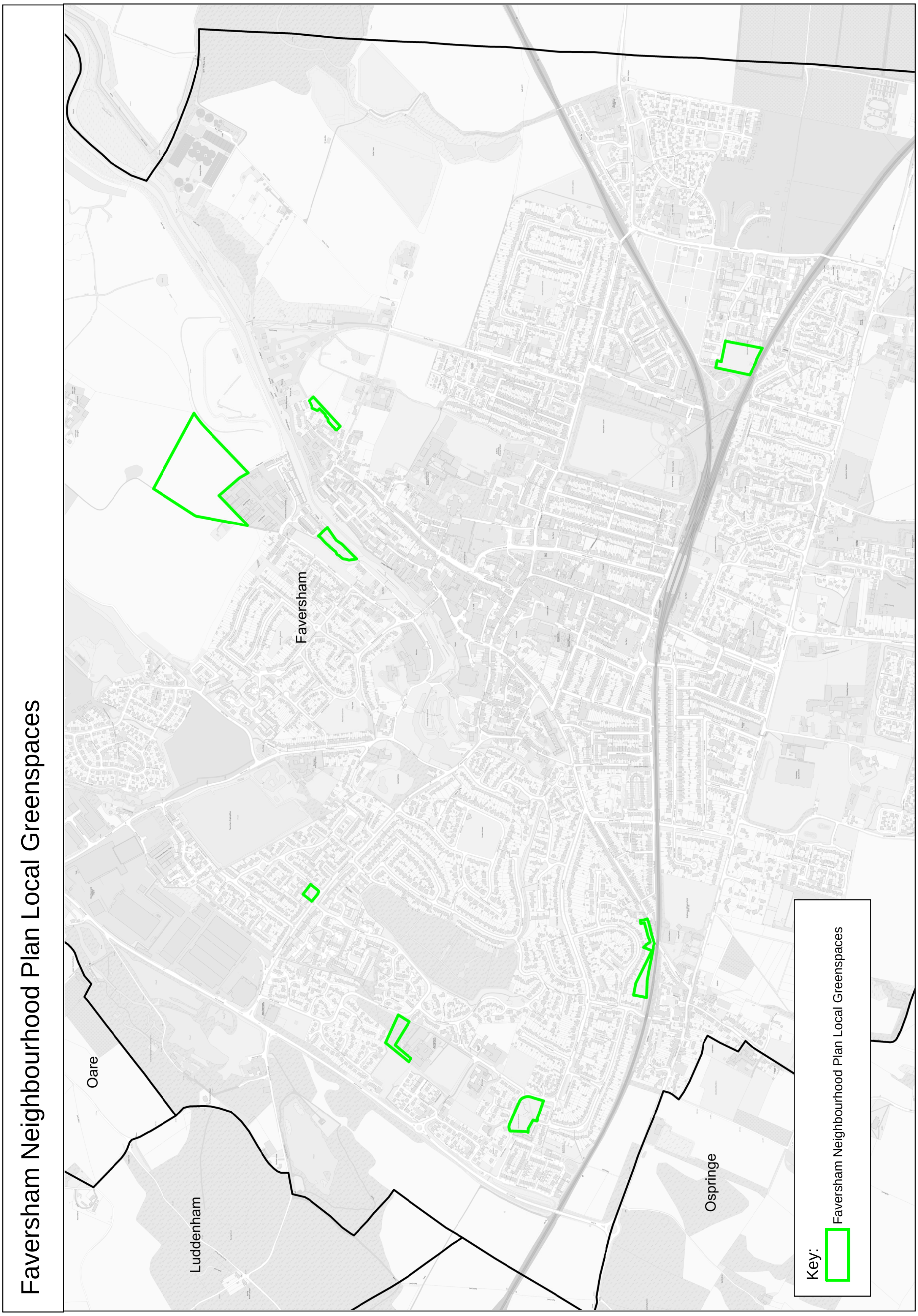
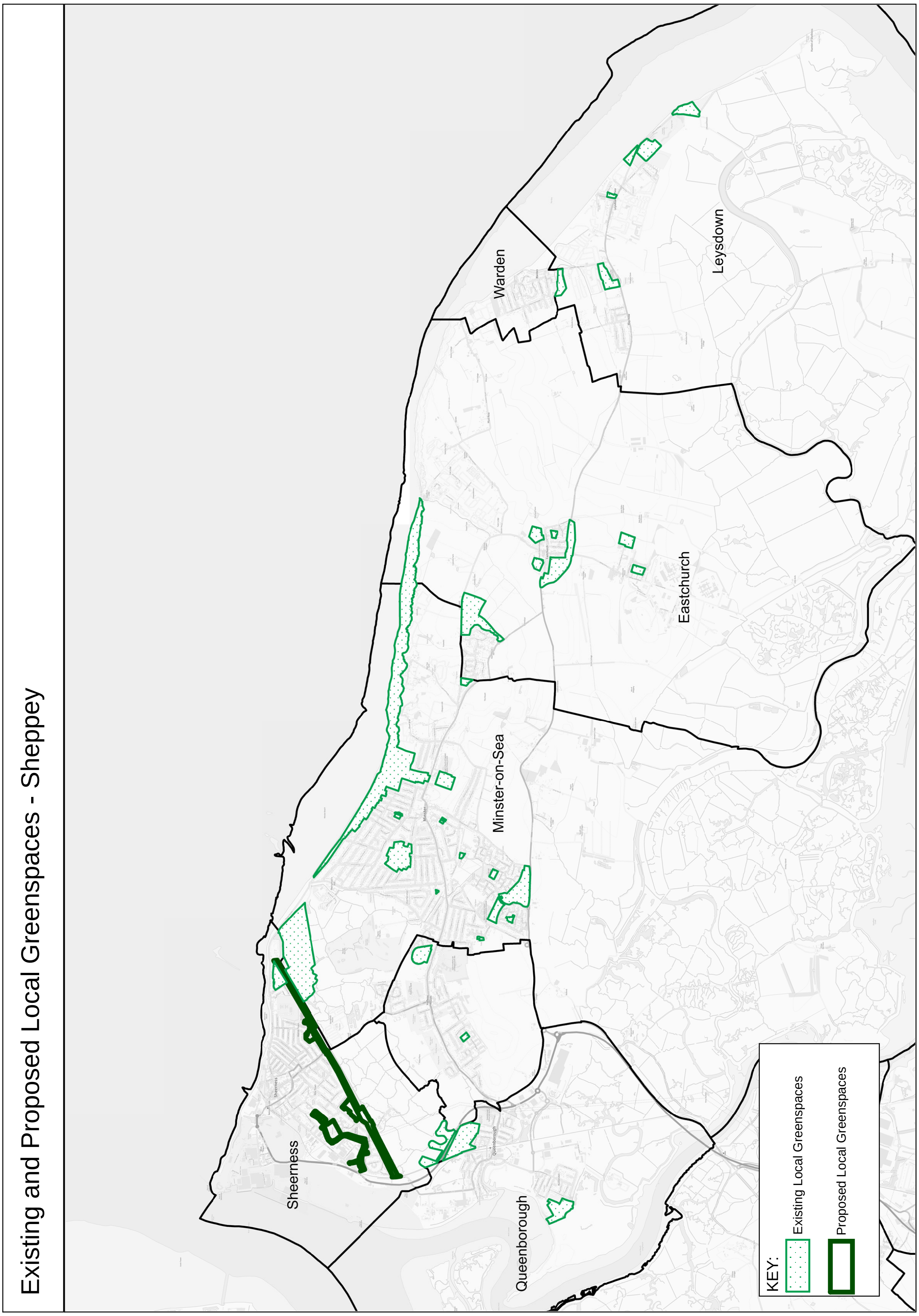
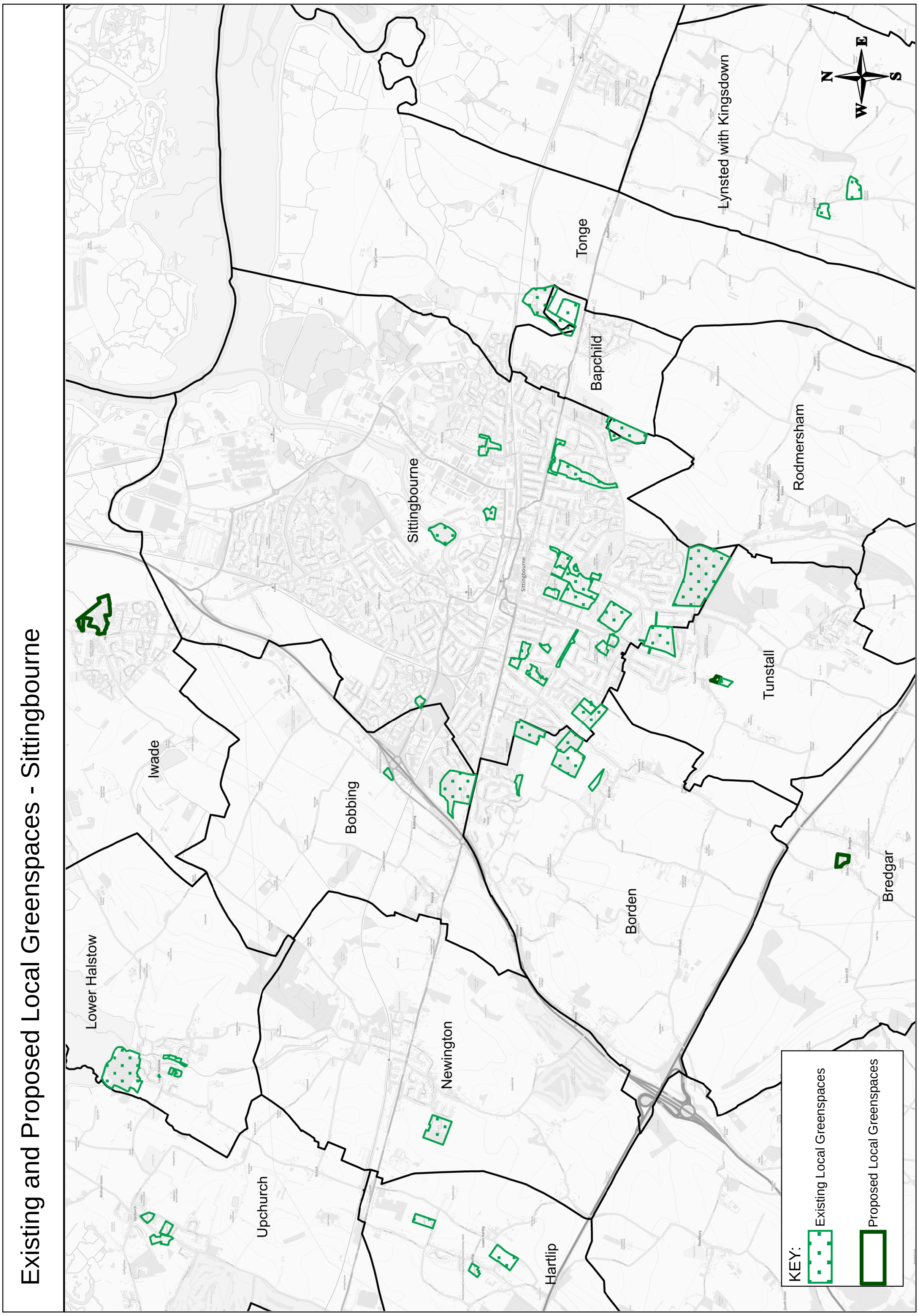


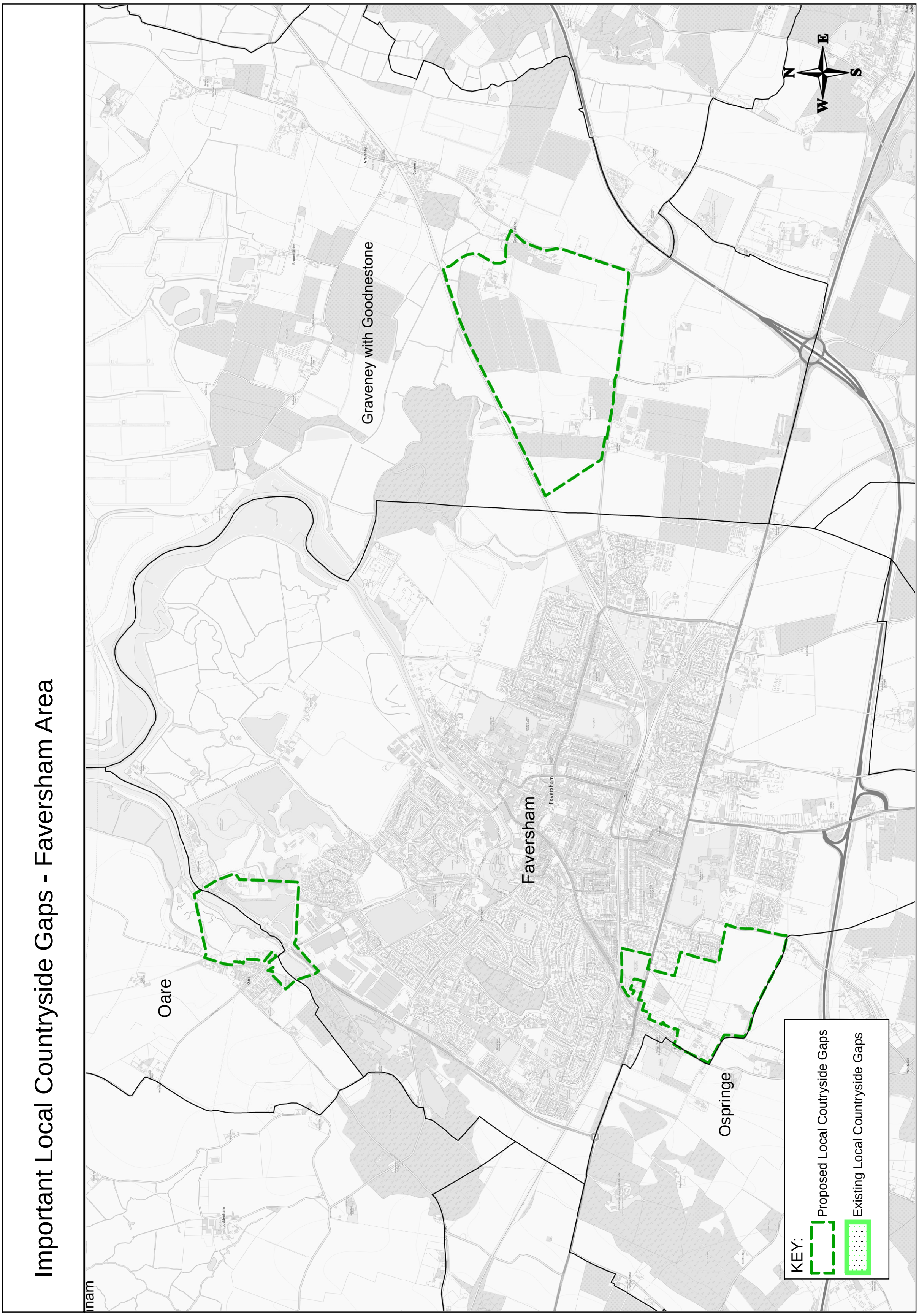
Picture Faversham Neighbourhood Plan Local Greenspaces



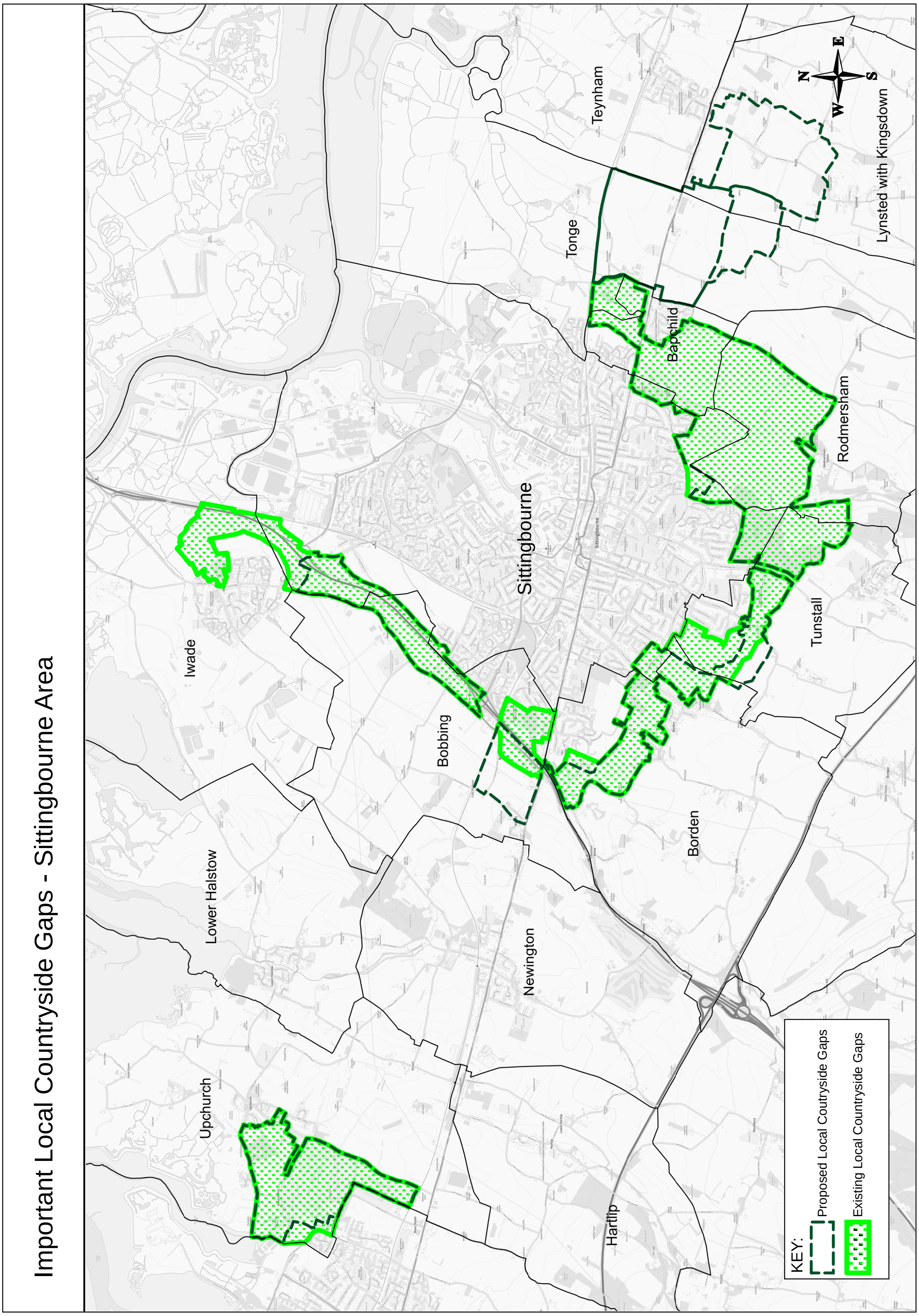
Picture Existing and Proposed Sheppey Local Greenspaces



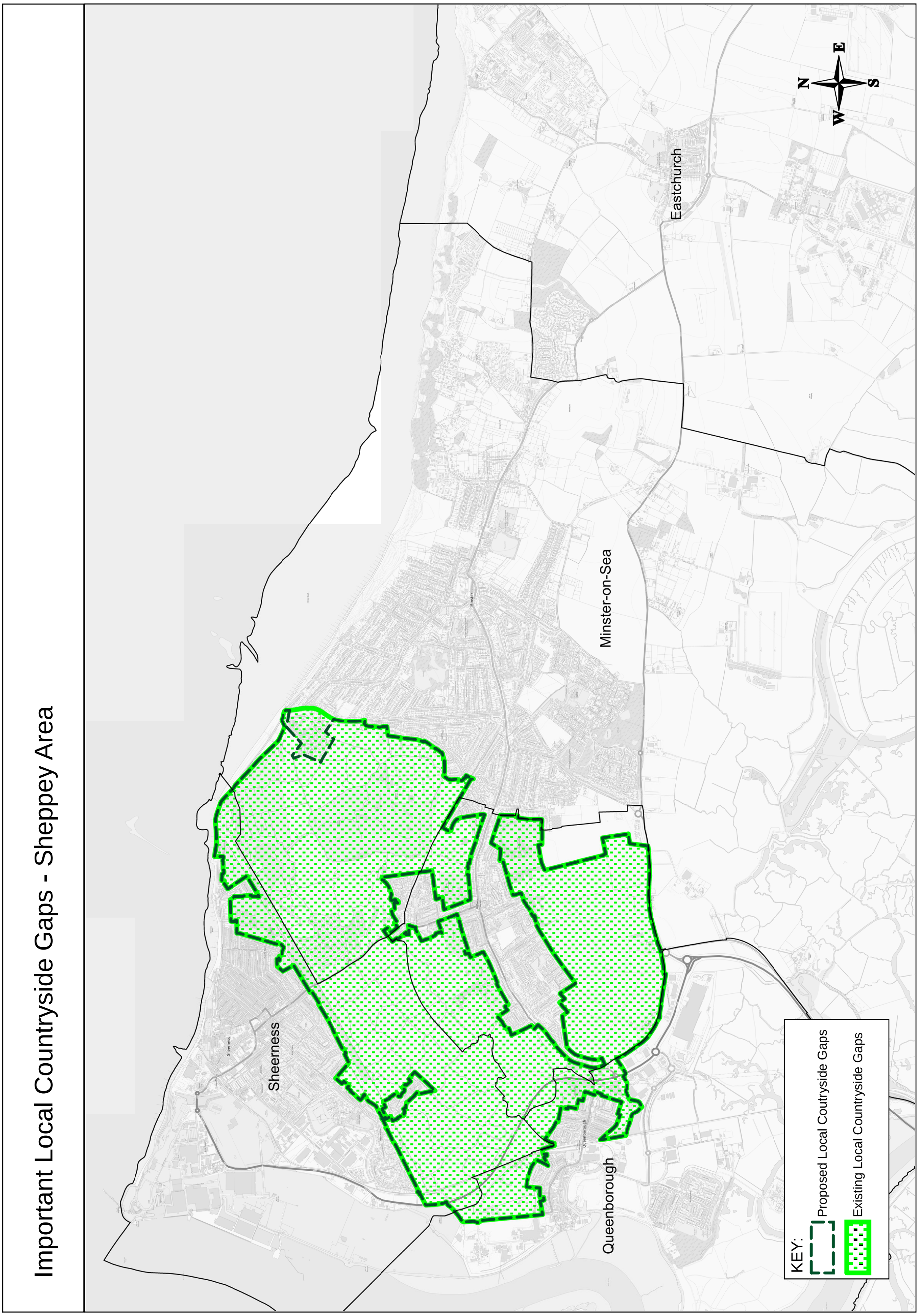
Picture Existing and Proposed Sittingbourne Local Greenspaces



Picture Existing and Proposed Important Local Countryside Gap - Faversham



Picture Existing and Proposed Important Local Countryside Gap - Sittingbourne



Picture Existing and Proposed Important Local Countryside Gap - Sheppey

Appendix II Recommended changes to the policies map

Whole Plan Viability Assessment

2026 Update Note

May 2026

Planning &
Development

Important Notice

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29th May 2026	RS Drummond-Hay MRICS ACIH Director	RS D

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Table of Contents

1. Introduction

1.1 HDH Planning & Development Ltd, produced the *Swale Borough Council Whole Plan Viability Assessment* (HDH, May 2024). The 2024 WPVA built on (and replaced) the Council's existing viability work. This 2026 Update Note considered how changes in national policy, in the emerging Local Plan, and changes to and in the main inputs to the Viability Assessment (costs and values) may impact on viability.

1.2 Firstly, changes to national policy are considered, then changes in house prices and build costs, before the emerging Local Plan is reviewed. This Update Note should be read as an annex to *Swale Borough Council Whole Plan Viability Assessment* (HDH, May 2024).

1.3 As set out towards the end of this note, a further set of appraisals has been run that reflect the various updates and changes made.

2. Changes in National Policy

2.1 Since the 2024 WPVA was completed, numerous changes and potential changes to national policy have been announced. Some changes are as a result of the change in Government following the 2024 General Election, and others are carried forward from the wider updating of national policy.

National Planning Policy Framework

2.2 The 2024 WPVA was carried out in line with the then current NPPF. Since then, the National Planning Policy Framework (NPPF) has been updated.

2.3 The extant NPPF was published in December 2024 (and was further updated in February 2025[1]). This NPPF made some significant changes to the planning system, particularly to the way the overall requirement for housing is assessed (the Standard Method), however, it did not change the place of viability testing in the plan-making process, and the detail beyond that is largely unchanged.

2.4 In December 2025, the Government published a further Draft NPPF[2] for consultation. The Draft NPPF is comprehensive re-write of the national planning policy, making a number of significant changes to the planning system, including the new national decision-making policies. It is proposed that these national decision-making policies are '*read alongside the policies in the development plan*' and are a material consideration when determining planning applications.

2.5 For the purpose of this Update Note, the Draft NPPF carries forward the requirements to carry out a plan-wide viability assessment, and to ensure that the new Local Plan will deliver, making it clear that allocations for development must be viable:

> *2. For plans that allocate specific sites for development the assessment should be undertaken with reference to national guidance and include:*
>
> *a. A thorough site identification process to identify a sufficient range and quantity of potential sites;*
>
> *b An assessment of the availability, suitability and achievability (including likely viability) of those sites;*
>
> *c. An assessment of the amount of development those sites have the potential to accommodate and the potential timescales over which development could be delivered16; and*
>
> *d. The identification of the most appropriate sites for development taking into account the emerging vision and spatial strategy of the plan and the information above.*

2.6 The Draft NPPF also includes proposals to move or duplicate some of the text currently in the PPG, that relates to viability, into the body of the NPPF, thus giving it more weight. Annex B

[1] The December 2024 version of the National Planning Policy Framework was amended in February 2025 to correct cross-references from footnotes 7 and 8, and amend to the end of the first sentence of paragraph 155 to make its intent clear.

[2] National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK

of the explanatory document sets out the reasoning behind the proposed changes in the Draft NPPF, headed '*Viability: Standardised inputs in viability assessment*' says:

> *Standardised inputs to viability assessments provide a consistent framework for evaluating development proposals and ensure both authorities and developers have greater certainty in the viability assessment process.*
>
> *The government is therefore proposing moving the current Planning Practice Guidance sub-section on 'Standardised inputs to viability assessment' into an annex to the draft Framework, and updating where needed, to support the proposed policies PM12, DM5 and GB8 above, subject to views received. The remainder of the existing viability PPG would remain in guidance. The proposed updates seek to support greater consistency, upfront clarity for all interested parties, and reduce the need for negotiation at the decision-making stage. At the same time, the proposals seek to ensure the system remains sufficiently responsive to different development types and risk profiles, to ensure development can proceed.*

2.7 The consultation also sought views on changes in relation to growth testing, developer's returns and benchmark land values. The methodology used in this update note is consistent with the extant December 2024 NPPF, however appropriate regard is had to the Draft NPPF.

2.8 Paragraph 35 of the NPPF says that plans should set out what development is expected to provide, and that the requirement should not be so high as to undermine the delivery of the plan. This requirement is unchanged.

The Golden Rules

2.9 The extant NPPF includes various sections (Paragraphs 67, 68, 155, 156 and 157) concerning releasing land from the Green Belt. Such releases are subject to the Golden Rules which require that the affordable housing contribution, on such releases, to be 15% above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. The SBC area does not include areas of Green Belt, so these rules do not apply here.

Planning Practice Guidance

2.10 The December 2025 consultation on the Draft NPPF asks a number of questions in relation to viability, including views on changes in relation to growth testing, developer's returns and benchmark land values. It does not propose new wording. It will be necessary to keep these under review.

Viability and plan making

2.11 The viability sections of the PPG (Chapter 10) were rewritten in 2018, and subsequently further updated. The changes provide clarity and confirm best practice, rather than prescribe a new approach or methodology. Having said this, the underlying emphasis of viability testing was unchanged.

2.12 The overall requirement was updated in December 2025:

> *<u>How should plan makers set policy requirements for contributions from development?</u>*
>
> *Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). This should include the minimum proportion of Social Rent homes required.*
>
> *These policy requirements should be informed by evidence of infrastructure and affordable housing need, including the need for those who require Social Rent, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, Social Rent and other types of affordable housing requirements should be expressed as a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.*
>
> *PPG 10-001-20251216*

2.13 The 2024 WPVA took a proportionate approach, building on the Council's existing evidence, and considers all the local and national policies that will apply to new development.

> *The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. … Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.*
>
> *PPG 10-002-20251216*

2.14 Whilst the wording was updated, the overall requirement remains similar. The emerging policy options that were under consideration by the Council were be tested individually and cumulatively, to ensure that when taken together, that they are set at an appropriate level.

> *It is the responsibility of land owners, site promoters and developers to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions.*
>
> *PPG 10-002-20251216*

2.15 The Council will continue to engage with the promoters of the key sites in the Plan.

> *Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.*
>
> *PPG 10-003-20180724*

2.16 The 2024 WPVA was based on typologies[3] that were developed by having regard to the potential sites that are most likely to be included in the emerging Plan. 13 potential strategic sites were also modelled, so as to inform a decision (when taken with wider evidence) as to whether or not they were to be included in the final iteration of the Local Plan. These potential strategic sites were modelled based on information provided by the Council, and the refined two preferred sites are now retested, based on the latest information in this Update Note.

> *Plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.*
>
> *It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. It is important for developers and other parties buying (or interested in buying) land to have regard to the total cumulative cost of all relevant policies when agreeing a price for the land. Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.*
>
> *PPG 10-006-20190509*

2.17 Consultation formed part of the preparation of the 2024 WPVA, and the comments made through the Regulation 18 consultation are reviewed below.

Viability and decision taking

2.18 As mentioned above, the December 2025 consultation on the Draft NPPF includes proposals to move or duplicate sections of the text currently in the PPG that relate to viability, into the body of the NPPF, thus giving it more weight.

Standardised inputs to viability assessment

2.19 Several sections have been updated, although the 2024 WPVA remains consistent with the changes. The PPG sets out how land values should be considered, confirming the use of the Existing Use Value Plus (EUV+) approach.

> *To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy*

---

[3] The PPG provides further detail at 10-004-20190509:

A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.

In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan.

requirements. Landowners and site purchasers should consider policy requirements when agreeing land transactions. This approach is often called 'existing use value plus' (EUV+).

PPG 10-014-20190509

2.20 The PPG goes on to set out:

Benchmark land value should:

- *be based upon existing use value*
- *allow for a premium to landowners (including equity resulting from those building their own homes)*
- *reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees*

Viability assessments should be undertaken using benchmark land values derived in accordance with this guidance. Existing use value should be informed by market evidence of current uses, costs and values. Market evidence can also be used as a cross-check of benchmark land value but should not be used in place of benchmark land value. There may be a divergence between benchmark land values and market evidence; and plan makers should be aware that this could be due to different assumptions and methodologies used by individual developers, site promoters and landowners.

This evidence should be based on developments which are fully compliant with emerging or up to date plan policies, including affordable housing requirements at the relevant levels set out in the plan. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic benchmark land values of non-policy compliant developments are not used to inflate values over time.

In plan making, the landowner premium should be tested and balanced against emerging policies. In decision making, the cost implications of all relevant policy requirements, including planning obligations and, where relevant, any Community Infrastructure Levy (CIL) charge should be taken into account.

PPG 10-015-20190509

2.21 The December 2025 consultation on the Draft NPPF asks a number of questions in relation to deriving the BLV. The approach adopted in this Update Note is to start with the EUV. The 'plus' element is informed by the price paid for policy compliant schemes to ensure an appropriate landowners' premium.

Existing use value (EUV) is the first component of calculating benchmark land value. EUV is the value of the land in its existing use. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the type of site and development types. EUV can be established in collaboration between plan makers, developers and landowners by assessing the value of the specific site or type of site using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield (excluding any hope value for development).

Sources of data can include (but are not limited to): land registry records of transactions; real estate licensed software packages; real estate market reports; real estate research; estate agent websites; property auction results; valuation office agency data; public sector estate/property teams' locally held evidence.

PPG 10-016-20190509

2.22 The methodology used in the 2024 WPVA followed this approach to establish the EUV. This approach was carried into this update.

Community Infrastructure Levy Regulations and Guidance

2.23 The Council has not adopted CIL. The CIL Regulations are broad so, in any event, it is necessary to have regard to them. The CIL Regulations have not been updated since 2020 so CIL Regulation 122 remains as being of particular importance. This sets out that payments requested under the s106 regime must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Wider Changes Impacting on Viability

2.24 The Draft NPPF includes proposals to move or duplicate some of the text currently in the PPG, that relates to viability, into the body of the NPPF, thus giving it more weight. The consultation then seeks views on changes in relation to growth testing, developer's returns and benchmark land values. It will be necessary to keep this under review.

2.25 There have been several changes at a national level over the last few years that are timely to mention.

Accessible and Adaptable Standards

2.26 In July 2022, the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes[4]. At that time the Government said that it intended to mandate M4(2) (Category 2: Accessible and Adaptable dwellings) requirement in Building Regulations as a minimum standard for most new homes. This was reflected in the appraisals in the 2024 WPVA.

2.27 In the Draft NPPF, under policy *HO5: Meeting the needs of different groups*, the Government proposed the following text:

> *In relation to accessible housing, setting out the proportion of new housing that should be delivered to requirement M4(2) and M4(3) of the Building Regulations. M4(2) requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards.*

2.28 The requirement tested in the 2024 WPVA was for 95% M4(2) housing and 5% (M4)3 housing, so is consistent in this regard.

Environmental Standards

2.29 In the spring of 2024, the Government carried out a consultation on how national standards may be changed as part of the move to Zero Carbon. The Department of Levelling up, Communities and Housing published revisions to Conservation of Fuel and Power, Approved

[4] Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK (www.gov.uk)

Document L of the Building Regulations as a 'stepping stone' on the pathway to Zero Carbon homes that sets the target of an interim 31% reduction in CO_2 emissions over 2013 standards for dwellings. This is assumed to apply to all new homes in this assessment.

2.30 In 2023 the then Housing Minister made a Written Parliamentary Statement[5] which set out the Government's position in this regard. Whilst this did does not preclude the introduction of policies that go beyond national standards, this does suggest that such policies will need to be well justified and subject to greater scrutiny.

2.31 Under the Draft NPPF, the Government consulted on the following text:

Plan-making policies

CC1: Planning for climate change

1 Development plans should take a proactive approach to mitigating climate change and supporting the transition to net zero30. They should also take a proactive approach to adapting to climate change, taking into account the implications of extreme weather and long-term climate trends including overheating, wildfires, drought, flood risk, coastal change, water supply, biodiversity and landscapes. They should do this by:

a. Proposing development patterns through their spatial strategy and allocations which:

i. can help contribute to radical reductions in greenhouse gas emissions (which can be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions and their mitigation); and

ii. avoid increased vulnerability and improve resilience to the effects of climate change (including through providing for necessary infrastructure improvements and the future relocation of homes and other uses where public safety would be at risk, for example as a consequence of coastal change);

b. Addressing any specific risks from climate change in their proposed allocations for development, and necessary adaptations, both of which should be considered for the anticipated lifetime of the development;

c. Setting local water efficiency standards for new development where these are justified in accordance with policy PM13; and

d. Identifying opportunities for green infrastructure provision and nature-based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies in accordance with policy N1.

National decision-making policies

CC2: Mitigation of climate change

1. In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:

a. Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4;

b. Support good access to facilities to limit the need to travel, whether through the development's location, through development densities which improve

[5] Written statements - Written questions, answers and statements - UK Parliament

catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities;

c. Use design approaches which conserve energy and other resources in accordance with policy DP3(1)(c);

d. Take advantage of opportunities to re-use existing structures and materials, including by re-using non-contaminated excavated soil and hardcore within the site;

e. Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy;

f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and

g. Not increase the extraction of fossil fuels unless it is in accordance with policy M5.

2. Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

2.32 The Draft NPPF consultation also says (on page 16):

> ***6 Streamlining local standards.*** *We want to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those specific issues where local variation is justified. We also want to limit duplication of matters which are covered by the Building Regulations – other than where there is the existing ability to use 'optional technical standards'.*

2.33 The Draft NPPF consultation, in Policy *PM13: Setting standards* says:

1. Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking, and where this will provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. Such standards should:

a. Be justified, drawing upon relevant evidence of local characteristics and needs, while utilising or adapting relevant national standards where it is appropriate to do so (such as in relation to green infrastructure). Evidence in support of standards should be proportionate, in accordance with policy PM8, especially where relevant national standards already exist;

b. Not cover matters which are already addressed by Building Regulations, other than in relation to:

i. accessibility standards, for which local standards in relation to requirement M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in line with policy HO5; or

ii. water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress.

c. Not cover matters relating to the construction or internal layout of buildings unless they are to implement the nationally described space standard.

2.34 The Draft NPPF consultation, in Policy *PM13: Setting standards*, says:

> *In addition, the policy proposes preventing standards which cover matters already addressed by building regulations, with the exception of the established national technical standards for accessibility and water efficiency. In relation to water efficiency, the policy recognises that some areas may need to set a tighter standard than the existing optional requirement, due to the pressure on water supplies. This reflects relevant parts of the Written Ministerial Statement made on 19 December 2023 titled The Next Stage in Our Long-Term Plan for Housing Update. The Department for Environment, Food and Rural Affairs ongoing consultation on revising water efficiency standards will not affect this policy.*
>
> *Beyond these areas, the policy identifies specific areas where local standards should not be set. This includes matters relating to the construction or internal layout of buildings (other than the nationally described space standard), which the government considers are matters best left to the market to determine.*
>
> *The policy as drafted would limit local standards for energy efficiency, as we are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. If this specific restriction were to be taken forward following consultation, we intend to use secondary legislation to commence section 43 of the Deregulation Act 2015 to amend the Planning & Energy Act 2008 to make clear that local plans should not set higher energy efficiency standards for residential development. The draft Framework policy would also replace the policy contained in the 2023 Written Ministerial Statement titled Planning – Local Energy Efficiency Standards Update.*

2.35 The Government announced in March 2026 that it will be implementing the Future Homes Standard and Future Building Standard through Building Regulations in March 2027[6].

2.36 The draft Local Plan policy exceeds current national standards and the Future Homes Standard. The policy is included, based on information provided by the Council's climate change consultants (Bioregional), in the appraisals at the end of this Update Note.

Biodiversity Net Gain

2.37 The Environment Act received Royal Assent in November 2021 and mandates that new developments must deliver an overall increase in biodiversity. The PPG was updated in 2024[7] in this regard. The requirement is that developers ensure habitats for wildlife are enhanced relative to pre-development state. Developers must assess the type of habitat and its condition before submitting plans and then demonstrate how they are improving biodiversity.

2.38 Green improvements on-site are preferred (and expected), but in the circumstances where they are not possible, developers will need to pay a levy for habitat creation or improvement elsewhere. The mandatory BNG requirement was introduced for most major developments from February 2024, and for small sites/minor development from April 2024.

> *The definition of a minor development for the purposes of BNG is development that is not major development and includes:*
>
> - *residential development where the number of dwellings is between 1 and 9 on a site of an area 1 hectare or less, or if the number of dwellings is unknown, the site area is less than 0.5 hectares.*

[6] FHBS_Circular.pdf

[7] Biodiversity net gain - GOV.UK (www.gov.uk)

- *commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare.*
- *development that is not the winning and working of minerals or the use of land for mineral-working deposits.*
- *development that is not waste development.*

2.39 In May 2025 the Government undertook a consultation[8] on the implementation of BNG. This would introduce a '*new medium development threshold for sites between 10 and 49 homes, up to 1.0 ha in size*'. Alternatively, consideration was given to exempting all minor developments. Bearing in mind that this was a consultation, the outcome of which is not yet known, it is assumed the BNG requirements remain as per the extant NPPF and PPG.

2.40 The Draft NPPF consultation in Policy *N1: Identifying environmental opportunities and safeguards*, says:

> *Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Any such requirements should not extend to categories of development which are exempt from statutory biodiversity net gain.*

2.41 Pending publication of revised standards, the national requirements are unchanged (although, as set out later, the SBC will be seeking 20% BNG rather than 10% BNG).

Fire Safety Standards

2.42 The Government published the outcome in March 2024 in the updated Building Regulations[9]. The guidance makes second staircases mandatory in all new residential buildings over 18m (about 6 storeys) in England from September 2026. The modelling in the further appraisals set out at the end of this note reflect this.

Levelling-up and Regeneration Act

2.43 The *Levelling-up and Regeneration* Act become law in 2023. Many of the measures in the Act will be implemented, in due course, through secondary legislation and / or regulations. The provisions within the Act will have a significant impact on the overall plan-making process, but they do not alter the place of viability in the current Local Plan process.

2.44 The *Levelling-up and Regeneration Act* includes reference to a new national Infrastructure Levy. The Government has announced that this will not be taken forward.

Planning Application Fees

2.45 Planning fees increase each year. The updated amounts are applied[10] in the appraisals set out at the end of this note.

[8] Improving the implementation of biodiversity net gain for minor, medium and brownfield development - GOV.UK

[9] Amendments to the Approved Documents - Approved Document B: Fire safety volumes 1 and 2 (publishing.service.gov.uk)

[10] Planning fees: annual indexation from 1 April 2026

Building Safety Levy

2.46 The Building Safety Levy (BSL) was announced in February 2021 to pay for the remediation of building safety defects as part of the response to the Grenfell Tower fire. In March 2025, the Government announced that the Levy will be introduced in Autumn 2026. In Swale, the Levy, if introduced as per the consultation, would be £15.86 per sqm for brownfield land and £31.72 per sqm for greenfield land[11] and would apply to major development.

2.47 The BSL was not included in the 2024 WPVA. It is included in the appraisals at the end of this note.

Viability Guidance

2.48 Neither the NPPF nor the PPG set out step-by-step technical guidance, although the updated PPG includes guidance in a number of specific areas. The earlier viability work drew on the *Viability Testing in Local Plans – Advice for planning practitioners* (LGA/HBF – Sir John Harman) June 2012[12] (known as the Harman Guidance[13]), and followed the relevant RICS guidance being the *Financial viability in planning: conduct and reporting RICS professional statement, England* (1st Edition, May 2019) and A*ssessing viability in planning under the National Planning Policy Framework 2019 for England, GUIDANCE NOTE* (RICS, 1st edition, March 2021).

2.49 No further relevant guidance has been published.

Affordable Housing

2.50 Paragraph 65 of the extant NPPF sets out national thresholds for the provision of affordable housing. These are unchanged since 2024:

> *Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.*

2.51 Two requirements of earlier national policy have been dropped. Under Footnote 31 of the NPPF, the requirements for 25% for the affordable housing to be First Home no longer applies. The requirement for 10% of all homes to be Affordable Home Ownership (as per paragraph 66 of the 2023 NPPF[14]) no longer applies.

2.52 The Council has updated its draft policy in this regard, to seek a tenure mix that aligns more closely with its identified need. This also takes into account the greater emphasis for Social

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[11] Building Safety Levy: Technical consultation response - GOV.UK

[12] Viability Testing in Local Plans has been endorsed by the Local Government Association and forms the basis of advice given by the, MHCLG funded, Planning Advisory Service (PAS).

[13] viability-testing-local-p-42b.pdf

[14] [ARCHIVED CONTENT]

Rent as per paragraphs 64 and 71 of the NPPF. This change is reflected in the appraisals set out at the end of this Note.

3. Changes in House Prices

Market Housing

3.1 The residential value assumptions in the 2024 WPVA were researched and gathered in April 2024. Since then, house prices have changed. There are a range of data sources that can be referenced; however the Land Registry is the most complete.

Table 3.1 Change in Average House Prices

	Swale	Kent	England & Wales
2024-04	£282,577	£334,282	£272,735
2026-02	£289,812	£345,239	£284,720
Change	£7,235	£10,957	£11,985
	2.6%	3.3%	4.4%

Source: Land Registry (May 2026)

3.2 This data shows that average prices have increased a little in Swale, however, they have increased a little more in Kent and across England and Wales. This data can be disaggregated and newbuild sales separated out.

Table 3.2 Change in Average Newbuild House Prices – Swale

	Newbuild	**Existing**
2024-04	£442,021	£276,601
2025-12	£485,059	£284,540
Change	£43,038	£7,939
	9.7%	2.9%

Source: Land Registry (May 2026)

3.3 The Land Registry's latest data suggests that the average newbuild sale price in the Borough has increased by about 10% since the 2024 WPVA was completed.

3.4 The 2024 WPVA included data on newbuild price paid data sourced from Landmark (Tables 4.4 and 4.5 and Figure 4.7). In this note, similar data from Landstack is analysed, the price paid data from the Land Registry is married with the floor areas sourced from the EPC Register, for newbuild sales since the start of 2023. As set out in Table 4.4 of the 2024 WPVA, there is little data from the most recent years. The updated data has limited data from 2025 and 2026.

Table 3.3 Newbuild Price Paid Data by Year – Swale BC 2023 - 2026

	Bungalow	Detached	Flats	Semi-detached	Terraced	**All**
Count						
2023	2	85	9	81	31	208
2024	5	127	20	118	29	299
2025	4	85	0	42	19	150
2026	0	0	0	0	0	0
All	**11**	**297**	**29**	**241**	**79**	**657**
Average of Price Paid £						
2023	£327,500	£498,905	£194,722	£342,612	£343,321	£400,043
2024	£412,000	£490,497	£192,375	£334,162	£344,620	£393,397
2025	£417,500	£504,985		£344,896	£350,576	£438,269
2026						
All	**£398,636**	**£497,050**	**£193,103**	**£338,873**	**£345,543**	**£405,746**
Average of £ per sqm						
2023	£4,658	£4,283	£3,354	£4,095	£3,641	£4,083
2024	£5,328	£4,113	£3,302	£3,869	£3,511	£3,967
2025	£5,768	£4,191		£4,193	£3,536	£4,158
2026						
All	**£5,366**	**£4,184**	**£3,343**	**£3,998**	**£3,570**	**£4,049**

Source: Landstack (May 2026)

3.5 The data above compares with that presented in Table 4.5 of the 2024 WPVA. And suggests that average houseprices have increased marginally, but when considered on a £ per sqm basis are unchanged

Table 3.4 Change in Newbuild Price Paid Data – Swale BC

	2022 to 2024	2023 to 2026	Change	
Bungalow		£398,636	£398,636	
Detached	£472,858	£497,050	£24,192	5.12%
Flats	£180,628	£193,103	£12,475	6.91%
Semi-detached	£355,826	£338,873	-£16,953	-4.76%
Terraced	£341,659	£345,543	£3,884	1.14%
All	£397,747	£405,746	£7,999	2.01%
Bungalow		£5,366	£5,366	
Detached	£4,222	£4,184	-£38	-0.89%
Flats	£3,030	£3,343	£313	10.32%
Semi-detached	£4,181	£3,998	-£183	-4.38%
Terraced	£3,697	£3,570	-£127	-3.43%
All	£4,051	£4,049	-£2	-0.05%

Source: Landstack (May 2026)

3.6 The above data can be disaggregated and is presented in **Appendix 1**. The data compares with that presented in Appendix 6 of the 2024 WPVA.

3.7 A survey of newbuild asking prices was carried out in February 2023. This was refreshed in December 2023 and April 2024.

a. In February 2023, there were 60 new homes being advertised for sale in the Council area. The analysis of these showed that asking prices for newbuild homes started at £162,500 and went up to £775,000. The average was about £429,000 (£4,221 per sqm).

b. In December 2023, there were 94 new homes being advertised for sale in the Council area. The analysis of these showed that asking prices for newbuild homes started at £1162,500 and went up to £950,000. The average was about £407,000 (£4,097 per sqm).

c. In April 2024, there were 128 new homes being advertised for sale in the Council area. The analysis of these shows that asking prices for newbuild homes start at £270,000 and go up to over £1,200,000. The average was about £460,000 (£4,274 per sqm).

3.8 The survey data was further refreshed in 2026, when there were 107 newbuild homes being advertised for sale. The research is presented in **Appendix 2** and summarised below:

Table 3.5 Survey of Newbuild Asking Prices – April 2026.

		Detached	Flat	Semi-detached	Terraced
Aile Homes					
Monarch Place	£	£608,333		£475,000	£462,500
	£/sqm	£4,588		£4,398	£4,302
Barratt					
Cherry Meadow@Applegate Park	£				£348,328
	£/sqm				£4,820
Crest Nicholson					
Crown Meadows	£	£610,625			
	£/sqm	£4,355			
DWH					
Mulberry Rise @Applegate Park	£	£452,995		£378,995	
	£/sqm	£3,992		£3,509	
Fernham Homes					
Love Lane	£	£707,250		£427,500	
	£/sqm	£4,706		£4,294	
Jones Homes					
Shurland Park	£			£335,882	
	£/sqm			£4,369	
Kayleigh Stevens					
Callum Park	£	£1,138,500			
	£/sqm	£3,760			
Matthews Homes					
Blake Gardens	£	£411,667			
	£/sqm	£3,477			
Pentland Homes					
Grovehurst gate	£	£525,000		£384,000	£315,000
	£/sqm	£4,614		£4,278	£4,500
Persimmon					
Moores Quarter	£				£391,333
	£/sqm				£3,824
Ovinia Chase	£	£388,639		£368,225	
	£/sqm	£4,575		£4,216	
Redrow					
Amber Fields	£	£530,000			
	£/sqm	£3,985			
Preston Fields	£	£696,667		£410,000	£370,000
	£/sqm	£4,564		£4,556	£3,217
Regent Quay	£	£575,000			
	£/sqm	£4,259			
Riverdale Developments					
Scholars Place	£			£384,950	
	£/sqm			£3,883	
Rosechurch Homes					
Edgelake	£	£450,000		£454,500	
	£/sqm	£4,167		£3,987	
Swale Borough	£	**£573,957**		**£369,590**	**£376,726**
	£/sqm	**£4,285**		**£4,262**	**£4,250**

Source: Market Survey (April 2026) (The blanks indicate where no asking price and or GIA is available.

3.9 In 2024 the average newbuild asking price was about £460,000 (£4,274 per sqm). The updated research shows that asking prices for newbuild homes start at £275,000 and go up to over £1,395,000. The average is now about 3% higher at about £473,300 and on a floor area basis is unchanged at £4,953 per sqm.

Affordable Housing Values

3.10 The derivation of the value assumptions for affordable housing was set out from paragraph 4.54 of the 2024 WPVA.

3.11 In the 2024 WPVA, the assumptions were that Social Rent would have a value of £1,300 per sqm of market value (para 4.59), and Affordable Rent would have a value of £2,400 per sqm of market value (para 4.65). It was also assumed that Affordable Home Ownership units would have a value of 70% market value (para 4.70).

3.12 The assessment of values has been updated using the same method, however the yield assumption has been increased to 5%. The calculations are set out in **Appendix 3**.

3.13 An updated value of £1,400 per sqm is derived for Social Rent, and the Affordable Rent assumption is unchanged.

The Wider Housing Market

3.14 The development identified in the new Local Plan will be built out over many years and across development cycles. It is useful to consider how values may change in the future. There is a degree of uncertainty in the housing market as reported by the RICS. The April 2026 RICS UK Residential Market Survey[15] said:

> ***Higher mortgage rates continue to dampen buyer demand***
>
> - *Sales market activity indicators remain firmly negative*
> - *Headline house prices continue to see moderate downward pressure*
> - *Forward-looking sentiment points to a subdued picture over the months ahead*
>
> *The April 2026 RICS Residential Market Survey results continue to reflect a challenging global macroeconomic backdrop, with the associated rise in interest rate expectations weighing on buyer demand. Moreover, near-term sentiment indicators suggest that these subdued conditions are set to persist over the coming months, while the outlook for the year ahead has softened noticeably.*
>
> *From an aggregate perspective, the new buyer enquiries series registered a net balance of -34% in April. While this is marginally less downbeat than the -40% reading recorded last month, it still points to weak market momentum, with almost all regions of the UK experiencing a noticeable softening in demand.*
>
> *At the same time, the agreed sales indicator posted a net balance of -36% in the latest survey (compared with -35% previously), signalling that a firmly downward trend remains in place. Looking ahead, the near-term sales expectations balance of -32% suggests that the current muted conditions are likely to persist over the coming months. At the twelve-month horizon, sales expectations have edged into marginally negative territory (net balance of -6%), with this metric weakening progressively over each of the past three months.*
>
> *With regard to supply, the new instructions indicator recorded a broadly flat net balance of -3% in April (compared with -6% previously), suggesting that the flow of new listings coming onto*

[15] UK Residential Market Survey

the sales market was largely stagnant over the month. However, the new appraisals measure (which asks respondents to compare activity with the same period twelve months earlier) posted a net balance of -16%, down from zero last month. As such, this points to a potential slowdown in the pipeline of new instructions going forward.

At the headline level, the house price indicator recorded a net balance of -34%, marking a further deterioration from the -25% reading seen last month. Regional results point to a growing divergence between the North and South, with more pronounced downward pressure on prices evident in London, the South East, East Anglia and the South West. By contrast, the North West and the North of England continue to post marginally positive readings for the time being. Meanwhile, house prices are still rising across Scotland and Northern Ireland.

Returning to the aggregate level, near-term house price expectations remain negative, with a net balance of -38%, although this is less weak than the -45% reading recorded last month. Looking ahead over a twelve-month horizon, a net balance of +5% of contributors now expects prices to rise, albeit only marginally. That said, this represents the flattest reading for this series since late 2023. When broken down by region, London, the South East and East Anglia all now show moderately negative house price expectations for the year ahead (on a net balance basis).

Across the rental market, tenant demand edged higher, with a net balance of +14% of respondents reporting an increase (from the seasonally adjusted quarterly lettings dataset). Meanwhile, the landlord instructions measure remained negative, albeit slightly less so than last quarter, registering a net balance of -17% (compared with -24% previously). Looking ahead, a net balance of +25% of contributors anticipates rental prices rising, broadly in line with the average reading seen over the past year.

3.15 HM Treasury brings together some of the forecasts in its regular *Forecasts for the UK economy: a comparison of independent forecasts* report.

Table 3.6 Consolidated House Price Forecasts

Table 2 - 2026: Growth in prices and monetary indicators (% change)

Forecasters and dates of forecasts			CPI (Q4 on Q4 year ago, %)	RPI (Q4 on Q4 year ago, %)	Average earnings (Q4 on Q4 year ago, %)	Sterling index (Jan 2005=100)	Official Bank rate (level in Q4, %)	Nominal GDP	House price inflation (Q4 on Q4 year ago, %)
City forecasters									
Barclays Capital	April	*	3.2	4.6	-	-	3.75	-	-
Berenberg	March		2.5	-	2.8	-	3.00	-	-
Bloomberg Economics	Dec		2.1	-	-	-	3.50	-	-
Capital Economics	April	*	4.6	5.9	2.3	81.1	3.75	3.3	1.5
Deutsche Bank	April	*	3.4	4.6	-	-	3.75	-	-
HSBC	April	*	2.7	4.6	3.6	85.4	3.75	-	2.0
JP Morgan	April	*	3.7	-	-	-	4.00	3.4	-
KPMG	March		3.1	-	-	-	3.50	-	-
Natwest Markets	April	*	3.8	4.6	3.2	-	3.75	3.6	-
Nomura	March		2.5	3.1	3.0	-	3.25	-	-
Pantheon	Jan		2.7	2.9	4.0	-	3.50	-	2.0
UBS	April	*	3.7	4.2	3.1	-	3.50	3.8	-
Non-City forecasters									
British Chambers of Commerce	April	*	2.7	-	3.9	-	3.75	-	-
Beacon Economic Forecasting	April	*	2.9	3.5	3.7	83.7	4.00	4.6	1.2
CBI	Dec		2.4	2.6	2.8	-	3.50	3.9	-
CEBR	March		2.0	3.0	3.1	85.0	3.25	-	4.5
Experian Economics	April	*	3.7	4.3	3.0	-	3.75	-	0.1
Heteronomics	April	*	3.9	4.6	3.6	85.4	3.75	-	2.0
ICAEW	Jan		2.1	-	-	-	3.25	-	-
ITEM Club	Feb		2.3	-	-	-	3.5	-	2.8
Liverpool Macro Research	Jan		2.3	3.1	3.5	84.2	3.25	-	-
NIESR	Feb		2.2	3.3	3.7	-	3.25	-	-0.2
Oxford Economics	April	*	4.5	5.4	4.3	81.7	3.75	3.0	0.7
OECD	March	*	4.0	-	-	-	-	-	-
IMF	April	*	3.2	-	-	-	-	-	-
Average of forecasts received in the last 3 months (excludes OBR, IMF and OECD forecasts)									
Independent			3.2	4.3	3.3	83.7	3.6	3.6	1.6
Received this month (marked *)			3.6	4.6	3.4	83.5	3.8	3.6	1.3
City			3.3	4.5	3.0	83.2	3.6	3.5	1.8
Range of forecasts received in the last 3 months (excludes OBR, IMF and OECD forecasts)									
Highest			4.6	5.9	4.3	85.4	4.00	4.6	4.5
Lowest			2.0	3.0	2.3	81.1	3.00	3.0	-0.2
Median			3.1	4.6	3.2	84.4	3.75	3.5	1.5
OBR	Mar		1.9	2.9	3.1	84.6	3.31	3.3	2.7

Source: Forecasts for the UK economy: a comparison of independent forecasts No 465 (HM Treasury, April 2026).

3.16 Property agents Savills are forecasting the following changes in house prices, suggesting continued growth:

Table 3.7 Savills Property Price Forecasts

	2026	2027	2028	2029	2030	5 Years to Sept 2030
Mainstream UK	2.0%	4.0%	5.0%	5.5%	4.0%	22.2%
Prime Regional	1.5%	3.0%	4.0%	4.5%	3.5%	17.6%
Prime Wider South	1.5%	3.0%	4.0%	4.5%	3.5%	17.6%
South East	1.0%	3.0%	4.0%	4.5%	3.5%	17.0%
UK Rents	2.0%	2.0%	2.5%	2.5%	2.5%	12.0%

Source: Savills [16]

3.17 In this context is relevant to note that the Nationwide Building Society reported in April 2026[17]:

House price growth remained resilient in April

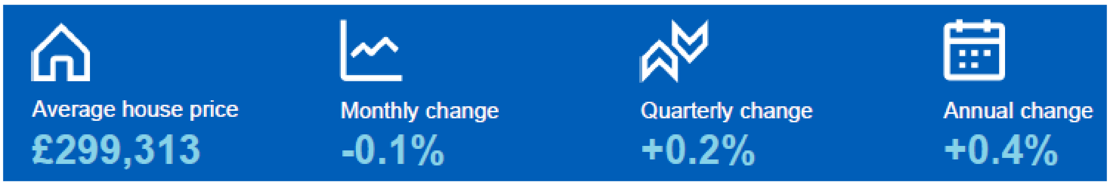
- *UK annual house price growth picked up to 3.0% in April, from 2.2% in March*
- *House prices were up 0.4% month on month*

Headlines	Apr-26	Mar-26
Monthly Index*	554.8	552.7
Monthly Change*	0.40%	0.90%
Annual Change	3.00%	2.20%
Average Price (not seasonally adjusted)	£278,880	£277,186

** Seasonally adjusted figure (note that monthly % changes are revised when seasonal adjustment factors are re-estimated)*

3.18 Nationwide produces regional figures on a quarterly basis. This data suggests, for the Outer South East, an annual -0.7% change in Q1 2026 and an annual 0.1% change from the previous quarter.

3.19 Halifax Building Society reported a slightly different situation in May 2026[18]:



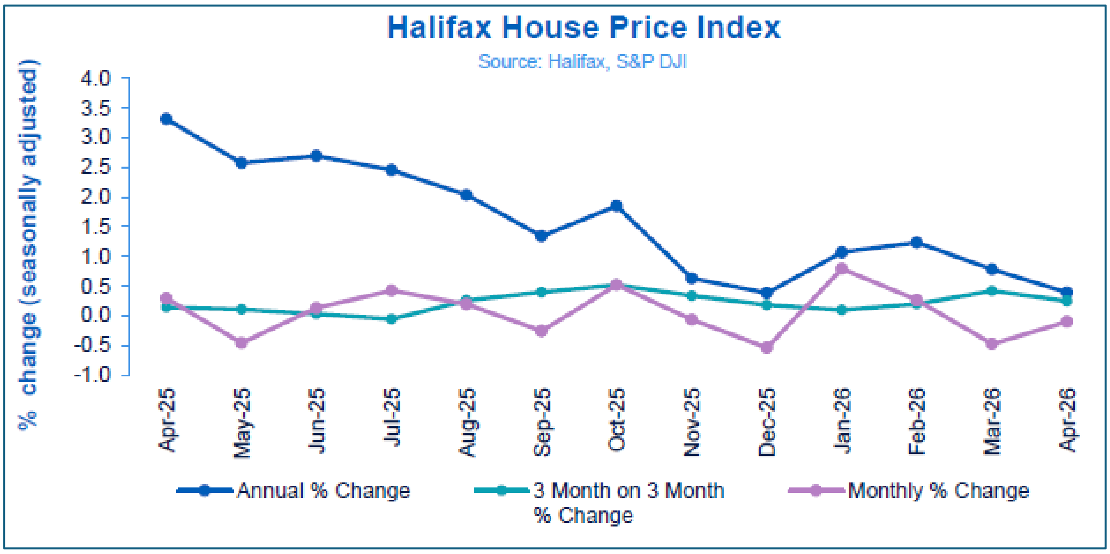
House prices remained broadly stable in April

- ***House prices edged down -0.1% in April, following a -0.5% fall in March***
- *Average property price now £299,313, compared with £299,609 in March*
- *Annual growth slowed to +0.4%, from +0.8% in March*
- *Northern Ireland continues to record the strongest annual growth at +7.6%*

[16] Savills UK | Residential Property Market Forecasts

[17] Nationwide HPI News - Reports

[18] Halifax UK | House Price Index | Media Centre



3.20 Whilst there is clearly uncertainty in the market, a degree of house price growth is anticipated.

3.21 The final section of this note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in values has been carried out.

4. Changes in Development Costs

4.1 The build costs in the 2024 WPVA, as suggested in the PPG, were derived from the BCIS data. The cost figure for Swale for 'Estate Housing – Generally' was £1,517 per sqm at that time (April 2024). The equivalent figure now (May 2026) has increased to £1,575 per sqm. This data suggests that the cost of construction has increased by about 3.8% since the 2024 WPVA was undertaken.

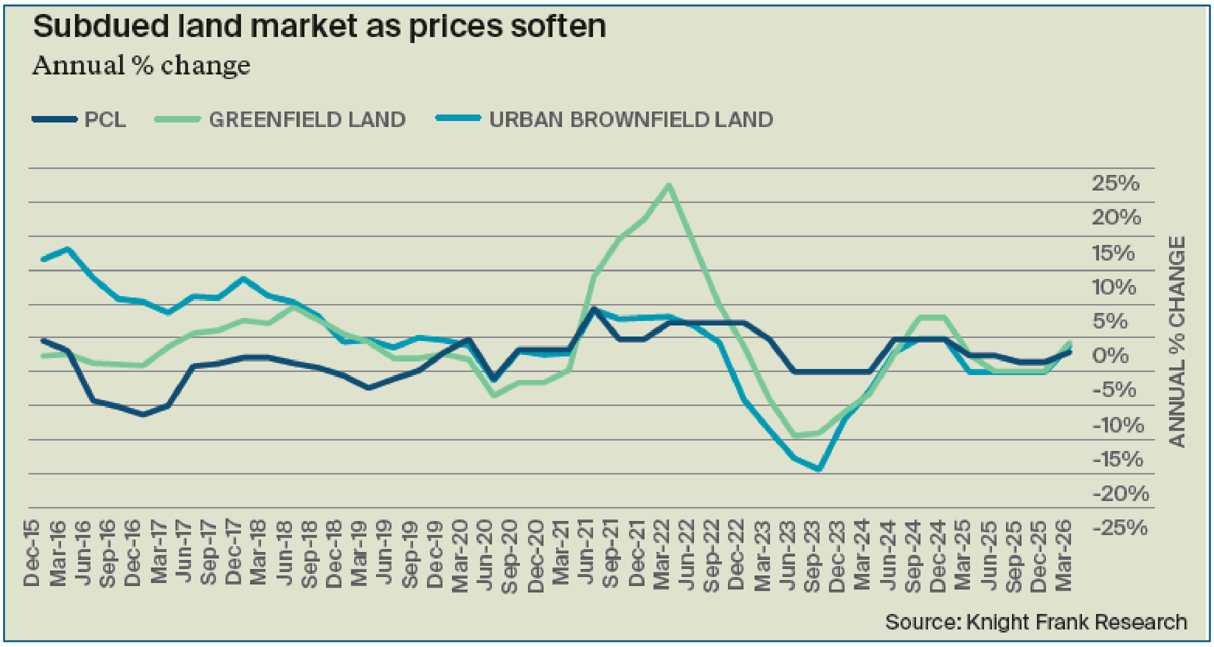
4.2 There has been much coverage in the press around build cost inflation. The BCIS is predicting that going forward, the General Build Cost Index will increase by about 2.1% over the next year (from May 2026 – 497.7 to May 2026 – 507.8) and by about 7.1% over the next three years. (from May 2026 – 497.7 to May 2029 – 532.8).

4.3 The final section of this Update Note includes a further set of appraisals based on the updated policy requirements, price and cost information. Sensitivity testing to changes in (BCIS based) build costs has been carried out.

5. Changes in Land Value

5.1 It is timely to review how the value of development land has changed over the last few years. There are several sources of relevant information. *Development Land Index* (Knight Frank Q1 2026 – being the most recently published) suggests that land prices may have fallen over the last few years.

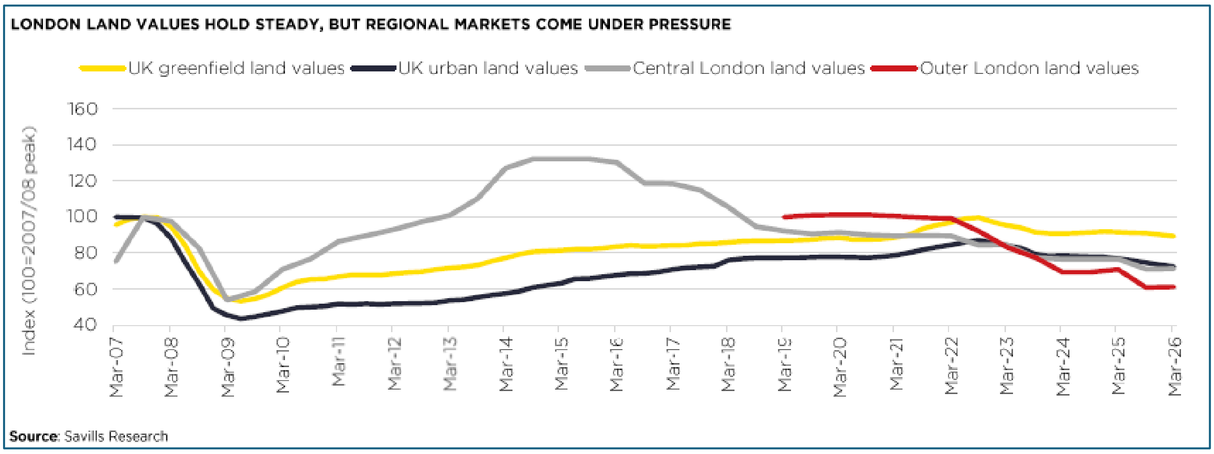
Knight Frank Development Land Index



Source: *Development Land Index (*Knight Frank Q1 2026)

5.2 A similar picture is given by Savills in its *Market in Minutes, Residential Development Land* (Savills Q1 2026).

Savills Indexed Residential Development Land Index (Index to 100 at 2007/2008 peak)



Source: Market in Minutes, Residential Development Land (Savills Q4 2025)

5.3 The above data suggests that the value of development land is broadly unchanged.

6. Changing Policy Requirements

6.1 In discussion with the Council, the following policy obligations were suggested in the 2024 WPVA – although it was stressed that the plan-making process was ongoing, so this needed to be kept under review, and in any event there was to be the normal political balance when prioritising and setting Local Plan policies.

a.	Affordable Housing	Greenfield Sites	30%.
		Brownfield Sites	10% (threshold 10)
		Potential Strategic Sites	25%
		Affordable housing mix in line with the requirements for 10% AHO and 25% of affordable homes to be First Homes (30% discount) and the balance of AHO as shared ownership. The balance as Affordable Rent.	
b.	Design	95% Part M4(2) Accessible and Adaptable and 5% Part M4(3) Wheelchair Accessible.	
		Zero Carbon, 110LPPPD Water Efficiency, 20% Biodiversity Net Gain.	
c.	Developer Contributions	Birdwise payments on all sites and open space payments on brownfield sites, plus allowance of £10,000 per unit on typologies and £25,000 per unit on the potential strategic sites.	

6.2 This was caveated as follows (paragraph 12.97):

> *If the Council were to follow this advice it would be necessary to be cautious in relying on brownfield sites in the five-year land supply and overall housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This may influence the selection of sites for allocation, although a small proportion of the possible allocations are brownfield sites.*

6.3 The 2024 WPVA included a review of national policy requirements, including anticipated changes. The policies of in the emerging *Local Plan Review 2021, Pre-Submission Document (Regulation 19)* February 2021 were reviewed and tested with various alternative options (particularly in relation to climate change and developer contributions) as discussed with the Council. The 2024 WPVA then informed the Local Plan were reviewed in Chapter 8 of the report and informed the *Swale Borough Council Local Plan Review (Regulation 18) January 2026* that was then subject to formal consultation.

6.4 The Council has now further refined the Local Plan and selected the preferred strategic sites. The policy changes are considered below.

Local Plan Polices

6.5 The policies of in the emerging Local Plan were reviewed in Chapter 8 of the report and informed the Regulation 18 Consultation that ended in February 2026. Several refinements / clarifications have been made which are highlighted below:

Strategic Policies

6.6 The draft Strategi Policies include the following:

- Policy ST1 Delivering Sustainable Development in Swale
- Policy ST2 Swale Settlement Strategy
- Policy ST3 Climate Change
- Policy ST4 Development Needs for the Borough
- Policy ST5 Building a Strong, Competitive Economy
- Policy ST6 Delivering a wide Choice of High-quality Homes
- Policy ST7 Good Design and Placemaking
- Policy ST8 Health and Wellbeing
- Policy ST9 Planning for Infrastructure
- Policy ST10 Promoting Sustainable Transport and Active Travel
- Policy ST11 Protecting and Enhancing the Natural Environment
- Policy ST12 Conserving and Enhancing the Historic Environment

6.7 These are general policies, which, on the whole do not include specific requirements – the specifics being sought and specified through the Development Management Polices as set out below. There is one notable exception.

<u>Accessible and Adaptable Standard</u>

6.8 Policy ST6 includes the requirement for *'… dwellings that meet minimum space standards M4(2) on 95% of all dwellings and the accessible standards M4(3) on the remaining 5% of dwellings*'. This is not elaborated on under the Development Management Polices.

6.9 This requirement was included in the 2024 WPVA. The cost of a wheelchair accessible dwelling, based on the Wheelchair Housing Design Guide for a 3 bed house, is taken to be £25,136 per dwelling[19]. The cost of a wheelchair adaptable dwelling, based on the Wheelchair Housing Design Guide for a 3 bed house, is taken to be £10,111 per dwelling[20]. The cost of Category 2 is taken to be £521[21]. These costs have been indexed to £37,700 per dwelling, £15,170 per dwelling and £780 per dwelling respectively.

6.10 This requirement is reflected in the updated appraisals towards the end of this note.

[19] Paragraph 152 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[20] Paragraph 153 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

[21] Paragraph 157 Housing Standards Review – Final Implementation Impact Assessment (DCLG, March 2015).

Development Management Policies - General Development Criteria

Policy G1 General Development Criteria

6.11 This policy includes a new requirement that development proposals must be '*accompanied by a statement to demonstrate the degree to which it accords with the TCPA Healthy Homes Principles*'. Whilst this is a new requirement it does not introduce standards over and above Building Regulations or those covered elsewhere in the WPVA. No additional cost is attributed to this requirement.

Development Management Policies - Good Design

Policy GD1 Local Design Principles

6.12 This is a broad policy that is general in nature. It does not introduce standards over and above those and above Building Regulations or those covered elsewhere in the WPVA, except in relation to Nationally Described Space Standards which are mandated.

6.13 Whilst NDSS were not a requirement in the previous iteration of the Local Plan, these were assumed to apply in the 2024 WPVA (paragraph 8.22).

Policy GD2 Alterations & Extensions

6.14 This is a development management policy that does not impact on the delivery of the Local Plan.

Policy GD3 Shop fronts, signs & advertisements

6.15 This is a development management policy that does not impact on the delivery of the Local Plan.

Development Management Policies - Housing

Policy H1 Affordable Housing

6.16 This policy has been updated to seek 10% rather than 20% affordable housing on brownfield sites:

> *Residential development proposals will be required to make affordable housing provision as follows:*
>
> *i. on sites of 10 or more dwellings on previously developed land, 10% of the total dwellings will be in the form of affordable housing; and*
>
> *ii. on sites of 10 or more on greenfield land, 30% of the total dwellings will be in the form of affordable housing.*

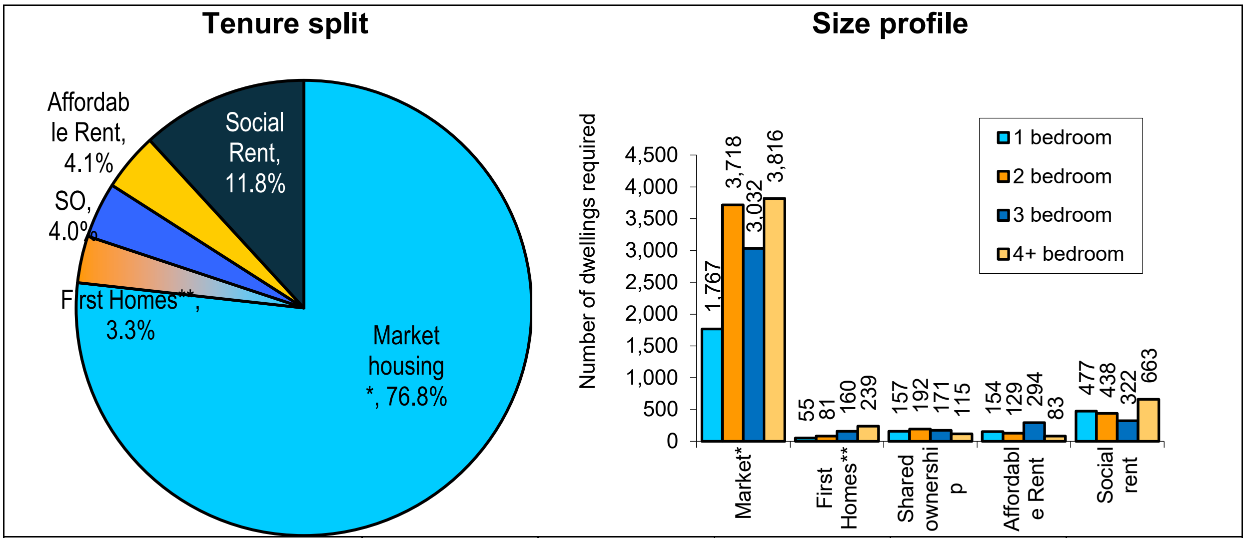
6.17 The policy does not specify a particular tenure mix, rather seeking:

> *The Council will seek an appropriate tenure mix of affordable housing to include social rented, affordable rent, intermediate rent, shared ownership affordable units and affordable home ownership tenures in line with the identified needs of the area.*

6.18 In the 2024 WPVA, an affordable housing mix of 10% AHO and 25% of affordable homes to be First Homes (30% discount) and the balance of AHO as shared ownership. The balance as Affordable Rent.

6.19 Bearing in mind the dropping of the requirements for 10% AHO and First Homes the mix has been updated. The *Swale Local Housing Market Assessment Update* (HDH, May 2026) is being finalised. This includes the following mix:

Figure 8.1 Requirement for all new housing in Swale over the plan-period



New housing required 2025 to 2040	By Tenure	1 bed	2 bed	3 bed	4 bed
Market housing*	**12,334** **76.8%**	1,767 14.33%	3,718 30.14%	3,032 24.58%	3,816 30.94%
First Homes	**535** **3.3%**	55 10.28%	81 15.14%	160 29.91%	239 44.67%
Shared Ownership (SO)	**636** **4.0%**	157 24.69%	192 30.19%	171 26.89%	115 18.08%
Affordable Rent	**661** **4.1%**	154 23.30%	129 19.52%	294 44.48%	83 12.56%
Social Rent	**1,900** **11.8%**	477 25.11%	438 23.05%	322 16.95%	663 34.89%
Total	**16,065** **100.0%**	2,610 16.25%	4,558 28.37%	3,980 24.77%	4,917 30.61%

*Market housing includes both owner-occupied and private rented These figures represent the distribution of housing that should be delivered. Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

6.20 In discussion with the Council, the tenure mix has been updated to 30% Affordable Home Ownership, 30% Social Rent, 40% Affordable Rent. This change is reflected in the updated appraisals towards the end of this note. The unit size mix is also updated to reflect the updated analysis.

Policy H2 Small and medium sites for housing development

6.21 This policy has as a number of specific requirements (e.g. to provide 20% BNG) however these are covered elsewhere, under specific policies so it does not introduce standards over and above Building Regulations or those covered elsewhere in the WPVA. No additional costs are attributed to these requirements.

Policy H3 Rural exception and community-led housing development

6.22 This is an enabling policy that does not impact on the delivery of the Local Plan.

Policy H4 Self-build and custom build

6.23 Self-build and custom build were considered in the 2024 WPVA (paragraph 10.53), however, at that time, the Council was not planning to introduce such a requirement. This new policy seeks:

> *Sites of 20 or more homes will provide at least 5% serviced plots for sale to self-builders. In rural areas and settlements as defined via a Proposals Map, which will be available in later stages of the Local Plan, the threshold for providing self- build will be 10 homes and the percentage of provision should be rounded up to the nearest unit.*

6.24 The impact of this new policy is considered towards the end of this note.

Policy H5 Park Homes

6.25 This is a development management policy that does not impact on the delivery of the Local Plan.

Policy H6 Gypsy, Traveller & Travelling Showpeople Accommodation

6.26 This is an enabling and development management policy that does not impact on viability.

Policy H7 Dwellings for rural workers

6.27 This is an enabling and development management policy that does not impact on viability.

Policy H8 Extensions to, & the replacement of, dwellings in the countryside

6.28 This is an enabling and development management policy that does not impact on viability.

Policy H9 Extending the garden of a dwelling in the countryside

6.29 This is a development management policy that does not impact on viability.

Development Management Policies - Economic Development

Policy E1 Loss of employment floorspace & land

6.30 This is a development management policy that does not impact on the delivery of the Local Plan.

Policy E2 The Rural Economy

6.31 This is an enabling and development management policy that does not impact on viability. Whilst it does include some specific requirements, these are covered under other policies considered elsewhere.

Policy E3 Proposals for Main Town Centre Uses

6.32 This is an enabling and development management policy that does not impact on viability.

Policy E4 New Holiday Parks or extensions to existing parks & the occupancy of holiday parks

6.33 This is an enabling and development management policy that does not impact on viability. Whilst it does include some specific requirements, these are covered under other policies considered elsewhere.

Development Management Policies - Infrastructure

Policy INF1 Managing transport demand & impact

6.34 This is a critical policy in relation to the delivery of development. It includes a requirement for a Transport Statement or Transport Assessment. It goes on to set out the detail of what is required. The preparation of a Transport Statement or Transport Assessment is a normal requirement and would be covered in the general allowances for fees. This was considered in the 2024 WPVA (paragraph 8.77).

6.35 It is assumed that any mitigation requirements are covered under the payments set out under the wider s106 assumptions.

6.36 The policy goes on to seek 'broadband / connected communities infrastructure'. This became a requirement of Part R of Building Regulations[22] in 2022 so is a national requirement that does not add to the normal cost of development.

Policy INF2 Vehicle parking

6.37 It is understood that the Council has taken the requirement for carparking into account when establishing the potential capacity of the allocations in the draft Local Plan, to there is no impact on development viability.

[22] New build connectivity: information for developers - GOV.UK

6.38 Much of the policy relates to EV charging with is a requirement of Part S of Building Regulations[23]. This is a national requirement that does not add to the normal cost of development over and above the costs included under the climate change policies below.

Policy INF3 Open space, sport and recreation provision

6.39 The requirements for openspace are unchanged.

Policy INF4 Local Green Spaces

6.40 This is a development management policy that does not impact on the delivery of the Local Plan.

Development Management Policies - Climate Change, Pollution & The Water Environment

Policy C1 Sustainable design and adaptation principles

6.41 This is a non-specific policy that amongst other things requires that '*all new developments must minimise their carbon footprint and energy impact through sustainable design and construction practices*'. It is assumed that compliance with Policy C2 below is sufficient to be policy compliant in this regard.

6.42 The policy requires several specific reports including (eg Climate, Energy and Waste Statement; Evidence of following TCPA's Healthy Homes Principles; Compliance with a cooling hierarchy; Overheating Assessment (major development only); elsewhere, several further reports are sought (e.g. Emissions Mitigation Assessment (also known as a Damage Cost Calculation); Arboriculture Survey: etc.).

6.43 Initially, in the 2024 WPVA (paragraph 7.24), for residential and non-residential development, professional fees were assumed to amount to 8% of build costs to include cost of preparing the planning application and land promotion. Separate, additional, allowances were made for planning fees, acquisition, sales and fees. This assumption was subsequently increased, as a result of the technical consultation, to 10%. The reporting requirements go well beyond the norm.

6.44 The policy goes on to require that water conservation and storage measures should also be integrated into designs. This is a general policy and interventions could very from the provision of a water butt, to rainwater harvesting. The cost of rainwater harvesting was tested in the 2024 WPVA (paragraph 8.117) but at that that stage was not carried forward into the suggested policy mix.

6.45 There are few published costs for rainwater harvesting, although figures of £2,000 to £3,000 are sometimes quoted. The provision of rainwater harvesting requires the capture of rainfall.

[23] Infrastructure for charging electric vehicles: Approved Document S - GOV.UK

This is normally done through an underground tank. A second cold water system is then installed. As this is not at 'mains' pressure, this normally utilises a pump and pressure cylinder.

6.46 The requirements of this policy is assumed to be met through the provision of a water butt or similar low cost solution. A £50 per unit cost is now reflected in the updated appraisals towards the end of this note.

Policy C2 Net zero operational carbon in new build residential development

6.47 This is a detailed policy that seeks new development to be to a net zero operational standard.

6.48 Moving beyond national standards was considered in the 2024 WPVA. Since then the Government has confirmed that the Future Homes Standard will be mandated through Building Regulations in March 2027.

6.49 In the 2024 WPVA, the cost of Zero Carbon was assumed to add 8% to the costs of residential construction and this was taken to be the base assumption. In line with advice from the Council's consultants, Bioregional, this assumptions has been updated to plus 6% for houses and plus 5% for flats. In addition, 0.7% is allowed to recognise that the BCIS costs do not yet fully reflect the costs of the 2021 changes to Part L of Building Regulations.

6.50 The policy is expressed using non-standard metrics (i.e. rather than Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP) as referred to in the 2023 Ministerial Statement), requires reference to Microgeneration Certification Scheme, smart energy systems and post-occupancy evaluation. The professional fees assumption has been increased by 1% to 11% of the build cost (see also Policy C1 above) in this regard.

Policy C3 Net zero operational carbon in new build non-domestic development

6.51 The costs of the policy requirements were considered in the 2024 WPVA.

Policy C4 Embodied carbon and waste

6.52 The costs of embodied carbon policies were not considered in the 2024 WPVA. The Council's climate change consultants (Bioregional) have advised with regard to the costs of such policies.

6.53 The policy to limits embodied carbon to 600 $kgCO_2e/m^2$ GIA. This requirement broadly aligns with typical net zero design.

Table 6.1 Embodied Carbon by Architype

Variant	Part L 2021	Net zero operational energy (NZE)	NZE with reduced embodied carbon specification 1	NZE with reduced embodied carbon specification 2	Best practice retrofit
Houses	599	606	223	237	142
Low rise flats	412	492	224	362	95
Retail	331	340	164	245	74
Primary school	419	514	292	358	138
Offices	500	543	231	428	80
Warehouse	374	415	261	377	114

Source: SO & VoWH Joint Local Plan: Net Zero Carbon Study (Bioregional, December 2023)

6.54 The bulk of this policy concerns reporting rather than making changes to the project design. The costs of reporting are assumed to be within the uplifted fee assumption set out above.

Policy C5 Renewable energy development and infrastructure

6.55 This is an enabling and development management policy that does not impact on viability.

Policy C6 Coastal Change Management

6.56 This is development management policy that does not impact on viability.

Policy C7 Implementing the Medway Estuary & Swale Coastal Risk Management Strategy

6.57 Birdwise and open space requirements were considered in the 2024 WPVA. The policy has been widened somewhat, with mitigation rates now including:

Flood Zone 2 and 3 zone rate: £500/dwelling

£20/sq m for all other buildings up to a cap of £10,000 at which point it reduces to £4/sq m for every further square meter

and/or

Isle of Sheppey rate: £100/dwelling

£4/sqm for all other buildings up to a cap of £2,000 at which point it reduces to £2/sq m for every further square meter

Sites on the Isle of Sheppey, within flood zone 2 or 3 will be required to pay both rates.

6.58 It is important to note that only and 9 out of 47 of the residential allocations and 5 out of 18 potential non-residential allocations- are within Flood Zones 2 and 3. For the purpose of this assessment, these payments are assumed to be within the wider infrastructure and mitigation cost assumptions.

Policy C8 Flood risk

6.59 This is a development management policy that seeks to direct development away from flood risk areas. It does not impact directly on viability.

Policy C9 Sustainable Drainage

6.60 The requirements for SUDS were considered in the 2024 WPVA. The assumptions are unchanged and are reflected in the updated appraisals towards the end of this note.

Policy C10 Water quality and Water Resources

6.61 This is a development management policy that does not impact directly on viability, except with regard to water usage setting out a requirement for a minimum water efficiency of 100 litres per person per. This was not a considered in the 2024 WPVA.

6.62 *Water Ready – A report to inform HM Government's roadmap for water efficient new homes* (Future Homes Hub, April 2024)[24], sets out the following costs:

a. 100 LPPPD £350 per dwelling.

b. 90 LPPPD £2,000 per dwelling.

6.63 The requirement for a minimum water efficiency of 100 litres per person per (at £350 per unit) are now reflected in the updated appraisals towards the end of this note.

Policy C11 Air Quality

6.64 This is a development management policy that does not impact directly on viability.

Policy C12 Pollution & Land Instability

6.65 This is a development management policy that does not impact directly on viability

Development Management Policies - Biodiversity and Landscapes

Policy B1 Biodiversity & geodiversity conservation & BNG 134

6.66 The policy seeks 20% BNG (rather than the 10% required nationally). This was considered in the 2024 WPVA (paragraph 8.97).

6.67 The assumptions are unchanged and are reflected in the updated appraisals towards the end of this note.

[24] Water Ready_A report to inform HM Government-s roadmap for water efficient new homes.pdf (cdn-website.com)

Policy B2 Conserving & enhancing valued landscapes; Policy B3 Kent Downs National Landscape Management Plan; Policy B4 The separation of settlements – Important Local Countryside Gaps; Policy B5 Woodland, orchards, trees and hedgerows; Policy B6 Agricultural land; Policy B7 The Coast; Policy B8 Rural Lanes; Policy B9 The keeping & grazing of horses

6.68 These development management policies do not impact directly on viability.

Development Management Policies - Historic Environment

Policy HE1 Development involving Listed Buildings; Policy HE2 Development affecting a Conservation Area; Policy HE3 Parks & gardens; Policy HE4 Non-designated Heritage Assets; Policy HE5 Archaeology

6.69 These development management policies do not impact directly on viability.

Implementation & Monitoring

6.70 This part of the draft plan does not impact directly on viability.

7. Regulation 18 Responses

7.1 The comments made through the formal Regulation 18 consultation have been reviewed. Many of the comments made that mentioned viability or concerned the need to consider viability, or the need to update the 2024 WPVA, rather than make comments about the specifics of the 2024 WPVA. Only those comments that specifically concern the 2024 WPVA are reviewed below.

Richard Butler for Vistry

7.2 Questioned whether all key issues have been taken into consideration. This Update Note considers the cumulative impact of the polices in the draft Local Plan, together with national policy.

7.3 The assumption with regard to the costs of strategic infrastructure and mitigation are based on the most recent information available from the Council.

NHS property Services Ltd

7.4 Further consideration should be given to developer contributions. The assumptions used in this Update Note are based on the most up to date information – however sensitivity testing has been carried out.

Cameron Chapman of DHA Planning for Malro Homes

7.5 Commented as follows:

> *We are concerned that viability on Sheppey remains a very significant concern and ask that an appropriate viability assessment is undertaken.*

7.6 Whilst this is noted, no viability specific comments were made. The Isle of Sheppey is treated as a distinct sub-area within the 2024 WPVA and in this Update Note.

7.7 Concern was raised on connection with TCPA Healthy Homes Principles (HHP) and the provision of M4(2) and M4(3) dwellings. These requirements are considered in Chapter 2 and Chapter 6 above. The draft Local Plan does not seek the provision of M4(2) and M4(3) dwellings, however 40% M4(2) is included as per the Draft NPPF.

7.8 Concern is raised over the requirements for 20% BNG and the potential impact on the delivery of affordable housing. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

D Lawrence of DHA Planning for Sheppey Gateway Ltd

7.9 Concern was raised on connection with TCPA Healthy Homes Principles (HHP) and the provision of M4(2) and M4(3) dwellings. These requirements are considered in Chapter 2 and

Chapter 6 above. The draft Local Plan does not seek the provision of M4(2) and M4(3) dwellings, however 40% M4(2) is included as per the Draft NPPF.

7.10 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

G Filmer of DHA Planning for Fernham Homes

7.11 Concern was raised on connection with TCPA Healthy Homes Principles (HHP) and the provision of M4(2) and M4(3) dwellings. These requirements are considered in Chapter 2 and Chapter 6 above. The draft Local Plan does not seek the provision of M4(2) and M4(3) dwellings, however 40% M4(2) is included as per the Draft NPPF.

7.12 The importance of flexibility within the affordable housing tenure mix was raised. This is noted and is tested in the appraisals at the end of this Update Note.

7.13 Concern was raised about 'being required to provide extensive evidence'. The fees assumption in this Update is 11% which is well above the more widely used assumption of 8%.

7.14 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.15 Concern is expressed over the requirement for the water use standards of 100 LPPPD. As set out in Chapter 6 above, this was not considered in the 2024 WPVA. This requirement is now tested.

7.16 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

CPRE Kent

7.17 It is highlighted that the requirements for affordable housing in Faversham is less than the 35% in the adopted neighbourhood plan. More affordable housing for rent should be sought. The policy is informed by the viability evidence, which is updated in this regard in the Update Note.

Peter Court of Petter Court Associates for various clients

7.18 Whilst the 10% affordable housing requirements on brownfield sites is supported, it is suggested that the 30% on greenfield sites may be over-optimistic. This is informed by the viability evidence, which has been updated in this regard.

Faversham Community Land Trust

7.19 A range of comments are made with regard the affordable housing, including the difference between Affordable Rent and Social Rent.

7.20 The Council has updated the affordable housing mix, including an element of Social Rent. This Update Note considers the impact of this.

Five Parishes Opposition Group

7.21 It is suggested that the affordable housing requirements of 30% is too low. This is informed by the viability evidence, which has been updated in this regard in this Update Note.

The Planning Bureau for McCarthy Stone

THIS IS A LONG AND DETAILED REP THAT WE HAVE NOT BEEN THROUGH POINT BY POINT.

7.22 It is suggested that separate affordable housing targets should be set for specialist older peoples housing.

7.23 The Council does not consider this to be proportionate as the PPG (paragraph 10-008-20190509) specifically anticipates that viability will be considered for 'housing for older people' at the development management stage.

CHECK IF APPENDIX 18 OF THE 2024 WPVA IS MISSING – SBC SUGGEST NOT…

7.24 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Charles Glover-Short of Southern Housing

7.25 The importance of viability testing is highlighted. The 2024 WPVA tested the cumulative impact of the Council's emerging policies. The analysis is refreshed in this Update Note.

7.26 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.27 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Bashford for Quinn Estates

7.28 It is suggested that the viability evidence is out of date – in part because it does not reflect the Council's approach to s106 contributions. This Update Note refreshes the 2024 WPVA. It includes sensitivity testing of developer contributions.

7.29 They also noted that the 2024 WPVA does note to consider all the policies on the Draft Plan. This is agreed, as set out in Chapter 6 above the new requirements are now tested – see Chapter 6 above.

7.30 The affordable housing requirement should be 25% rather than 30%. The viability evidence is refreshed in this Update Note.

7.31 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.32 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

E Bonthron of Esquire Developments and Kent SME Network

7.33 A combination of an increase in construction costs, inflation rates, landowner expectations, BNG credit costs, as well as uncompetitive offers from Registered Providers impacts on viability.

7.34 This is agreed. The 2024 WPVA tested the cumulative impact of the Council's emerging policies. The analysis is refreshed in this Update Note.

7.35 Payments in lieu of onside provision of affordable housing should be quantified. This was not included in the 2024 WPVA, but is included at the end of this Update Note.

7.36 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.37 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.38 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

David Churchill of Carter Jonas for Shaptor Capital

7.39 Suggest 30% affordable housing is not supported by the 2024 WPVA. This comment makes reference to the strategic sites, most of which are not being carried forward into the new Local Plan. This is informed by the viability evidence, which has been updated in this regard in this Update Note.

7.40 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.41 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Sarah Muteham for Boughton under Blean Parish Council

7.42 The flat rate of 30% affordable housing is challenged. This is informed by the viability evidence, which has been updated in this regard in this Update Note.

M Behrendt of the Home Builders Federation

7.43 It is suggested that 30% affordable housing may be challenging on some greenfield sites – particularly on some allocations.. No technical evidence was submitted to support this. It is through that this comment makes reference to the strategic sites, most of which are not being carried forward into the new Local Plan.

7.44 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update

7.45 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.46 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Sally Furminger of Lichfields for Taylor Wimpey

7.47 It is suggested that the 2024 WPVA should be updated to include all the policies in the draft Local Plan. This Update Note refreshes the 2024 WPVA. The Draft Local Plan includes polices that were not in the earlier iterations. As set out in Chapter 6 above the new requirements are now tested – see Chapter 6 above.

7.48 The requirements that go above national standards will impact on viability. This is agreed and these are subject to viability testing in this Update Note.

7.49 The housing mix should be updated in the viability evidence. This is agreed and these are subject to viability testing in this Update Note.

7.50 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.51 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.52 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

P Atkin of Pegasus for Prudential Assurance Co. Ltd

7.53 It was suggested that the affordable housing requirements may be challenging. No technical evidence was submitted to support this. The viability evidence is refreshed in the Update Note.

7.54 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.55 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Sarah Moakes

7.56 The current multi-tiered policy should be maintained. The draft policy is informed by the viability evidence, which has been updated in this regard in this Update Note.

R England of WSP for Homes England

7.57 They note:

> *Whole Plan Viability Assessment (2023) assumes the large brownfield typology in the Isle of Sheppey is viable at 10% affordable housing, based on minimum developer contributions (Figure 10.10b) and 5% based on maximum developer contributions (Figure 10.10c).*
>
> *This is based on standardised abnormal costs and does not account for site specific inputs for strategic infrastructure and mitigation associated with bringing forward the Q&R site. Given the extent of early infrastructure investment, enabling works undertaken by Homes England and associated costs we recommend that a site specific policy criterion is included, based on an up*

to figure of 10% affordable housing provision; subject to viability testing, to ensure the site is viable and deliverable.

7.58 No site-specific details were provided.

7.59 The viability testing the 2024 WPVA and this Update Note is based on typologies (as per paragraph 10-012-20180724 of the PPG), although the South East of Faversham and West of Bobbing Village are tested individually. It is necessary to make high level assumptions in a plan-wide viability assessment.

Ian Warner of Tetlow King for Palm Developments

7.60 It is noted that the costs of development have changed. This is agreed and these are subject to viability testing in this Update Note.

7.61 It is suggested that the consideration of specialist Older Peoples Housing is too narrow. Whilst this is noted, the assessment has been informed by the representations made and a review of market evidence as per the PPG. Further, as the PPG (paragraph 10-008-20190509) specifically anticipates that viability will be considered for 'housing for older people' at the development management stage, the approach taken is proportionate.

7.62 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.63 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.64 Concern is expressed over the requirement for the water use standards of 100 LPPPD. As set out in Chapter 6 above, this was not considered in the 2024 WPVA. This requirement is now tested.

T Whipps of LRM Planning for W.T. Lamb Holdings Ltd

7.65 It is suggested that setting the affordable housing requirements by the predominant land use (ie greenfield or brownfield) is overly simplistic and a more nuanced approach should be taken. Whilst this is noted, most of the allocations are either greenfield or brownfield rather than being mixed use. The approach taken is considered proportionate.

7.66 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.67 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.68 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

A Payne of DHA Planning for Cantium Land

7.69 They say '*… the application of 20% BNG to small and medium sites has the potential to make the delivery of site unviable particularly as it may be difficult to incorporate a 20% BNG onsite…*'.

7.70 It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Emily Comber of Croudace Homes

7.71 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.72 Concern is raised over the requirements for self and custom build plots. As set out in Chapter 6 above, the impact of this policy is considered later in this Update.

7.73 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Georgina Wise of Gladman Developments

7.74 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Ivy Planning for AC Goatham & Sons Ltd

7.75 Concern is raised over the requirements for 20% BNG and the potential impact on the delivery of affordable housing. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

John Collins of DHA Planning for a landowner in Doddington.

7.76 Concern is raised over the requirements for 20% BNG, particularly on Sheerness and in the context of delivering affordable housing. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Matt Porter of DHA Planning for Frognal Properties Ltd

7.77 Concern is raised over the requirements for 20% BNG, particularly on small and medium sites. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

A Day of DHA Planning for Pentland Homes

7.78 Concern is raised over the requirements for 20% BNG. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

7.79 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.80 Concern is expressed over the requirement for the water use standards of 100 LPPPD. As set out in Chapter 6 above, this was not considered in the 2024 WPVA. This requirement is now tested.

A Payne of DHA Planning for EH Nicholls Ltd

7.81 Concern is raised over the requirements for 20% BNG, particularly on small and medium sites. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Kent County Council

7.82 Kent County Council made wide ranging comments concerning the provision of infrastructure and for the need to appropriate mitigation. The modelling in this Update is as agreed with SBC and set out in Chapter 6 above.

7.83 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

L Sinden of DHA Planning for Persimmon Homes

7.84 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.85 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Dunkirk Parish Council

7.86 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Mollie Lay of Finn's

7.87 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.88 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

Maidstone Borough Council

7.89 Concern is raised over the net-zero / climate change policies. The modelling in this regard has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.90 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

C Leckie of Savills for the owners of Land at Old Ferry Road, Iwade

7.91 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

7.92 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

GHA Barnes of Shepherd Neame

7.93 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Rachel Harrison for Peel Land and Peel Ports

7.94 Concern is raised over the net-zero / climate change policies. The modelling in this regard (including fees for the various assessments) has been updated as set out in Chapter 6 above (as advised by the Councils climate change consultants, Bioregional).

Iceni Projects for Owners of Lamberhurst Farm

7.95 Concern is raised over the requirements for 20% BNG and the potential impact on viability. It is understood that the requirements for 20% BNG has been taken into account when stablishing site capacity by the Council. The updated appraisals towards the end of this Note include the requirements for 20% BNG.

8. Strategic Sites

8.1 At the time of the 2024 WPVA, the Council had not formally identified the Strategic Sites. 13 possible options were tested:

Table 8.1 2024 Potential Strategic Sites –

		Units	Area Ha
South and West of Iwade (Site B)	Iwade	1,381	65.760
West of Bobbing village	Bobbing	4,173	198.720
Land at Stickfast Lane	Bobbing	2,411	114.820
Fax Farm	Dunkirk	1,201	57.210
Winterbourne Fields	Dunkirk	1,742	82.960
SE Faversham	Faversham SE	2,745	130.720
East of Faversham Expansion	Faversham E	2,665	126.890
Iwade - Solar Farm	Iwade	2,873	136.790
Rushenden South	IoS Sheerness	3,130	149.040
South East Sittingbourne	Sittingbourne SE	16,814	800.690
Land at South-West Minster	IoS Minster-on-Sea	2,235	106.430
Ashford Road, North Street	Faversham S	6,490	309.040
Between A2 Bapchild and Northern Relief Road	Bapchild	1,925	91.680

Source: SBC (April 2024)

8.2 Of these, two are being taken into the new Local Plan and are modelled in this Update Note. Both the sites are well progressed through the development management process:

South East Faversham SHELAA/114

8.3 This site is subject to a Resolution to Grant. The scheme is for 2,500 homes (approximately 40% affordable homes). The application includes a detailed planning application of for 261 homes with 92 affordable housing units, 54,000sqm of employment space (including 3,021sqm local retail centre), the remaining 51,000sqm – likely to be 15% local centres retail, 85% warehouse.

8.4 Based on the committee report the costs of strategic infrastructure and mitigation of just under £44,000,000 plus the provision of a 3FE primary school (with nursery). The cost of the 3FE primary school is estimated at £16,000,000 (based on 690 places at £22,890 per place[25]). A total cost strategic infrastructure and mitigation of about £24,000 per unit is assumed.

[25] *National School Delivery Cost Benchmarking Primary, Secondary & SEN Schools (A national cost benchmarking study undertaken by Hampshire County Council in conjunction with East Riding of Yorkshire Council and the Department for Education* (June 2025)

Land west of existing Bobbing Village SHELAA/012

8.5 An outline application as been submitted. A decision on the scheme has been deferred, but is anticipated shortly. The application is for. all matters reserved except for means of access, for a mixed use development comprising up to 2,500 dwellings, a 5.21 ha commercial employment zone including doctors' surgery, a 4.35 ha sports hub (and sports pitches), 3FE primary school, community facilities, local retail provision, public open space, children's play areas and associated parking, servicing, utilities, footpath and cycle links, drainage, ground and other infrastructure.

8.6 The committee report sets out the costs of strategic infrastructure and mitigation of just under £58,000,000. This is about £23,300 per unit.

9. Findings and Conclusions

9.1 HDH Planning & Development Ltd produced the 2024 WPVA. The study was commissioned to support the development of the Local Plan. The report was undertaken in line with the requirements set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

9.2 Since the earlier evidence was collected, the costs and the values, being the main inputs into a viability assessment, have changed and several changes have been made to national policy. The Council has also refined some of the policies in the draft Local Plan. This note considers how these changes may impact on viability.

9.3 The costs of construction has increased since the 2024 WPVA was undertaken, however the value of newbuild housing is largely unchanged. The Land Registry's latest data suggests that the average newbuild sale price has increased by about 9.7% over the last 2 years in the Council area. However analysis of the price paid data suggests that the price of newbuild homes is largely unchanged, as does the analysis of newbuild asking prices.

9.4 The BCIS suggests that build costs have increased by 3.8% since 2024, being more than the increase in values, suggesting, all other things being equal, that viability has worsened since 2024.

9.5 House price forecasts and build costs forecasts suggest that, going forward, house prices are likely to increase at a broadly similar rate to that of build costs.

Updated Policy-on Appraisals

9.6 Paragraphs 10.47 to 10.49 of the 2024 WPVA considered the impact of changes in costs and values on the preferred set of policies, based on further appraisals that were summarised in Appendix 17 of that report. This analysis is now repeated. As set out in the preceding chapters above, there have been a number of changes to national policy and to the draft Local Plan since the 2024 WPVA was completed. The following adjustments are made in the fresh appraisals:

a) The value of housing is unchanged, however an updated value of £1,400 per sqm is used for Social Rent (the Affordable Rent assumption is unchanged).

b) The construction costs are increased to the latest BCIS costs.

c) The affordable housing mix has been updated, in discussion with the Council, to 30% Affordable Home Ownership (as Shared Ownership), 30% Social Rent, and 40% Affordable Rent.

d) The unit size mix is also updated to reflect the Council's updated Housing Market Assessment. (The requirements for 95% of units to be to the M4(2) Accessible and Adaptable standard and the remaining 5% of dwellings to be to M4(3) Wheelchair Adaptable standard is carried forward unchanged).

e) The common areas in flatted development have been increased to allow for second staircases.

f) The Net Zero cost assumption has been updated to the BCIS costs plus 6.7% to the costs of construction of houses and to the BCIS plus 5.7% to the costs of flats. The professional fees are increased by 1% to allow for the use of the non-standard reporting and further supporting reports (e.g. with regard to embodied carbon).

g) The requirements for some rainwater harvesting (£50 per unit) are included to allow for water butts.

h) The requirement for a minimum water efficiency of 100 litres per person per (£350 per unit) are included.

i) The modelling of the Strategic Sites has been updated as per Table 8.2 above, including the updated estimates of strategic infrastructure taken from the committee reports.

j) For the typologies, an all-inclusive s106 cost for strategic infrastructure and mitigation of £11,000 per unit to include Medway Estuary & Swale Coastal Risk Management Strategy, but additional allowances are made for Birdwise (£324 per unit) and Open space (£593 per unit) is assumed. This is unchanged.

k) The Building Safety Levy has been added at £15.86 per sqm for brownfield land and £31.72 per sqm for greenfield land and would apply to major development.

l) The updated national planning application fees are applied.

9.7 The updated appraisal results are summarised in **Appendix 4** below. These results are directly comparable with those included in Appendix 17 of the 2024 WPVA.

9.8 As the provision of affordable housing is one of the main policy costs, additionally, a further set of appraisals is run with the overall policy requirements as per the Local Plan (30% on greenfield and 10% on brownfield), where the tenure mix includes 30% AHO, but the Social Rent / Affordable Rent is varied. The results are summarised in **Appendix 5** below

9.9 The results are broadly similar to those in 2024.

a) Most greenfield typologies derive a Residual Value that is in excess of the Benchmark land Value, indicating that such development is likely to be viable.

b) As in 2024 not all the brownfield typologies generate a Residual Value that is in excess of the BLV, suggesting that brownfield sites are unlikely to be viable. Having said this, the analysis in Appendix 5 shows that adjusting the affordable housing tenure mix, to reduce the proportion of Social Rent and increase the proportion of Affordable Rent has a significant impact on the Residual Value and is a way to improve viability without reducing the overall affordable housing requirements. The Council should be flexible in the tenure mix of affordable housing sought (the tenure mix is not specified in the Draft policy.

c) The flatted typologies are unlikely to be viable across the Borough, in each case deriving a Residual Value that is not only below the BLV, but negative. The Council does not rely on flatted development within its housing trajectory to deliver housing.

d) Neither of the Strategic Sites derive a Residual Value that is more than the BLV. This is often the case with high level modelling in plan-wide viability testing. As set in the 2024 WPVA, the delivery of any large site is challenging. Both of the sites are well progressed through the development management process, and the Council anticipates that broadly policy compliant schemes will be approved shortly.

The Strategic Sites are modelled on the basis that a site is acquired by the developer in a single tranche at the start of the project. Such a scenario is relatively unlikely on very large sites, where the site is typically purchased in phases. Such an approach benefits the developer in terms of cashflow and this will have a material impact on viability.

It is recommended that that the Council continues to engage with the owners of Strategic Sites in line with the advice set out in the Harman Guidance.

9.10 Based on the above results, and comments, the Council can continue to confident that the development in the Local Plan will be deliverable, and that 2024 WPVA, subject to this Update Note, can be relied on. In the 2024 WPVA it was advised that the Council should be cautious in relying on brownfield sites in the housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This advice remains.

Commuted Sums and Payments in Lieu of Affordable Housing

9.11 Through the Regulation 18 Consultation, it was suggested that commuted sums in lieu of on-site provision of affordable housing should be quantified. SBC's preference is for affordable housing to be delivered on-site. This approach is in line with Paragraph 64 of the NPPF that says:

> *Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:*
>
> *a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
>
> *b) the agreed approach contributes to the objective of creating mixed and balanced communities.*

9.12 Some councils set out guidance as to how a commuted sum would be calculated so as to provide transparency, and to avoid the undue delays that might arise during s106 negotiations if details of a payment had to be developed from first principles on each occasion. The following analysis provides a basis for calculating the commuted sum.

9.13 An approach to the calculation is based on the difference in the Residual Value of the development site with and without affordable housing, so is the cost of the contribution that the developer would have made if an on-site affordable contribution were delivered.

9.14 The calculation works as follows:

- Estimate the value of the site with 100% market housing.
- Estimate the Residual Value of the site with the target level (10% / 30%) of affordable housing.

9.15 The difference between (a) and (b) is the reduction in site value due to the affordable housing policy contribution. This is set out in **Appendix 6**.

9.16 Taking the appraisal for Site 15, in the Sittingbourne and West SBC area as an example. The Residual Value when subject to30% affordable housing is £446,252 and without affordable housing it is £1,151,784. The difference is £705,503 (£1,151,784 – £446,252). £705,503 divided by 90 affordable units (30% of 30) is £78,392 per unit (£705,531 ÷ 9).

9.17 The calculated contributions across the typologies vary, but the average is about £78,500 per affordable unit not provided on-site.

9.18 Paragraph 64 of the NPPF is clear that off-site provision or financial contribution in lieu is allowed where it *'can be robustly justified'*. On this basis, the above calculations provide a sound basis for determining a commuted sum figure. There are two alternatives open to the Council. The first is to work to a published standard commuted sum payment. If SBC were to take this option, a £78,500 payment per affordable unit not delivered on-site would be appropriate.

9.19 This opportunity is taken to highlight a weakness in the approach set out above. It is assumed that the scheme with and without affordable housing is the same scheme in terms of housing mix, type and form. As set out in Chapter 6 above, the housing mix to meet local need varies across the tenures. This nuance is not reflected in the approach set out above.

9.20 The Council is currently preparing a new Local Plan. This document will be long lived and is likely to be in place across several economic cycles. It is therefore suggested that separate guidance is prepared setting out the amount of the payment, and to allow a simple review should viability change.

9.21 Alternatively, the Council may prefer to calculate the commuted sum scheme-by-scheme as it does now. This has the advantage of being an up-to-date figure, but the disadvantage of a lack of clarity for developers. The methodology used is to assess the Open Market Value of the units that would be affordable units, and then deduct from that the amount that a housing association would pay for those units as affordable units – the difference being the commuted sum.

Self and Custom Build

9.22 At the time of the 2024 the Council was not planning to introduce a self and custom build policy. The draft Local Plan now includes a requirement that on 'sites of 20 or more homes will provide at least 5% serviced plots for sale to self-builders. In rural areas and settlements as defined via a Proposals Map, which will be available in later stages of the Local Plan, the threshold for providing self- build will be 10 homes and the percentage of provision should be rounded up to the nearest unit.

9.23 If a developer is to sell a plot as a serviced self-build plot, they would not receive the profit from building the unit, they would however receive the price for the plot. If they were to provide the plot as a custom-build plot (i.e. where the developer designs and builds to the buyer's design and specifications) they would receive a payment for the land, the costs of construction and the price paid would incorporate the developer's return. The impact on viability is therefore the balance between the profit foregone and the receipt for the serviced plot. The developer's return per market house is generally in the £60,000 to £75,000 range.

9.24 There are a few serviced development sites being publicly marketed in the area at the time of this report. Having made enquiries with local agents, the general consensus is that reasonably sized, and well serviced, single plots are likely to fetch in excess £100,000 in the current market, although the price for larger plots, with land for gardens and appropriate for larger family homes are likely to achieve a price that is significantly more.

9.25 The modelling in this viability update is based on at least 30 units per net ha with allowance for open space. On this basis, a self-build plot is likely to be about 0.03ha or so. A conservative plot price of £100,000 would lead to a land value of over £3,000,000/ha. This is substantially above the BLV and allows scope for the services to be laid on to the plot or plots. It is also well above the developer's return that would be forgone from developing the unit.

9.26 Based on the above analysis it is unlikely that a requirement for self-build plots will adversely impact on viability.

Conclusion

9.27 Based on the analysis in this Update Note, the Council can continue to confident that the development in the Local Plan will be deliverable, and that 2024 WPVA, subject to this Update Note, can be relied on. In the 2024 WPVA it was advised that the Council should be cautious in relying on brownfield sites in the housing trajectory, as the delivery of these is likely to continue to be challenging. It will be necessary to have regard to the progress of brownfield sites through the development management process and / or commitments from site promoters. This advice remains.

Appendix 1 – Newbuild Price Paid Data by Ward

2023 to 2026

Count of price	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	1		1
Bobbing, Iwade and Lower Halstow		98	98
Borden and Grove Park		54	54
Boughton and Courtenay		2	2
Chalkwell	18	70	88
Hartlip, Newington and Upchurch		1	1
Milton Regis	2	18	20
Murston		24	24
Priory		86	86
Queenborough and Halfway	8	71	79
Sheppey Central		75	75
St Ann's		8	8
The Meads		63	63
Watling		45	45
West Downs		13	13
Grand Total	**29**	**628**	**657**

Average of price	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£162,000		£162,000
Bobbing, Iwade and Lower Halstow		£437,058	£437,058
Borden and Grove Park		£502,796	£502,796
Boughton and Courtenay		£937,500	£937,500
Chalkwell	£189,306	£453,602	£399,541
Hartlip, Newington and Upchurch		£342,500	£342,500
Milton Regis	£134,500	£312,117	£294,356
Murston		£374,917	£374,917
Priory		£446,814	£446,814
Queenborough and Halfway	£220,188	£292,407	£285,093
Sheppey Central		£340,335	£340,335
St Ann's		£459,370	£459,370
The Meads		£453,976	£453,976
Watling		£450,084	£450,084
West Downs		£397,327	£397,327
Grand Total	**£193,103**	**£415,565**	**£405,746**

Average of £ per sqm	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£2,946		£2,946
Bobbing, Iwade and Lower Halstow		£4,353	£4,353
Borden and Grove Park		£4,008	£4,008
Boughton and Courtenay		£3,182	£3,182
Chalkwell		£3,953	£3,953
Hartlip, Newington and Upchurch		£3,683	£3,683
Milton Regis		£3,494	£3,494
Murston		£3,966	£3,966
Priory		£4,527	£4,527
Queenborough and Halfway	£3,392	£3,840	£3,790
Sheppey Central		£3,582	£3,582
St Ann's		£3,829	£3,829
The Meads		£4,091	£4,091
Watling		£4,127	£4,127
West Downs		£4,148	£4,148
Grand Total	**£3,343**	**£4,059**	**£4,049**

2023

Count of price	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	1		1
Bobbing, Iwade and Lower Halstow		10	10
Borden and Grove Park		8	8
Boughton and Courtenay		2	2
Chalkwell		23	23
Hartlip, Newington and Upchurch		1	1
Milton Regis	2	18	20
Murston		9	9
Priory		30	30
Queenborough and Halfway	6	33	39
Sheppey Central		9	9
St Ann's		5	5
The Meads		29	29
Watling		10	10
West Downs		12	12
Grand Total	**9**	**199**	**208**

Average of price	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£162,000		£162,000
Bobbing, Iwade and Lower Halstow		£468,600	£468,600
Borden and Grove Park		£508,496	£508,496
Boughton and Courtenay		£937,500	£937,500
Chalkwell		£465,365	£465,365
Hartlip, Newington and Upchurch		£342,500	£342,500
Milton Regis	£134,500	£312,117	£294,356
Murston		£402,167	£402,167
Priory		£434,633	£434,633
Queenborough and Halfway	£220,250	£304,433	£291,482
Sheppey Central		£361,972	£361,972
St Ann's		£463,995	£463,995
The Meads		£449,858	£449,858
Watling		£381,600	£381,600
West Downs		£418,250	£418,250
Grand Total	**£194,722**	**£409,329**	**£400,043**

Average of £ per sqm	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Abbey	£2,946		£2,946
Bobbing, Iwade and Lower Halstow		£4,241	£4,241
Borden and Grove Park		£4,225	£4,225
Boughton and Courtenay		£3,182	£3,182
Chalkwell		£4,075	£4,075
Hartlip, Newington and Upchurch		£3,683	£3,683
Milton Regis		£3,494	£3,494
Murston		£4,111	£4,111
Priory		£4,835	£4,835
Queenborough and Halfway	£3,423	£4,037	£3,942
Sheppey Central		£3,443	£3,443
St Ann's		£3,854	£3,854
The Meads		£4,067	£4,067
Watling		£3,825	£3,825
West Downs		£4,348	£4,348
Grand Total	**£3,354**	**£4,109**	**£4,083**

2024

Count of price	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow		63	63
Borden and Grove Park		41	41
Chalkwell	18	26	44
Murston		9	9
Priory		31	31
Queenborough and Halfway	2	25	27
Sheppey Central		46	46
St Ann's		3	3
The Meads		23	23
Watling		11	11
West Downs		1	1
Grand Total	**20**	**279**	**299**

Average of price	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow		£426,159	£426,159
Borden and Grove Park		£497,635	£497,635
Chalkwell	£189,306	£434,000	£333,898
Murston		£362,944	£362,944
Priory		£459,556	£459,556
Queenborough and Halfway	£220,000	£277,205	£272,968
Sheppey Central		£334,946	£334,946
St Ann's		£451,662	£451,662
The Meads		£437,239	£437,239
Watling		£348,638	£348,638
West Downs		£146,250	£146,250
Grand Total	**£192,375**	**£407,807**	**£393,397**

Average of £ per sqm	**Column Labels**		
Row Labels	**Flat**	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow		£4,326	£4,326
Borden and Grove Park		£3,930	£3,930
Chalkwell		£3,865	£3,865
Murston		£3,848	£3,848
Priory		£4,370	£4,370
Queenborough and Halfway	£3,302	£3,559	£3,539
Sheppey Central		£3,618	£3,618
St Ann's		£3,788	£3,788
The Meads		£4,042	£4,042
Watling		£3,809	£3,809
West Downs		£1,741	£1,741
Grand Total	**£3,302**	**£3,971**	**£3,967**

2025

Count of price	**Column Labels**	
Row Labels	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow	25	25
Borden and Grove Park	5	5
Chalkwell	21	21
Murston	6	6
Priory	25	25
Queenborough and Halfway	13	13
Sheppey Central	20	20
The Meads	11	11
Watling	24	24
Grand Total	**150**	**150**

Average of price	**Column Labels**	
Row Labels	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow	£451,907	£451,907
Borden and Grove Park	£535,995	£535,995
Chalkwell	£464,988	£464,988
Murston	£352,000	£352,000
Priory	£445,630	£445,630
Queenborough and Halfway	£291,111	£291,111
Sheppey Central	£342,993	£342,993
The Meads	£499,830	£499,830
Watling	£525,115	£525,115
Grand Total	**£438,269**	**£438,269**

Average of £ per sqm	**Column Labels**	
Row Labels	**House**	**Grand Total**
Bobbing, Iwade and Lower Halstow	£4,465	£4,465
Borden and Grove Park	£4,292	£4,292
Chalkwell	£3,930	£3,930
Murston	£3,926	£3,926
Priory	£4,352	£4,352
Queenborough and Halfway	£3,877	£3,877
Sheppey Central	£3,563	£3,563
The Meads	£4,256	£4,256
Watling	£4,399	£4,399
Grand Total	**£4,158**	**£4,158**

2026

NO DATA FOR 2026

Appendix 2 – Newbuild Asking Prices, May 2026

Name	Development	Address	Postcode	Name	No. Beds	D F SD T	sqm	Price	£/m2
Redrow	Regent Quay	Sittingbourne	ME10 3HH	Harrogate	4	D	135	£575,000	£4,259
Redrow	Preston Fields	Faversham	ME13 8LY	Stamford	3	T	115	£370,000	£3,217
Redrow	Preston Fields	Faversham	ME13 8LY	Hampstead	5	D	160	£745,000	£4,656
Redrow	Preston Fields	Faversham	ME13 8LY	Balmoral	4	D	173	£760,000	£4,393
Redrow	Preston Fields	Faversham	ME13 8LY	Shaftesbury	4	D	126	£585,000	£4,643
Redrow	Preston Fields	Faversham	ME13 8LY	Letchworth	3	S	90	£410,000	£4,556
Redrow	Heritage Fields	Sittingbourne	ME10 1YN						
Redrow	Amber Fields	Sittingbourne	ME10 2DD	Oxford	4	D	133	£540,000	£4,060
Redrow	Amber Fields	Sittingbourne	ME10 2DD	Oxford LS	3	D	133	£520,000	£3,910
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Kennett	3	S	108	£377,995	£3,500
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Kennett	3	S	108	£379,995	£3,518
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Hadley	3	D	88	£414,995	£4,716
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Bayswater	4	D	130	£470,995	£3,623
DWH	Mulberry Rise @Applegate Park	Sittingbourne	ME10 1YN	Bayswater	4	D	130	£472,995	£3,638
Persimmon	Moores Quarter	Sittingbourne	ME10 3JN	Ashdown	3	T	101	£395,000	£3,911
Persimmon	Moores Quarter	Sittingbourne	ME10 3JN	Ashdown	3	T	101	£380,000	£3,762
Persimmon	Moores Quarter	Sittingbourne	ME10 3JN	Whinfell	4	T	105	£399,000	£3,800
Persimmon	Burley Place	Sittingbourne	ME10 2DD						
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Kennett	4	S	108	£389,950	£3,611
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£355,000	£4,551
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Sherwood	3	D	79	£375,000	£4,747
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£385,000	£4,425
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£385,000	£4,425
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Addlebrough	2	S		£298,950	
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£345,000	£4,423
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£350,000	£4,487
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Galloway	3	S	78	£355,000	£4,551
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Sherwood	3	D	79	£383,950	£4,860
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Sherwood	3	D	79	£383,950	£4,860
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£389,950	£4,482
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£389,950	£4,482
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Barndale	3	D	87	£390,000	£4,483
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Knebworth	4	D	94	£414,950	£4,414
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Kennett	4	S	108	£425,950	£3,944
Persimmon	Ovinia Chase	Minster on Sea	ME12 3LY	Kennett	4	S	108	£425,950	£3,944
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY		2	S	70	£275,000	£3,929

Jones Homes	Shurland Park	Minster on Sea	ME12 3LY		2	S	70	£275,000	£3,929
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Marton	2	S	63	£295,000	£4,683
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Langley	3	S	68	£320,000	£4,706
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Thornton	3	S	70	£335,000	£4,786
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Birch	3	S	82	£350,000	£4,268
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Birch	3	S	82	£350,000	£4,268
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Shurland	3	S	85	£350,000	£4,118
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Shurland	3	S	85	£350,000	£4,118
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Shurland	3	S	85	£350,000	£4,118
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Jones Homes	Shurland Park	Minster on Sea	ME12 3LY	Baycliffe	3	S	87	£375,000	£4,310
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Thurnham	4	D	128	£575,000	£4,492
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Bridge	3	D	106	£525,000	£4,953
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Lenham	4	D	111	£500,000	£4,505
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Lenham	4	D	111	£500,000	£4,505
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Hadlow	3	S	96	£450,000	£4,688
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Throwley	3	S	88	£370,000	£4,205
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Throwley	3	S	88	£375,000	£4,261
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Throwley	3	S	88	£375,000	£4,261
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Alkham	3	S	88	£350,000	£3,977
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Barham	2	T	70	£315,000	£4,500
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Barham	2	T	70	£315,000	£4,500
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Chilham	4	D	128		
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Hollingbourne	4	D	123		
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Palmarsh	3	D	95		
Pentland Homes	Grovehurst gate	Sittingbourne	ME9 8RB	Sarre	4	D	122		
Barratt	Cherry Meadow@Applegate Park	Sittingbourne	ME9 8BT	Ellerton	3	T	70	£339,995	£4,857
Barratt	Cherry Meadow@Applegate Park	Sittingbourne	ME9 8BT	Ellerton	3	T	70	£344,995	£4,929
Barratt	Cherry Meadow@Applegate Park	Sittingbourne	ME9 8BT	Moresby	3	T	77	£359,995	£4,675
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Seaton	3	D	97	£440,000	£4,536
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Seaton	3	D	97	£440,000	£4,536
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Dorking	4	D	141	£600,000	£4,255
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Buckingham	5	D	141	£650,000	£4,610
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£685,000	£4,202
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£685,000	£4,202
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£685,000	£4,202
Crest Nicholson	Crown Meadows	Faversham	ME13 8GW	Windsor	5	D	163	£700,000	£4,294

Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Holly	3	D	103	£350,000	£3,398
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Holly	3	D	103	£350,000	£3,398
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Hazel	3	D	107	£395,000	£3,692
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Chestnut	4	D	145	£475,000	£3,276
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Beech	4	D	122	£450,000	£3,689
Matthews Homes	Blake Gardens	Minster on Sea	ME12 3LY	Elm	4	D	132	£450,000	£3,409
Riverdale Developments	Scholars Place	Iwade	ME9 8TG		3	S		£369,950	
Riverdale Developments	Scholars Place	Iwade	ME9 8TG	Locke	3	S	103	£399,950	£3,883
Riverdale Developments	Scholars Place	Iwade	ME9 8TG	Austen	4		112	£450,000	£4,018
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Eastwell	3	S	109	£400,000	£3,670
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Fairfield	3	S	89	£430,000	£4,831
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Eastwell	3	S	109	£435,000	£3,991
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Wisley	3	S	95	£445,000	£4,684
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Heaversham	4	D	127	£599,000	£4,717
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Sheldwich	4	D	134	£625,000	£4,664
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Shepherdswell	5	D	172	£785,000	£4,564
Fernham Homes	Love Lane	Faversham	ME13 8YJ	Applehurst	4	D	168	£820,000	£4,881
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Rosemoor	3	D	108	£450,000	£4,167
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Rosemoor	3	D	108	£450,000	£4,167
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Rosemoor	3	D	108	£450,000	£4,167
Rosechurch Homes	Edgelake	Sittingbourne	ME10 3TF	Molineux	3	S	114	£454,500	£3,987
Aile Homes	Monarch Place	Newington	ME9 7GJ	Fulham	3	T	105	£450,000	£4,286
Aile Homes	Monarch Place	Newington	ME9 7GJ	Hammersmith	3	T	110	£475,000	£4,318
Aile Homes	Monarch Place	Newington	ME9 7GJ	Wandsworth	3	S	108	£475,000	£4,398
Aile Homes	Monarch Place	Newington	ME9 7GJ	Westminster	3	D	112	£500,000	£4,464
Aile Homes	Monarch Place	Newington	ME9 7GJ	Chelsea	4	D	120	£550,000	£4,583
Aile Homes	Monarch Place	Newington	ME9 7GJ	Chelsea	4	D	120	£575,000	£4,792
Aile Homes	Monarch Place	Newington	ME9 7GJ	Chelsea	4	D	120	£575,000	£4,792
Aile Homes	Monarch Place	Newington	ME9 7GJ	Kensington	4	D	147	£675,000	£4,592
Aile Homes	Monarch Place	Newington	ME9 7GJ	Belgravia	5	D	180	£775,000	£4,306
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		6	D	415	£1,395,000	£3,361
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		5	D	357	£1,235,000	£3,459
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		5	D	336	£1,125,000	£3,348
Kayleigh Stevens	Callum Park	Sittingbourne	ME9 7TY		4	D	164	£799,000	£4,872

Appendix 3 – Derivation of Affordable Housing Value Assumptions – April 2026

Social Rent

General needs (social rent)
Average weekly rent (£ per week) and unit counts by unit size for Swale - large PRPs

Unit Size	£ per week				
	Net rent	Formula rent	Service charge^	Gross rent^	Unit count
Non-self-contained	-	-	-	-	-
Bedsit	£94.04	£93.04	£7.71	£101.75	30
1 Bedroom	£102.48	£101.20	£12.23	£112.42	1,559
2 Bedroom	£118.31	£117.33	£8.08	£122.21	2,084
3 Bedroom	£131.40	£130.21	£5.77	£132.65	2,735
4 Bedroom	£147.62	£147.02	£5.55	£149.78	167
5 Bedroom	£159.50	£157.51	£7.65	£162.90	9
6+ Bedroom	£164.87	£169.51	£3.76	£166.12	3
All self-contained	£120.71	£119.56	£9.33	£124.91	6,587
All stock sizes	**£120.71**	**£119.56**	**£9.33**	**£124.91**	**6,587**

Owned stock. Large PRPs only - unweighted. Excludes Affordable Rent and intermediate rent, but includes other units with an exception under the Rent Policy Statement. Stock outside England is excluded.
Source: SDR 2025

Source: Table 9, SDR 2025 – Data Tool[26]

Affordable Rent

Affordable Rent general needs
Average weekly gross rent (£ per week) and unit counts by unit size for Swale

Unit Size	£ per week	
	Gross rent	Unit count
Non-self-contained	-	-
Bedsit	£112.13	2
1 Bedroom	£133.39	273
2 Bedroom	£164.64	659
3 Bedroom	£186.82	576
4 Bedroom	£266.21	76
5 Bedroom	£234.33	2
6+ Bedroom	-	-
All self-contained	£172.20	1,588
All stock sizes	**£172.20**	**1,588**

Owned stock. All PRPs owning Affordable Rent units - unweighted. Stock outside England is excluded.
Source: SDR 2025

Source: Table 1, SDR 2025 – Data Tool[27]

[26] Private registered provider social housing stock and rents in England 2024 to 2025 - GOV.UK

[27] Private registered provider social housing stock and rents in England 2024 to 2025 - GOV.UK

BRMA LHA Caps - £ per week

	Canterbury BRMA	Maidstone BRMA	Medway & Swale BRMA
Shared Accommodation	£97.81	£102.37	£94.36
One Bedroom	£155.34	£172.60	£155.34
Two Bedrooms	£205.97	£208.27	£195.62
Three Bedrooms	£253.15	£276.16	£216.33
Four Bedrooms	£302.63	£356.71	£299.18

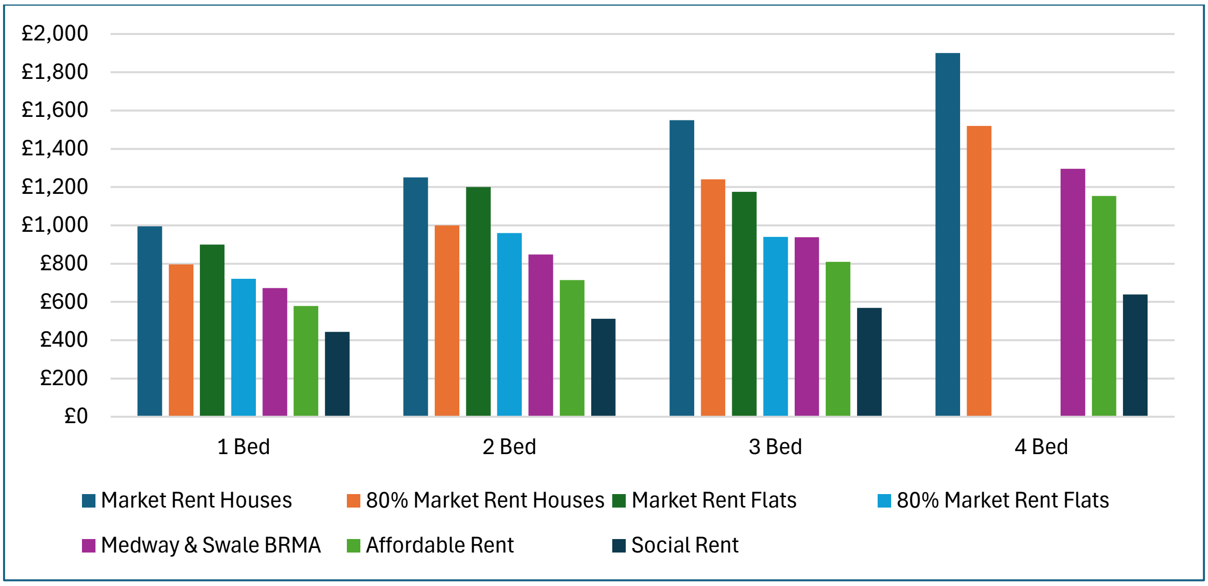
Source: VOA (May 2026)

Average Rents - March-2026 - £ per month

1 Bed	£772
2 Bed	£1,020
3 Bed	£1,232
4 Bed	£1,846
Detached	£1,567
Semidetached	£1,232
Terraced	£1,140
Flat maisonette	£861

Source: ONS (April 2026) Price Index of Private Rents, UK: monthly price statistics - Office for National Statistics

Rents by Tenure – £/Month



Source: Market Survey, SDR and VOA (May 2026)

Capitalisation of Social Rents

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Rent (£/month)	£444	£513	£569	£640
Rent (£/annum)	£5,329	£6,152	£6,833	£7,676
Net Rent	£4,263	£4,922	£5,466	£6,141
Value	£85,263	£98,434	£109,325	£122,820
sqm	50	70	84	97
£ per sqm	£1,705	£1,406	£1,301	£1,266

Source: HDH (May 2026)

Capitalisation of Affordable Rents

	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
Rent (£/month)	£673	£848	£937	£1,296
Rent (£/annum)	£8,078	£10,172	£11,249	£15,557
Net Rent	£6,462	£8,138	£8,999	£12,446
Value	£129,243	£162,756	£179,987	£248,918
sqm	50	70	84	97
£ per sqm	£2,585	£2,325	£2,143	£2,566

Source: HDH (May 2026)

Appendix 4 – Sensitivity Testing Based on Full Policy Requirements

Isle of Sheppey

			EUV	BLV	Residual Value (£ per gross ha)														
				Value Change	-10%	-5%	0%	+5%	+10%	+15%	+20%								
				BCIS Change									-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	IoS	1,100,000	1,320,000	341,302	713,126	1,076,941	1,440,756	1,804,572	2,168,387	2,531,339		1,675,729	1,376,335	1,076,941	777,547	472,607	162,348	-156,405
Site 2	Brown 90	IoS	1,100,000	1,320,000	163,458	583,678	1,003,899	1,424,119	1,844,339	2,264,560	2,684,780		1,716,991	1,360,445	1,003,899	647,353	290,806	-73,576	-447,686
Site 3	Brown 30	IoS	1,100,000	1,320,000	270,345	1,250,692	2,214,810	3,178,929	4,143,048	5,107,166	6,071,285		3,857,450	3,036,130	2,214,810	1,393,491	567,500	-291,767	-1,153,546
Site 4	Brown 15	IoS	1,100,000	1,320,000	183,680	768,327	1,332,396	1,894,634	2,456,872	3,019,110	3,581,348		2,287,439	1,809,918	1,332,396	854,874	361,459	-139,586	-640,631
Site 5	Brown 9	IoS	1,100,000	1,320,000	484,829	1,017,461	1,534,313	2,048,526	2,562,740	3,076,953	3,591,167		2,357,613	1,945,963	1,534,313	1,122,663	699,416	268,134	-163,794
Site 6	Brown 6	IoS	1,100,000	1,320,000	480,866	1,030,068	1,569,237	2,095,964	2,619,946	3,143,928	3,667,910		2,412,040	1,992,011	1,569,237	1,137,034	699,014	258,294	-182,427
Site 7	Central 60	IoS	1,100,000	1,320,000	4,129	498,492	985,162	1,471,832	1,958,502	2,445,171	2,931,841		1,826,838	1,406,000	985,162	564,324	141,848	-299,290	-745,252
Site 8	Central 24	IoS	1,100,000	1,320,000	-67,047	437,664	923,020	1,406,621	1,890,221	2,373,822	2,857,422		1,763,701	1,343,360	923,020	502,680	65,706	-375,341	-823,768
Site 9	Central 9	IoS	1,100,000	1,320,000	887,857	1,551,422	2,197,435	2,840,202	3,482,969	4,125,736	4,768,503		3,187,002	2,692,219	2,197,435	1,702,652	1,194,569	679,246	160,089
Site 10	Brown 90 HD Flats	IoS	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545		-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	IoS	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571		-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	IoS	25,000	325,000	54,710	250,991	446,659	637,300	827,942	1,018,583	1,209,224		801,924	624,292	446,659	263,706	80,141	-109,618	-311,148
Site 13	Large Green 400 HD	IoS	25,000	325,000	134,689	384,835	632,057	875,012	1,117,968	1,360,923	1,603,878		1,079,306	855,682	632,057	403,887	172,794	-61,896	-312,708
Site 14	Green 150	IoS	25,000	325,000	-111,578	118,442	341,613	564,783	787,954	1,011,125	1,234,296		773,576	557,594	341,613	125,631	-96,492	-323,343	-558,042
Site 15	Green 30	IoS	25,000	325,000	-103,110	131,377	357,002	580,694	804,386	1,028,078	1,251,770		786,836	571,919	357,002	140,406	-84,695	-310,199	-543,750
Site 16	Green 12	IoS	75,000	375,000	-450,206	-118,292	210,922	536,946	853,184	1,166,943	1,480,701		849,951	535,282	210,922	-116,596	-445,358	-784,610	-1,123,862
Site 17	Green 6	IoS	75,000	375,000	-26,949	398,698	822,908	1,240,330	1,646,266	2,051,929	2,457,593		1,514,655	1,172,617	822,908	467,745	111,145	-245,455	-606,640

Sittingbourne and West Swale BC

			EUV	BLV	Residual Value (£ per gross ha)													
				Value Change	-10%	-5%	0%	+5%	+10%	+15%	+20%							
				BCIS Change								-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	Sittingbourne West	1,100,000	1,320,000	510,462	885,938	1,258,849	1,631,759	2,004,670	2,377,580	2,745,849	1,857,637	1,558,243	1,258,849	959,455	660,061	350,304	40,044
Site 2	Brown 90	Sittingbourne West	1,100,000	1,320,000	352,557	783,283	1,214,009	1,644,735	2,075,461	2,506,186	2,936,912	1,927,101	1,570,555	1,214,009	857,463	500,916	144,370	-227,226
Site 3	Brown 30	Sittingbourne West	1,100,000	1,320,000	720,052	1,708,648	2,696,870	3,685,091	4,673,313	5,661,535	6,649,756	4,339,509	3,518,189	2,696,870	1,875,550	1,054,230	214,039	-647,739
Site 4	Brown 15	Sittingbourne West	1,100,000	1,320,000	449,150	1,037,221	1,613,515	2,189,809	2,766,103	3,342,397	3,918,691	2,568,558	2,091,037	1,613,515	1,135,993	653,403	155,381	-345,664
Site 5	Brown 9	Sittingbourne West	1,100,000	1,320,000	726,446	1,264,351	1,791,420	2,318,489	2,845,557	3,372,626	3,899,695	2,614,719	2,203,069	1,791,420	1,379,770	963,976	537,906	105,978
Site 6	Brown 6	Sittingbourne West	1,100,000	1,320,000	728,273	1,286,173	1,833,973	2,371,054	2,908,136	3,445,217	3,982,299	2,674,031	2,254,002	1,833,973	1,406,619	973,911	533,191	92,470
Site 7	Central 60	Sittingbourne West	1,100,000	1,320,000	230,824	729,660	1,228,497	1,727,333	2,226,170	2,725,007	3,223,843	2,070,172	1,649,335	1,228,497	807,659	386,821	-43,968	-485,537
Site 8	Central 24	Sittingbourne West	1,100,000	1,320,000	161,293	669,130	1,164,820	1,660,511	2,156,202	2,651,892	3,147,583	2,005,501	1,585,161	1,164,820	744,480	319,042	-121,629	-562,676
Site 9	Central 9	Sittingbourne West	1,100,000	1,320,000	1,187,653	1,859,983	2,518,819	3,177,655	3,836,491	4,495,327	5,154,163	3,508,386	3,013,602	2,518,819	2,024,035	1,525,268	1,016,143	497,304
Site 10	Brown 90 HD Flats	Sittingbourne West	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545	-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	Sittingbourne West	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571	-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	Sittingbourne West	25,000	325,000	54,710	250,991	446,659	637,300	827,942	1,018,583	1,209,224	801,924	624,292	446,659	263,706	80,141	-109,618	-311,148
Site 13	Large Green 400 HD	Sittingbourne West	25,000	325,000	134,689	384,835	632,057	875,012	1,117,968	1,360,923	1,603,878	1,079,306	855,682	632,057	403,887	172,794	-61,896	-312,708
Site 14	Green 150	Sittingbourne West	25,000	325,000	-111,578	118,442	341,613	564,783	787,954	1,011,125	1,234,296	773,576	557,594	341,613	125,631	-96,492	-323,343	-558,042
Site 15	Green 30	Sittingbourne West	25,000	325,000	-103,110	131,377	357,002	580,694	804,386	1,028,078	1,251,770	786,836	571,919	357,002	140,406	-84,695	-310,199	-543,750
Site 16	Green 12	Sittingbourne West	75,000	375,000	-450,206	-118,292	210,922	536,946	853,184	1,166,943	1,480,701	849,951	535,282	210,922	-116,596	-445,358	-784,610	-1,123,862
Site 17	Green 6	Sittingbourne West	75,000	375,000	-26,949	398,698	822,908	1,240,330	1,646,266	2,051,929	2,457,593	1,514,655	1,172,617	822,908	467,745	111,145	-245,455	-606,640
Site 19	West of Bobbing Village	Bobbing	25,000	250,000	-166,714	-7,304	138,530	280,681	420,930	560,640	697,905	406,080	273,255	138,530	690	-149,405	-307,719	-481,847

Sittingbourne and East Swale BC

			EUV	BLV	Residual Value (£ per gross ha)													
				Value Change	-10%	-5%	0%	+5%	+10%	+15%	+20%							
				BCIS Change								-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	Sittingbourne East	1,100,000	1,320,000	510,462	885,938	1,258,849	1,631,759	2,004,670	2,377,580	2,745,849	1,857,637	1,558,243	1,258,849	959,455	660,061	350,304	40,044
Site 2	Brown 90	Sittingbourne East	1,100,000	1,320,000	352,557	783,283	1,214,009	1,644,735	2,075,461	2,506,186	2,936,912	1,927,101	1,570,555	1,214,009	857,463	500,916	144,370	-227,226
Site 3	Brown 30	Sittingbourne East	1,100,000	1,320,000	720,052	1,708,648	2,696,870	3,685,091	4,673,313	5,661,535	6,649,756	4,339,509	3,518,189	2,696,870	1,875,550	1,054,230	214,039	-647,739
Site 4	Brown 15	Sittingbourne East	1,100,000	1,320,000	449,150	1,037,221	1,613,515	2,189,809	2,766,103	3,342,397	3,918,691	2,568,558	2,091,037	1,613,515	1,135,993	653,403	155,381	-345,664
Site 5	Brown 9	Sittingbourne East	1,100,000	1,320,000	726,446	1,264,351	1,791,420	2,318,489	2,845,557	3,372,626	3,899,695	2,614,719	2,203,069	1,791,420	1,379,770	963,976	537,906	105,978
Site 6	Brown 6	Sittingbourne East	1,100,000	1,320,000	728,273	1,286,173	1,833,973	2,371,054	2,908,136	3,445,217	3,982,299	2,674,031	2,254,002	1,833,973	1,406,619	973,911	533,191	92,470
Site 7	Central 60	Sittingbourne East	1,100,000	1,320,000	230,824	729,660	1,228,497	1,727,333	2,226,170	2,725,007	3,223,843	2,070,172	1,649,335	1,228,497	807,659	386,821	-43,968	-485,537
Site 8	Central 24	Sittingbourne East	1,100,000	1,320,000	161,293	669,130	1,164,820	1,660,511	2,156,202	2,651,892	3,147,583	2,005,501	1,585,161	1,164,820	744,480	319,042	-121,629	-562,676
Site 9	Central 9	Sittingbourne East	1,100,000	1,320,000	1,187,653	1,859,983	2,518,819	3,177,655	3,836,491	4,495,327	5,154,163	3,508,386	3,013,602	2,518,819	2,024,035	1,525,268	1,016,143	497,304
Site 10	Brown 90 HD Flats	Sittingbourne East	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545	-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	Sittingbourne East	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571	-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	Sittingbourne East	25,000	325,000	253,444	459,766	661,131	862,495	1,063,860	1,265,225	1,466,589	1,016,395	838,763	661,131	483,498	300,957	117,392	-69,976
Site 13	Large Green 400 HD	Sittingbourne East	25,000	325,000	387,962	648,760	905,382	1,162,003	1,418,625	1,675,247	1,931,868	1,352,631	1,129,006	905,382	681,757	454,207	223,114	-9,097
Site 14	Green 150	Sittingbourne East	25,000	325,000	121,231	356,956	592,680	828,404	1,064,128	1,299,853	1,535,577	1,024,644	808,662	592,680	376,698	160,716	-59,678	-286,299
Site 15	Green 30	Sittingbourne East	25,000	325,000	134,254	372,381	608,655	844,930	1,081,205	1,317,479	1,553,754	1,038,489	823,572	608,655	393,739	178,208	-46,149	-271,653
Site 16	Green 12	Sittingbourne East	75,000	375,000	-114,177	233,556	577,302	910,053	1,241,461	1,572,868	1,904,275	1,202,929	890,787	577,302	253,770	-73,748	-401,266	-739,477
Site 17	Green 6	Sittingbourne East	75,000	375,000	404,019	851,606	1,291,310	1,719,792	2,148,274	2,576,756	3,005,238	1,971,027	1,631,168	1,291,310	942,799	589,998	233,398	-123,202

Faversham and Adjacent

			EUV	BLV	Residual Value (£ per gross ha)													
				Value Change	-10%	-5%	0%	+5%	+10%	+15%	+20%							
				BCIS Change								-10%	-5%	0%	+5%	+10%	+15%	+20%
Site 1	Large Brown 300	Faversham	1,100,000	1,320,000	676,745	1,058,750	1,440,756	1,822,762	2,204,768	2,584,967	2,960,360	2,039,545	1,740,150	1,440,756	1,141,362	841,968	538,260	228,000
Site 2	Brown 90	Faversham	1,100,000	1,320,000	541,656	982,888	1,424,119	1,865,350	2,306,582	2,747,813	3,189,045	2,137,212	1,780,665	1,424,119	1,067,573	711,027	354,480	-6,765
Site 3	Brown 30	Faversham	1,100,000	1,320,000	1,154,280	2,166,604	3,178,929	4,191,254	5,203,578	6,215,903	7,228,227	4,821,568	4,000,249	3,178,929	2,357,609	1,536,290	714,438	-141,933
Site 4	Brown 15	Faversham	1,100,000	1,320,000	710,473	1,304,284	1,894,634	2,484,984	3,075,334	3,665,684	4,256,034	2,849,677	2,372,156	1,894,634	1,417,112	939,591	450,348	-50,697
Site 5	Brown 9	Faversham	1,100,000	1,320,000	964,550	1,508,602	2,048,526	2,588,451	3,128,375	3,668,299	4,208,223	2,871,826	2,460,176	2,048,526	1,636,877	1,225,227	804,953	375,750
Site 6	Brown 6	Faversham	1,100,000	1,320,000	975,681	1,542,279	2,095,964	2,646,145	3,196,326	3,746,507	4,296,688	2,936,022	2,515,993	2,095,964	1,675,935	1,244,000	808,087	367,367
Site 7	Central 60	Faversham	1,100,000	1,320,000	449,825	960,829	1,471,832	1,982,835	2,493,838	3,004,842	3,515,845	2,313,507	1,892,670	1,471,832	1,050,994	630,156	209,319	-230,215
Site 8	Central 24	Faversham	1,100,000	1,320,000	387,902	898,840	1,406,621	1,914,401	2,422,182	2,929,963	3,437,743	2,247,301	1,826,961	1,406,621	986,280	565,940	132,082	-308,965
Site 9	Central 9	Faversham	1,100,000	1,320,000	1,485,282	2,165,297	2,840,202	3,515,107	4,190,012	4,864,918	5,539,823	3,829,769	3,334,986	2,840,202	2,345,418	1,850,635	1,346,842	834,519
Site 10	Brown 90 HD Flats	Faversham	1,100,000	1,320,000	-2,806,137	-2,432,233	-2,058,329	-1,684,425	-1,313,590	-946,568	-579,545	-1,151,280	-1,603,058	-2,058,329	-2,513,600	-2,968,871	-3,427,618	-3,888,942
Site 11	Brown 24 HD	Faversham	1,100,000	1,320,000	-2,437,991	-2,112,105	-1,791,598	-1,471,092	-1,150,585	-830,078	-509,571	-1,011,173	-1,401,386	-1,791,598	-2,181,811	-2,576,278	-2,971,938	-3,367,597
Site 12	Large Green 400 LD	Faversham	25,000	325,000	319,689	527,682	732,621	937,560	1,142,499	1,347,439	1,552,378	1,087,886	910,253	732,621	554,989	374,562	190,997	7,255
Site 13	Large Green 400 HD	Faversham	25,000	325,000	472,386	735,313	996,490	1,257,667	1,518,844	1,780,021	2,041,198	1,443,740	1,220,115	996,490	772,865	548,012	316,918	85,825
Site 14	Green 150	Faversham	25,000	325,000	196,552	436,460	676,369	916,278	1,156,186	1,396,095	1,636,004	1,108,333	892,351	676,369	460,387	244,405	28,064	-198,487
Site 15	Green 30	Faversham	25,000	325,000	211,602	452,071	692,540	933,009	1,173,478	1,413,947	1,654,415	1,122,374	907,457	692,540	477,623	262,706	41,868	-183,636
Site 16	Green 12	Faversham	75,000	375,000	-3,067	350,838	696,305	1,033,596	1,370,886	1,708,176	2,045,466	1,320,589	1,008,447	696,305	377,183	49,708	-277,810	-611,348
Site 17	Green 6	Faversham	75,000	375,000	547,674	1,000,312	1,443,434	1,879,522	2,315,610	2,751,699	3,187,787	2,123,150	1,783,292	1,443,434	1,099,332	749,615	393,015	36,415
Site 18	South East Faversham	Faversham	25,000	250,000	-464,951	-272,444	-106,922	48,879	195,839	339,186	481,904	203,171	52,899	-106,922	-276,561	-465,431	-700,673	-944,557

Appendix 5 – Varied Affordable Housing Tenure Mix

Isle of Sheppey

			EUV	BLV	Residual Value (£ per gross ha)								
				Affordable Housing	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
				Affordable Home Ownership	30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	IoS	1,100,000	1,320,000	1,007,854	1,025,126	1,042,398	1,059,669	1,068,305	1,076,941	1,094,213	1,111,485	1,128,757
Site 2	Brown 90	IoS	1,100,000	1,320,000	922,538	942,878	963,218	983,558	993,729	1,003,899	1,024,239	1,044,579	1,064,920
Site 3	Brown 30	IoS	1,100,000	1,320,000	2,054,083	2,094,265	2,134,447	2,174,628	2,194,719	2,214,810	2,254,992	2,295,174	2,335,356
Site 4	Brown 15	IoS	1,100,000	1,320,000	1,221,288	1,249,065	1,276,842	1,304,619	1,318,507	1,332,396	1,360,173	1,387,950	1,415,727
Site 5	Brown 9	IoS	1,100,000	1,320,000	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313	1,534,313
Site 6	Brown 6	IoS	1,100,000	1,320,000	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237	1,569,237
Site 7	Central 60	IoS	1,100,000	1,320,000	910,330	929,038	947,746	966,454	975,808	985,162	1,003,870	1,022,578	1,041,286
Site 8	Central 24	IoS	1,100,000	1,320,000	853,157	870,622	888,088	905,554	914,287	923,020	940,486	957,952	975,418
Site 9	Central 9	IoS	1,100,000	1,320,000	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435	2,197,435
Site 10	Brown 90 HD Flats	IoS	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	IoS	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	IoS	25,000	325,000	303,337	339,321	375,304	411,287	429,279	446,659	481,406	516,153	550,901
Site 13	Large Green 400 HD	IoS	25,000	325,000	446,749	493,807	540,865	586,612	609,334	632,057	677,502	722,947	768,393
Site 14	Green 150	IoS	25,000	325,000	179,904	220,331	260,758	301,185	321,399	341,613	382,040	422,467	462,894
Site 15	Green 30	IoS	25,000	325,000	203,558	241,919	280,280	318,641	337,821	357,002	395,363	433,724	472,085
Site 16	Green 12	IoS	75,000	375,000	46,452	87,570	128,687	169,805	190,363	210,922	252,040	293,157	334,275
Site 17	Green 6	IoS	75,000	375,000	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908

Sittingbourne and West Swale BC

			EUV	BLV	Residual Value (£ per gross ha)								
				Affordable Housing	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
				Affordable Home Ownership	30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	Sittingbourne Wes	1,100,000	1,320,000	1,189,762	1,207,034	1,224,305	1,241,577	1,250,213	1,258,849	1,276,121	1,293,392	1,310,664
Site 2	Brown 90	Sittingbourne Wes	1,100,000	1,320,000	1,132,648	1,152,988	1,173,328	1,193,669	1,203,839	1,214,009	1,234,349	1,254,689	1,275,030
Site 3	Brown 30	Sittingbourne Wes	1,100,000	1,320,000	2,536,142	2,576,324	2,616,506	2,656,688	2,676,779	2,696,870	2,737,051	2,777,233	2,817,415
Site 4	Brown 15	Sittingbourne Wes	1,100,000	1,320,000	1,502,407	1,530,184	1,557,961	1,585,738	1,599,626	1,613,515	1,641,292	1,669,069	1,696,846
Site 5	Brown 9	Sittingbourne Wes	1,100,000	1,320,000	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420
Site 6	Brown 6	Sittingbourne Wes	1,100,000	1,320,000	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973
Site 7	Central 60	Sittingbourne Wes	1,100,000	1,320,000	1,153,665	1,172,373	1,191,081	1,209,789	1,219,143	1,228,497	1,247,205	1,265,913	1,284,621
Site 8	Central 24	Sittingbourne Wes	1,100,000	1,320,000	1,094,957	1,112,423	1,129,889	1,147,355	1,156,087	1,164,820	1,182,286	1,199,752	1,217,218
Site 9	Central 9	Sittingbourne Wes	1,100,000	1,320,000	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819
Site 10	Brown 90 HD Flats	Sittingbourne Wes	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	Sittingbourne Wes	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	Sittingbourne Wes	25,000	325,000	303,337	339,321	375,304	411,287	429,279	446,659	481,406	516,153	550,901
Site 13	Large Green 400 HD	Sittingbourne Wes	25,000	325,000	446,749	493,807	540,865	586,612	609,334	632,057	677,502	722,947	768,393
Site 14	Green 150	Sittingbourne Wes	25,000	325,000	179,904	220,331	260,758	301,185	321,399	341,613	382,040	422,467	462,894
Site 15	Green 30	Sittingbourne Wes	25,000	325,000	203,558	241,919	280,280	318,641	337,821	357,002	395,363	433,724	472,085
Site 16	Green 12	Sittingbourne Wes	75,000	375,000	46,452	87,570	128,687	169,805	190,363	210,922	252,040	293,157	334,275
Site 17	Green 6	Sittingbourne Wes	75,000	375,000	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908	822,908
Site 19	West of Bobbing Village	Bobbing	25,000	250,000	39,780	64,467	89,155	113,842	126,186	138,530	163,217	187,905	211,941

Sittingbourne and East Swale BC

			EUV	BLV	Residual Value (£ per gross ha)								
				Affordable Housing	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
				Affordable Home Ownership	30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	Sittingbourne East	1,100,000	1,320,000	1,189,762	1,207,034	1,224,305	1,241,577	1,250,213	1,258,849	1,276,121	1,293,392	1,310,664
Site 2	Brown 90	Sittingbourne East	1,100,000	1,320,000	1,132,648	1,152,988	1,173,328	1,193,669	1,203,839	1,214,009	1,234,349	1,254,689	1,275,030
Site 3	Brown 30	Sittingbourne East	1,100,000	1,320,000	2,536,142	2,576,324	2,616,506	2,656,688	2,676,779	2,696,870	2,737,051	2,777,233	2,817,415
Site 4	Brown 15	Sittingbourne East	1,100,000	1,320,000	1,502,407	1,530,184	1,557,961	1,585,738	1,599,626	1,613,515	1,641,292	1,669,069	1,696,846
Site 5	Brown 9	Sittingbourne East	1,100,000	1,320,000	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420	1,791,420
Site 6	Brown 6	Sittingbourne East	1,100,000	1,320,000	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973	1,833,973
Site 7	Central 60	Sittingbourne East	1,100,000	1,320,000	1,153,665	1,172,373	1,191,081	1,209,789	1,219,143	1,228,497	1,247,205	1,265,913	1,284,621
Site 8	Central 24	Sittingbourne East	1,100,000	1,320,000	1,094,957	1,112,423	1,129,889	1,147,355	1,156,087	1,164,820	1,182,286	1,199,752	1,217,218
Site 9	Central 9	Sittingbourne East	1,100,000	1,320,000	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819	2,518,819
Site 10	Brown 90 HD Flats	Sittingbourne East	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	Sittingbourne East	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	Sittingbourne East	25,000	325,000	522,142	556,889	591,636	626,383	643,757	661,131	695,878	730,625	765,372
Site 13	Large Green 400 HD	Sittingbourne East	25,000	325,000	723,601	769,046	814,491	859,936	882,659	905,382	950,827	996,272	1,041,718
Site 14	Green 150	Sittingbourne East	25,000	325,000	430,971	471,398	511,825	552,253	572,466	592,680	633,107	673,534	713,962
Site 15	Green 30	Sittingbourne East	25,000	325,000	455,211	493,572	531,933	570,294	589,475	608,655	647,016	685,378	723,739
Site 16	Green 12	Sittingbourne East	75,000	375,000	416,011	456,333	496,656	536,979	557,141	577,302	617,625	657,020	696,207
Site 17	Green 6	Sittingbourne East	75,000	375,000	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310	1,291,310

Faversham and Adjacent

			EUV	BLV	Residual Value (£ per gross ha)								
			Affordable Housing		10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%	10% / 30%
				Social Rent	70%	60%	50%	40%	35%	30%	20%	10%	0%
				Affordable Rent	0%	10%	20%	30%	35%	40%	50%	60%	70%
			Affordable Home Ownership		30%	30%	30%	30%	30%	30%	30%	30%	30%
Site 1	Large Brown 300	Faversham	1,100,000	1,320,000	1,371,669	1,388,941	1,406,213	1,423,485	1,432,121	1,440,756	1,458,028	1,475,300	1,492,572
Site 2	Brown 90	Faversham	1,100,000	1,320,000	1,342,758	1,363,098	1,383,439	1,403,779	1,413,949	1,424,119	1,444,459	1,464,800	1,485,140
Site 3	Brown 30	Faversham	1,100,000	1,320,000	3,018,202	3,058,383	3,098,565	3,138,747	3,158,838	3,178,929	3,219,111	3,259,293	3,299,474
Site 4	Brown 15	Faversham	1,100,000	1,320,000	1,783,526	1,811,303	1,839,080	1,866,857	1,880,745	1,894,634	1,922,411	1,950,188	1,977,965
Site 5	Brown 9	Faversham	1,100,000	1,320,000	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526	2,048,526
Site 6	Brown 6	Faversham	1,100,000	1,320,000	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964	2,095,964
Site 7	Central 60	Faversham	1,100,000	1,320,000	1,397,000	1,415,708	1,434,416	1,453,124	1,462,478	1,471,832	1,490,540	1,509,248	1,527,956
Site 8	Central 24	Faversham	1,100,000	1,320,000	1,336,757	1,354,223	1,371,689	1,389,155	1,397,888	1,406,621	1,424,087	1,441,552	1,459,018
Site 9	Central 9	Faversham	1,100,000	1,320,000	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202	2,840,202
Site 10	Brown 90 HD Flats	Faversham	1,100,000	1,320,000	-2,160,939	-2,135,286	-2,109,634	-2,083,982	-2,071,155	-2,058,329	-2,032,677	-2,007,024	-1,981,372
Site 11	Brown 24 HD	Faversham	1,100,000	1,320,000	-1,868,209	-1,849,056	-1,829,904	-1,810,751	-1,801,175	-1,791,598	-1,772,446	-1,753,293	-1,734,141
Site 12	Large Green 400 LD	Faversham	25,000	325,000	593,633	628,380	663,127	697,874	715,247	732,621	767,368	802,115	836,862
Site 13	Large Green 400 HD	Faversham	25,000	325,000	814,709	860,154	905,599	951,045	973,767	996,490	1,041,935	1,087,381	1,132,826
Site 14	Green 150	Faversham	25,000	325,000	514,660	555,087	595,514	635,942	656,155	676,369	716,796	757,223	797,651
Site 15	Green 30	Faversham	25,000	325,000	539,096	577,457	615,818	654,179	673,359	692,540	730,901	769,262	807,623
Site 16	Green 12	Faversham	75,000	375,000	537,080	577,403	617,726	657,118	676,712	696,305	735,492	774,679	813,867
Site 17	Green 6	Faversham	75,000	375,000	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434	1,443,434
Site 18	South East Faversham	Faversham	25,000	250,000	-228,457	-197,286	-166,278	-136,600	-121,761	-106,922	-77,245	-47,567	-18,500

Appendix 6 - Commuted Sums Calculation

Isle of Sheppey

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	IoS	Brown	PDL	300	30	11,587,494	9,230,925	2,356,570	78,552
Site 2	Brown 90	IoS	Brown	PDL	90	9	2,960,546	2,258,772	701,774	77,975
Site 3	Brown 30	IoS	Brown	PDL	30	3	993,550	755,049	238,501	79,500
Site 4	Brown 15	IoS	Brown	PDL	15	1.5	517,003	399,719	117,284	78,189
Site 5	Brown 9	IoS	Brown	PDL	9	0.9	345,220	345,220	0	0
Site 6	Brown 6	IoS	Brown	PDL	6	0.6	235,386	235,386	0	0
Site 7	Central 60	IoS	Brown	PDL	60	6	1,721,360	1,231,453	489,908	81,651
Site 8	Central 24	IoS	Brown	PDL	24	2.4	649,017	461,510	187,507	78,128
Site 9	Central 9	IoS	Brown	PDL	9	0.9	329,615	329,615	0	0
Site 10	Brown 90 HD Flats	IoS	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	IoS	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	IoS	Green	Agricultural	400	120	17,896,129	8,507,797	9,388,332	78,236
Site 13	Large Green 400 HD	IoS	Green	Agricultural	400	120	18,067,696	9,029,384	9,038,312	75,319
Site 14	Green 150	IoS	Green	Agricultural	150	45	5,584,817	2,091,506	3,493,311	77,629
Site 15	Green 30	IoS	Green	Agricultural	30	9	1,151,784	446,252	705,531	78,392
Site 16	Green 12	IoS	Green	Paddock	12	3.6	375,426	84,369	291,057	80,849
Site 17	Green 6	IoS	Green	Paddock	6	1.8	164,582	164,582	0	0

Sittingbourne and West Swale BC

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	Sittingbourne Wes	Brown	PDL	300	30	13,285,785	10,790,133	2,495,653	83,188
Site 2	Brown 90	Sittingbourne Wes	Brown	PDL	90	9	3,475,229	2,731,520	743,709	82,634
Site 3	Brown 30	Sittingbourne Wes	Brown	PDL	30	3	1,172,307	919,387	252,919	84,306
Site 4	Brown 15	Sittingbourne Wes	Brown	PDL	15	1.5	608,905	484,054	124,851	83,234
Site 5	Brown 9	Sittingbourne Wes	Brown	PDL	9	0.9	403,069	403,069	0	0
Site 6	Brown 6	Sittingbourne Wes	Brown	PDL	6	0.6	275,096	275,096	0	0
Site 7	Central 60	Sittingbourne Wes	Brown	PDL	60	6	2,053,231	1,535,621	517,610	86,268
Site 8	Central 24	Sittingbourne Wes	Brown	PDL	24	2.4	781,122	582,410	198,712	82,797
Site 9	Central 9	Sittingbourne Wes	Brown	PDL	9	0.9	377,823	377,823	0	0
Site 10	Brown 90 HD Flats	Sittingbourne Wes	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	Sittingbourne Wes	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	Sittingbourne Wes	Green	Agricultural	400	120	17,896,129	8,507,797	9,388,332	78,236
Site 13	Large Green 400 HD	Sittingbourne Wes	Green	Agricultural	400	120	18,067,696	9,029,384	9,038,312	75,319
Site 14	Green 150	Sittingbourne Wes	Green	Agricultural	150	45	5,584,817	2,091,506	3,493,311	77,629
Site 15	Green 30	Sittingbourne Wes	Green	Agricultural	30	9	1,151,784	446,252	705,531	78,392
Site 16	Green 12	Sittingbourne Wes	Green	Paddock	12	3.6	375,426	84,369	291,057	80,849
Site 17	Green 6	Sittingbourne Wes	Green	Paddock	6	1.8	164,582	164,582	0	0

Sittingbourne and East Swale BC

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	Sittingbourne East	Brown	PDL	300	30	13,285,785	10,790,133	2,495,653	83,188
Site 2	Brown 90	Sittingbourne East	Brown	PDL	90	9	3,475,229	2,731,520	743,709	82,634
Site 3	Brown 30	Sittingbourne East	Brown	PDL	30	3	1,172,307	919,387	252,919	84,306
Site 4	Brown 15	Sittingbourne East	Brown	PDL	15	1.5	608,905	484,054	124,851	83,234
Site 5	Brown 9	Sittingbourne East	Brown	PDL	9	0.9	403,069	403,069	0	0
Site 6	Brown 6	Sittingbourne East	Brown	PDL	6	0.6	275,096	275,096	0	0
Site 7	Central 60	Sittingbourne East	Brown	PDL	60	6	2,053,231	1,535,621	517,610	86,268
Site 8	Central 24	Sittingbourne East	Brown	PDL	24	2.4	781,122	582,410	198,712	82,797
Site 9	Central 9	Sittingbourne East	Brown	PDL	9	0.9	377,823	377,823	0	0
Site 10	Brown 90 HD Flats	Sittingbourne East	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	Sittingbourne East	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	Sittingbourne East	Green	Agricultural	400	120	23,282,578	12,592,963	10,689,615	89,080
Site 13	Large Green 400 HD	Sittingbourne East	Green	Agricultural	400	120	23,205,136	12,934,024	10,271,112	85,593
Site 14	Green 150	Sittingbourne East	Green	Agricultural	150	45	7,616,382	3,628,652	3,987,730	88,616
Site 15	Green 30	Sittingbourne East	Green	Agricultural	30	9	1,569,763	760,819	808,944	89,883
Site 16	Green 12	Sittingbourne East	Green	Paddock	12	3.6	564,527	230,921	333,606	92,668
Site 17	Green 6	Sittingbourne East	Green	Paddock	6	1.8	258,262	258,262	0	0

Faversham and Adjacent

					Units		Residual Value (£)		Difference	
					All	Affordable	No Aff	With Aff	Site	Per Affordable
Site 1	Large Brown 300	Faversham	Brown	PDL	300	30	14,984,076	12,349,340	2,634,736	87,825
Site 2	Brown 90	Faversham	Brown	PDL	90	9	3,989,911	3,204,268	785,643	87,294
Site 3	Brown 30	Faversham	Brown	PDL	30	3	1,351,064	1,083,726	267,338	89,113
Site 4	Brown 15	Faversham	Brown	PDL	15	1.5	700,807	568,390	132,417	88,278
Site 5	Brown 9	Faversham	Brown	PDL	9	0.9	460,918	460,918	0	0
Site 6	Brown 6	Faversham	Brown	PDL	6	0.6	314,395	314,395	0	0
Site 7	Central 60	Faversham	Brown	PDL	60	6	2,385,101	1,839,790	545,312	90,885
Site 8	Central 24	Faversham	Brown	PDL	24	2.4	913,228	703,310	209,918	87,466
Site 9	Central 9	Faversham	Brown	PDL	9	0.9	426,030	426,030	0	0
Site 10	Brown 90 HD Flats	Faversham	Brown	PDL	90	9	-2,853,001	-3,308,029	455,028	50,559
Site 11	Brown 24 HD	Faversham	Brown	PDL	24	2.4	-786,397	-895,799	109,402	45,584
Site 12	Large Green 400 LD	Faversham	Green	Agricultural	400	120	25,078,061	13,954,685	11,123,376	92,695
Site 13	Large Green 400 HD	Faversham	Green	Agricultural	400	120	24,917,616	14,235,571	10,682,046	89,017
Site 14	Green 150	Faversham	Green	Agricultural	150	45	8,293,570	4,141,034	4,152,536	92,279
Site 15	Green 30	Faversham	Green	Agricultural	30	9	1,709,090	865,675	843,415	93,713
Site 16	Green 12	Faversham	Green	Paddock	12	3.6	627,561	278,522	349,039	96,955
Site 17	Green 6	Faversham	Green	Paddock	6	1.8	288,687	288,687	0	0

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AECOM

Sustainability Appraisal (SA) of the Swale Local Plan

SA Report
Non-technical Summary (Draft)

June 2026

Delivering a better world

Quality information

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Table of Contents

1. Introduction

1.1.1. This is the Non-technical Summary (NTS) of the Sustainability Appraisal (SA) Report published as part of the SA process for the Swale Local Plan. Specifically, the SA Report is published alongside the proposed submission version of the Swale Local Plan under Regulation 19 of the Local Planning Regulations (2012).

1.1.2. The Local Plan aims to establish a strategy for growth and change across the District up to 2042, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

1.1.3. The SA Report aims is to present an appraisal of the plan alongside ‘reasonable alternatives’ with a view to informing representations and subsequent plan finalisation (see discuss of next steps, below). The SA Report is structured so as to:

- explain work up to this point including appraisal of **reasonable alternatives**;
- present an appraisal of **the proposed submission plan**; and
- discuss **next steps**.

1.1.4. This NTS is structured as per the SA Report.

2. Reasonable alternatives (RAs)

2.1.1. Within the main report the key sections are as follows:

- Section 4 – explains a focus on RAs and specifically in the form of **growth scenarios**.
- Section 5 – defines growth scenarios.
- Section 6 – appraises growth scenarios.
- Section 7 – explains why the preferred scenario is ‘justified’ in light of the appraisal.

2.2. Defining growth scenarios

2.2.1. Section 5 (defining growth scenarios) is a key section that explains a lengthy process of evidence-gathering and decision-making / narrowing of options over time.

2.2.2. For context, ‘growth scenarios’ are defined as alternative approaches to the supply of land, primarily by allocating sites, in order to provide for development needs alongside delivering on wider objectives. Identifying a supply of land is a key aim of any local plan.

2.2.3. All local plans summarise the proposed broad approach to land supply in a ‘key diagram’, and so growth scenarios are defined, in short, as alternative key diagrams.

2.2.4. A starting point for defining growth scenarios is always understanding of local housing need (LHN), as defined by the Government’s standard method. For Swale the plan period is 2025 to 2041 and the standard method sets LHN at 1,064 dwellings per annum (dpa), hence LHN over the plan period is 16 x 1,064 = 17,024.

2.2.5. The next question is whether there are any clear reasons for the local plan setting a ‘housing requirement’ either above or below LHN, where the housing requirement is defined as the number of homes that the local plan commits to delivering, in the knowledge that under delivery leads to punitive measures, namely the presumption in favour of sustainable development (NPPF para 11).

2.2.6. For Swale there are no clear reasons for a housing requirement that departs from LHN, and so attention focuses squarely on growth scenarios involving a total supply sufficient to enable the housing requirement to be set precisely at LHN. This is discussed further in the main report.

2.2.7. The next consideration is existing supply from sites with planning permission, which in Swale is high including because the 'the presumption' has applied for some time.

2.2.8. Specially, as of 31st March 2025, existing supply from sites with permission (including to resolution to grant) was 7,167 homes and additionally there were 263 homes set to be delivered at sites allocated within a 'made' neighbourhood plan, which brings the total existing supply figure (as of 31st March 2025) to **7,430 homes**.

2.2.9. Also, it is appropriate to account for future supply from windfall, i.e. to assume a future supply of homes that will come forward in line with policy despite not having a local plan allocation. The total windfall assumption (there are two components) is **2,409 homes**.

2.2.10. This leaves a residual figure of 7,185 homes (17,024 - 7,430 – 2,409) to plan for through the Local Plan, which essentially means via new allocations (there is also potential to assume supply from 'broad locations', but in practice the focus is on allocations).

2.2.11. On the one hand this residual figure should be considered a minimum, because there is a need to consider a supply 'headroom' as a contingency for delivery issues, i.e. with a view to ensuring that the housing requirement can be delivered in practice (year-on-year).[1] However, on the other hand, 'existing supply' could increase ahead of plan adoption, which would commensurately reduce the residual figure for the Local Plan.

2.2.12. Growth scenarios for the Swale Local Plan are therefore essentially alternative approaches to delivering in the region of 7,185 homes via site allocations.

2.2.13. In turn, the question is "which site allocations", and a starting point is a large strategic site for **2,500 homes** that now has a resolution to grant planning permission, namely South East Faversham (23/505533/EIHYB). This site is for **2,500 homes** and is expected to deliver in full in the plan period (with delivery starting in 2027/28 and a maximum delivery rate of 261 homes per annum) and clearly its allocation can be assumed as a 'constant' across all of the growth scenarios.

2.2.14. This reduces the residual target figure to 4,685 homes (7,185 – 2,500).

2.2.15. Next there is a need to account for supply from urban regeneration sites, which can also reasonably held constant across the growth scenarios. Specifically, the emerging proposed approach is to allocate a ten sites for a total of **1,074 homes**, which breaks down as 834 homes in Queenborough/Rushenden and 240 homes in Sittingbourne.

2.2.16. This reduces the residual target figure to 3,611 homes (4,685 – 1,074); however, there is a need to add a note of caution in that there is an element of uncertainty regarding delivery from certain of these urban regeneration sites, such that they could deliver less.

2.2.17. The remaining task is to consider alternative ways of providing for ~ 3,611 homes via 'non-regen' site allocations and, in this regard, there is a key distinction between:

- Strategic sites – there is strong support for ensuring a good proportion of supply from sites delivering at least ~1,000 homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery strategic infrastructure alongside new housing. The NPPF supports strategic sites (para 77).
- Non-strategic sites – there is a need to ensure that a good proportion of supply from smaller greenfield sites, with a view to a robust supply trajectory (i.e. a rolling 5YHLS over the early years of the plan period) and because such sites tend to benefit from strong development viability, e.g. such that they can deliver the full quota of affordable housing alongside delivering on wider policy asks such as net zero development. Also, the NPPF supports smaller sites because they are suited to delivery by SME housebuilders and can allow "opportunities for villages to grow and thrive."

[1] Specifically, there is a need for a supply headroom over the early years of the plan period to ensure that the Council can maintain a 'five year housing land supply' (5YHLS) ahead of a new local plan that represents a new opportunity to boost supply. It is also important to note that as part of the 5YHLS calculation there is a need to apply a 5% or 20% 'buffer' (NPPF para 79).

2.2.18. Beginning with strategic sites (aside from South East Faversham, which has been discussed above), the emerging proposed approach is to allocate **West of Bobbing** for 2,500 homes (again with delivery entirely within the plan period, beginning in 2030/31).

2.2.19. However, at the time of writing (June 2026) there is also a need to remain open to the possibility of alternatively allocating **'Highsted Park'** (located to the east / south east of Sittingbourne), which is a much larger site for 8,400 homes that would deliver 2,000 homes in the plan period.[2] Specifically, there is a need to remain open to this possibility because West of Bobbing is not committed; however, this situation could change in the very near future, with a planning application set to be decided on 24th June 2026 in light of an officer recommendation to approve.[3] Were it to transpire that West of Bobbing is approved then Highsted Park would become 'unreasonable' as an option for allocation, given LHN and because the sites are located in relative proximity.

2.2.20. Also, it is important to note that a planning application for Highsted Park is due to be decided in 2026, with the decision being made by the Secretary of State informed by the recommendations of a planning inspector following hearings that ran over a period of 8 months in 2025 (there are 4,721 documents associated with the application). This is a very large-scale and complex site that is proposed to deliver a range of strategic infrastructure including a new motorway junction and strategic link road, such that it is inherently difficult to appraise it here (i.e. there is no practical way of the appraisal accounting for all of the detailed evidence considered through the planning application).

2.2.21. In summary, on balance it is considered necessary to feature Highsted Park in the growth scenarios despite the inherent challenge and a clear risk of the appraisal becoming out of date prior to the Local Plan / SA Report being published.

2.2.22. The final strategic site for consideration is then **'East of Faversham Extension'**, which could deliver around 1,500 homes alongside strategic employment land, and *might* also deliver a secondary school to meet an established need (N.B. Highsted Park would also naturally deliver a secondary school, recognising its much larger scale). This option has been carefully considered by elected councillors through the committee process over recent months and years (e.g. part of the site was a proposed allocation for 900 homes in an early draft version of the plan published for consultation in 2021 and, indeed, this allocation featured as a 'constant' across all of the reasonable alternative growth scenarios at that point in time);[4] however, it does not feature as part of the proposed strategy at the current time (but the eastern-most part of the site is proposed to deliver a standalone employment site). In a number of respects there is clear merit to allocating the site in full, as opposed just allocating the eastern part of the site for employment land, but there are challenges including relating to the proximity of South East Faversham (which is adjacent to the south). On balance there is a reasonable need to explore the option of allocation further through the appraisal of growth scenarios, but precisely how it should feature requires further consideration (see discussion below).[5]

2.2.23. The final 'ingredient' of growth scenarios is then supply from **non-strategic sites** (outside of regen areas) and, in this regard, the starting point is an understanding that the emerging proposed approach involves allocation of 31 sites for 1,809 homes.

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[2] In the plan period around 1,250 could be delivered in the north of the site (north of the A2) and 750 homes in the south.

[3] The application was debated by Planning Committee in March 2026, but a decision was deferred to allow time for officers to seek clarifications on: A) foul water; B) open space provisions (on-site and off-site financial contributions); D) delivery of 40% affordable housing; and E) viability, with the specific request being that a viability assessment is provided.

[4] At the subsequent Regulation 18 'issues and preferred options' stage (October 2021) the site did not feature explicitly, but the following was stated in respect of the preferred broad strategy: *"Large scale strategic growth at Faversham would provide good potential to successfully masterplan and deliver a new community, or series of new communities, in line with established best practice principles and to ensure that it was planned in a holistic way. It would also deliver a much needed new secondary school. This option performs well in terms of air quality because strategic growth to the east and southeast of Faversham gives rise to relatively limited concerns as sustainable and active travel measures are easier to implement at these scales of new development as the critical mass is there. Trip internalisation can be implemented, funds can be directed to walking and cycling infrastructure, masterplanning and design measures can focus on supporting walking and there is some potential to walk/cycle to the town centre. It also allows for larger scale biodiversity and net gain achievements; again, due to the critical mass."*

[5] One other strategic site of note is 'Winterbourne Fields' located at Dunkirk (east of Boughton), where there is a pending planning application for 1,815 homes. However, this site is considered to perform relatively poorly such that it need not be considered further, i.e. because it would not be allocated ahead of the better forming sites discussed above.

2.2.24. It is also reasonable to explore one or more scenarios where some of these sites are *not* allocated and, specifically, 12 ‘lower accessibility sites’ can be identified that do not relate well to a higher order settlement. Total capacity of these sites is 899 homes, i.e. such that under a scenario whereby they are not allocated the supply from non-strategic sites (outside of regen areas) would be reduced 1,043 homes (1,809 - 899).

2.2.25. The main report presents further information on the reasons for identifying these 12 sites, but there are four key points to make here. Firstly, whilst several comprise brownfield land it is nonetheless considered important to question the suitability of these sites for housing. Secondly, two of the sites are located at Leysdown, which is a fourth tier settlement, but one that is located in a very rural area (the east of Sheppey) where there are some wider challenges to growth to explore through the appraisal. Thirdly, three of the sites are proposed for park homes to meet a specific need, but it is nonetheless considered reasonable to test the possibility of non-allocation on the grounds of locational challenges including accessibility. Fourthly, the list of 12 sites does *not* include the four adjacent proposed allocations at Upchurch, despite Upchurch being a fifth tier settlement. This is because the sites are considered to be strongly performing including on the basis that Upchurch has a relatively good local offer (for a fifth tier settlement) and benefits from reasonable links to Rainham.

2.2.26. The final consideration is then the possibility of featuring one or more non-strategic omission sites within the growth scenarios, with considerations as follows:

- Several large sites have gained planning permission since the 31st of March 2025 cutoff date (such that they are not counted within the ‘existing supply figure’) but are not proposed for allocation. These sites need not feature explicitly within the reasonable growth scenarios, but they are acknowledged as forming part of the existing supply in practice (‘the baseline’), such that they naturally factor-into all appraisal work.[6]
- Attention focuses particularly on omission sites that are rated as ‘potentially suitable’ through the Council’s Housing and Economic Land Availability Assessment (HELAA).
- Sittingbourne – is a tier 1 settlement but is set to see considerable growth over the plan period and there are no stand-out omission sites.
- Sheerness – is a tier 2 settlement but there are no stand-out omission sites of note.
- Faversham – is a tier 2 settlement but is set to see considerable growth over the plan period plus there has been significant recent growth. In terms of non-strategic sites (recalling discussion above regarding strategic sites) attention focuses on land to the south west, where there are two pending planning applications and a concern is sub-optimal piecemeal growth over time,[7] with opportunities missed around infrastructure and steps to avoid/mitigate impacts, particularly noting significant heritage, landscape and transport / air quality constraints in this area. However, at the current time it is not possible to envisage an opportunity for strategic / coordinated growth and so, on balance, omission sites in this area are ruled out.[8] It can also be noted that the possibility of planning strategically for further growth in this area was a focus of appraisal and consultation at the Regulation 18 consultation stage in 2021.
- Isle of Sheppey – Queenborough & Rushenden is a tier 3 settlement but there are no omission sites of note. Minster & Halfway is also a tier 3 settlement, and there are omission sites of note, but there is set to be high growth over the plan period and there growth-related challenges such that there is a need to ensure a strategic approach / avoid further piecemeal growth. Finally, in the east of the Island there are no stand-out omission sites and there is not considered to be a strategic case for higher growth.

[6] The most significant sites are at Minster (650 homes allowed at appeal; 22/502086/OUT); Faversham (100 homes on a site allocated for employment land; 25/501495/OUT); and Newington (90 homes; 25/500761/FULL). These sites and others that have been permitted since the 31st March 2025 cutoff date, but which are not allocated, lead to additional plan period supply. and others will deliver additional supply in the plan period over-and-above supply accounted for

[7] There is a pending application for 250 homes in the centre of this area (west of Brogdale Road; 25/504265/ENVSCR) and another for 100 homes in the east of this area (west of Ashford Road; 25/501495/OUT).

[8] There are also two HELAA ‘unsuitable’ sites of note at Faversham. Firstly, to the north west is a 250 home site allowed at appeal and now the subject of a legal challenge (23/502113/OUT). Secondly, to the north east is a site where a request for an EIA screening opinion was recently submitted ahead of a potential application for 240 homes (26/500667/ENVSCR).

- Newington – is a tier 4 settlement that benefits from good accessibility and transport credentials but is set to see high growth and there are no stand-out omission sites.
- Teynham – is a tier 4 settlement that benefits from a railway station, but there is a large committed site to the west, and there is also a need to note the proximity of Highsted Park. In 2021 a previous version of the plan identified the possibility of strategic growth at Teynham to *"maximise opportunities for more comprehensive placemaking"*, and potentially with a view to delivering a village bypass; however, concerns were raised and latest understanding is that a bypass is not likely to be achievable. Potential sites are located around the edge of the village as follows:
  - West – a large site would extend the existing committed site, but this site also forms the north east extent of the Highsted Park proposal.
  - East – a large site benefits from proximity to the rail station, but there are landscape constraints. At the time of the previous consultation in 2021 the proposal was for a modest scheme of 100 homes to minimise landscape concerns.
  - South – a smaller site of note despite being categorised as 'unsuitable' in the HELAA. Specifically, it is of note because a coordinated scheme in combination with an adjacent proposed allocation might be envisaged; however, in practice it is not clear that there are significant in-combination opportunities. Also, there is a degree of heritage constraint affecting Lynsted Lane and its junction with the A2.

  Overall, whilst there are site and settlement growth options that warrant ongoing consideration, on balance omission sites at Teynham are ruled out. As well as the context of adjacent Highsted Park, there is also a need to recognise strategic road / connectivity and air quality constraints, at least in the absence of new strategic road infrastructure as proposed to be delivered by Highsted Park.
- Boughton and Iwade – are the remaining tier 4 settlements, but there is limited strategic case for considering omission sites nor do any stand-out as having merit in site-specific terms. There are large omission sites at Iwade, but there is also a large committed site, plus a large committed site at Sittingbourne is located nearby. Furthermore West of Bobbing is located nearby, and A249 capacity is a factor.
- Tier 5 settlements – Upchurch stands out as having the best local offer (see the Settlement Hierarchy Study, 2020), and an omission site for 40 homes was recently consideration closely as an option for allocation by elected councillors. However, in addition to the proposed allocations it would risk problematic high growth at Upchurch, and it can also be noted that there is currently a pending planning application for 101 homes on a HELAA unsuitable site (26/500852/OUT). One other site at a tier 5 settlement that was recently closely considered by members as a possible allocation is a 26 home site at Lower Hartlip, but the village has a limited offer and connectivity between the site, and the village primary school appears to be challenging.

2.2.27. In summary, the discussion above has considered the following supply components:

- Existing supply – 7,430 homes (i.e. **constant**)
- Windfall – 2,409 homes (i.e. **constant**)
- South East of Faversham – 2,500 homes (i.e. **constant**)
- Regeneration sites – 1,074 homes (i.e. **constant**)
- West of Bobbing – 0 or 2,500 homes (i.e. **variable**)
- Highsted Park – 0 or 2,000 homes (i.e. **variable**)
- East of Faversham Extension – 0 or 1,500 homes (i.e. **variable**)
- Non-strategic sites (non-regen) – 910 or 1,809 homes (i.e. **variable**)

2.2.28. As such, there is a need to build growth scenarios on the basis of four 'constant' and four 'variable' supply components, and with it being the case that each of the variable supply components is associated with two options.

2.2.29. A starting point is the emerging proposed approach, which is presented in Table 2.1 as growth scenario 1. This would involve a supply 4% above LHN over the plan period.

2.2.30. There is feasibly a lower growth scenario simply involving lower supply from non-strategic sites, but this would lead to a total supply below LHN and so is unreasonable.

2.2.31. The next two scenarios then involve additional allocation of East of Faversham Extension alongside either the lower or the higher non-strategic sites supply figure.

2.2.32. The final three scenarios then assume Highsted Park in place of West of Bobbing, and it is important to recall that whilst Highsted Park would deliver fewer homes in the plan period it would deliver very significant further growth beyond the plan period.

2.2.33. In conclusion, there are **six reasonable growth scenarios**. These can be understood in summary as three involving West of Bobbing (lower growth to higher growth) and three involving Highsted Park (lower growth to higher growth).

***Table 2.1** The reasonable alternative growth scenarios (constants greyed-out)*

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Existing supply	7,430	7,430	7,430	7,430	7,430	7,430
Windfall	2,409	2,409	2,409	2,409	2,409	2,409
South East of Faversham	2,500	2,500	2,500	2,500	2,500	2,500
Regeneration sites	1,074	1,074	1,074	1,074	1,074	1,074
West of Bobbing	2,500	2,500	2,500	-	-	-
Highsted Park	-	-	-	2,000	2,000	2,000
East of Faversham Ext.	-	1,500	1,500	-	1,500	1,500
Non-strategic sites	1,809	910	1,809	1,809	910	1,809
Total homes (2025-2041)	**17722**	**18323**	**19222**	**17222**	**17823**	**18722**
% over LHN (17,024)	**4%**	**8%**	**13%**	**1%**	**5%**	**10%**

2.3. Growth scenarios appraisal

2.3.1. Section 6 of the main report presents an appraisal of the growth scenarios under the 'SA framework', which primarily comprises a list of 13 sustainability topics. The appraisal concludes with a summary appraisal 'matrix' with a column for each of the SA topics and a row for each of the scenarios. The summary matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence, and "?" used where there is uncertainty at this stage); and then **2)** categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green** / **no colour**.[9]

2.3.2. The appraisal shows a mixed picture, with all of the scenarios associated with pros and cons, and it is for the Council to weigh these pros and cons before deciding on which of the scenarios best represents sustainable development 'on balance'.

[9] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

2.3.3. As part of this, account can be taken of the fact that Scenario 1 (the proposed submission approach) and Scenario 4 (which sees Bobbing replaced with Highsted Park) are ranked first under the greatest number of sustainability topic headings.

2.3.4. However, it is important to be clear that this does not automatically mean either Scenario 1 or Scenario 4 is appraised as performing best overall, because: A) there is also a need to account for the conclusions reached in respect of significant effects; B) the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics as part of decision-making (and, to be clear, the topics are not assumed to have equal weight); and C) the topic specific appraisal conclusions are open for debate (indeed the very aim is to spark debate).

***Table 2.2**: Growth scenarios summary appraisal*

	Scenario 1 Bobbing Small sites	**Scenario 2** Bobbing East Fav.	**Scenario 3** Bobbing East Fav. Small sites	**Scenario 4** Highsted Small sites	**Scenario 5** Highsted East Fav.	**Scenario 6** Highsted East Fav. Small sites
Accessibility	4	2	3	3	1	2
Air quality	?	?	?	?	?	?
Biodiversity	1	2	3	1	2	3
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	3	1	2	3	1	2
Communities	1	2	2	1	2	2
Economy and employment	2	2	2	1	1	1
Historic environment	?	?	?	?	?	?
Homes	2	2	1	2	2	1
Landscape	1	2	2	3	4	4
Soils / resources	1	2	2	1	2	2
Transport	1	2	3	1	2	3
Water	?	?	?	?	?	?

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

Accessibility

2.3.6. There is support for strategic growth locations that can deliver community infrastructure alongside new homes and, in particular, Highsted Park which would deliver a range of strategic community infrastructure, and East of Faversham which could potentially deliver a secondary school to address an existing need (although there is uncertainty regarding both need and delivery). There is also support for lower growth via non-strategic sites (Scenarios 2 and 5) with a view to a focus of growth at more accessible locations. The best performing scenarios are considered to perform very well ('significant positive effects') given a strong focus of growth at strategic sites.

Air quality

2.3.7. This is a very significant issue in Swale although there is a need to account for the improving situation nationally associated with the transition to electric vehicles.

2.3.8. Highsted Park aims to deliver a strategic transport solution to address traffic congestion in the Sittingbourne area. However, it would mean committing a constrained area to high growth over the very long term (with ~6,400 homes delivered beyond the plan period) and potentially tying the hands of a future Local Plan prepared for an area extending far beyond Swale following Local Government Reorganisation (LGR) and in the context of Devolution.[10] It could well be that a future local plan is able to direct growth to locations within Kent that are preferable from an air quality perspective.

2.3.9. Support for East of Faversham Extension would mean supporting higher growth within a constrained Borough, but the site benefits from good connectivity to both Faversham and the M2, which would have the effect of reducing the need for car journeys along the problematic A2. See further discussion below under the 'transport' topic heading.

2.3.10. Overall, it is not possible to reach conclusions with any confidence, but it is appropriate to flag a concern ('moderate or uncertain' negative effect) under all of the scenarios.

Biodiversity

2.3.11. The Borough as a whole is subject to significant biodiversity constraint, but this has factored-in strongly as part of spatial strategy / site-selection work over the course of the plan-making process and it is not clear that there are significant concerns under any scenario. However, under the higher growth scenarios there could be a need for further work to confirm the sufficiency of the long-established SPA mitigation strategy.

2.3.12. Focusing on the three variable strategic sites, as an initial point it is important to note that all three could deliver onsite strategic green infrastructure including aimed at minimising offsite recreational pressure. It is then challenging to differentiate between the three sites with confidence, but the following bullet points present previous analysis from the Interim SA (ISA) Report at the Regulation 18 stage in 2021:

- With regards to Bobbing, the ISA Report explained that the site is associated with biodiversity constraint for two reasons: *"Firstly, the site is slightly closer to the SPA than is the case for [Highsted Park], and whilst it is not clear that this is a particularly accessible or sensitive part of the SPA, there is a need to consider in-combination impacts given committed growth at Iwade and North West Sittingbourne (also the potential for the Bobbing scheme to expand in the future). Secondly, the proposal is for development to largely envelop a small ancient woodland (Rook Wood)… [which] could lead to a challenge in respect of… biodiversity net gain. There is a need to consider functional connectivity between Rook Wood and Hawes Wood to the west."*

[10] See discussion of Kent LGR here. Also, it is important to be clear that whatever the outcome of LGR, the intention is for future local plan-making to be informed by sub-regional Spatial Development Strategy (SDS) under the devolution agenda.

- With regards to Highsted Park, the ISA Report suggested that the site is 'notably constrained' because: *"… there would likely be a need for a focus of growth in the Highstead / Rodmersham Green area, where there is a high density of woodland (including ancient woodland) and traditional orchard priority habitat that is shown by the Biodiversity Baseline Study (2020) to comprise a northern promontory of the North Downs Priority Area (also, the study highlights connectivity between traditional orchard habitat patches as a priority). Development is not necessarily precluded within priority areas; however, taking a precautionary approach it is appropriate to flag a risk of development worsening ecological connectivity… at the landscape scale (also potentially direct impacts to habitat patches, e.g. from recreational pressure)."*
- With regards to East of Faversham, the ISA Report explained that under certain of the growth scenarios: *"…there could well also be strategic growth to the east of Faversham (north of the A2), and if this were to extend north beyond the Graveney Road / as far as the railway line (to Whitstable), then this would give rise to degree of concern. This is because: adjacent land to the north (on the opposite side of the railway, but easily accessible via a public footpath) comprises the Abbey Fields [Local Wildlife Site]; the SPA would be c.2.25km by public footpath; and there would also be a convenient driving route to the SPA, via Goodnestone."*

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

Climate change adaptation

2.3.14. Flood risk is a significant issue across large parts of the Borough, and whilst this has factored-into spatial strategy / site-selection work there are some proposed allocations subject to a degree of risk and the Environment Agency has not yet had the opportunity to formally comment on the proposed allocations through a consultation.

2.3.15. Another key climate change adaptation consideration is then the defined a Coastal Change Management Area (CCMA), which defines the area likely to be affected by physical change to the shoreline over the next 100 years, through erosion, coastal landslip, permanent inundation, or coastal accretion. Three of the proposed allocations on the Isle of Sheppey that do not feature in Scenarios 2 and 5 are adjacent to the CCMA, and there is a need to acknowledge that the CCMA is defined with an element of uncertainty including given climate change uncertainties. Also, a fourth site is located at Warden, which is a settlement at risk of coastal change.

2.3.16. Finally, it is noted that land to the south east of Sittingbourne (Highsted Park) is characterised by a series of valleys with associated with surface water flood zones. However, there is likely potential to avoid flood zones through masterplanning (green/blue infrastructure) and avoid worsening of downstream flood risk through high quality Sustainable Drainage Systems (SuDS).

Climate change mitigation

2.3.17. Whilst the proposal is to require all sites to come forward as 'net zero development', in practice this would likely prove challenging at some sites where development viability is weaker (without having to accept compromises in respect of wider objectives, notably affordable housing). All of the strategic sites should be well placed to deliver net zero development (N.B. it has not been possible to review site-specific proposals) but it is important to note that viability is strongest at Faversham (although there could feasibly be a concern regarding market saturation affecting viability). Viability is then challenging – with implications for net zero development – at several of the non-strategic sites that feature only in Scenarios 1, 3, 4 and 6. Also, these same sites are all in less accessible locations, i.e. locations likely to be associated with relatively high car dependency.

2.3.18. Finally, with regards to significant effects, whilst the Borough has now revised its net zero target date from 2030 to 2045 there is nonetheless a need to demonstrate considerable ambition in order to deliver the required decarbonisation trajectory, such that it is appropriate to predict a 'moderate or uncertain' negative effect for all but the two better performing scenarios.

Communities

2.3.19. This is an opportunity to consider issues and opportunities over-and-above those relating to ‘accessibility’. Whilst there are numerous maters to consider, the appraisal reflects an understanding that there is a significant degree of concern amongst local communities in respect of the two strategic sites where there are currently pending planning applications (Bobbing and Highsted Park) and that there would likely be significant local community concern in respect of East of Faversham Extension, including recognising its proximity to South East Faversham (which has a resolution to grant permission). Whilst the appraisal is undertaken on the assumption of a strategic approach to growth to the east and south east of Faversham that maximises benefits / avoids issues, in practice this could prove challenging.

Economy and employment

2.3.20. Employment land needs would be provided for in full across all of the scenarios, but on balance it is considered appropriate to flag support for Highsted Park for the reasons set out in the ISA Report from the Regulation 18 stage in 2021:

“… strategic growth at SE Sittingbourne represents a very significant opportunity, from an ‘economy and employment’ perspective, given the potential to: deliver a new motorway junction, which will improve transport connectivity to Eurolink, Kent Science Park and potentially the Port of Sheerness (from the east); support objectives for Kent Science Park (the scheme website suggests: “With Kent Science Park at the heart of the proposals for Highsted Park – Swale can become a leader for inward investment especially targeting growth sectors”); and potentially support new warehousing/distribution in a location well-linked to a motorway junction, thereby fully reflecting ELR recommendations, although proposals are less clear in this respect. However, there are additional considerations to factor-in, when considering the merits of strategic growth at SE Sittingbourne from an ‘economy and employment’ perspective, in particular around the possibility of growth here detracting from growth elsewhere in the Borough (Sittingbourne, Faversham and Sheppey) and in the neighbouring authorities of Medway and/or Maidstone [e.g. in around Junction 8 of the M20 in Maidstone].”

2.3.21. With regards to Bobbing, the ISA Report in 2020 flagged some concerns regarding a lack of clarity and potentially ambition in respect of employment land, but the current planning application now proposes a 5.2 ha commercial/employment zone adjacent to the A249 junction. The ISA Report also flagged *“concerns regarding traffic at the A249 junctions with the B2006 and M2… traffic could affect the functioning of… employment areas at Sittingbourne (Eurolink HGVs use the B2006 junction) and Sheppey.”*

2.3.22. With regards to East of Faversham Extension, the assumption is that new strategic employment land would be delivered adjacent to the M2 junction under any scenario (i.e. it is not reliance on East of Faversham Extension), but a new employment area would benefit from an adjacent new community.

2.3.23. Finally, with regards to the package of ‘lower accessibility’ sites (Scenarios 1, 3, 4, and 6), there is potentially a ‘local economy’ case for housing growth on the Isle of Sheppey, including in the east of the Island, but it is not clear that this is a significant factor.

Historic environment

2.3.24. Whilst it is appropriate to flag a ‘moderate or uncertain’ negative effect under the other scenarios in the knowledge that Historic England is yet to be consulted on a draft version of the Local Plan, at this stage it is not possible to differentiate between the scenarios with confidence. There is a case for favouring Scenario 1 as it would avoid higher growth at Faversham and Bobbing is potentially preferable to Highsted Park; however, the context is that historic environment matters will presumably have been a focus of detailed consideration through the pending planning applications for both Bobbing and Highsted Park.

2.3.25. The following bullet points present analysis from the previous ISA Report (2021):

- Highsted Park – "… there is the potential to draw upon a valley topography to frame growth, which arguably leads to benefits in respect of alignment with historic settlement pattern (and landscape containment / lower risk of 'sprawl'); however, the corollary is growth would be in proximity to existing historic environment assets. The current proposed masterplan seeks to take a 'landscape led approach' and avoid impacts as far as possible, including by avoiding development in proximity to the only conservation area in the vicinity (Rodmersham Green); however, tensions remain nonetheless, most notably at the northern extent of the area, where a new link road would cut through the Tonge Conservation Area, and in the central area, where development would abut the hamlet of Rodmersham, where there is a cluster of four listed buildings including a grade 1 listed church, which the Swale Landscape Sensitivity Assessment (2019) describes as "an important local landmark and skyline feature". A further statement made by the Assessment, as part of a discussion of 'time depth', is also of note: *"It is evident that there have been changes in land cover in recent years, with the conversion of areas of commercial orchards to arable, and vice versa, for example along Church Street and Pitstock Road. However, this does not change the fundamental character of the landscape. The loss of some areas of traditionally managed orchards has adversely affected the historic and scenic character of the landscape, although more intensive commercial orchards remain an important feature which contributes to a distinctive sense of place"*."
- Bobbing – "The site is subject to notably lower constraint. The new settlement would envelop the string of ten listed buildings that stretches between Bobbing in the south (where there is a grade 1 listed church) and Howt Green in the north; however, there is no… conservation area; the historic character of this area is presumably somewhat affected by the nearby A429; and development would deliver a bypass of Bobbing. Development would envelop only one historic farmstead (with one grade II listed building), although the possibility of further expansion (in the future) encroaching upon two further farmsteads can be envisaged."

2.3.26. In respect of East of Faversham Extension, the following bullet points present analysis from the ISA Report (2021) in respect of growth both to the south east of Faversham (i.e. the site that now has a resolution to grant permission) and to the east:

- "… as noted by the Swale Heritage Strategy (2020): *"It is no coincidence that Faversham has the highest concentration of historic buildings in the area and also the most viable commercial and residential economic markets in the Borough".* In this context, there is potentially merit to a strategic growth to the east / southeast of the town, from a historic environment perspective, in order to alleviate pressure for growth in sensitive locations elsewhere. This suggestion reflects an understanding that land to the east and southeast of Faversham is relatively unconstrained in historic environment terms, and also an understanding that there would be good potential to avoid and mitigate historic environment impacts by taking a strategic approach… There could also be good potential to deliver a new community – with associated employment, services, facilities, retail and infrastructure upgrades – that supports Faversham as a thriving market town and visitor/tourist destination. However, there are wide ranging risks and uncertainties, including around traffic (including through the Ospringe Conservation Area)… impacts to the historic agricultural and horticultural landscape setting of the town and impacts to landscapes that link the town to surrounding historic settlements and landscapes, in particular Goodnestone and the marshes to the northeast. A key consideration is the integrity of the three closely linked historic farmsteads located between the expanding eastern edge of Faversham and Goodnestone. Historic England's response to the consultation in early 2021 [mostly focused on] policy requirements… [but] a notable comment was that: *"Ewell Farm is… one of several historic farmsteads surrounding the town of Faversham which illustrate a historic landscape character intimately connected with agriculture."*

- "… much of the 20th and 21st Century expansion of Faversham has been to the east hence further expansion potentially gives rise to relatively limited concerns… However, there is a need to consider the rural setting of Faversham… with the Swale Landscape Sensitivity Assessment (2019) explaining: *"The time-depth of the landscape relates predominantly to the continuity of agriculture and fruit cultivation within the area, together with the presence of scattered historic farmsteads, with occasional pasture and traditional orchards. Some areas of orchard have been lost in recent decades, together with field boundaries, resulting in more open, larger arable fields, particularly in the north and east of the area."* A further consideration is encroachment… towards historic farmsteads, and impacts to views from cycling routes and public footpaths that link Faversham to the Goodnestone Conservation Area and the marshland walking and cycling routes beyond."

Homes

2.3.27. All of the scenarios would involve a total supply comfortably above LHN, but there is also a crucial need to consider the robustness of the supply over the early years of the plan period, i.e. with a view to ensuring that the Council can maintain a five year housing land supply (5YHLS) ahead of a future supply boost through a new local plan.

2.3.28. In this regard, on the one hand there is support for dispersed smaller sites under Scenarios 1, 3, 4 and 6; however, on the other hand, some of these sites may be associated with challenging viability, leading to both delivery risk and also a concern regarding affordable housing delivery.

2.3.29. With regards to East of Faversham Extension, strong viability at Faversham could suggest good delivery credentials, but there could be some delivery risks given proximity of South East Faversham and the likely need to give further consideration to strategic transport upgrades and potentially a secondary school.

2.3.30. With regards to Highsted Park delivering mostly beyond the plan period, there is a case for highlighting this as a positive, including because there is a case for extending the plan period to 2043; however, in the context of LGR and devolution what is of paramount importance is supply in the early and middle parts of the plan period.

2.3.31. In conclusion, the two higher growth scenarios perform very well because the housing requirement could be set at LHN over the plan period, there would not be a need for a stepped requirement, and there would be confidence in the ability to deliver on the housing requirement / maintain a 5YHLS (particularly once account is taken of the likelihood of the housing land supply position improving once recent permissions are factored in). There could even be the potential to set the requirement slightly above LHN, e.g. as a proactive approach to affordable housing delivery.

Landscape

2.3.32. The first point to note is that several of the variable non-strategic sites (Scenarios 1, 3, 4 and 6) are brownfield sites, and none are known to be sensitive in landscape terms.

2.3.33. With regards to the variable strategic sites, whilst there is uncertainty at this stage given the ongoing planning applications, on balance it is considered appropriate to flag a concern with Highsted Park relative to the other two sites. This is in line with the conclusion from the ISA Report published at the Regulation 18 stage in 2021:

"… as per the conclusion of the equivalent appraisal in 2020, it is appropriate to highlight Option 5 as performing well, because there is potentially something of a landscape opportunity to be realised through strategic growth directed to both Bobbing and to the east / south east of Faversham. The potential to comprehensively plan for the very long term future growth of the Borough's two main settlements can be envisaged; however, in neither case are the current proposals considered to respond to the opportunity in full."

2.3.34. In terms of more detailed analysis, the first point to note is that the following analysis in respect of Bobbing from the ISA Report (2021) likely still holds broadly true:

"… stands-out as least constrained [of the strategic site options under consideration]. The site is distant from the AONB and associated with broad landscape units assigned 'moderate' and 'low-moderate' sensitivity scores by the Landscape Sensitivity Assessment. The southern part of the site is more sensitive, given existing narrow settlement gaps; however, the current proposal is for development to extend only as far south as the railway line, meaning that, whilst the Bobbing settlement gap would be eroded or lost, the gap(s) between Sittingbourne and Newington would not be affected. In this respect, it is important to note that an earlier masterplan proposed a large area of parkland to the south of the railway. Finally, it is important to note that the Stantec Assessment of Stage 2 Submissions (2019) identifies the potential for the scheme to expand beyond its current 'red line boundary' (see page 15 of the report). There is an argument for comprehensive long-term planning for this part of the Borough, rather than piecemeal growth. The possibility of comprehensively planning for the entire area of land between the A249 in the east, the A2 in the south, the Lower Halstow – Iwade Ridge in the west and Iwade in the north might be envisaged, with a view to securing infrastructure, environmental protection/enhancement and employment land."

2.3.35. In respect of Highsted park the ISA Report (2021) presented lengthy analysis, but the concern is that some of it might now be less than fully up-to-date given that so much work has subsequently been undertaken through the planning application process. The analysis from 2021 covered factors including: A) impacts to the Kent Downs National Landscape, particularly relating to a new motorway junction; B) settlement gaps, including the gap between Sittingbourne/Bapchild and Teynham; and C) the sensitivity of the Rodmersham, Milstead and Highstead Dry Valley character area, which is a "a topographically distinct landscape with a strong sense of place and rural character", albeit one where "the quality has deteriorated notably on the edge of Sittingbourne". The appraisal in 2021 concluded:

"The current masterplan proposals are described as 'landscape led', and it is recognised that the scheme has evolved considerably and repeatedly over recent years, with the latest Stantec report explaining that efforts have been made to avoid the valley and valley slopes, and that proposals have "move[d] away from a necklace approach". However, there is a need to understand the pros and cons of achieving the required scale of growth whilst containing growth west of a line that runs between Cromer's wood, Rodmersham Green, Rodmersham, Bapchild and Tonge Conservation Area / Church, thereby achieving a scheme that is more contained in landscape terms, in that it remains 'facing' Sittingbourne. Under the current proposal there could be a concern regarding long term sprawl at the edge of Sittingbourne and also in the Teynham/Lynstead area, which might be argued for as 'infilling' or 'rounding off'."

2.3.36. Finally, in respect of East of Faversham Extension, a recent study has assessed the landscape sensitivity of the site, although it should be noted that the site assessed extends as far east as the A299 Thanet Way, i.e. to include the proposed employment allocation that is assumed a constant under all of the growth scenarios. The assessment concludes overall 'moderate' sensitivity to housing development, but does highlight a number of potential concerns. It concludes:

"The access along the PRoW, mature hedgerows, rural approach to Faversham, proximity to listed buildings and rural context between Faversham and Goodnestone increase sensitivity to development… Due to the presence of existing modern housing adjacent to the site, development would be in accordance with the general settlement pattern and scale. This, along with the well filtered nature of the site's boundaries, and the influence of neighbouring road and rain infrastructure, would reduce sensitivity to housing development."

2.3.37. In conclusion, whilst it is appropriate to rank the scenarios in order to flag a concern with Highsted Park on balance significant negative effects are not predicted. This is a reflection of the inability to fully account for the evidence generated through the planning application process.

2.3.38. Finally, with regards to significant effects, it should be noted that a Landscape Sensitivity Assessment has recently been completed that examines select proposed allocations (N.B. it does not examine Bobbing) and flags a concern with two proposed allocations that are a constant across the growth scenarios, namely: 1) Upchurch, where it assigns ‘moderate-high’ landscape sensitivity; and 2) the proposed employment allocation to the east of Faversham, where it assigns ‘moderate-high’ landscape sensitivity to the area of land between Faversham and the A299 as a whole and specifically recommends: *“Avoid developing the more elevated fields closer to the A299 which are more prominent in views within the surrounding landscape.”*

Soils / resources

2.3.39. This is a key issue for Swale, given its strong association with the Kent Fruit Belt, and the recently released national agricultural land quality dataset confirms that there would be a very significant loss of the highest quality agricultural land under all scenarios.

2.3.40. Numerous of the non-strategic sites that feature only in Scenarios 1 and 3 are brownfield sites or otherwise not in agricultural use, and Highsted Park would involve some growth focused away from the A2 corridor that is grade 2 quality land as opposed to grade 1 quality land, but overall the primary consideration is a need to flag a concern with higher growth including looking beyond the plan period. Again, it could feasibly be the case that a future SDS gives weight to protecting highest quality agricultural land.

Transport

2.3.41. Whilst there have been recent improvements to the A249 it remains the case that road capacity is a major constraint to growth along the A2 corridor, through Sittingbourne, at the A249 / M2 junction (south of Sittingbourne), at the A2 / M2 junction (east of Faversham, known as Brenley Corner), at on the Isle of Sheppey (particularly in tourist season). It can be suggested that the Borough is inherently constrained, because whilst very well connected by rail the main settlements feed onto a limited number of strategic road corridors, including the A2 which passes through the centre of settlements (the only bypasses are at Sittingbourne town centre and Boughton). Enabling longer distance trips via the M2 rather than the A2 is an important objective, but just three junctions serve the Borough and two are known to have capacity issues.

2.3.42. There is considerable historical context to exploring transport solutions to enable growth, for example the ISA Report (2021) quoted the following from the Infrastructure Delivery Plan (IDP, 2021): *“The Inspector who examined the Bearing Fruits Local Plan was satisfied that the level of growth in the first part of the plan period could be accommodated on the local road network. Beyond this there were implications in delivering the full housing need figure for both the strategic and local road network that would require the implementation of improvement works. At the time of the examination, the nature of improvement works had not been determined, but the Inspector did not consider this to be a showstopper to the Local Plan being adopted. The Inspector, therefore, found the Local Plan sound subject to a commitment to undertake an early review of the Local Plan to address the highway capacity issues….* Also, the ISA Report (2021) noted that the adopted Local Plan (2017) explains: *“The main strategic risk to the plan overall relates to any significant deferral in the improvement to Junction 5 of the M2”*. Finally, the ISA Report (2021) explained the context of KCC having raised significant transport concerns at the preceding Regulation 19 stage: “*KCC is concerned that the consultation is missing critical highway evidence to justify the Local Plan strategy and as a consequence the Local Plan is currently supported by an inaccurate evidence base. There are fundamental changes from the modelling used as evidence for the Local Plan and the housing proposals within this regulation 19 consultation. Specifically, the housing numbers are higher in the Teynham area, greater levels of employment land and a reliance on a design solution for Brenley Corner that cannot at this stage be relied upon. The County Council, as Local Highway Authority, requires further supporting transport modelling that accurately reflects the proposed housing and employment strategy as presented before it can make a fully informed comment…”*

2.3.43. Further context then comes from the following statement made within the consultation document published under Regulation 18 in 2021:

"The solutions to the existing infrastructure issues are now coming forward (M2 junction 5 and capacity issues on the A249) which opens Sittingbourne and the Isle of Sheppey back up for development."

2.3.44. It is difficult to differentiate between the growth scenarios with confidence, but on balance the scenarios are ranked broadly in order of total growth quantum and in light of the following considerations:

- The variable non-strategic sites perform relatively poorly in transport terms.
- Bobbing is not well linked to Sittingbourne and there are M2 J5 capacity challenges.
- Whilst Highsted Park would deliver a transformational road infrastructure solution, and it is acknowledged that the proposal is to front-load infrastructure delivery (as far as possible, within the bounds of what can be viably achieved), again a need to consider the context of forthcoming LGR and devolution.
- East of Faversham Extension is relatively well related to a town centre, and there could be transport opportunities to explore (the Regulation 18 consultation document in 2021 highlighted an opportunity *"to look at the role of the A2 at Faversham and divert traffic to the M2 allowing greater integration of sites south of the A2").* However, there would be a need for further work to model traffic impacts, and it is not clear that allocation would help significant in respect of funding upgrades to M2 J7 (Brenley Corner).

2.3.45. Finally, with regards to significant effects, whilst there is a case for flagging a significant negative effect under the worst performing scenarios, on balance it is considered appropriate to conclude a 'moderate or uncertain' negative effect under all six scenarios.

Water

2.3.46. Whilst the ISA Report from 2021 presented a detailed discussion of potential issues relating to water resources and wastewater treatment, the evidence referenced at that time is now dated, and there is limited more recent evidence (the Infrastructure Delivery Plan is not available at the time of writing). Whilst there are not known to be any key challenges in respect of either water resources or wastewater treatment capacity, the Environment Agency and Southern Water will wish to comment through the consultation. Capacity at wastewater treatment works has been rising up the agenda as a key issue for local plan spatial strategy / site selection over recent years, and over recent months water supply has begun to emerge as a strategic constraint in parts of Kent.

2.4. The preferred growth scenario

2.4.1. Officers will complete this section prior to publication, explaining why Scenario 1 is on balance 'justified', in that it represents "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" (NPPF para 36).

3. Whole plan appraisal

3.1.1. Part 2 of the report presents an appraisal of the proposed submission plan as a whole, which in practice means expanding on the appraisal of growth scenario 1, including factoring development management (DM) policies and with additional focus on site allocations that are held 'constant' across the growth scenarios.

3.1.2. Overall the appraisal reaches the conclusion that the plan as a whole performs as per Scenario 1 (i.e. appraisal conclusions are not 'boosted' to account DM policies), in summary: moderate or uncertain **positive** effects in terms of economy/employment and 'homes'; **neutral** effects in terms of accessibility, biodiversity, communities and landscape; moderate or uncertain **negative** effects in terms of air quality, climate change adaptation, climate change mitigation, the historic environment, transport and water; and a **significant negative** effect in terms of loss of high quality agricultural land.

3.1.3. With regards to DM policies, the current draft NPPF proposes 'national development management policies' such that a primary consideration is site-specific policies, which must respond to locationally specific issues and opportunities and be deliverable in light of viability parameters. However, under the new NPPF there will likely still be some scope for area wide DM policies that respond to a locally specific issue / opportunity where firmly evidenced. Viability is a key consideration, and trade-offs must be acknowledged, e.g. sites with more challenging viability may only be deliverable if compromises are made regarding policy 'asks' in terms of infrastructure delivery / contributions, affordable housing, net zero development or wider matters. A Whole Viability Assessment has been completed that concludes *"the Council can continue to confident that the development in the Local Plan will be deliverable [but] the Council should be cautious in relying on brownfield sites in the housing trajectory, as the delivery of these is likely to continue to be challenging."* However, even for greenfield sites there is a need for ongoing scrutiny of the viability impact of policy requirements in order to avoid false comfort in respect of requirements that fall away at the planning application stage on viability grounds. Further discussion is presented in the main report.

4. Next steps

4.1.1. Following the current Regulation 19 publication stage the intention is to submit the plan (as previously published) for an Examination in Public overseen by the Planning Inspectorate alongside this SA Report and all of the representations received.

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