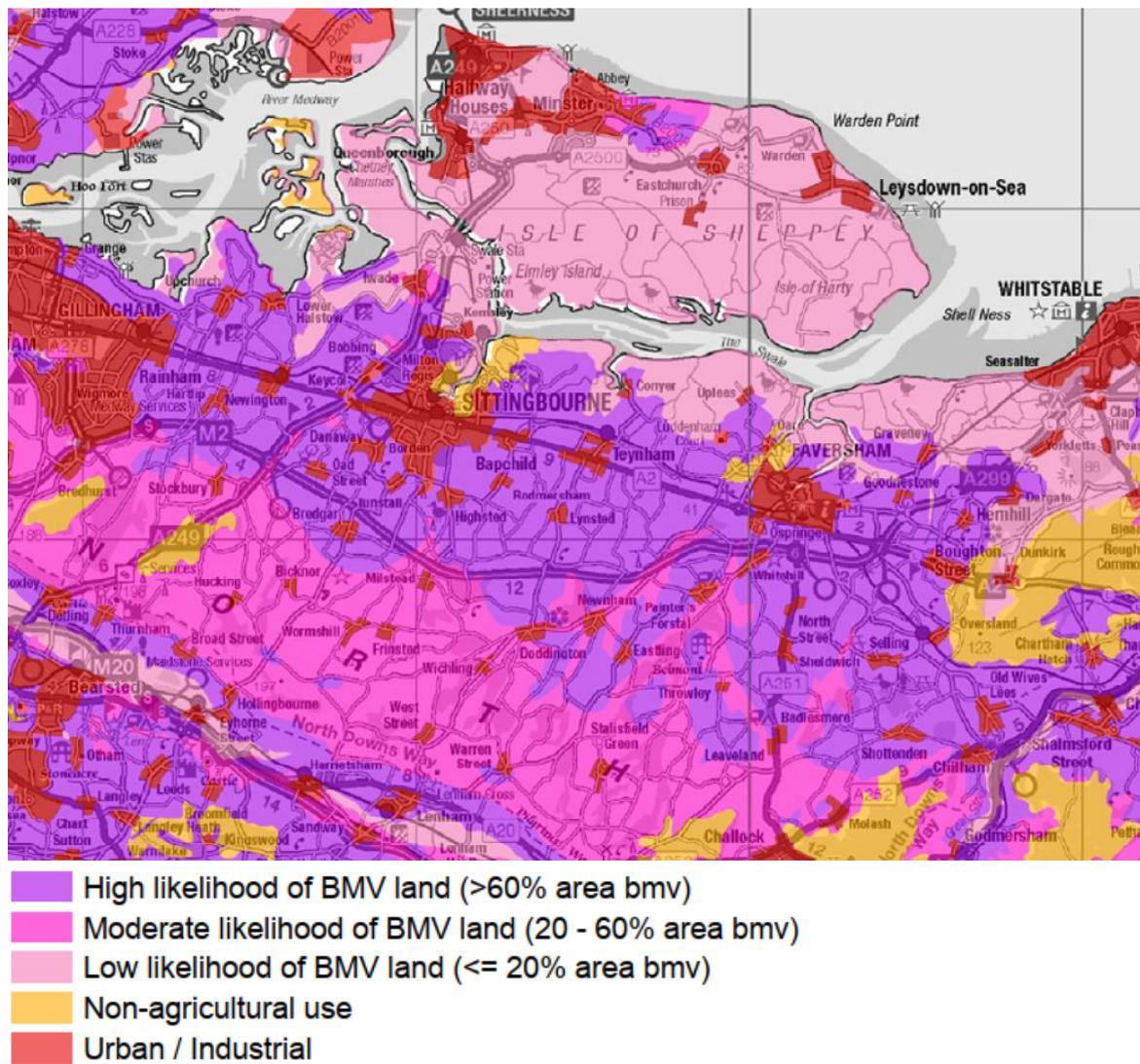
Figure 12-1: Agricultural Land Classification for the Borough⁷³



12.3.7. **Figure 12-2** also shows the results of Natural England’s ‘Predictive Best and Most Versatile Land Assessment’ for the London and the South East region. It indicates that the majority of mainland Swale has moderate (20%-60%) or high (>60%) likelihood for BMV land. Conversely, the majority of the Isle of Sheppey is graded as low likelihood (<20%) for BMV land.

⁷³ Natural England (2010) ‘Agricultural Land Classification map London and the South East (ALC007)’ can be accessed through [this link](#).

Figure 12-2: Likelihood of BMV Land Within the Borough⁷⁴



Mineral Resources

12.3.8. Mineral resources are defined as natural concentrations of minerals or bodies of rock that have the potential to be of economic interest in the present or the future due to their inherent properties. As minerals are a non-renewable resource, minerals safeguarding is deployed as the process through which it is ensured that non-minerals development does not needlessly prevent the future extraction of mineral resources.⁷⁵

⁷⁴ Natural England (2017) 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)' can be accessed through [this link](#).

⁷⁵ UK Government (2014) 'Guidance: Minerals' can be accessed through [this link](#).

- 12.3.9. There are three mineral safeguarding areas in Swale, as designated in the Kent Minerals and Waste Local Plan.⁷⁶ These are: River Terrace; Brickearth Swale Areas; and Wharfs and Rail Depots.
- 12.3.10. Swale contains a range of mineral-related sites and facilities.⁷⁷ Faversham Quarry, operated by Brett Aggregates Ltd, is a key site for secondary and recycled aggregates, supporting sustainable construction practices. In addition, Ridham Dock serves as a major wharf for aggregate handling and import/export, operated by Brett Aggregates and Lafarge Tarmac, facilitating marine-dredged sand and gravel movements.
- 12.3.11. Beyond aggregates, Swale hosts several brickearth extraction sites, including Claxfield Farm, Hempstead House, and sites at Paradise Farm (Hartlip) and Orchard Farm (Iwade), operated by Weinerberger Ltd and Ibstock Building Products. Brickearth is an important raw material for brick manufacturing. The borough also includes a clay site at Norwood Quarry, managed by FCC Environment (UK) Ltd.⁷⁷
- 12.3.12. As noted in the adopted Local Plan for Swale, in the event that mineral reserves are identified on sites allocated for development, developers should work with the Minerals Planning Authority (Kent County Council) to ensure the timely working of the site, provided that there is a sustainable and viable outlet for the resource which allows extraction without an unreasonable impact on development coming forward.

Waste

- 12.3.13. Swale Borough Council is part of the Mid Kent Waste Partnership alongside Ashford and Maidstone, with waste collection services delivered by SUEZ Recycling and Recovery UK since March 2024. The borough operates a fortnightly collection for residual waste and dry recyclables, weekly food waste collections, and a charged garden waste service. Non-recyclable waste is sent to energy-from-waste facilities, with no waste going to landfill.⁷⁸
- 12.3.14. The latest DEFRA data suggests that 40.1% of Swale's household waste is recycled; this ranks 184 of 333 local authorities.⁷⁹ For comparison, the national average recycling rate for household waste is 44%.

⁷⁶ Kent County Council (2025). '*Kent Minerals and Waste Local Plan*' can be accessed through this link. See p191.

⁷⁷ Kent County Council (no date). '*Minerals and waste sites in Kent*' can be accessed through [this link](#).

⁷⁸ Swale Borough Council (2025). '*Annual Performance Report for the Waste Collection & Street Cleansing Service*' can be accessed through [this link](#).

⁷⁹ Wikiwaste (2025). '*Key Metric Rankings*' can be accessed from [this link](#).

- 12.3.15. There are two household waste sites in Swale: Sittingbourne Household Waste Recycling Centre and Sheerness Household Waste Recycling Centre.⁸⁰

Brownfield Sites

- 12.3.16. Brownfield sites are previously developed land that is no longer in use. They are preferred for new developments because they help reduce urban sprawl, make use of existing infrastructure, and regenerate neglected areas.
- 12.3.17. The most recent Swale Borough Brownfield Register (2024)⁸¹ identifies 55 sites within Swale Borough. Of these sites, 41 have been permissioned, one is marked as 'permitted', one is marked as 'prior notification', and 13 are marked as 'not permissioned'.
- 12.3.18. Development on brownfield sites can pose risks of mobilising pollutants from contaminated land, which could adversely affect groundwater quality. It will be important that all development proposals incorporate appropriate site investigations and remediation measures to prevent contamination. Development should be designed and implemented in line with the Environment Agency's Approach to Groundwater Protection, ensuring that groundwater resources are safeguarded and that no adverse impacts occur as a result of construction or operational activities.⁸²

Historic Landfill Sites

- 12.3.19. Historic landfill sites (HLS), once used for waste disposal, can create challenges for development due to potential contamination from harmful gases and leachate. Development sites near to HLS must conduct site assessments to check for environmental risks, which may require remediation efforts like soil removal or gas monitoring. Development on Historic Landfills may also require an environmental permit.
- 12.3.20. There are several HLS across Swale, particularly around Faversham, north of Sittingbourne, and in the western part of the Isle of Sheppey. The locations of these sites can be viewed online.⁸³

⁸⁰ Kent County Council (no date). 'Our Household Waste Recycling Centres' can be accessed from [this link](#).

⁸¹ Swale Borough Council (2024). 'Part 1 of the Brownfield Land Register' through [this link](#).

⁸² Environment Agency (2018). 'The Environment Agency's approach to groundwater protection' can be accessed through [this link](#).

⁸³ Arcgis.com (no date). 'Historic landfills in England' can be accessed through [this link](#).

Future Baseline

- 12.3.21. Future development has the potential to affect soil resources in the neighbourhood area through the loss of BMV ('excellent', 'very good' and 'good') quality agricultural land. Due to the prevalence of BMV land across the borough, it is likely that development outside of the urban settlement could lead to the permanent loss of this resource. However, it is recognised that detailed land classification has not been carried out and therefore uncertainty remains in this respect.
- 12.3.22. Rising temperatures and shifting rainfall patterns may lead to more frequent droughts or floods, affecting soil moisture, structure, and agricultural productivity. Soil erosion risks may also increase due to extreme weather, reducing soil fertility and agricultural potential, especially in BMV land.
- 12.3.23. Demand for waste processing is likely to grow alongside population increases and urban expansion. The capacity of existing waste management infrastructure will need to be regularly assessed to ensure it can cope with the increasing demand. Additionally, with the identification of potential sites for new waste facilities, it will be important to assess any potential impacts these facilities might have on nearby communities, as well as any associated environmental risks such as emissions or leachate.

12.4. Key Issues

- 12.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to soils and mineral resources:
- Development outside urban areas could result in the permanent loss of BMV agricultural land, particularly in the central belt and parts of the Isle of Sheppey. This could impact food production and soil quality;
 - Redevelopment of brownfield sites offers opportunities to reduce urban sprawl, utilise existing infrastructure, and support regeneration. However, development on these sites may pose contamination risks to groundwater, requiring appropriate site investigations and remediation;
 - The borough contains designated Mineral Safeguarding Areas for River Terrace, Brickearth, and Wharfs/Rail Depots, which should be protected to avoid sterilisation of mineral resources by non-mineral development;
 - Historic landfill sites across the borough, particularly near Faversham, Sittingbourne, and the Isle of Sheppey, present contamination risks from harmful gases and leachate. Development near these sites may require environmental permits and remediation measures;

- Population growth and urban expansion will increase demand for waste processing infrastructure. Existing facilities must be monitored and potentially expanded to meet future needs, while ensuring that any new facilities do not adversely affect nearby communities or the environment; and
- Climate change may increase the risk of soil erosion, drought, and flooding, affecting soil structure, moisture levels, and agricultural productivity, especially in areas with BMV land.

12.5. SA Objectives

12.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objectives and assessment questions in relation to soils and natural resources:

Protect soil and mineral resources, promote efficient land use, and manage waste effectively

12.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...protect BMV agricultural land from unnecessary loss or degradation, prioritising development on brownfield or lower-quality land?
- ...safeguard mineral resources within Mineral Safeguarding Areas, ensuring that non-mineral development does not prevent future extraction?
- ...manage development proposals near historic landfill sites to prevent environmental contamination and health risks?
- ...support the sustainable management and expansion of waste processing infrastructure to meet growing demand?

13. Transport

13.1. Focus of Theme

13.1.1. This theme focuses on transport infrastructure, transport usage, traffic flows and congestion, and accessibility levels in the borough.

13.2. Policy Context

13.2.1. **Table 13-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 13-1: Plans, Policies and Strategies Reviewed in Relation to Transportation

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Decarbonising Transport: A Better, Greener Britain</u>	2021
<u>Decarbonising Transport: Setting the Challenge</u>	2020
<u>The National Design Guide</u>	2019
<u>The Transport Investment Strategy – Moving Britain Ahead</u>	2017
<u>The Department for Transport’s Cycling and Walking Investment Strategy</u>	2016
Local	
<u>Swale Local Cycling and Walking Infrastructure Plan</u>	2025
<u>Kent Local Transport Plan 5</u>	2024
<u>Kent Bus Service Improvement Plan (BSIP)</u>	2024
<u>Swale Transport Strategy (2022–2037)</u>	2022
<u>Kent Active Travel Strategy</u>	2017

13.2.2. The key messages emerging from the review are summarised below:

- The Local Plan 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;
- Swale's Local Cycling and Walking Infrastructure Plan (2025) aims to both encourage and facilitate the modal shift away from motorised vehicles to more active modes, transforming areas in ways which support active travel, reduce congestion, support local economies and improve physical and mental health in line with sustainable visions at a local to a national level;
- Kent's Local Transport Plan 5: Striking the Balance (2024-2037) sets out Kent County Council's overarching transport strategy. It aims to deliver a balanced approach to transport across Kent, integrating proposals with sub-strategies such as the Bus Service Improvement Plan and the Kent Cycling and Walking Infrastructure Plan for more detailed actions. This is also accompanied by Kent's Active Travel Strategy (2017); and
- The Swale Transport Strategy (2022-2037) sets out a framework to reduce car dependency and promote sustainable and active travel across the borough. It supports housing growth while aiming to improve air quality, enhance safety, and create healthier, more affordable travel options. The strategy's vision is to deliver a sustainable transport network that meets local needs and encourages greener, more active lifestyles.

13.3. Baseline Summary

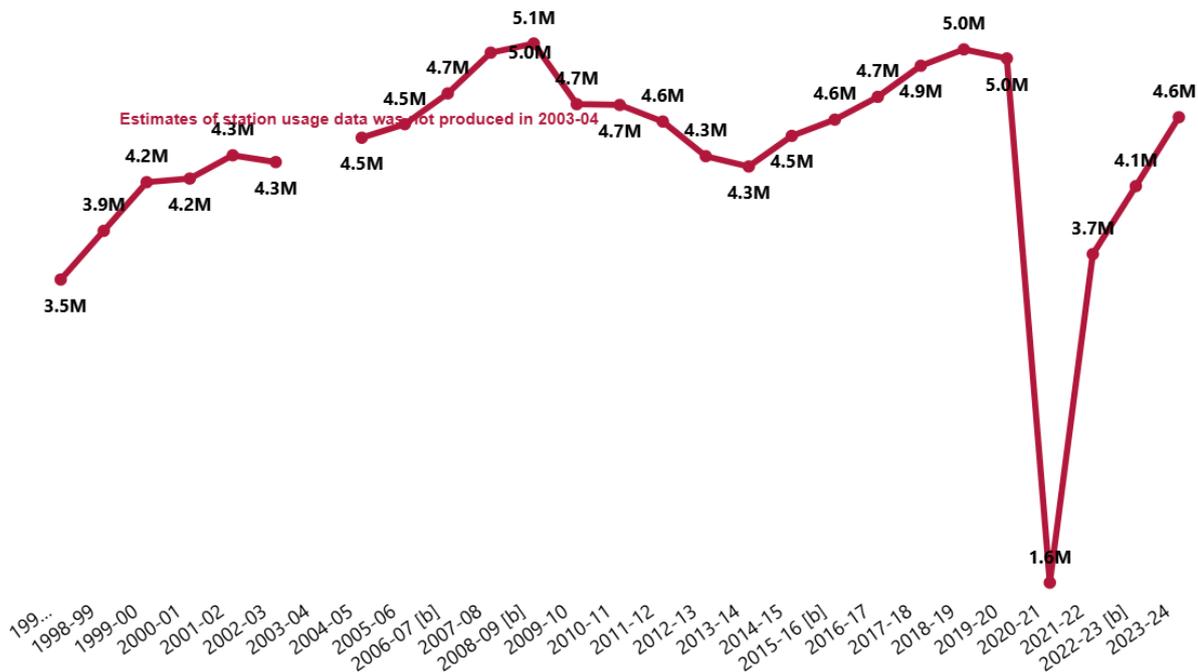
Current Baseline

Rail Network

- 13.3.1. The rail network in Swale is primarily served by the Sheerness Line, which connects Sittingbourne on the Chatham Main Line to the Isle of Sheppey via stations at Kemsley, Swale Halt, Queenborough, and Sheerness-on-Sea. This line provides an important link between the island and the mainland, crossing the Kingsferry Bridge, and supports both passenger and freight movements, including traffic to local industrial sites such as Ridham Dock and Sheerness steelworks.⁸⁴
- 13.3.2. Sittingbourne acts as the main interchange, offering connections to London and East Kent, including high-speed services from nearby Faversham.
- 13.3.3. In addition to the mainline services, Swale features heritage railways such as the Sittingbourne & Kemsley Light Railway, which operate seasonally for tourism and leisure purposes.
- 13.3.4. According to the Office of Rail and Road, estimated usage of Swale Borough's train stations has shown steady growth between 1997 and 2024, increasing from 3.5 million to 4.6 million annual entries and exits over this period (see **Figure 13-1**). There was a significant dip in usage in 2020-21, reflecting the impact of the COVID-19 pandemic and associated travel restrictions. Since then, usage has not recovered but not yet surpassed pre-pandemic levels.

⁸⁴ Visit Swale (no date). 'Heritage Railways in Swale' can be accessed through [this link](#).

Figure 13-1: Passenger Numbers at Swale Borough’s Train Stations⁸⁵



Bus Network

13.3.5. The bus network in Swale is operated by three main providers:

- Stagecoach;
- Chalkwell Buses; and
- Travelmasters.

13.3.6. Buses in Swale provides essential connections between key towns such as Sittingbourne, Faversham, and Sheerness, as well as links to surrounding rural areas.⁸⁶ Services cover local routes within the borough and longer-distance connections to destinations including Maidstone and Canterbury.

13.3.7. The network supports access to employment, education, and healthcare, and includes school and community transport options. Recent improvements have focused on fare reductions through national schemes, real-time tracking, and contactless payment systems, making services more affordable and convenient.⁸⁷

⁸⁵ Office of Rail and Road (2025) ‘Estimates of station usage’ can be accessed through [this link](#).

⁸⁶ Kent County Council (no date). ‘Bus Routes in Swale Area’ can be accessed through [this link](#).

⁸⁷ Swale Borough Council (no date). ‘Travel by bus or rail’ can be accessed through [this link](#).

Road Network and Congestion

- 13.3.8. Swale Borough's road network is shaped by its strategic position in North Kent, incorporating major routes such as the A2, A249, and M2. The A2 provides an important east–west corridor linking Sittingbourne and Faversham, while the A249 connects the Isle of Sheppey to the mainland and serves as a key route to the M2 and wider Strategic Road Network. These roads are essential for local travel, freight movements from Sheerness Docks, and regional connectivity.
- 13.3.9. Swale's Transport Strategy (2022-2027) notes that congestion is a persistent challenge, particularly along the A2 through Sittingbourne and at junctions on the A249, where traffic volumes are compounded by housing growth and commercial development. The borough's rural character and dispersed settlements mean car dependency remains high, placing additional pressure on these corridors.
- 13.3.10. Several improvement schemes are underway to address these issues, such as improvements to Key Street and Grovehurst Road junctions on the A249, which aimed at reducing queuing and improving journey time reliability.⁸⁸

Public Rights of Way (PRoW) and Cycleways

- 13.3.11. Swale benefits from an extensive network of public rights of way, including footpaths, bridleways, and byways, which provide access to its varied landscapes from the Thames Estuary to the Kent Downs. These routes support leisure, tourism, and active travel, offering opportunities for walking, cycling, and wheeling.⁸⁹
- 13.3.12. Long-distance trails such as the Saxon Shore Way, North Downs Way, and the King Charles III England Coast Path pass through the borough, alongside numerous shorter circular and linear routes that connect rural villages with towns like Sittingbourne and Faversham. This network is complemented by seafront promenades and country lanes, forming part of the National Cycle Network Routes 1 and 174, which runs through Swale and links to wider Kent and national routes.

⁸⁸ Kent County Council (2023). 'A249 Key Street and Grovehurst Road junction Improvements' can be accessed through [this link](#).

⁸⁹ Swale Borough Council (no date). 'Swale's Cycling and Walking Pathways' can be accessed through [this link](#).

13.3.13. Swale Borough Council is actively working to improve and expand this infrastructure through its Local Cycling and Walking Infrastructure Plan (2025). The plan aims to create a cohesive, safe, and accessible network by upgrading existing paths, adding new cycle lanes, improving signage, and introducing better lighting and crossings. These enhancements are designed to encourage modal shift from car travel to active travel, reduce congestion, and improve air quality, while supporting health and wellbeing.

Future Baseline

13.3.14. Swale Borough is expected to see continued population growth, driven by new developments such as those in the emerging SBLP. As the population increases, there will be greater demand for transport services and infrastructure.

13.3.15. National and local health agendas are expected to drive greater emphasis on walking and cycling. Investment in safe, connected active travel networks will be essential to encourage modal shift, reduce emissions, and improve wellbeing.

13.3.16. Climate change will impact Swale Borough's transport network, with extreme weather increasing risks like flooding, road damage, and public transport disruptions. Heavy rainfall may waterlog roads, while extreme heat could degrade surfaces and affect rail reliability, potentially leading to greater car dependency, congestion, and emissions. To mitigate these risks, future transport planning must integrate climate resilience measures and promote sustainable travel options.

13.4. Key Issues

13.4.1. Considering the policy context and baseline information, the following key issues (constraints and/ or opportunities) are identified in relation to transportation:

- Rail services in Swale Borough provide essential connectivity but face capacity challenges as demand grows. Continued development will require improvements to service frequency and resilience to maintain accessibility and reliability;
- The bus network offers important links between towns and rural areas but may become strained with population growth. Enhancements in service frequency, coverage, and integration with rail will be needed to make public transport a viable alternative to car travel;

- Swale has an extensive network of public rights of way and cycle routes. Further investment will be important to reduce car dependency, improve health outcomes, and address severance issues between north and south of the borough;
- Major roads such as the A2, A249, and M2 experience congestion, particularly at key junctions. Growth in housing and freight movements could exacerbate this, requiring strategies to manage traffic flow and promote sustainable alternatives; and
- Climate change poses risks to the transport network, including flooding and heat-related damage to roads and rail infrastructure. Future planning must incorporate climate resilience measures to safeguard infrastructure and maintain service reliability.

13.5. SA Objective

13.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to transportation:

Promote sustainable transport use and reduce the need to travel

13.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...connect future development with sustainable transport networks?
- ...enhance bus service frequency, reliability, and integration?
- ...expand and improve active travel infrastructure, including cycle routes and footpaths, to reduce car dependency and address severance issues?
- ...manage road congestion effectively through traffic flow improvements, road upgrades, and promotion of alternative transport modes?
- ...integrate climate resilience measures to protect transport infrastructure from flooding, heat damage, and other extreme weather impacts?

14. Water

14.1. Focus of Theme

14.1.1. This theme focuses on water supply resources and water quality (including wastewater treatment) in Swale Borough.

14.2. Policy Context

14.2.1. **Table 14-1** presents the most relevant documents identified in the policy review for the purposes of the SA.

Table 14-1: Plans, Policies and Strategies Reviewed in Relation to Water

Document Title	Year of Publication
National	
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>The 25 Year Environment Plan</u>	2018
<u>Future Water: The government's water strategy for England</u>	2011
<u>Water for Life</u>	2011
Local	
<u>Kent Local Flood Risk Management Strategy</u>	2024
<u>Southern Water North Kent Drainage and Wastewater Management Plan</u>	2022
<u>Swale Surface Water Management Plan</u>	2012
<u>River Medway and Swale Estuary Shoreline Management Plan</u>	2010

14.2.2. The key messages emerging from the review are summarised below:

- The SBLP will be required to be in general conformity with the NPPF, which seeks to improve the water environment and recognises 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 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims for clean and plentiful water and reduced risk from environmental hazards. This includes measures to restore and protect peatlands, use water more sustainably, reduce pollution, and minimise environmental impacts. This leads national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies;
- The Kent Local Flood Risk Management Strategy (2024-2034) sets out how the council, as Lead Local Flood Authority, will manage flood risks from surface runoff, groundwater, and ordinary watercourses. It strengthens collaboration between authorities, improves understanding of flood risk, and builds on lessons from previous strategies to enhance resilience across the county;
- The Southern Water Drainage and Wastewater Management Plan (2022) focuses on reducing storm overflow spills, improving sewer resilience, and mitigating flood risks by managing excess rainwater in the North Kent River Basin Catchment. It also addresses the ecological and nutrient impacts of wastewater discharges on local rivers and estuaries while planning for future development and protecting groundwater quality;
- The Swale Surface Water Management Plan investigates local flood risks from surface runoff, groundwater, and ordinary watercourses. Led by Kent County Council in partnership with other authorities, it identifies priority areas, proposes mitigation options, and sets out an action plan to reduce flood risk and improve resilience across Swale; and
- The Medway Estuary and Swale SMP provides a high-level framework for managing risks from coastal change in a sustainable way. It sets long-term policies to protect people, property, and the natural and historic environment, forming part of the national strategy for flood and coastal defence.

14.3. Baseline Summary

Current Baseline

Water Quality

- 14.3.1. The borough lies within the Thames River Basin District, with most of its area falling under the Kent North Management Catchment and White Drain and Lakes Operational Catchment. It also includes the following water bodies:
- Murston Lakes, angling lakes Water Body; and
 - White Drain.
- 14.3.2. Areas west of Sittingbourne fall within the Medway Management Catchment and the Medway Lower Operational Catchment.
- 14.3.3. The borough's coastline is part of the Thames TraC Management Catchment and the Medway Swale Estuary Operational Catchment, which includes the following water bodies:
- Medway;
 - Murston Lakes; and
 - Swale.
- 14.3.4. In the latest survey year (2022), the White Drain water body was assessed as having poor ecological status, while Murston Lakes was rated good; other water bodies were recorded as moderate. However, all water bodies failed the most recent chemical status assessment (2019), primarily due to polybrominated diphenyl ethers (PBDE), with additional failures linked to mercury and benzo(g,h,i)perylene in certain areas.
- 14.3.5. The Medway Swale Estuary Partnership (MSEP) works to conserve and improve the ecological health of the Medway and Swale estuaries and their tributaries through community engagement and targeted projects.⁹⁰ Their initiatives include developing a Catchment Action Plan under the Catchment Based Approach (CaBA), tackling issues such as pollution and invasive species, and supporting habitat restoration.⁹¹

⁹⁰ MSEP (no date). 'Welcome to the Medway Swale Estuary Partnership' can be accessed through [this link](#).

⁹¹ MSEP (no date). 'North Kent Catchment Action Plan' can be accessed through [this link](#).

- 14.3.6. MSEP also collaborates with local councils and groups on projects like improving the Iwade Stream and Westbrook in Faversham, and runs volunteer programs for monitoring and practical conservation work.⁹²
- 14.3.7. Nitrate Vulnerable Zones (NVZs) represent areas at risk from agricultural nitrate pollution, identifying rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farming areas. Figure 10-1 in the Swale Borough Council Level 1 Strategic Flood Risk Assessment (SFRA) shows that the borough contains a groundwater NVZ located between Sittingbourne and Faversham, as well as a surface water NVZ on the borough's eastern border.⁹³

Water Resources

- 14.3.8. In England, watercourses can be designated as 'main rivers'. These are usually larger rivers and streams, and are managed by The Environment Agency. The designated main rivers in Swale Borough include:⁹⁴
- River Medway;
 - Otterham Creek;
 - Iwade Stream;
 - Milton Creek;
 - Windmill Creek;
 - The Swale;
 - Scrapsgate Drain;
 - Warden Bay Stream;
 - Capel Fleet Drain;
 - Faversham Creek;
 - White Drain.

⁹² MSEP (no date). 'Introduction' can be accessed through [this link](#).

⁹³ Swale Borough Council (2020). 'Swale Borough Council Level 1 Strategic Flood Risk Assessment' can be accessed through [this link](#).

⁹⁴ Swale Borough Council (2020). 'Swale Borough Council Level 1 Strategic Flood Risk Assessment Appendix B' can be accessed through [this link](#).

- 14.3.9. Rivers that are not designated as main rivers are known as ‘ordinary watercourses’, and are instead managed by lead local flood authorities, borough councils and internal drainage boards. Swale Borough has many ordinary watercourses, which are smaller streams, tributaries, and drainage channels that contribute to the local water network.⁹⁵
- 14.3.10. Swale also has many waterbodies throughout the borough, with named examples including Bysing Wood Pool and Stonebridge Pond in Faversham, Mill Pond in Tonge, and Lasher’s Lake in Hernhill.
- 14.3.11. In relation to water resources, the borough is served by Southern Water South East Water. The Environment Agency have published a document entitled ‘Water Stressed Areas – 2021 classification’ which included a map of England, identifying areas of relative water stress. In this regard, the whole of Southern Water and South East Water’s supply area is shown as an area of ‘Serious’ water stress, based upon the amount of water available per person both now and in the future.⁹⁶
- 14.3.12. Within their Water Resource Management Plans (WRMPs) water companies refer to their Water Resource Zones (WRZs). WRZs are the largest possible zone in which all resources, including external transfers, can be shared and hence the zone in which all customers experience the same risk of supply failure from a resource failure. In this respect, the borough falls within the Kent Medway West WRZ, Kent Medway East WRZ, and Ashford WRZ which experience pressures due to climate change and population growth.

Groundwater

- 14.3.13. Groundwater plays an important role in the borough’s water resource system, contributing to both water supply and ecological health. Swale sits upon aquifers, which are vulnerable to pollution, over-abstraction, and changes in infiltration patterns due to urban development.

⁹⁵ Swale Borough Council (2020). ‘*Swale Borough Council Level 1 Strategic Flood Risk Assessment Appendix B*’ can be accessed through [this link](#).

⁹⁶ Environment Agency and DEFRA (2021) ‘*Water stressed areas – 2021 classification*’ can be accessed through [this link](#).

14.3.14. All development through the SBLP must be consistent with the Environment Agency's Approach to Groundwater Protection, which sets out principles for safeguarding groundwater from contamination and unsustainable use.⁹⁷ This includes:

- Preventing pollution from hazardous substances and contaminated land;
- Ensuring infiltration-based drainage systems (for example, SuDS) do not compromise groundwater quality or increase flood risk; and
- Conducting site-specific groundwater risk assessments where development may affect aquifers or involve subsurface works.
- Groundwater protection is also important for maintaining long-term water availability, especially in a borough identified as being within a seriously water-stressed area. Sustainable water management should therefore include:
 - Minimising demand on groundwater through water-efficient design and technologies;
 - Protecting recharge zones and avoiding development that could reduce infiltration in appropriate areas; and
 - Remediating contaminated sites prior to development to prevent leaching into groundwater.

14.3.15. 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 supply. According to the SFRA (see Figure 10-1 in the SFRA), large areas in southern half of the borough fall within an SPZ.⁹⁸

⁹⁷ Environment Agency (2018). 'The Environment Agency's approach to groundwater protection' can be accessed through [this link](#).

⁹⁸ Swale Borough Council (2020). 'Swale Borough Council Level 1 Strategic Flood Risk Assessment' can be accessed through [this link](#).

Future Baseline

- 14.3.16. Climate change is expected to have significant implications for water resources in Swale Borough, exacerbating existing pressures on both water availability and quality. Rising temperatures and changing rainfall patterns could lead to more frequent droughts, reducing river flows and increasing competition for already scarce water supplies in the area. More intense rainfall events may also result in increased surface water runoff, heightening the risk of pollution in local watercourses.
- 14.3.17. Future development also has the potential to affect water quality through increased consumption, diffuse pollution, waste-water discharges, water run-off, and modification. Southern Water South East Water are likely to maintain adequate water services over the SBLP period; therefore, it will be important for new development to avoid negative impacts on water quality, and instead contribute to reducing consumption and improving efficiency.
- 14.3.18. It is also noted that the requirements of the Water Framework Directive, as transposed into national legislation, are likely to lead to continued improvements to water quality within the SBLP and wider area. However, it will nonetheless be important for new development to avoid impacts on water quality, and support demand management measures by contributing to reduced consumption and improved efficiency.
- 14.3.19. To support this, the SBLP should set strong targets for greenfield runoff rates, ensuring that post-development runoff does not exceed pre-development levels. The use of SuDS will be important in achieving this, helping to manage surface water, improve water quality, and enhance biodiversity.
- 14.3.20. Given that the borough is located within a seriously water-stressed area (as identified in the Environment Agency's latest Water Stressed Areas classification), all new residential developments must meet the higher water efficiency standard of 110 l per person per day, as set out in the Building Regulations &c. (Amendment) Regulations 2015.^{99,100}
- 14.3.21. For non-residential developments of 1,000 m² or more, the SBLP should encourage achievement of the BREEAM 'Excellent' standard for water consumption (WAT 01) or an equivalent benchmark.¹⁰¹
- 14.3.22. Increased water efficiency in new developments enables growth to be realised without placing additional pressure on water resources.

⁹⁹ Gov.uk (2021). 'Water stressed areas – 2021 classification' can be accessed through [this link](#).

¹⁰⁰ Gov.uk (2015). 'The Building Regulations &c. (Amendment) Regulations 2015' can be accessed through [this link](#).

¹⁰¹ BREEAM (no date). 'An Introduction to BREEAM' can be accessed through [this link](#).

Developers are encouraged to incorporate water-efficient technologies, fixtures, and fittings (such as low-flow taps and toilets, rainwater harvesting systems, and greywater recycling).

14.4. Key Issues

14.4.1. Considering the policy context and baseline information, the following key issues (constraints and / or opportunities) are identified in relation to Water:

- Water bodies in the borough show mixed ecological status: White Drain is 'poor', Murston Lakes is 'good', and others are 'moderate'. Future development must ensure no further deterioration and should contribute to achieving good ecological status as required by the Water Framework Directive;
- All water bodies failed the most recent chemical status assessment (2019), primarily due to PBDE, with additional failures linked to mercury and benzo(g,h,i)perylene. Development should avoid introducing pollutants and support measures to improve chemical quality;
- Swale Borough contains several NVZs, meaning parts of the borough are at risk of agricultural nitrate pollution. New development should minimise the risk of water pollution from urban runoff, construction, and wastewater discharge;
- Increased housing and associated infrastructure could lead to higher water consumption and wastewater generation, which may place additional pressures on water treatment facilities and local watercourses;
- The borough lies within an area of 'serious' water stress, requiring development to incorporate water efficiency measures to reduce demand;
- Climate change and population growth are placing additional pressures on the borough's WRZ. New development should consider sustainable water management, including rainwater harvesting, greywater recycling, and water-efficient appliances;
- Groundwater SPZs are present in parts of the borough, meaning development in these areas must prevent contamination of drinking water sources.

14.5. SA Objective

14.5.1. Considering the key issues discussed above, it is proposed that the SA should include the following objective in relation to water:

Protect and enhance water quality and resources, ensuring sustainable water management to support current and future needs while reducing pollution risks

14.5.2. The following questions will help assess how well each option supports the SA objective. Will the option help to:

- ...improve the ecological status of all water bodies, supporting the achievement of good status as required by the Water Framework Directive?
- ...address chemical status failures by reducing pollutants such as PBDE, mercury, and hydrocarbons?
- ...minimise pollution risks from nitrate vulnerable zones, urban runoff, construction, and wastewater discharge?
- ...reduce water consumption through incorporation of water-efficient technologies such as rainwater harvesting and greywater recycling?
- ...protect Groundwater Source Protection Zones from contamination linked to development and land use changes?

15. Proposed SA Framework

- 15.1.1. The SA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SA themes (as set out in **Chapters 2-14**).
- 15.1.2. The framework consists of a set of headline objectives and supporting assessment questions, which will be used to appraise the environmental effects of the draft Plan (and reasonable alternatives).
- 15.1.3. **Table 15-1** below outlines the proposed SA framework, bringing together the objectives and assessment questions that have been set out at the end of each SA theme.
- 15.1.4. Example supporting questions for each SA Objective are listed at the end of each SA theme's chapter.

Table 15-1: Proposed SA Framework

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

16. Next Steps

16.1. SA Stages

- 16.1.1. Scoping (the current stage) is the first stage of the SA process. The next stage will involve appraising reasonable alternatives for the SBLP against the SA framework. The findings of this appraisal will be documented within an Interim SA Report, which will accompany the Regulation 18 draft plan for consultation.

16.2. Consultation on the Scoping Report

- 16.2.1. Public involvement through consultation is a key element of the SA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.
- 16.2.2. The statutory consultation bodies are the Environment Agency, Historic England, and Natural England. This scoping report has been released to these three statutory consultees.
- 16.2.3. Consultees are invited to comment on the content of this scoping report, particularly the evidence base for the SA, the identified key issues, and the proposed SA Framework.
- 16.2.4. The consultation period runs from **XXXX 2025 to XXXX 2025**. Comments on the scoping report should be sent to:

Antonio Vinti, AECOM (antonio.vinti@aecom.com)
- 16.2.5. All comments received on the scoping report will be reviewed and will influence the development of the SA where appropriate.

