

Agenda

Planning and Transportation Policy Working Group Meeting

Date: Wednesday, 27 May 2026

Time 7.00 pm

Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT

Membership:

Councillors Mike Baldock, Monique Bonney, Hayden Brawn (Vice-Chair), Simon Clark, Charles Gibson (Chair), Kieran Golding, Alastair Gould, James Hunt, Peter MacDonald, Julien Speed and Mike Whiting.

Quorum = 3

Pages

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 - (d) Anyone unable to use the stairs should make themselves known during this agenda item.
2. Apologies for Absence
 3. Minutes

To approve the [Minutes](#) of the Extraordinary Meeting held on 22 January 2026 (Minute Nos. 638 – 644) and the [Minutes](#) of the Meeting held on 12 March 2026 (Minute Nos. 805 – 810) as correct records.
 4. Declarations of Interest

Councillors should not act or take decisions in order to gain financial or other material benefits for themselves, their families or friends.

The Chair will ask Members if they have any disclosable pecuniary interests (DPIs) or disclosable non-pecuniary interests (DNPIs) to declare in respect of items on the agenda. Members with a DPI in an item must leave the room for that item and may not participate in the debate or vote.

Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.
 5. Houses in Multiple Occupation Supplementary Planning Document - for adoption 5 - 48
 6. Housing Market Assessment update 2026 49 - 154
 7. Local Plan Review - Regulation 18 Representations, Summaries and Draft Responses 155 - 356
 8. Local Plan Review - Draft Strategic Policies and Draft Houses in Multiple Occupation Development Management Policy 357 - 420

Issued on Monday, 18 May 2026

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**Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT**

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Planning and Transportation Policy Working Group	
Meeting Date	27 th May 2026
Report Title	Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) – Results of Public Consultation and Adoption.
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officer	Ian Harrison, Planning Manager (Planning Applications)
Classification	Open
Recommendations	1. That members note the responses received to the public consultation undertaken in relation to the Draft HMO SPD; and 2. That members recommend that Policy and Resources Committee (P&R) recommend the HMO SPD (as set out in Appendix I) to Full Council for adoption.

1 Purpose of Report and Executive Summary

- 1.1 At the Policy and Resources Committee on 11th March 2026, it was agreed that the Draft HMO SPD be published for public consultation. A copy of the final HMO SPD proposed for adoption is available at Appendix I.
- 1.2 The purpose of this report is to present a summary of the responses received during the four week consultation which ran from 30th March 2026 to 29th April 2026 and to recommend the document proceeds to Policy and Resources Committee.

2 Background

- 2.1 At the Full Council Meeting on 1st October 2025, a motion was brought relating to the *“Management and Regulation of HMOs in Swale”*. A link to the full minutes of the Agenda Item can be found at the background papers below.
- 2.2 Amongst other measures, it was resolved to *“Refer this matter to the relevant Committee to develop a Supplementary Planning Document (SPD) addressing:*
 - *A maximum threshold for HMOs within defined areas or individual streets to avoid over concentration*
 - *Minimum off-street parking requirements for HMOs to reduce pressure on local roads*
 - *Proper waste and recycling storage and management for all HMOs*

- *Minimum room sizes and standards in line with national guidelines*

- 2.3 It was also resolved that there would be consultation with residents, ward councillors, parish councils, area committees, and other stakeholders to ensure the proposed SPD was responsive to community concerns while supporting access to affordable housing.
- 2.4 A full commentary explaining the approach taken in meeting the requirements of the motion has been provided within the reports that were presented to PTPWG on 22 January 2026 and P&R Committee on 11 March 2026. Links to those reports are provided as background papers.
- 2.5 In summary, the following timetable has generally been followed with the only noteworthy exception being the change of the consultation period to the dates that are specified above, and the agreement to hold an Extraordinary Full Council to adopt the SPD, rather than utilise an Urgent Decisions Committee.

Stage	Date
Presentation of this report to the Planning and Transportation Policy Working Group.	22 January 2026
Circulation of Draft HMO SPD to Members of the Planning and Transportation Policy Working Group for comment.	Late February 2026
Seek approval from the Policy and Resources Committee to consult on the Draft HMO SPD.	11 March 2026
Undertake a four week consultation in respect of the Draft HMO SPD.	23 March 2026 to 20 th April 2026
Extraordinary meeting of the Planning and Transportation Policy Working Group to recommend post-consultation draft for adoption.	Mid / Late May 2026
Policy and Resources Committee Meeting to recommend post-consultation draft for adoption.	Mid June 2026
Urgent Decision Committee for adoption.	Late June 2026

- 2.6 The Council has now undertaken the four week consultation. This was undertaken through a link to the document and the Council's planning policy consultation system being provided on the Council's web-site. Letters and emails notifying key consultees of the consultation were sent on 30th March. The detail of the consultation is provided within the Consultation Statement which is available at Appendix II.
- 2.7 The Consultation Statement also provides a summary of each of the comments received and also details how the public consultation was undertaken, as required by Regulation 12 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

- 2.8 Having considered each of the comments received in detail, it is not considered that any changes are required to the Draft HMO SPD.

3 Proposals

- 3.1 That members note the responses received to the public consultation undertaken in relation to the Draft HMO SPD; and
- 3.2 That members recommend that Policy and Resources Committee (P&R) recommend the HMO SPD (as set out in Appendix I) to Full Council for adoption.

4 Alternative Options Considered and Rejected

- 4.1 There are a number of alternative options. These have been considered and are set out with their advantages and disadvantages below:
- **Alternative Option 1:** Recommend that the P&R Committee agree an amended version of the Draft HMO SPD for subsequent adoption by Full Council.
 - **Alternative Option 2:** Prepare a form of guidance note other than an SPD.
 - **Alternative Option 3:** Prepare a supplementary plan under the new Local Plan system.
 - **Alternative Option 4:** Do not seek to adopt an HMO SPD.

Table I: Alternative Options Available

Alternative Option	Advantages	Disadvantages
Alternative Option 1 Recommend that the P&R Committee agree an amended version of the Draft HMO SPD for subsequent adoption by Full Council.	• This approach would provide the opportunity for the comments made to be addressed in an alternative manner.	• Changes could undermine the consultation and the soundness of the SPD. • Amendments might not align with the scope of the Full Council motion. • Amendments might exceed the scope of Planning Control.
Alternative Option 2 Prepare a form of guidance note other than an SPD	• Would reduce the relevance of the existing time constraints around the adoption of SPDs.	• Would not fulfil the stated resolution of the Council. • Unlikely that any other document would carry comparable weight and, as such, would have reduced effectiveness.
Alternative Option 3 Prepare a Supplementary Plan under new Local Plan system.	• Any such document would be likely to carry more weight than an SPD	• Uncertainty around compatibility with existing or emerging development plans and the applicable procedures. • Timeline would not align with the aims of the Full Council resolution.
Alternative Option 4 Do not prepare or seek to adopt an HMO SPD (i.e. do nothing).	• Requires no further resources. • Places the Council at the smallest possible risk in terms of challenge.	• Would not fulfil the stated resolution of the Council. • Planning applications for HMOs would continue to be considered with limited guidance available as to how the policies of the development plan will be applied, providing less certainty for applicants and not ensuring that

Alternative Option	Advantages	Disadvantages
		HMOs are provided in preferable ways. • A potential uplift in applications for HMOs would not be reflected within the Council's suite of guidance documents.

5 Consultation Undertaken or Proposed

- 5.1 Details of the public consultation exercise that has been undertaken can be found at Appendix II. This included notifying Councillors, Parish and Town Councils and other interested parties and consultees, internal bulletins, press releases and publicity on the Council's website and social media pages. 12 responses were received and they have been fully considered within the Consultation Statement at Appendix II.
- 5.2 The Motion requested Area Committees be consulted on the draft SPD. There were no Area Committees scheduled during the consultation window, and the time constraints were such that the consultation period could not be moved to cover an Area Committee cycle. However, widespread publicity aimed to ensure that those who would likely or potentially expressed a view at an Area Committee were aware of the opportunity.

6 Implications

Issue	Implications
Corporate Plan	The HMO SPD would support the delivery of all of the Corporate Plan priorities: • Community • Economy • Environment • Health and housing • Running the Council The Plan contains a specific objective to 'progress a Local Plan with local needs and capacity at its heart.'
Financial, Resource and Property	There would be financial and resource implications associated with adopting the HMO SPD relating primarily to officer time and costs associated with consultation. This is within the base budget.
Legal, Statutory and Procurement	The preparation and adoption of an SPD is carried out under a national legislative and regulatory framework.

Crime and Disorder	There are no direct crime and disorder impacts arising from this recommendation. However, the HMO SPD contains guidance that would influence the location of HMOs which, in some parts of the country, have been considered or identified to correlate to anti-social behaviour. Examples of this are detailed in comparable SPDs that cover the areas of South Gloucestershire, Maidstone and Wigan.
Environment and Climate/Ecological Emergency	There are no environment and climate/ecological emergency impacts arising from this decision. However, the HMO SPD addresses matters that affect the local environment including parking, refuse storage and living conditions.
Health and Wellbeing	There are no direct health and wellbeing impacts arising from this decision. However, the HMO SPD attempts to positively affect the health and wellbeing of local residents.
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.
Risk Management and Health and Safety	There are no Health and Safety Risks identified at this stage. A risk could arise from the HMO SPD being found to be unsound or ineffective in any respect but, at this stage, there is not considered to be a risk.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.
Local Government Reorganisation	The recommendation has little impact on Local Government Reorganisation other than, depending on the outcome of that action, it may increase the degree of divergence within the guidance that is in place within any newly created authority.

7 Appendices

7.1 Appendix I – HMO SPD.

7.2 Appendix II – Consultation Statement

8 Background Papers

8.1 [Minutes of Full Council Meeting of 1st October 2025](#)

8.2 [Report to Planning and Transportation Policy Working Group – 22 January 2026](#)

8.3 [Minutes of Planning and Transportation Policy Working Group – 22 January 2026](#)

8.4 [Report to Policy and Resources Committee – 11 March 2026](#)

8.5 [Report to Policy and Resources Committee – 11 March 2026](#)

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Houses in Multiple Occupation

Supplementary Planning Document

Supplementary Planning Document, Houses in Multiple Occupation

1	Introduction.....	1
2	HMOs Within the Planning System and Key Definitions.....	2
3	Planning Policies (Local and National).....	6
4	Existing HMO Stock and Potential Effects of HMO stock.....	8
5	Guidance Topic 1 - Concentration of HMO's.....	12
6	Guidance Topic 2 - Parking.....	15
7	Guidance Topic 3 - Waste and Recycling Storage and Management.....	18
8	Guidance Topic 4 - Room Sizes.....	19
9	Other controls, relevant legislation and contacts.....	20
10	Appendix A - HMO Concentration Assessment.....	22

1 Introduction

1.1 Swale Borough Council is actively seeking the provision of housing to meet the identified needs of the Borough's residents. As will be set out within this document, this is integral to Bearing Fruits 2031 - The Swale Borough Local Plan (Adopted July 2017) which is part of the Council's Development Plan.

1.2 Whilst there is limited definitive evidence available of a need for Houses in Multiple Occupation (HMOs), the Council's Housing Market Assessment identifies that single person households are relatively unlikely to afford market housing and the Council has declared an affordable housing emergency. In addition, there is evidence that demonstrates an increase in the supply of HMOs. In combination, it is considered that the evidenced need for accommodation that is comparatively cheaper and available to rent and the increase in the supply of HMOs suggests that HMOs are forming an increasing part of the Council's Housing stock.

1.3 The evidence base indicates that buildings of various types can become HMOs, albeit most appear to have resulted from the conversion of dwellings. Whilst most dwellings are or were designed for occupation by family units, HMOs are very likely to have a higher adult population and are likely to be used more intensively as a result of bedrooms being formed in place of rooms that were initially envisaged to be used for other purposes. Similarly, buildings used for other purposes previously might not have envisaged residential use at all. As a consequence, there can be instances where the differing occupation of a building and the impacts of accommodating an alternative mix of residents can have implications especially on

- the character and appearance of an area;
- parking provision within the locality; and
- the living conditions of the intended occupiers of the HMO and residents of the surrounding area.

Purpose of the HMO Supplementary Planning Document (SPD)

1.4 In light of the above, the purpose of the HMO SPD is to guide the application of the Council's existing policies in respect of applications for HMOs. This covers the following matters:

- The avoidance of the over concentration of HMOs;
- The availability of adequate parking;
- The provision of storage for waste and recycling and its management, and
- The provision of adequate room sizes for future residents.

Status and Scope

1.5 The SPD cannot introduce new policies but will identify matters that should be addressed by an applicant in order to demonstrate compliance with existing policies of Bearing Fruits 2031 - The Swale Borough Local Plan (Adopted July 2017) hereafter referred to as 'The Local Plan'.

1.6 Similarly the document will provide an indication of how the Council will approach applications for HMOs and how these approaches relate to the existing policies of The Local Plan.

1.7 Once adopted as an SPD, this document will be a material planning consideration for the Council when determining planning applications involving the provision of HMOs.

2 HMOs Within the Planning System and Key Definitions

2.1 It is considered appropriate to provide a summary of how the planning system controls the change of use of a building to an HMO. It is anticipated that this might assist some future applicants.

2.2 Where an HMO use is introduced, experience demonstrates that it is often reported to the Council's Planning Investigations Team. An additional purpose of this specific section is, therefore, to provide a reference point for those persons who become aware of an HMO being introduced or wish to comment on an application related to an HMO, whether that be a Certificate of Lawfulness or an application for Planning Permission.

Development

2.3 Section 55 of the Town and Country Planning Act 1990 defines development and, for the purposes of this SPD, it is relevant that it includes building operations and material changes of use of land. The word 'material' is addressed further below.

2.4 From this basis, where the use of a building materially changes, it will constitute development. Section 55 of the T&CP Act 1990 highlights that this is not applicable where the new use falls within the same Use Class as the former use.

2.5 Where a material change of use occurs, to be lawful, it would either need to be Permitted Development or granted planning permission following the submission of a planning application.

2.6 Permitted Development is development that is enabled by the Town and Country Planning (General Permitted Development) (England) Order 2015 (The GPDO). Of specific relevance to changes of use are the Classes within Part 3 of Schedule 2 of the GPDO which mean that certain changes can occur when needing planning permission.

Definition of an HMO - Section 254 of the Housing Act 2004

2.7 As will be set out below, the planning legislation that is relevant to HMOs links to the definition that is provided by Section 254 of the Housing Act 2004. A shortened and summarised version of this definition is as follows:

2.8 A building or a part of a building is a "house in multiple occupation" if: -

(a) it meets the "the standard test" which comprises of the following criteria:

1. one or more units of living accommodation that are not self-contained flats;
2. the occupiers do not form a single household;
3. it is the accommodation is occupied by persons as their main residence;
4. the occupiers residential use is their only use of the premises;
5. rents are paid by at least one occupier; and
6. two or more occupiers share one or more basic amenity, or the living accommodation is lacking one or more amenity

(b) it meets "the self-contained flat test" which is as per (2) to (6) above and it consists of a self-contained flat.

(c) it meets the conditions in subsection(4) (<https://www.legislation.gov.uk/ukpga/2004/34/section/254>) ("the converted building test") which is as per (1) to (5) above and the building has been converted.

(d) an HMO declaration is in force in respect of it under section 255; or a declaration can be made where the above tests are met other than (4) but their use represents a significant use.

There is an additional sub-section (e) that relates to converted blocks of flats, but this is not relevant to Use Class C4 as will be set out below and is therefore of limited relevance to planning.

Classification of HMOs

Town and Country Planning Use Classes Order 1987 (as amended)

2.9 This legislation (hereafter referred to as the Use Classes Order) categorises uses of land. Those that fall outside those classes are deemed to be “Sui Generis” i.e. they are effectively a bespoke use of land that is not categorised and, as such, any material changes of use of that land would need planning permission.

2.10 Of relevance to this HMO SPD are the following use classes, for which shortened versions of the formal definitions have been provided:

Use Class C3 – Dwellinghouses

2.11 Use as a dwellinghouse (whether or not as a sole or main residence) by:

- a. a single person or by people to be regarded as forming a single household;
- b. not more than six residents living together as a single household where care is provided for residents; or
- c. not more than six residents living together as a single household where no care is provided to residents (other than a use within Class C4).

Use Class C4 – Houses in Multiple Occupation

2.12 Use of a dwellinghouse by not more than six residents as a “house in multiple occupation”

2.13 Interpretation – *“For the purposes of Class C4 a “house in multiple occupation” does not include a converted block of flats to which section 257 of the Housing Act 2004 applies but otherwise has the same meaning as in section 254 of the Housing Act 2004.”*

Sui Generis – Other Uses that are outside the Use Classes

2.14 In relation to HMOs this means the use of a dwellinghouse by more than six residents as a “house in multiple occupation”

Permitted Development

2.15 The following section of the abovementioned GPDO applies to the conversion of dwellings (Use Class C3) to HMOs that fall within Use Class C4. A shortened version of the Permitted Development is provided.

Class L of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015.

Permitted Development:

Development consisting of a change of use of a building—

- a. from a use falling within Class C4 to a use falling within Class C3;
- b. from a use falling within Class C3 to a use falling within Class C4.

Development is not permitted by Class L if it would result in the use—

- a. as two or more separate dwellinghouses falling within Class C3 in relation to any building previously used as a single dwellinghouse; or
- b. as two or more separate dwellinghouses falling within Class C4 in relation to any building previously used as a single dwellinghouse.

Guidance Related to Permitted Development

2.16 Where a development falls within the scope of Permitted Development, it can lawfully occur without any involvement by the Planning Service at Swale Borough Council. There is no need to apply for planning permission.

2.17 Often a person will choose to submit an application for a Certificate of Lawfulness for a Proposed Use or Development (often referred to as a CLOPUD or LAWPRO). Such an application seeks confirmation that the proposal is Permitted Development and the application has to be considered only in respect of whether or not the development could have lawfully occurred on the date that the application was submitted.

2.18 Alternatively, if development has already occurred, a Certificate of Lawfulness for an Existing Use of Development (a CLEUD or LDCEX) can be sought.

2.19 Seeking a Certificate of Lawfulness is entirely optional. The only consideration to be made by the Planning Service for those types of applications is whether the development is lawful. Planning merits and national and local planning policies, including this SPD, would not be relevant to such an application.

Planning Permission

2.20 Other than where a development is Permitted Development, planning permission is required.

2.21 In summary, changing a building to a Large HMO (Sui Generis Use) i.e. an HMO with 7 or more residents, needs planning permission.

2.22 Alterations to the number of residents within a Large HMO could represent a material change of use meaning planning permission might also be required.

2.23 The conversion of buildings in any other use to HMOs of any size would also need planning permission.

Physical Works

2.24 In many instances, the conversion of a dwellinghouse to an HMO will involve building operations.

2.25 Such works might be able to occur under the terms of Classes A (extensions and alterations other than the roof), B (roof extensions), C (other roof alterations), E (outbuildings) of Part 1 of Schedule 2 of the GPDO. The reason for this being that buildings with a lawful use as a dwellinghouse retain their Permitted Development rights.

2.26 If the building operations exceed those Permitted Development rights, planning permission is required.

2.27 The abovementioned Permitted Development Rights relating to building operations are not applicable to flats.

2.28 Section 56 of the T&CPA highlights that internal works within a building are not development and do not require planning permission.

Listed Buildings and Conservation Areas.

2.29 Notwithstanding the above, if a building is a listed building, consent may be required for internal works under the terms of the separate regime of control that applies to listed buildings. A change of use does not require listed building consent and so, on its own, the creation of an HMO would not need listed building consent. It is the physical works to a building that may need consent.

2.30 A site being within a Conservation Area limits building operations that can occur under Permitted Development rights, in the same way that they are partially reduced for dwellings. However, being in a Conservation Area does not create any additional limitations with respect to the creation of HMOs in terms of change of use.

Materiality of Change of Use

2.31 Above, the term 'material' was highlighted in respect of the definition of development and the inclusion within that of the change of use of land. In this regard, it is relevant to stress that not all changes of use of land will be material. Of relevance to HMOs, is that there could be circumstances where enabling an

additional person to reside at a premises might not be considered to result in a material change of use. This would be for determination in the circumstances of a specific case, as what might be material in one case, might not in another.

Restrictions on Permitted Development Rights relating to the Change of Use of Land.

2.32 At this time, there are no area-based restrictions in Swale on the ability of property owners to utilise the Permitted Development right set out above in respect of changes of use to create HMOs.

2.33 However, as part of the same Council motion that sought the preparation of this SPD, the Council requested that steps are taken towards making a direction under the terms of Article 4 of the GPDO which would have the effect of removing Permitted Development rights relating to Class L of Part 3 and the creation of HMOs.

2.34 Such a restriction on Permitted Development rights would materially alter the above commentary as the Permitted Development opportunity would not be applicable and planning permission would be required for all HMOs that fall within Use Class C4 as well as those Large HMOs that fall outside the Use Classes Order.

Breaches of Planning Control

2.35 Where development has occurred that requires planning permission and no such planning permission has been obtained, interested parties are invited to notify the Council's Planning Investigations Team. To do so, it is requested that the following webpage is used: <https://swale.gov.uk/planning-and-regeneration/planning-breaches-and-enforcement/report-a-breach-of-planning-consent#h2>

2.36 Investigations of breaches will occur in accordance with the Council's Planning Enforcement Strategy. This can be found at: <https://swale.gov.uk/your-council/strategies-and-policies/planning-enforcement-strategy>

2.37 It is hoped that interested parties may have found this document before reporting a development that has or is in the process of occurring. In such instances it is helpful that regard is had to the content of this SPD before reporting a development.

2.38 Where a development or building operations are occurring and there is a suspicion that a breach of planning control will occur, formal enforcement action will seldom be considered until a breach of planning control has definitively occurred.

3 Planning Policies (Local and National)

3.1 The development plan in effect within the Swale Borough includes Neighbourhood Plans and the Kent Waste and Minerals Local Plan (2024 to 2039). It also includes Bearing Fruits 2031 - The Swale Borough Local Plan (Adopted July 2017) which is the primary source of planning policy relating to development throughout the Swale Borough.

3.2 As far as it is relevant to this SPD, Local Plan Policy ST1 (Delivering sustainable development in Swale) states that *“all development proposals will, as appropriate:*

7. Deliver a wide choice of high quality homes by:

- a. meeting the full, objectively assessed need for housing in the housing market area;*
- b. providing housing opportunity, choice and independence with types of housing for local needs; and*
- c. keeping vitality within rural communities with identified housing needs, proportionate to their character, scale and role.*

8. Achieve good design through reflecting the best of an area’s defining characteristics.

9. Promote healthy communities through:

- a. location of development to achieve safe, mixed uses and shared spaces;*
- b. rejuvenation of deprived communities.”*

3.3 Local Plan Policy CP3 (Delivering a wide choice of high quality homes) states that the Council and others *“shall work towards the delivery of a wide choice of high quality homes that extend opportunities for home ownership and create sustainable, inclusive and mixed communities.”* It goes on to state that *“development proposals will, as appropriate:*

(2) tailor the purpose and objectives of housing proposals to the issues present within local housing market areas;

(5) achieve a mix of housing types, reflecting the findings of the current Strategic Housing Market Assessment or similar needs assessment;

(6) meet the housing requirements of specific groups, including families, older persons, or disabled and other vulnerable persons; and

(8) achieve sustainable and high quality design in accordance with Policy CP4 and Policy DM19.”

3.4 Leading on from the above, Policy CP4 (Requiring good design) states *“that all development proposals will be of a high quality design that is appropriate to its surroundings.”* It goes on to state that *“development proposals will, as appropriate:*

1. Create safe, accessible, comfortable, varied and attractive places;

2. Enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and strengthening sense of place;

5. Retain and enhance features which contribute to local character and distinctiveness;

7. Achieve a mix of uses, building forms, tenure and densities;

10. Use densities determined by the context and the defining characteristics of the area

11. Ensure the long-term maintenance and management of buildings, spaces, features and social infrastructure;

12. Be flexible in order to respond to future changes in use, lifestyle, and demography;

3.5 Policy DM14 (General development criteria) sets out that *“All development proposals will, as appropriate:*

3. Accord with adopted Supplementary Planning Documents and Guidance

5. Reflect the positive characteristics and features of the site and locality

7. Be both well sited and of a scale, design, appearance and detail that is sympathetic and appropriate to the location;

8. Cause no significant harm to amenity and other sensitive uses or areas;

10. Achieve safe vehicular access, convenient routes and facilities for pedestrians and cyclists, enhanced public transport facilities and services, together with parking and servicing facilities in accordance with the County Council's standards."

3.6 Finally, Policy DM7 (Vehicle Parking) states that "*when prepared, the Swale Vehicle Parking SPD will provide guidelines for:*

- 1. Car parking standards for residential development, which will*
 - a. take into account the type, size and mix of dwellings and the need for visitor parking; and*
 - b. provide design advice to ensure efficient and attractive layout of development whilst ensuring that appropriate provision for vehicle parking is integrated within it.*
- 3. Cycle parking facilities on new developments, of an appropriate design and in a convenient, safe, secure and sheltered location."*

3.7 At the Neighbourhood Plan level, there are no specific policies within the Boughton and Dunkirk Neighbourhood Plan (2023) which address HMOs. However, policies H1, H8, T3 and E1 are considered to align with The Local Plan insofar as they address the provision of housing to meet local needs whilst minimising environmental impacts, providing adequate parking and ensuring that development respects and enhances local character, environmental quality and amenity value.

3.8 Similarly, the Faversham Neighbourhood Plan (2024) does not include any policies that specifically address HMOs. However, policies FAV3 and FAV10 are considered to align with The Local Plan insofar as they address meeting local housing need and achieving development that compliments the existing townscape and character and represents sustainable design in various stated respects.

3.9 The abovementioned Local Plan policies are considered to be aligned with paragraphs 8, 63, 96, 109, 111, 112, 131 and 135 of the NPPF.

3.10 Moreover, although it has been published in draft and is the subject of current public consultation, it is relevant that the policies appear to align with policies, DP3, P3, TR2 and TR4 of the Consultation Draft NPPF that was published on 16 December 2025.

3.11 In this context, it is considered sound for an SPD to guide the circumstances where HMOs will be supported as they will achieve the outcomes set out within these policies.

4 Existing HMO Stock and Potential Effects of HMO stock

Existing HMO Stock

4.1 Identifying the existing HMO stock with reliance solely on planning records is problematic given that, as set out above, many can be formed without needing planning permission and without recourse to the Council's Planning Service. In short, many could have been created without the Planning Service knowing, especially where there are a lower number of residents that might not attract the same amount of attention as larger HMOs. Notwithstanding this, the Council's planning application, local plan monitoring and planning enforcement records have been reviewed and this has enabled several HMOs to be identified. Other Council records have also been utilised including the HMO License Register.

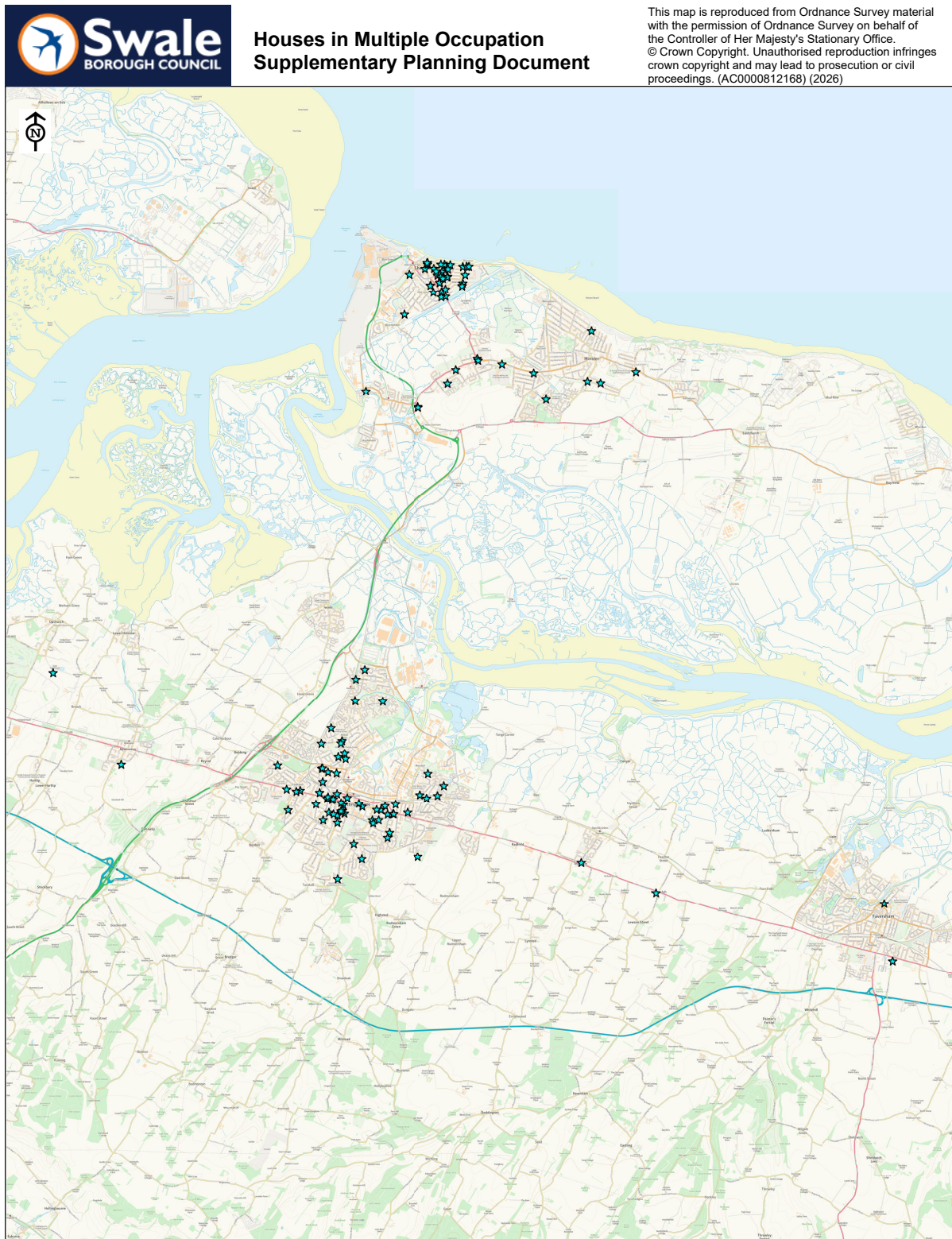
4.2 Some records will need to be reviewed further and, as this search process can only represent a snapshot in time, the stock of HMOs will evolve. It is, however, anticipated that a register of known HMOs can be kept up-to-date through the collaboration of the respective teams within the Council.

4.3 This research to date indicates that there are 126 HMOs within the Swale Borough.

4.4 Evidence sourced from the Office for National Statistics (ONS) indicates that when the 2021 Census was undertaken, there were 61 Small HMOs and 14 Large HMOs in the Swale Borough. In total there were, therefore, 75 HMOs.

4.5 It therefore appears that there has been an increase of 51 HMOs in approximately 5 years, a 68% increase above the 75 HMOs that were recorded in the Census.

4.6 The map below shows that there is a degree of dispersion to the location of HMOs:



Picture 4.0.1

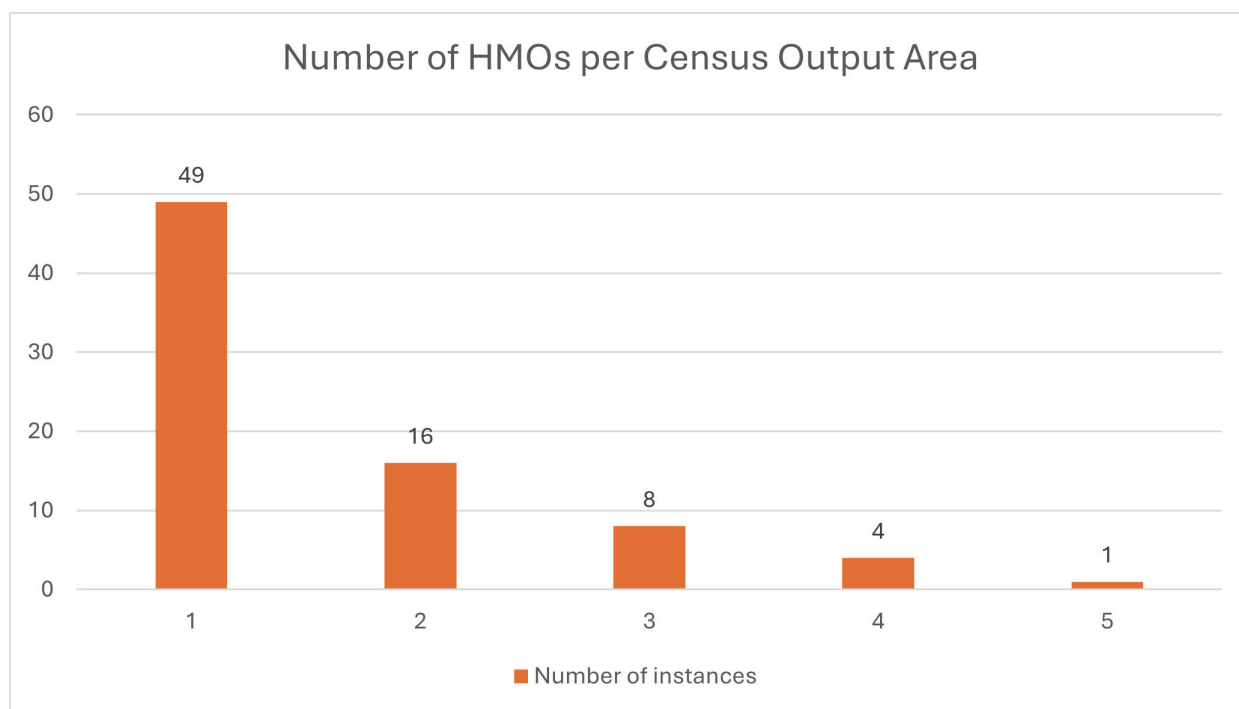
4 Existing HMO Stock and Potential Effects of HMO stock

4.7 On a ward level, the 126 HMOs that have been identified are broken down as follows:

Ward	HMO's	Ward	HMO's	Ward	HMO's
Abbey	1	Milton Regis	8	Sheppey Central	5
Borden and Grove Park	6	Minster Cliffs	1	Teynham and Lynsted	2
Chalkwell	12	Murston	4	Watling	1
Hartlip, Newington and Upchurch	2	Queenborough & Halfway	8	Woodstock	3
Homewood	15	Roman	16		
Kemsley	3	Sheerness	39	TOTAL	126

Table 4.0.1

4.8 At a more localised level, Census data can be broken down to Output Area (OA) level which are generally areas of between 40 and 250 households with resident populations of between 100 and 625 people. Through separating the 126 identified HMOs into the Output Areas, the following dispersal of HMOs has been established:



Picture 4.0.2

Number of HMOs per OA	1	2	3	4	5
Number of instances	49	16	8	4	1

Table 4.0.2

4.9 The OA area with the most HMOs is in Sheerness, near and around the junction of Marine Parade, Broadway, and Alma Road. There are 158 households within that area and, as such, 5 HMOs amounts to 3.16% of the households being HMOs.

4.10 If combined with an adjacent OA to the west which is one of those that has 4 HMOs, there are 344 households and 9 HMOs in that area, amounting to 2.62%.

Potential Effects of an HMO Stock

4.11 The number and quality of HMOs in the borough has been cited as a matter that requires further consideration and, in this regard, the Full Council meeting on 1 October 2025 provides a useful steer of the matters that are considered to require attention.

4.12 It is noted that the motion for Full Council and the debate of that motion identified the following potential impacts of HMOs:

- Impacts on local amenity;
- Increased parking demand;
- Refuse generation;
- Impacts on local infrastructure and public services;
- Impacts on housing balance and changes to the character of residential areas;
- A reduction of the supply of properties for families and single occupiers; and
- Poor living conditions for occupiers.

5 Guidance Topic 1 - Concentration of HMO's

Ensuring the Concentration of HMOs respects Character and Living Conditions

5.1 This matter is considered to align with the consideration of developments in respect of Policies ST1, CP3, CP4 and DM14.

5.2 It is considered that the avoidance of an undue accumulation of HMOs within a particular area will ensure that areas with a character defined by dwellinghouses is not unduly eroded. Moreover, it is considered that this will ensure that the developments contribute to achieving sustainable, inclusive and mixed communities as required by Policy CP3.

5.3 Furthermore, noting the potential for a material increase in the number of adult residents and the activity associated with such a population, it is considered that there is scope for there to be a different level of noise and disturbance caused, that could have an impact on the living conditions of existing residents within that area.

5.4 Noting that policy DM14 seeks to ensure development causes no significant harm to amenity and other sensitive uses or areas and that paragraph 135f) of the NPPF states that development should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, it is considered appropriate to seek to ensure that a suitable living environment is retained.

5.5 As demonstrated above, there is a fairly broad dispersal of 126 HMOs over 16 wards and 8 wards without any HMOs. However, there are some distinct areas where a concentration of HMOs has been identified. Such concentrations can have many implications, including the erosion of the residential character of an area.

5.6 A methodology for assessing the acceptability of a concentration of HMOs is to identify a catchment area, calculate the number of residential properties and the number of HMOs within that area and set a threshold based on the number of HMOs that are considered to be able to be accommodated without causing the erosion of the character of the area or other strains that could be contrary to the abovementioned policies.

5.7 Appendix A sets out a step-by-step approach to undertaking an HMO Concentration Assessment.

5.8 It is considered that a 100m radius from the existing front door of a dwelling is a suitable catchment area in the context that, for many, such an area would be construed as being the area in which they live and the area around their home

5.9 Having regard to the evidence above that addresses the prevalence of HMOs within an area, it is considered that a threshold of 10% is an appropriate guideline.

5.10 If the threshold of 10% is exceeded in a predominantly residential area, it is likely that a site visit will demonstrate that there is already a noticeable presence of HMOs within the locality. It would be expected that this would not be the case where fewer HMOs exist. Therefore, unless it can be demonstrated that an additional HMO beyond the 10% threshold can be comfortably accommodated within an area, it is probable that a proposal to introduce a further HMO will be found to cause the undue undermining of an existing residential character.

5.11 In more commercial or mixed-use areas where there are fewer than 10 residential properties within the Assessment Area, a 30% threshold will be applied.

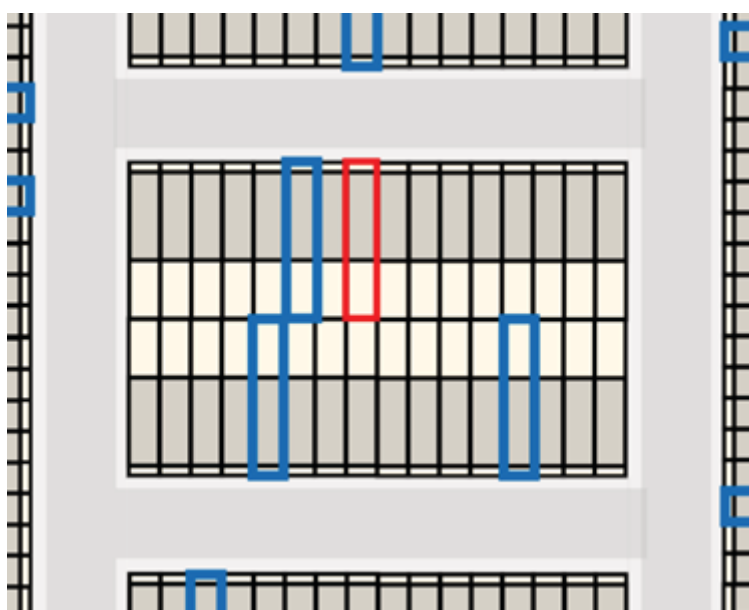
5.12 Where a building contains flats, if one of those flats is used as an HMO, the building shall be considered as a whole and that building will be counted as an HMO for the purposes of a concentration assessment.

Avoidance of Sandwiching

5.13 In the interests of providing adequate living conditions for existing residents, it is considered appropriate to avoid instances of sandwiching. Where the increased activity resulting from an HMO which has been set out above can be experienced at one side of a C3 dwellinghouse, it is unlikely to have a significantly harmful impact on the overall living conditions of those neighbouring residents.

5.14 However, where a residential dwellinghouse in C3 use is neighboured by HMOs at both sides, it is likely that there will be a sense of being surrounded by HMOs which will materially change the living conditions of those residents.

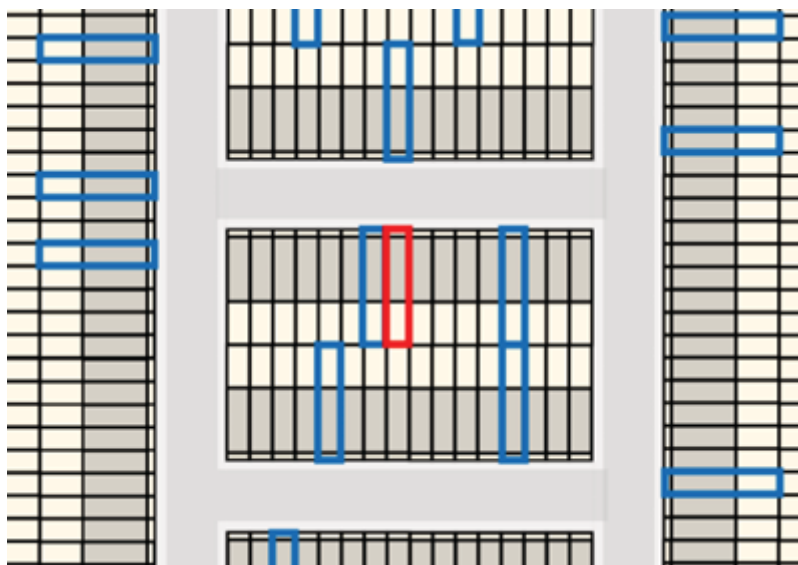
5.15 Consequently, unless it can be demonstrated that significant harm will not arise, it is likely that a situation where a dwellinghouse becomes “sandwiched” between two HMOs will not be found acceptable. An example of a likely unacceptable HMO sandwich situation is demonstrated on the diagram below:



Picture 5.0.1

5.16 In this example above, there would be a dwellinghouse falling within Use Class C3 sitting between an existing HMO (marked in blue) and a proposed HMO (marked in red). This would not be acceptable.

5.17 However, one HMO being located next to another may be acceptable:



Page 28
Picture 5.0.2

5.18 This will only be considered as an issue where properties are adjacent to each other in a side-by-side format. In such an arrangement, properties are usually closer to their neighbours than properties at the opposite side of a road or where there are gardens between the buildings. Moreover, where there are attached properties, there is a greater likelihood of disturbance being noticed through the adjoining structures.

5.19 Where a building contains flats, the same approach shall also apply but on a horizontal and vertical basis. No flat should abut (to the side, above or below) more than one HMO in the interests of providing suitable living conditions for the occupiers of flats which are likely to be more constrained as a result of their configuration.

Question 1

Will the approach set out at Guidance Topic 1 (Concentration of HMOs) be effective in addressing the concentration of HMOs. If not, are there any other approaches to concentration that we should consider?

6 Guidance Topic 2 - Parking

6.1 This objective is considered to align with the consideration of developments in respect of Policies DM7 and DM14. The Council's Parking Standards currently provide no parking standards for HMOs. By setting out how parking is expected to be provided, it will allow clarity for all.

6.2 An assessment of the location of the existing HMOs within the Swale Borough indicates that many are located in areas where there is limited off-street parking and a reliance, by all, on on-street parking. Parking stress can be detrimental to living conditions and detract from the amenities of an area and, as such, it will be beneficial for such developments to be steered to locations where they can be accommodated or make adequate provisions.

6.3 Census data from the 2021 Census indicates that there were 11,119 privately rented properties in the Swale Borough. HMOs align closest with this type of property tenure.

6.4 Within that, 4,646 of the properties had just one usual resident aged 17 years or over. It is considered that this figure is relevant as most HMO rooms are occupied on a single adult basis and where there are more, this is likely to be balanced out with periods of under-occupancy elsewhere as not all properties are occupied at all times.

6.5 Within those properties, 1,793 had no access to a car, 2,571 had access to a car and 282 had access to two or more cars.

6.6 Using that data and proceeding on the basis that the two or more category would most likely have no more than two cars in the majority of cases, it can be assumed that the 4,646 persons renting privately in the Swale Borough led to car ownership amounting to approximately 3,135 cars. This amounts to a car ownership rate of 0.67 cars per person living alone.

6.7 More broadly, again based on the 2021 Census, of the 15,957 one-person households within the Swale Borough, 5,871 had no access to a car, 8,866 had access to one car, 961 had access to two and 259 had access to 3. That equates to a total of 11,565 cars which amounts to an average of 0.72 cars per person living alone.

6.8 At a Borough level, the 2021 Census indicates that 16.6% of households do not have a car or van. However, for those wards where HMOs were identified, the percentage of households without cars are as follows:

Ward		Ward		Ward	
Abbey	24%	Milton Regis	20%	Sheppey Central	12%
Borden and Grove Park	13%	Minster Cliffs	11%	Teynham and Lynsted	12%
Chalkwell	21%	Murston	21%	Watling	16%
Hartlip, Newington and Upchurch	9%	Queenborough & Halfway	17%	Woodstock	10%
Homewood	20%	Roman	27%		
Kemsley	12%	Sheerness	34%		

Table 6.0.1

6.9 Moreover, using the figures for one-person households only, the percentage of households without cars are as follows:

Ward		Ward		Ward	
Abbey	44%	Milton Regis	44%	Sheppey Central	26%
Borden and Grove Park	34%	Minster Cliffs	33%	Teynham and Lynsted	31%
Chalkwell	41%	Murston	44%	Watling	37%
Hartlip, Newington and Upchurch	28%	Queenborough & Halfway	36%	Woodstock	31%
Homewood	44%	Roman	52%		
Kemsley	28%	Sheerness	55%		

Table 6.0.2

6.10 At a more local level, using the data for the Output Areas where HMOs have been identified, 26.9% of households do not have access to a car, 41.3% of households have access to one car, 23.2% have access to 2 cars and 8.6% have access to 3 cars.

6.11 Proceeding on the basis that each room is occupied independently and is therefore tantamount to an individual household, both elements of evidence support a case that approximately 2 out of 3 occupiers would have access to a car and be located in areas where there is slightly over 1 car per household on average.

6.12 By extension, it is logical to state that car parking should be available at a rate of 0.66 car parking spaces per bedroom, rounded up to the nearest whole parking space. This would mean that a 3 bed HMO would need 2 spaces, a 4 bed HMO would need 3 spaces, 5 and 6 bed HMOs would need 4 spaces, a 7 bed HMO would need 5 spaces, 8 and 9 bed HMOs would need 6 spaces and a 10 bed HMO would need 7 spaces.

6.13 It is noted that the reality is that most HMOs are proposed where the form of the original building, the plot it sits within and the area generally, makes this level of parking provision unlikely in most cases.

6.14 To that end, on-street parking may be a requirement. In that scenario, it is recommended that any application is accompanied with evidence to demonstrate that parking spaces on-street within the vicinity of the site are likely to be available to accommodate the uplift from the existing use (based on the Council's adopted parking standards).

6.15 A Parking Survey, using a methodology such as the Lambeth Methodology, would be an appropriate way to demonstrate the adequate availability of on-street parking. Other approaches could be considered if they provide a robust assessment of parking availability.

Car Parking Permits

6.16 The Swale Parking Permit Policy is available at <https://swale.gov.uk/your-council/strategies-and-policies/parking-policy>

6.17 This restricts the provision of parking permits and, as such, reliance on parking permits within Controlled Parking Zones is unlikely to be practical for HMOs with more residents than allowed for by the parking policy.

Question 2

Will the approach set out at Guidance Topic 2 (Parking) be effective in ensuring that parking availability is not unduly altered. If not, are there any other approaches to parking availability that we should consider?

7 Guidance Topic 3 - Waste and Recycling Storage and Management

7.1 This objective is considered to align with the consideration of developments in respect of Policies CP4 and DM14, particularly through ensuring that development causes no significant harm to amenity and other sensitive uses or areas and creates safe, accessible, comfortable, varied and attractive places.

7.2 Whilst the provision of refuse storage facilities will primarily be addressed by the Council's Environmental Services team, the role of the HMO SPD is to ensure that refuse storage is provided in a manner that represents high quality design, as required by the abovementioned policies. The provision of discreet and accessible refuse and recycling storage will encourage its use and avoid an expanse of containers being kept at sites and within streets in prominent, visually unfortunate or obstructive arrangements.

7.3 For an HMO that is to be converted from a dwelling, where there are no more than 5 residents, the recycling storage arrangements would be no greater than would arise from the existing dwelling. As such, there would be no additional requirements to provide refuse and recycling storage. For guidance, it is recommended that the property would be entitled to the following provisions and it is recommended that arrangements are made within proposals for their storage and for them to be made available for collection and returned to their storage locations at the appropriate times:

- 1 x 180ltr refuse bin
- 1 x 240ltr recycling bin (with a 2nd provided if needed)
- 1 x 23ltr food bin (with a 2nd provided if needed)
- 1 x 5ltr food caddy

7.4 Where a HMO would have 6 or more persons, it might introduce the need for a larger 240ltr refuse bin or an additional 180ltr refuse bin to be provided. In addition, where there is more than one kitchen, additional 5ltr food caddies can be provided.

7.5 Where the alteration of the use of the building is likely to result in an uplift in the number of bins kept at a site (other than the 5ltr caddies which should be kept within kitchens), it will be expected that plans accompany any application to demonstrate how these will be stored. All such storage should be provided within the building or the plot and it will be expected that the storage will be discreet and/or visually acceptable in the context of the character and appearance of the site and the locality.

7.6 In addition, any management arrangements required to ensure that bins are presented to suitable collection locations and subsequently returned to their storage positions should be detailed within supporting submissions.

7.7 Conditions may be imposed to ensure the provision of adequate storage and management arrangements.

Question 3

Will the approach set out at Guidance Topic 3 (Waste and Recycling Storage and Management) be effective in ensuring that adequate waste/refuse storage and management arrangements are in place. If not, are there any other approaches to waste/refuse storage that we should consider?

8 Guidance Topic 4 - Room Sizes

8.1 This objective is considered to align with the consideration of developments in respect of Policies ST1, CP3 and CP4 by meeting the housing requirements of specific groups, creating accessible and comfortable places, being flexible in order to respond to future changes in use, lifestyle, and demography and delivering a wide choice of high-quality homes.

8.2 Minimum bedroom sizes and standards for licensable HMOs are already in effect under the terms of the Housing Act 2004. However, the HMO SPD will be applicable to all planning applications for HMOs, including those that might not require a licence.

8.3 The Council will expect any planning applications submitted for HMOs to demonstrate room sizes that accord with the National Standards that are currently set out, any standards that replace those standards or any local standards adopted by the Council's Private Sector Housing team, whichever are the largest. At present, the minimum room sizes for bedrooms (taken from the Housing Act) and shared kitchens (taken from the Council's HMO standards) are:

Occupancy	Minimum Bedroom Size for HMO
One child under the age of 10	4.64 square metres
One occupant over 10 years of age	6.51 square metres
Two occupants over 10 years of age	10.22 square metres

Table 8.0.1

Number of People Sharing a Kitchen	Minimum Kitchen Size
1 to 3 people	5 square metres
4 people	6 square metres
5 people	7 square metres
6 people	9 square metres
7 to 10 people	11 square metres

Table 8.0.2

Question 4

Will the approach set out at Guidance Topic 4 (Room Sizes) be effective in ensuring that that bedrooms and kitchens will be of acceptable size. If not, are there any other approaches to room size that we should consider?

9 Other controls, relevant legislation and contacts

9.1 This SPD has been prepared solely from a planning perspective. HMOs and building operations are, however, also controlled by other legislation:

The Housing Act 2004 (Requirement for a Licence)

9.2 This legislative regime is wholly separate from planning. At the time of writing, the Housing Act 2004 effectively states that:

9.3 *A HMO falling within the scope of requiring a license is one that —*

- (a) is occupied by five or more persons;*
- (b) is occupied by persons living in two or more separate households; and*
- (c) meet(i)the standard test under section 254(2) of the Act (<https://www.legislation.gov.uk/ukpga/2004/34/section/254>)*
- (ii) the self-contained flat test under section 254(3) of the Act but is not a purpose-built flat situated in a block comprising three or more self-contained flats; or*
- (iii) the converted building test under section 254(4) of the Act.*

9.4 When granting a licence conditions can be used to control various matters including:

- Gas Safety Certificates;
- Electrical Appliances and Furniture Safety Standards;
- Smoke and Carbon Monoxide Alarm provision;
- The provision of Terms of Occupation to Occupiers;
- Minimum sleeping room sizes;
- Anti-Social behaviour management conditions;
- Repairs; and
- Training of license holders.

9.5 The Licence Application process involves assessing the suitability of the licence holders (fit and proper persons test) and assessing the suitability of the property (shared bathing and toilet facilities and wash hand basins in rooms, kitchen facilities and fire safety facilities and equipment).

9.6 Full details of the approach to HMO Licensing at Swale Borough Council can be found at <https://swale.gov.uk/business-licensing-and-procurement/licences-permits-and-consents/houses-in-multiple-occupation>.

The Building Act 1984 and The Building Regulations 2010

9.7 Extensions, alterations and works within a building might require approval under the terms of the Building Regulations.

9.8 This is an entirely separate legislative function and the Planning Service at Swale Borough Council operates under a Memorandum of Understanding with the South Thames Gateway Building Control Body (details of which can be found at <https://www.stgbc.org.uk>).

9.9 Where works are considered to conflict with Building Regulations, they can be brought to the attention of the Building Control Body at the abovementioned website.

9.10 As set out in an earlier section of this SPD, internal works do not require planning permission and so any requirements resulting from the Building Regulations do not affect the assessment of a development from a planning perspective.

Party Wall Act / Civil Matters

9.11 Under the terms of the Party Wall Act 1996, neighbouring landowners are afforded certain protection in some respects. Details of which can be found at <https://www.gov.uk/government/publications/preventing-and-resolving-disputes-in-relation-to-party-walls/the-party-wall-etc-act-1996-explanatory-booklet>.

9.12 Damage, encroachment or any other comparable unauthorised use of a person's land without their consent is a matter for the respective landowners to address between themselves. Swale Borough Council has no remit to enforce property boundaries, resolve disputes or address any disagreements in these respects.

Ventilation

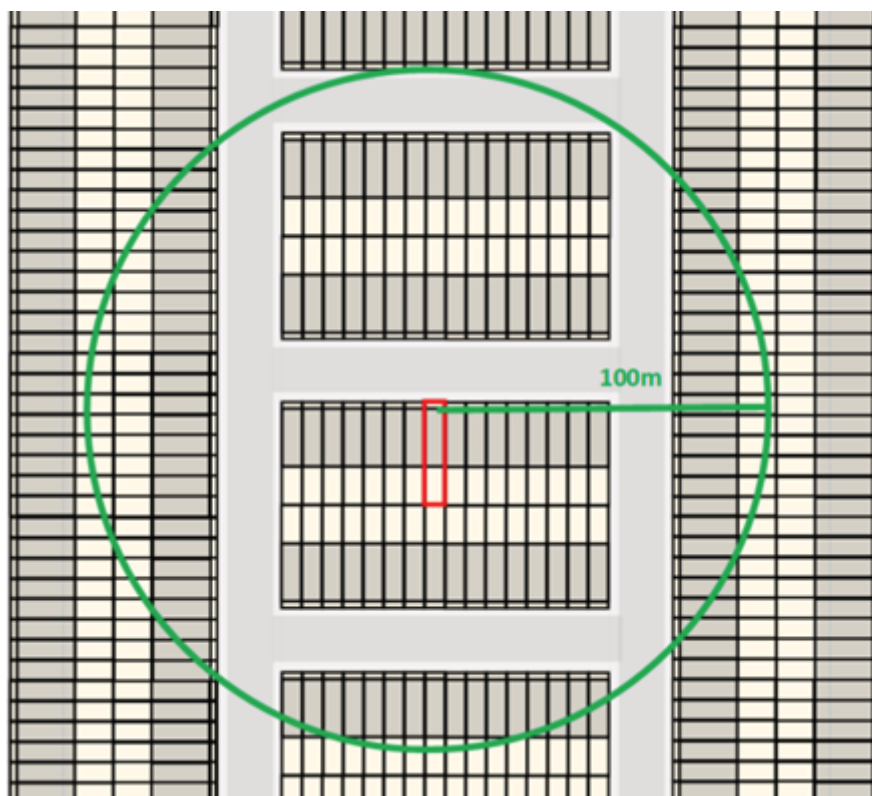
9.13 The ventilation of buildings is addressed through the Building Regulations, in particular Approved Document F.

9.14 It is acknowledged that, in the event of there being inadequate ventilation, there could be consequences with respect to the formation of damp and mould. Should that be the case, it is hereby highlighted that the Council's website (<https://swale.gov.uk/housing-council-tax-and-benefits/housing/damp-and-mould/tackling-damp-and-mould-advice-for-tenants>) provides assistance and guidance that may be of use to occupiers of such properties within these conditions.

10 Appendix A - HMO Concentration Assessment

Step 1 – Establish Assessment Area

10.1 Identify the location of the proposed HMO and the position of its front door and the spread of a 100m Assessment Area from that centre point.



Picture 10.0.1

Step 2 – Count the number of dwellinghouses within that Assessment Area

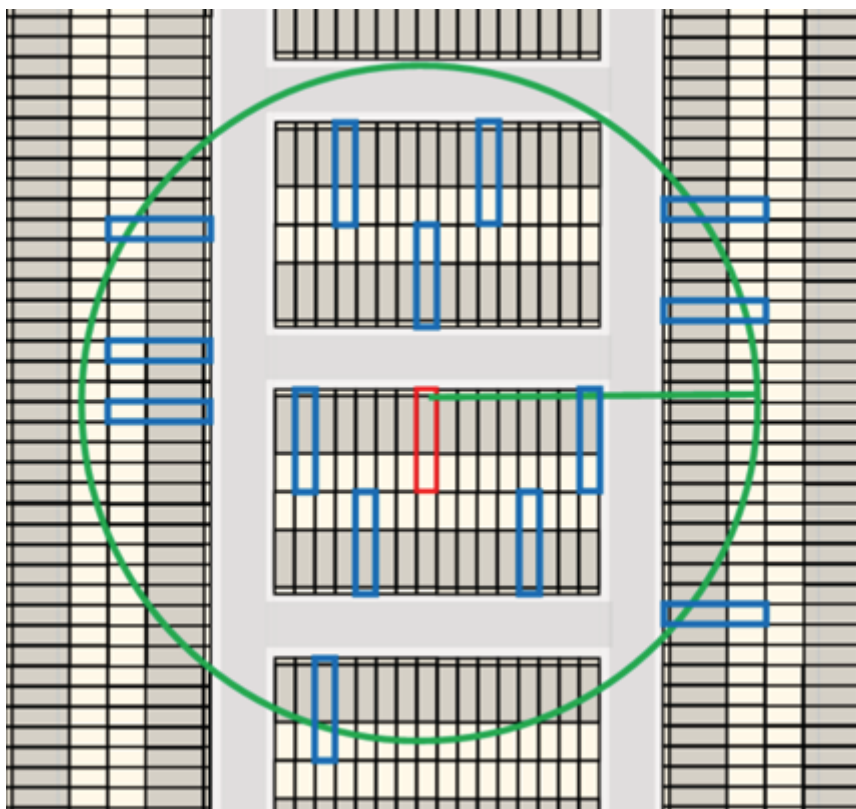
10.2 This includes all dwellings and parts of the planning unit of those dwellings (gardens) that fall within the 100m Assessment Area.

10.3 All buildings other than dwellings and flats are discounted.

10.4 As a working example, there are 146 dwellings in the Assessment Area shown above.

Step 3 – Establish the location of other HMOs within that Assessment Area

10.5 To do so, the Council will use Council Tax, HMO License and Planning records. (These have been demarked in blue on the following diagram. There are 14 currently present in the Assessment Area shown below)



Picture 10.0.2

Step 4 – Undertake Assessment

10.6 Calculate whether the existing or resultant situation would meet the 10% threshold of residential properties (or 30% in an area of mixed use or commercial properties with fewer than 10 residential properties).

10.7 Using the working example above, where there are 146 dwellings within the Assessment Area and 14 HMOs, the addition of an HMO would bring the total to 15 and so the number of HMOs would exceed the 10% threshold.

Question 5

Will the HMO SMD be effective in terms of maintaining the local character of the different areas within the Swale Borough?

Question 6

Will the HMO SPD be effective in terms of maintaining living conditions for existing residents of an area?

Question 7

Are there any other issues that we need to consider?

Appendix II

CONSULTATION STATEMENT

Houses in Multiple Occupation Supplementary Planning Document (HMO SPD)

1. Introduction

As required by Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, this Consultation Statement has been prepared in respect of the consultation undertaken with regard to the Council's Draft HMO SPD. A Consultation Statement is required to be prepared to detail the consultation undertaken during the preparation of a Supplementary Planning Document (SPD). This statement outlines the consultation that has occurred and the comments received and addresses whether they should be reason to alter the Draft HMO SPD.

2. Purpose and Scope of the HMO SPD

The purpose of the HMO SPD is to guide the application of the Council's existing policies in respect of applications for HMOs. This covers the following matters:

- The avoidance of the over concentration of HMOs
- The availability of adequate parking.
- The provision of storage for waste and recycling and its management.
- The provision of adequate room sizes for future residents.

3. Status of SPD

The HMO SPD would become a material consideration in planning applications.

4. Consultation Process

A two-stage internal engagement and public consultation process has been conducted.

Internal Engagement:

- Internal discussions involved an early draft of the HMO SPD being made available to colleagues within the Council's Private Sector Housing Team and Environmental Services Team.
- Moreover, the paper was presented to the Council's internal Senior Management Team meeting on 26 February 2026. That meeting was attended by, amongst others, representatives of the Council's Housing, Finance, Communications, Environment and Leisure and Environmental Health teams.
- Feedback from these departments informed the preparation of the draft SPD before wider public consultation.
- The Draft HMO SPD was also made available to members of the PTPWG prior to it being presented to the Council's P&R Committee on 11th March 2026. An opportunity was made for Councillors to comment on the draft HMO SPD within the formal meetings and, at the request of a Councillor at the PTPWG meeting, an informal discussion was undertaken prior to the publication of the Draft HMO SPD on the P&R agenda.

Public Consultation (Formal Consultation Period)

- The draft HMO SPD was published for a four-week public consultation period, beginning on 30th March 2026 and ending on 29th April 2026.
- Notifications were sent to consultees, local councillors, Parish and Town Councils, and other interested parties.
- The document was available to view through a link on the Council's web-site and a hard copy would have been available on request at the council office.
- The consultation period was publicised through internal bulletins, press releases and publicity on the Council's website and social media pages.

Using the Council's online consultation tool, in the interests of focusing the consultation responses to the content of the Draft SPD, seven questions were provided:

1. Will the approach set out at Guidance Topic 1 (Concentration of HMOs) be effective in addressing the concentration of HMOs. If not, are there any other approaches to concentration that we should consider?
2. Will the approach set out at Guidance Topic 2 (Parking) be effective in ensuring that parking availability is not unduly altered. If not, are there any other approaches to parking availability that we should consider?
3. Will the approach set out at Guidance Topic 3 (Waste and Recycling Storage and Management) be effective in ensuring that adequate waste/refuse storage and management arrangements are in place. If not, are there any other approaches to waste/refuse storage that we should consider?
4. Will the approach set out at Guidance Topic 4 (Room Sizes) be effective in ensuring that that bedrooms and kitchens will be of acceptable size. If not, are there any other approaches to room size that we should consider?
5. Will the HMO SMD be effective in terms of maintaining the local character of the different areas within the Swale Borough?
6. Will the HMO SPD be effective in terms of maintaining living conditions for existing residents of an area?
7. Are there any other issues that we need to consider?

5. Comments Received

Comments were received from 12 interested parties. These are summarised within the table below and an Officer Response is provided in respect of each comment.

Many of the responses addressed matters beyond the questions that are set out above and, as such, it is not considered prudent to utilise those questions as the basis for summarising the consultation responses. Where those questions have been responded to, this will be made clear in the summary below. Given the nature and number of the responses received, it is considered sensible to summarise the responses and respond to each, rather than group them by topics.

It is noted that where similar exercises have been undertaken, it has been deemed appropriate to highlight where changes to the relevant document are required or not required. In this instance, having had full regard to the comments made, it is not considered that any changes are required and therefore, in the interests of efficiency, this has not been marked on each comment response.

Minster-on-Sea Parish Council	Officer Response
Minster-on-Sea Parish Council provided a commentary on each of the component parts of the HMO SPD, setting out that they are supportive of the SPD.	Comments Noted

The response discussed the role that HMOs play in meeting the need of some residents, whilst also acknowledging the shortcomings of such accommodation and the need to ensure that it is provided in an appropriate manner.	Comments Noted
Queenborough Town Council	Officer Response
All HMOs should require planning permission and should pass through all the "correct planning permission conditions" which include parking, noise, party wall and room size considerations. HMOs needing planning permission will ensure that town and parish Councils are able to comment on their formation.	The need for planning permission would not be affected by the adoption of the HMO SPD. Room size and parking adequacy considerations are to be addressed by the SPD. However, the other matters raised fall outside the scope of planning.
Sheerness Town Council	Officer Response
The response discussed the role that HMOs play in meeting the need of some residents, whilst also acknowledging the shortcomings of such accommodation and the need to ensure that it is provided in an appropriate manner.	Comments Noted
The response noted that Sheerness has a comparatively high number of HMOs relative to the remainder of the Borough and suggests that this causes pressure on services such as waste collection, social services and social care. It is considered that when concerns are raised in the planning process, they are given insufficient consideration. Resources should be provided in the areas that HMO exist to provide the services required to serve residents.	The allocation of resources to serve the needs of communities exceeds the scope of this SPD.
It is suggested that the inappropriate use of Permitted Development Rights should be considered further and that enforcement action should be taken by Swale Borough Council.	The use of permitted development rights by any person is not unreasonable as, by definition, it is their right to do so. After investigating a breach, enforcement action will be taken where it is expedient to do so, in line with the Council's Enforcement Strategy. There has to be a sound basis for taking enforcement action and it is respectfully suggested that there is often a misalignment of what persons think should be enforced against and when enforcement action can actually be reasonably taken.
It is highlighted that a recent motion of SBC's Full Council meeting has been supported by Sheerness Town Council.	Comments Noted

It is highlighted that at a recent SBC meeting, it was suggested that no HMO applications should be considered until the impact of HMOs and work being undertaken by SBC, including in relation to the HMO SPD, has been concluded.	The Council has no power to stop applications being submitted and is duty bound to determine applications as soon as practical. A hiatus cannot reasonably be introduced and, to do so, would put the Council at risk of appeals on the grounds of the non-determination of applications.
Support is given for the controls proposed in relation to the concentration of HMOs that are set out in the SPD. It is considered that the concentration thresholds are already exceeded and, therefore, there should be no more HMOs in Sheerness.	The support is noted, but the suggestion that the threshold is already exceeded is not the finding of Officers. The suggestion that there can be no more HMOs throughout Sheerness is not agreed, particularly as the assessment method proposed is more localised than on a ward level.
The waste management elements of the HMO SPD are noted but it is considered that fly tipping should be prevented and that there should be fines and charges for those responsible to avoid other resources being spent on waste management.	The comments made in relation to fees and charges and the means of addressing fly-tipping, go beyond the scope of the HMO SPD.
Stronger support and action should be provided and the SPD should go further to achieve this.	The HMO SPD has addressed all matters that it is considered reasonable to address, for the reasons given in previous papers.
Historic England	Officer Response
No Comment.	Noted.
National Highways	Officer Response
No Comment	Noted.
Natural England	Officer Response
No Comment	Noted.
Hayley Hope	
No HMO should be approved within an Infrastructure Capacity Assessment in order to address deficiencies relating to primary school places, SEND provision and highway capacity.	There is no overarching policy basis to require this. Officer experience is that very few children reside in HMOs and, as such, most of the matters raised go beyond the scope of this SPD.
A Community Asset Contribution (Community House) should be provided by developers of significant projects. Properties should be donated, placed into Community Land Trusts and made available as a hub for mental health support, community larders, youth groups, the elderly and disabled. Their operation should also be funded for three years by developers.	In the context of HMOs, it is very unlikely that such a provision would meet the tests for planning obligations that are set out at section 122 of the CIL Regulations.

Brownfield land should be prioritised, with HMOs only being considered on previously developed land.	All known HMOs in the Borough have been brought about through the conversion of an existing building or the redevelopment of previously developed land. The use of previously developed land is already promoted within local and national planning policies.
All HMOs should meet the highest energy efficiency standards (EPC A/B) and the SPD should make Voltage Optimisation technology mandatory. This would make energy usage cleaner, reduce waste and reduce bills.	There is no overarching policy basis to require this. Policy DM19 will continue to be applicable to applications for HMOs and it is not considered that there is grounds to require HMOs to achieve a higher energy efficiency standard than would be applied to any other type of development.
A 10% concentration cap within a 100 metre radius should be included.	This aligns with the approach set out within the SPD.
On-site waste storage must be mandatory to prevent 'bin blight' and keep pavements clear from obstruction.	This would be a requirement for larger HMOs but not smaller HMOs as the refuse storage arrangements would be no different to a dwelling and so it would be disproportionate to require provisions to be made for a HMO when such provisions are unlikely to be required for a pre-existing building (particularly as existing dwelling).
Berni Targar	Officer Response
There are too many HMOs. The numbers should be controlled and restricted to fit in with the area.	There is no planning policy basis or assessment of demand to say that the existing or increasing supply is exceeding the demand or need for such properties. The SPD attempts to address the concentration of HMOs.
An allegation has been made of a HMO being occupied by a person(s) who has undertaken illegal activities.	Such an allegation should be made to the police and addressing such a matter falls outside the scope of planning and the SPD.
People having lodgers has morphed into HMOs and bedsits being created.	These are three separate categories of residential provision and, whilst there can be some blurring of the distinction between them, this is a matter that falls outside the scope of this SPD which is only intended to address HMOs.
HMOs make parking inadequacies worse.	This is a matter that is addressed by the SPD.
Occupiers are short-term renters who do not engage with the local community.	The engagement of residents of any type of residential property with the local community cannot be controlled by planning.
Tyone Bland	Officer Response
The imposition of HMOs on the overcrowded community will make that overcrowding worse.	The HMO SPD does not propose HMOs, it seeks to ensure that they are provided in an acceptable manner.

The provision of HMOs is driven by greed and is detrimental to all.	This comment goes outside the remit of planning.
HMOs accommodate people that you would not want in your community and yet they are forced upon a community.	The HMO SPD could not control who occupies a HMO.
Greater restrictions should be applied to protect local communities so that they take priority over a person attempting to make money.	The HMO SPD is attempting to guide matters that relate to planning.
"It's not wanted on our island."	Opinion of respondent is noted.
Mr Kennedy	Officer Response
Question 1 - HMOs are being created in Queenborough Conservation Area, an area lived in by the elderly and young people, and are out of character with the town.	The locations where HMOs have been formed have been assessed within the HMO SPD. The effect on the character of an area is an element of the reasoning for preparing the HMO SPD.
Question 1 - Parking of vans blocks light and this is made worse by charging for car parking.	Parking in the highway is controlled under other legislation and can occur with buildings that are occupied as dwellings or HMOs. Charging for parking is outside the remit of planning.
Question 1 - The occupiers of HMOs are often single males who undertake illegal activities and are a terrible image for visitors.	The HMO SPD would not attempt to control the gender of residents of an HMO. Illegal activities should be reported to the police.
Question 2 - HMOs result in more on-street parking which compounds issues arising from the charging for car parking, including congestion.	The HMO SPD attempts to ensure that HMOs are located in areas where suitable parking is available.
Question 3 - The conversion of terraced properties means there is insufficient space for bins.	Smaller HMOs have the same refuse storage requirements as dwellings. Refuse storage provisions for larger HMOs are addressed by the HMO SPD
Question 4 - Room quality (avoiding damp and having ventilation) is as much of an issue as room size.	The HMO SPD can only build upon existing policies and cannot introduce new controls and, as such, the provision of ventilation and the avoidance of damp is not considered to be able to be within the scope of the SPD.
Question 5 - There will be no enforcement. Residents' views should be considered before allowing developments.	Planning Enforcement occurs where there are breaches of planning control and it is expedient for action to be taken. There is often a difference between what is unwanted by an interested party and what is unlawful such that enforcement action could be taken. All comments made on planning applications are considered when planning applications are determined.

Question 6 - There will be no attention to local residents or maintaining the existing character of an area.	As established, many HMOs have been formed without planning permission being required. In those instances, there is no arena for the views of local residents to be considered. The views of local residents will be considered when an application is determined, along with planning policies and all other material considerations.
Question 7- The removal of interior fittings within a conservation area has occurred.	Such works do not require planning permission.
Question 7- Combined with the introduction of parking charges SBC are making daily life quite difficult for residents	Parking fees are outside the scope of the HMO SPD.
Antony Dennant	Officer Response
Question 1 - Speaking as a long term resident and landlord in respect of rental properties, it is considered that the controls will be ineffective as the SPD acknowledges that there are likely to be HMOs that are unknown to the Council as they did not require planning permission.	There is an ever increasing evidence base in relation to the existence of HMOs. The Council can only act on the evidence it has available. It is relevant to note that the SPD would influence future decisions of the Council but cannot alter previous developments, whether they needed planning permission or not.
Question 1 -The HMOs that exist have had a disastrous effect on the character of Alma Road.	A purpose of the HMO SPD is to ensure that the character of areas is retained. The HMO SPD will not and cannot introduce any powers to remove any existing HMOs or re-instate the character of any areas that have been perceived to be harmed.
Question 1 -The concentration of HMOs in Sheerness is disproportionate. Rather than taking a formula approach as suggested, Officers should visit sites and neighbourhoods to see the effects of development.	Officers will already make an assessment of the effect of developments on the character of an area and will visit sites in undertaking this assessment. However, a site visit can only represent a snap-shot in time. The suggested use of a concentration cap would give a greater tool for making such an assessment than would otherwise exist.
Question 1 - Accusation are made in respect of illegal activities and criminal behaviour undertaken by HMO residents.	These matters should be reported to other authorities and are outside the scope of the HMO SPD.
Question 1 - The respondent suggests that the comments within the HMO SPD are laughable when considered in relation to Alma Road.	The respondent's perception of Alma Road cannot be a reflection of the content of the HMO SPD as it is not in effect yet. It is suggested that the HMO SPD will be a tool to assist with ensuring that development is of high quality, being an additional tool to those that currently exist.

Question 2 - Parking in Alma Road is difficult and more properties are being converted to HMOs. There is insufficient parking enforcement. There is no solution that can help that area of Sheerness, the better option would be to spread the provision of HMOs across the Borough. It is perceived that Sheerness is the "dumping ground" of the Borough and that these developments would not be proposed in Faversham.	The Council has not allocated locations for HMOs to be provided. There are numerous supply, demand and other market factors that influence where HMOs have been formed. Parking enforcement is a matter that falls outside the scope of the HMO SPD. However, the proposed parking adequacy assessments that are set out within the HMO SPD are intended to ensure that future HMOs are located where adequate parking can be provided.
Question 3 - Refuse bins are not an issue but an issue exists around the use of bags for waste which are accessible to foxes and cats. In addition, the residents of HMOs do not have the inclination to care for the property or area and, as such, are likely to dispose of items in a careless manner. Moreover, landlords are disinterested or absent with no interest in maintaining the standards of a property or the area. In combination this causes areas to become "intractable, feral state" which is distressing to those who do care and have aspirations. HMOs should not be provided unless this matter can be addressed.	The HMO SPD addresses waste provision for larger HMOs as the Council's arrangements for smaller HMOs are the same as they are for dwellings and so any change of use would not derive any additional requirements that planning could reasonably address. The final comment is noted and aligns with the aims of the HMO SPD.
A. Elliot (Rock Road Residents).	Officer Response
Question 1 - The SPD is a step in the right direction but more should be done to notify residents of proposed HMOs. An example is cited where a HMO was introduced under permitted development rights without warning.	When they are formed through permitted development rights, notification is not possible as the Council will not have prior knowledge. The Council does not undertake consultation in respect of applications for Certificate of Lawfulness which is the only early warning that the Council may have. This is a sound process as applications for Certificates are determined on a factual basis and not on the grounds of the assessment of planning merits, either by the Council or by interested third parties.
Question 1 - Matters relating to the Party Wall Act have been referenced and accusations have been made about the conduct of the property owners.	The Party Wall Act is not planning legislation and is outside the remit of the Council. The conduct of property owners is not hereby commented on.
Question 2 - Parking is an issue and the approach suggested would seem sensible.	Noted

Question 3 - Larger waste provisions should be made. Experiences of poor waste management leading to animals accessing waste and causing problems have been cited. It has been suggested that many residents, for many reasons, are not familiar with good waste management practices and that they should be educated.	The HMO SPD is not attempting to specify the amount of storage that should be provided as that is controlled by other departments of the Council. The SPD is, however, seeking to control the means of storing waste bins for larger properties. This is considered to be a proportionate approach to take and sound in the context of the scope of planning control. The HMO SPD is not attempting to educate residents in relation to waste management techniques as that is beyond the scope of planning.
Question 4 - An example is cited of a HMO having insufficient room sizes and soundproofing. It is suggested that the Building Regulations approval should not have been given.	Room sizes would be controlled under the terms of the HMO SPD in respect of those HMOs where planning permission is required. Soundproofing between buildings is addressed, where applicable, by other legislation and it is not appropriate for planning to attempt to replicate other legislation. The approval of building regulations falls outside the scope of the HMO SPD.
Question 5 - Neighbours should be consulted when HMOs are introduced. It is suggested that residents neighbouring a HMO should be given a Council Tax reduction. The effects of a HMO on living conditions have been cited.	Neighbours are consulted where there is an arena to do so, i.e. a planning application. This is not achievable where a person is utilising permitted development rights to introduce an HMO. The HMO SPD cannot influence Council Tax. The provision of acceptable living conditions for all parties is the aim of the HMO SPD and planning policy more generally.
Question 6 - An example is cited of the impact of the construction process for a HMO on neighbouring residents. Accusations are made about the conduct and competency of builders and it is considered that the Council showed no regard to the concerns of and harms caused to neighbouring residents. This has continued since residents have occupied the building. Existing residents should be protected.	The accusations made relate to matters that fall outside the scope of planning control. Planning enforcement action can only be taken where there is a breach of planning control and so it is respectfully suggested that the Council not taking action should only be taken to reflect that there was no action that could be reasonably taken rather than that regard was not being had to interested parties.
Question 7 - More control should be had in respect of planning and building control in order to protect existing residents.	Building Control is outside the scope of the HMO SPD. The majority of the matters that have been raised would fall outside the scope of planning and, noting that the cited example was an incident of a HMO being formed under the terms of permitted development rights, the HMO SPD would not have any effect on a comparable situation if it were to occur elsewhere.

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Planning and Transportation Policy Working Group	
Meeting Date	27 th May 2026
Report Title	Housing Market Assessment update 2026
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
SMT Lead	Joanne Johnson, Head of Place
Lead Officer	Stuart Watson, Project Manager, Planning Policy
Classification	Open
Recommendations	• To note the Housing Market Assessment (HMA) update 2026 and to provide any comments members have on the document and its findings.

1. Introduction

- 1.1 The purpose of this report is to set out the main findings of the Housing Market Assessment (HMA) update 2026 (Appendix I). The HMA update is a draft and is being presented to members for their information and for the opportunity to provide comments early in the process. The draft is in the process of being proofread by officers and will inevitably include minor matters and typos¹.
- 1.2 The findings of the HMA update 2026 will inform important policy criteria within the Regulation 19 Local Plan that includes affordable housing, the type tenure and mix of homes including adaptable/accessible standards and the special care dwellings required during the Plan period.

2. Background

- 2.1 A Housing Market Assessment is an evidential document that primarily seeks to meet the policy requirements of chapter 5 of the National Planning Policy Framework (NPPF) 2024. That chapter sets out that as part of boosting the supply of homes the overall aims should be:

¹ For example: the Local Plan time frame of 15 years as referenced in the HMA is correct plus the approach to identifying the Local Housing need, however there is a minor typo in dates of the plan period as being 2025 to 2040 rather than 2027 to 2042. The revised dates will comply with the requirements of the Local Plan's examination in that Strategic Policies should be forward looking for a minimum of 15 years from adoption of the Plan.

- *to meet the area's identified housing need, including with an appropriate mix of housing types for the local community (NPPF Paragraph 61) and;*
- *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes. (NPPF paragraph 63).*

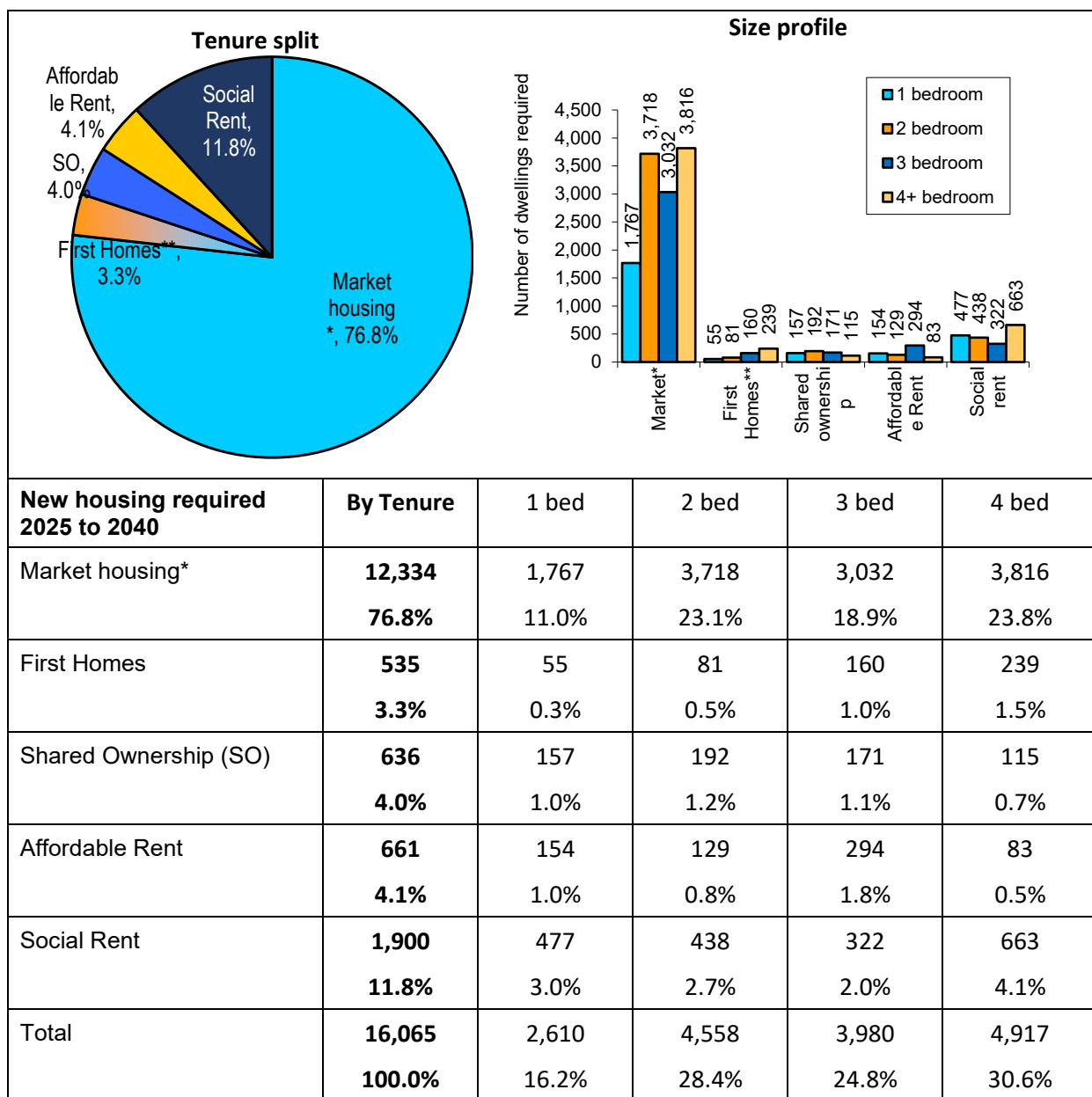
- 2.2 Previous HMAs were undertaken for the Council in 2020 and 2022. The 2022 document was not published at the time due to uncertainties over the Council's housing need approach based on the approach set out in the NPPF 2023 that has now been superseded. For the purposes of the Local Plan's examination, an HMA should be no less than two years old in order to provide a robust evidential approach that sets out reasonable conclusion for the purposes of Local Plan drafting. The HMA provides a snapshot in time in preparing the Local Plan and it uses the Government standard method of calculation of Local Housing Need as the starting point for identifying the needs for types of home.
- 2.3 The previous HMAs have now become dated due to their age as further versions of the NPPF and accompanying guidance has been published involving a range of matters including the approach to local housing need and affordable housing. The HMA update also reflects the latest housing market situation and utilises the most up to date data available.
- 2.4 The HMA 2026 update is being presented to members as part of its drafting to offer the opportunity to see the key findings and their implications for the Regulation 19 Local Plan and provide any comments they may have.
- 2.5 The findings of the HMA update 2026 will be used to inform matters on two important policies within the Regulation 19 Local Plan. The first is a strategic policy titled "Delivering a wide choice of high quality homes" that focuses on the borough-wide strategic matters of housing types, tenures and mix including adaptable/accessible standards of new homes throughout the plan period. This Policy and the other strategic policies for the Regulation 19 Local Plan are being presented as a separate item at this meeting. The second matter informs and updates the Development Management policy H1 Affordable Homes that was consulted upon as part of the recent Regulation 18 Local Plan consultation.

HMA Update 2026 – Key findings

2.6 A concise conclusion and summary of the HMA update 2026 is presented at chapter 8 on page 83 of the document. Members are recommended to read this chapter first and then use the conclusions to direct them to the relevant parts of the HMA. For members' information, figure 8.1 of the HMA is set out below and provides the housing type requirements for all new housing in Swale over the Plan period. A short summary of the key findings from chapter 8 of the HMA has been set out below:

- The affordable housing need during the Local Plan period is 304 dwellings per year or 28.4% of annual planned growth and that a 30% target would be plausible;
- There is an overall requirement for 15.9% of housing to be Affordable Rented/ Social Rented and 7.3% affordable home ownership (of which 4.0% could be Shared Ownership and 3.3% First Homes). This reflects the mix of housing that would best address the needs of the local population;
- Within the affordable rented/social rented requirement as set out, 79% should be social rented and the remainder affordable rented;
- For specialist dwellings for older persons Swale has an evidence need for 928 additional units of Sheltered housing for older people/ retirement housing and 267 additional Extracare units/ supported living housing over the Plan period. It is also identified that an additional 360 Registered Care spaces (nursing and residential care homes) will be required; and,
- It is calculated that adaptable housing M4(2) Category 2 will be required for 5,376 households by 2040 in Swale, of which around 1,123 dwellings should be M4(3b) Category 3 homes - wheelchair adaptable dwellings².

² Paragraph 008 of the PPG² sets out that 'Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future.' The same paragraph then goes onto clarify that 'accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs.' HMA update 2026 paragraph 7.35



3. Recommendations

- 3.1 To note the Housing Market Assessment (HMA) update 2026 and to provide any comments members have on the document and its findings.

4. Alternative Options Considered and Rejected

- 4.1 The matters in this report concern informing members on the development of the Local Plan evidence base.
- 4.2 Members could choose not to note the HMA update 2026 draft. However, choosing this option should be rejected as the evidence will provide a robust and updated position for policy drafting and the Local Plan examination in public.

5. Consultation Undertaken or Proposed

- 5.1 No formal consultation has been undertaken on the Housing Market Assessment update 2026 as it forms part of the evidence base of the Local Plan Review. The Regulation 19 Local Plan will be subject to a period of formal consultation at which point comments will be invited on the Plan, its policies and the supporting evidence base.

6. Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action: • A Local Plan with local needs and capacity at its heart. • Deliver the Housing, Homelessness and Rough Sleeping Strategy 2023 -2027, to meet and build on our statutory obligations to tackle homelessness and improve the standards of homes.
Financial, Resource and Property	The Local Plan work program is fully funded across a combination of base budget, committed reserves and a contribution from the Government's Local Plans Delivery Fund.
Legal, Statutory and Procurement	No implications identified at this stage
Crime and Disorder	No implications identified at this stage.

Environment and Climate/Ecological Emergency	No implications identified at this stage.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.
Local Government Reorganisation	The current Local Plan timetable expects the Local Plan to be submitted for its Examination in Public and to be adopted before local government reorganisation is expected to be complete.

7. Appendices

Appendix I: Housing Market Assessment update 2026



Swale Local Housing Market Assessment Update

Draft Report

April 2026

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Tables of Contents

1. Introduction.....	5
Purpose.....	5
Government Guidance	6
Report coverage.....	8
Summary.....	8
2. Local housing market drivers	11
Demography.....	11
Economy	15
Employment in Swale	15
Employment profile of residents in Swale.....	16
Qualifications	18
Income	19
Household income	21
Dwelling stock	21
Accommodation profile.....	22
Tenure	23
Tenure by bedroom.....	25
3. The cost and affordability of housing	27
Relative prices.....	27
The cost of housing	28
Private rents.....	30
Social and Affordable Rents.....	32
Analysis of housing market ‘gaps’.....	33
Intermediate products.....	35
Intermediate Rent/Rent-to-Buy.....	35
Shared Ownership	36
Shared Equity	36
First Homes	37
Local Housing Allowance.....	39
Affordability of housing	39
Affordability for specific household groups	40
4. Overall housing need.....	42
Step 1 – Setting the baseline	42
Step 2 – An adjustment to take account of affordability	43
Overall level of housing need	44
A suitable baseline	44
Conclusion	45
5. Type and tenure of future housing needed.....	46
Disaggregating the local housing need.....	46
Total future population in Swale.....	48
Economically active population	48
Household profile	49
Methodology of the demand model.....	50
First Homes	51
Tenure of housing required.....	52
Size of housing required within each tenure	53

6. Affordable housing need	58
Estimate of net annual affordable housing need	58
Overall households in affordable housing need by type (gross)	59
Type of affordable home required	60
Sensitivity analysis - affordability threshold	61
7. Requirements of specific groups	62
Housing Needs of Older People	63
Current situation	63
Future requirement	64
Specialist accommodation	65
People with disabilities	69
Current situation	69
Number of people in receipt of relevant benefits	70
Projected health of the future population	71
Accessible and adaptable housing	72
Adaptations and support	76
Families with children	77
Current situation	77
Future requirement	77
The private rented sector (PRS)	78
Growth	78
Those resident in the tenure	78
Current trends	81
The benefit-supported private rented sector	81
8. Conclusions and Summary	83
Appendix 1. Details of the NMSS model	88
Overview	88
Appendix 2. Detail of the calculation of the affordable housing need	90
Stage 1: Current unmet gross need for affordable housing	90
Affordability	91
Total current need	93
Stage 2: Newly arising affordable housing need	93
Need from newly forming households	93
Existing households falling into need	94
Total newly arising need	94
Stage 3: Current affordable housing supply	95
Current occupiers of affordable housing in need	95
Surplus stock	95
Committed supply of new affordable units	95
Planned units to be taken out of management	95
Total current affordable housing supply	96
Stage 4: Future housing supply of social re-lets and intermediate affordable housing	96
The future supply of Social/Affordable Rented housing	96
Supply of intermediate housing	97
Annual future supply of affordable housing	97

1. Introduction

Purpose

- 1.1 Swale Council is a Borough on the north coast of Kent, with excellent road and rail links to London and to the rest of the County. Sittingbourne is the largest settlement in the Borough with three other notable towns; Faversham, Sheerness and Queenborough in an authority with a large rural area. The Isle of Sheppey is in the north of the Borough and the south is part of the Kent Downs.
- 1.2 Swale Borough Council is preparing a new Local Plan which will propose a number of updated strategies and policies for guiding the housing, employment and other growth required across the Borough to at least 2040. As part of the new Local Plan programme the evidence base is being updated. A Housing Market Assessment was undertaken in Swale in 2020 and then an update report produced in 2022. These reports however became dated as new Government guidance had subsequently been published so the Council commissioned a new piece of work to reflect the latest market situation, utilise the most up-to-date data available and adhere to the latest guidance.
- 1.3 At the end of December 2024, the new Government published a new NPPF alongside a new Standard Method within the revised PPG. This Local Housing Market Assessment (LHMA) Update has been produced to provide a single document that contains the full profile of the current housing market area, the latest Standard Method figure for Swale (in 2026) and the associated outputs derived from this figure (the type and tenure of housing needed, the requirement for specialist accommodation for older people and the requirement for accessible and adaptable housing), a revised assessment of the extent of affordable housing need, and the associated conclusions resulting from these outputs. This document is intended to supersede both the 2020 Housing Market Assessment and the 2022 update.
- 1.4 This report provides evidence for the Local Plan. The information presented in this report complies with the current Government guidance as set out in the 2024 National Planning Policy Framework (NPPF)¹, and the Planning Practice Guidance (PPG), described below. In December 2025, the Government published, for consultation, a new iteration of the NPPF. Whilst this includes numerous changes to the planning system, the method for establishing the amount and types of housing to be planning for is largely unchanged.

¹ The December 2024 version of the National Planning Policy Framework was amended on 7 February 2025 to correct cross-references from footnotes 7 and 8 and amend the end of the first sentence of paragraph 155 to make its intent clear. The amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024.

Government Guidance

- 1.5 The framework for undertaking a SHMA is set out in detail in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). Both the NPPF and the PPG were updated in December 2024. The updated (2024) NPPF and PPG make some very significant changes to the way that the overall requirement for housing is calculated, however the detail beyond that is largely unchanged.

- 1.6 Paragraph 36 (a) of the NPPF requires that plans are '*positively prepared*'. As a minimum, the NPPF requires strategic policies to provide for objectively assessed needs for housing. This carried forward the requirements under the 2012 NPPF and concerns the overall housing requirement.

61. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.

62. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.

Paragraphs 61 to 63 – 2024 NPPF

- 1.7 The requirement for housing is derived through the Standard Method and is then disaggregated into the different types of housing the future population will need. Following which an assessment of the number of households in need of affordable housing must be undertaken. In essence, the first output² required by the NPPF, for a study of this type, is to disaggregate the new housing number as derived through the Standard Method. The second task is the assessment of Affordable Need, and the final task is the understanding of the needs of groups with specific housing requirements.

- 1.8 The NPPF outlines how a Housing Market Assessment fits into the wider housing policy framework and the PPG sets out how the various elements of a Housing Market Assessment

² Before this is done it is necessary to profile the local housing market and demographic situation, to ensure that the subsequent outputs have a meaning in a local situation. However, there are no outputs required within the NPPF from this contextual study.

should be undertaken, including detailing a comprehensive model for the assessment of affordable housing need (Chapter 6 of this report). The affordable housing need figure is an unconstrained figure set in the current housing market situation. It is not a component of the overall housing need, but is independent, calculated using a different approach and using different data sources.

- 1.9 This SHMA includes a Long-Term Balancing Housing Markets (LTBHM) model which breaks down the overall housing need into the component types (tenure and size) of housing required. Whilst both the Affordable Needs model and the LTBHM model produce figures indicating an amount of affordable housing required, they are not directly comparable as, in line with the PPG, they use different methods and have different purposes. The affordable housing need figure is calculated in isolation from the rest of the housing market and is used solely to indicate whether a Local Planning Authority should plan for more houses where it could help meet the need for affordable housing. The figure produced by the LTBHM model is based on the population projections and occupation patterns of household groups (considering the trends in how these occupation patterns are changing). This is the mix of housing for which the authority should be planning. How these figures should be used in Swale is summarised at the conclusion of this report.
- 1.10 In December 2024, the Government updated the Standard Method calculation. This has resulted in a notable modification to the Standard Method. This report has followed the approach set out in the 2024 PPG.
- 1.11 In May 2021, the Government published detail on First Homes and their implementation³. Footnote 31 of the December 2024 NPPF indicated that the *'requirement to deliver a minimum of 25% of affordable housing as First Homes, ... no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.'* First Homes therefore still exist as an affordable tenure; however, they are no longer mandatory. This report assesses the potential requirement for First Homes as part of the housing mix to accommodate the future population, however there is no presumption that they must form part of the future tenure profile.
- 1.12 It is worth noting that the Government is currently consulting on further proposed revisions to the NPPF⁴. The draft changes were published in December 2025, with the consultation closing in March 2026, and the outcome expected in summer 2026. While the proposals do not indicate any significant changes that would materially affect this report, the analysis has been prepared to reflect the direction of travel suggested by the consultation. This includes

³ <https://www.gov.uk/guidance/first-homes>

⁴ <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system#delivering-a-sufficient-supply-of-homes>

modelling relating to the requirement for M4(2) and M4(3) homes and the proposed emphasis on delivering additional social rented housing.

Report coverage

- 1.13 This report is focused on detailing the amount of new housing required over the plan-period in Swale, the size and tenure of housing that would be most suitable for the future population, the housing requirements of specific groups of the population and the level of affordable housing need that exists in the Borough. The report contains the following:

Chapter 2 presents an examination of the latest data on the labour market and the resident population in Swale and the changes that have occurred within them. It also profiles the current housing stock and the changes recorded within it.

Chapter 3 contains a detailed analysis of the cost of property in Swale and the affordability of the different forms of housing for residents.

Chapter 4 paragraph 008 of the PPG indicates that '*Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process⁵.*' The chapter sets out the calculation of the local housing need figure for the Borough, as per the Standard Method.

Chapter 5 disaggregates the local housing need to show the demographic profile of the future population in the Borough. The chapter uses this information to produce an analysis of the nature of future housing required within the Long-Term Balancing Housing Markets model (LTBHM).

Chapter 6 sets out the calculation of outputs for the affordable housing needs model in accordance with the PPG approach. The chapter identifies both the type of households in housing need and the tenure of affordable housing that would meet this housing need.

Chapter 7 contains an analysis of the specific housing situation of the particular sub-groups of the population identified within the NPPF.

Chapter 8 is a conclusion summarising the implications of these results.

Summary

- 1.14 The purpose of this report is to provide the Council with a robust and up-to-date evidence base that enables an understanding of the Borough's current and future housing needs through to the end of the new Local Plan period (2040). The information presented in this report complies with the current Government guidance on undertaking these studies as set out in the

⁵ Reference ID: 2a-008-20190220

December 2024 National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

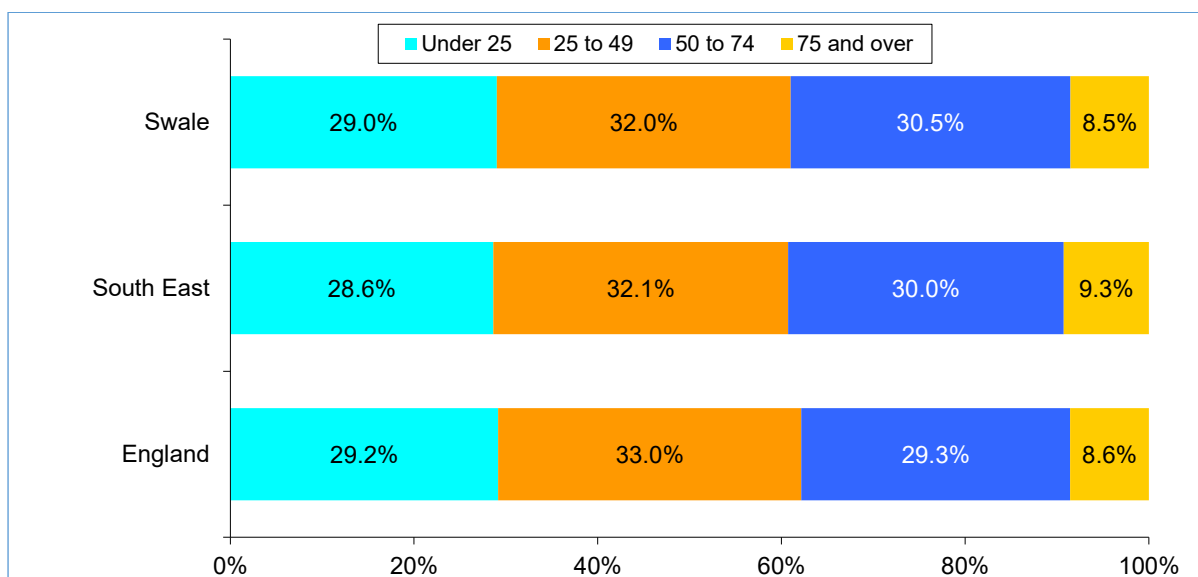
2. Local housing market drivers

- 2.1 Two main drivers of the housing market are the resident population and the local labour market. They affect the nature of housing demand, including household formation rates and households' investment in housing. This socio-economic situation is important context to be understood before the level of housing need is calculated. The first half of this chapter uses the most recently available data to document the current demographic profile in Swale and how it has changed. The current labour market conditions are then discussed in the second half of this chapter.
- 2.2 Analysis of the stock of housing allows an understanding of the current market balance and existing occupation patterns. Data from the 2021 Census is used to provide an overview of the housing stock in Swale and a comparison to the regional and national situation will be presented. The changes recorded over the last ten years will also be profiled.

Demography

- 2.3 The 2021 Census indicates that the resident population in Swale in 2021 was 151,678 and that since 2011 the population had increased by 11.7%, around 15,850 people. In comparison, the population of the South East region increased by 7.5% over the same period, whilst the population of England grew by 6.6%. The Borough therefore has had a notably higher growing population than the regional and national averages over the last 10 years.
- 2.4 The figure below illustrates the age composition of the population of Swale, the South East, and England in 2021. The data show that Swale has a larger proportion of people between 50 and 74, but a smaller proportion of people aged 75 and over than is recorded nationally and regionally.

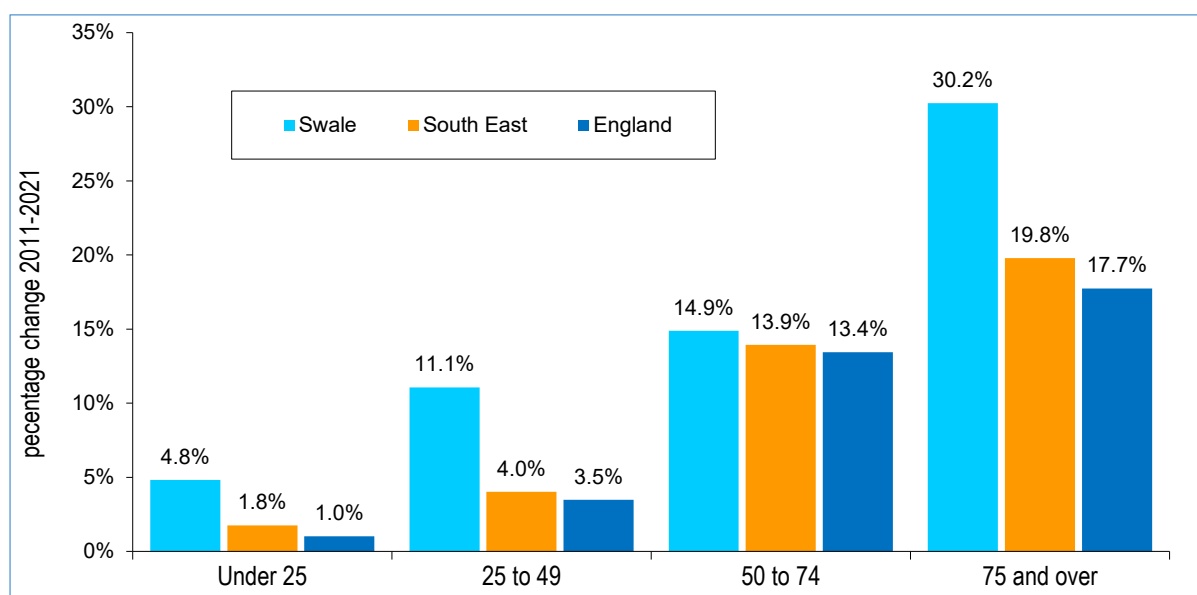
Figure 2.1 Population composition in Swale 2021



Source: 2021 Census

- 2.5 The figure below shows the change in the age profile in Swale between 2011 and 2021 as recorded by the Census. The regional and national equivalents are presented in addition. The figure shows that in Swale the number of people aged 75 and over has grown by some 30.2%, with a notable increase in those aged between 50 and 74 also recorded. The pattern of an ageing population is replicated at a regional and national level although it is more pronounced in Swale.

Figure 2.2 Change in number of people in each age band between 2011 to 2021



Source: 2011 and 2021 Census

- 2.6 The table below provides a range of demographic details for Swale, the South East and England, including the average household size, the population density, the proportion of disabled residents and the proportion of people with a non-White ethnicity.
- 2.7 The population density in Swale in 2021 was 406 people per sq km according to the 2021 Census, slightly lower than both the figure for England as a whole (434 people per sq km) and the figure for the South East (487 people per sq km). In 2021, the average household size in Swale was 2.46, notably higher than the national figure of 2.37 and the average regional figure of 2.39. Swale recorded 19.5% of the population as disabled under the Equality Act in 2021, markedly higher than the regional and national averages.
- 2.8 Some 6.2% of the population of the Borough was non-White according to the Census, lower than the national figure of 19.0% and the regional total of 13.7%. The largest non-White ethnic group in Swale is the Black, Black British, Black Welsh, Caribbean or African group, which constitutes 2.3% of the population. The 2021 Census indicates that 0.5% of the population of Swale had moved into the UK from abroad within the last two years, compared to 1.9% across England.

Table 2.1 Demographic profile of Swale in 2021

<i>Metric</i>	<i>Swale</i>	<i>South East</i>	<i>England</i>
Total population in households	148,676	9,088,552	55,504,302
Total households	60,495	3,807,966	23,436,090
Average household size	2.46	2.39	2.37
Population density (per sq km)	406	487	434
Proportion people disabled under the Equality Act	19.5%	16.1%	17.3%
Proportion people with a non-White ethnicity	6.2%	13.7%	19.0%
Proportion resident in the UK for less than 2 years	0.5%	1.7%	1.9%

Source: 2021 Census

- 2.9 Both Census collected data on the overall general health of the population. The table below shows the overall results recorded in 2021 in Swale, the South East and England for this measure alongside the relative change in the number of people in these different groups since the previous Census.
- 2.10 Overall, Swale has a lower proportion of people with very good health and a higher proportion with either bad health or very bad health than is recorded nationally and regionally. The biggest change recorded in Swale between 2011 and 2021 is an increase in the number of people with very good health, replicating the regional and national pattern. Swale also recorded a notable growth in the number of people with fair health and bad health.

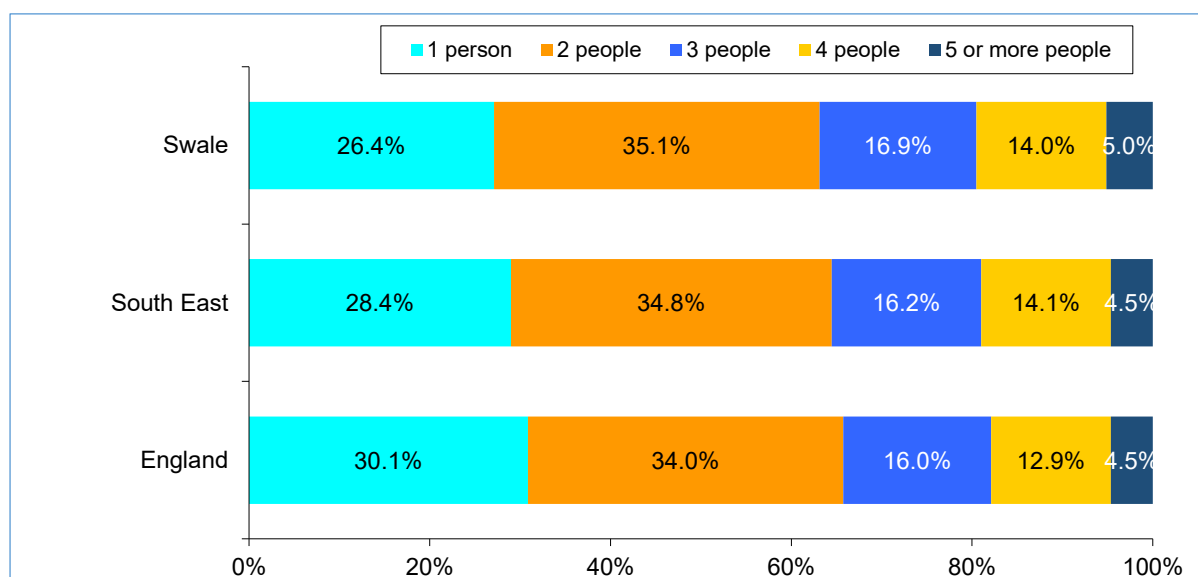
Table 2.2 General health 2011 and 2021

<i>General health</i>	<i>Swale</i>	<i>South East</i>	<i>England</i>	<i>Change in # in Swale since 2011</i>	<i>Change in # in South East since 2011</i>	<i>Change in # in England since 2011</i>
Very good health	45.5%	50.0%	48.5%	14.6%	9.5%	9.5%
Good health	34.8%	34.0%	33.7%	8.2%	5.5%	5.0%
Fair health	14.1%	11.8%	12.7%	11.6%	5.3%	2.8%
Bad health	4.4%	3.3%	4.0%	11.3%	5.4%	-0.1%
Very bad health	1.3%	0.9%	1.2%	8.6%	3.7%	0.3%
Total	100.0%	100.0%	100.0%	-	-	-

Source: 2011 and 2021 Census

- 2.11 The figure below shows the size of households in Swale, the South East and England. In 2021, some 26.4% of households in Swale contained one person, lower than the regional and national figures. The proportion of large households (containing four or more people) was however higher than the other geographies.

Figure 2.3 Household size in Swale 2021



Source: 2021 Census

- 2.12 The table below shows the composition of households in Swale. In 2021, some 38.7% of households in the Borough contained a couple with children, a figure higher than the national and regional equivalents. The second largest household group is other couple households without children. Relatively few other single person households were recorded in Swale.

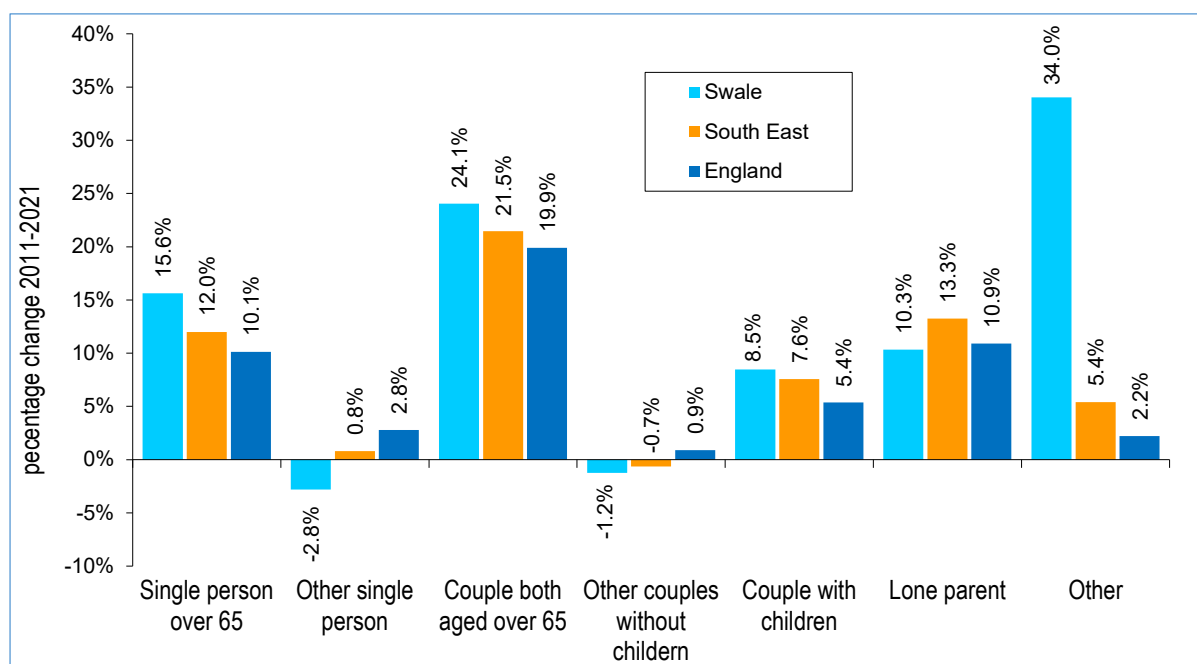
Table 2.3 Household type in Swale in 2021

<i>Household type</i>	<i>Swale</i>	<i>South East</i>	<i>England</i>
Single person over 65	13.0%	13.2%	12.8%
Other single person	13.4%	15.2%	17.3%
Couple both aged over 65	10.1%	10.2%	9.2%
Other couples without children	17.7%	17.4%	16.8%
Couple with children	27.4%	27.1%	25.2%
Lone parent	11.4%	9.7%	11.1%
Other	7.1%	7.2%	7.7%
Total	100.0%	100.0%	100.0%

Source: 2021 Census

- 2.13 The figure below shows the change in the household composition in Swale between 2011 and 2021 as recorded by the Census. The equivalent data for the South East and England is presented in addition. In the South East and England as a whole, the number of households containing two or more pensioners has increased the most, whilst in Swale the number of other households has increased the most (although from a relatively low base). Older couple households have recorded the second largest growth in Swale followed by single older households. In Swale there are two household types that reduced in number between 2011 and 2021: other couple households without children, and other single person households.

Figure 2.4 Change in household composition between 2011 to 2021



Source: 2011 and 2021 Census

Economy

- 2.14 Considerable data is available on the economic context in Swale, which enables a profile of the current local economy to be presented.

Employment in Swale

- 2.15 NOMIS⁶ data on 'job density' (this is a measure of the number of individual jobs⁷ per person of working age) for 2024 shows that there are 0.64 jobs per working age person in the Borough, compared to 0.85 jobs per working age person across the South East region and 0.86 for England as a whole. For all geographies, the level of job density has not changed notably over the last five years (from 0.62 to 0.64 in Swale, from 0.86 to 0.85 in the South East and from 0.85 to 0.86 in England).
- 2.16 Measured by the ONS Business Register and Employment Survey, there were 51,000 individual employee jobs⁸ in Swale in 2024. This is 4.1% higher than the number recorded in the Borough in 2019. The number of employee jobs in the South East has increased by 2.3% between 2019 and 2024, compared to 4.8% nationally over the same time period. It is worth

⁶ NOMIS is a website provided by the Office for National Statistics that contains a range of labour market data at a local authority level. www.nomisweb.co.uk.

⁷ Jobs includes employees (both full and part-time), self-employed, Government-supported trainees and HM Forces.

⁸ Employee jobs exclude self-employed, government-supported trainees and HM Forces. Employee jobs can be both part-time and full-time. Data also excludes farm-based agriculture.

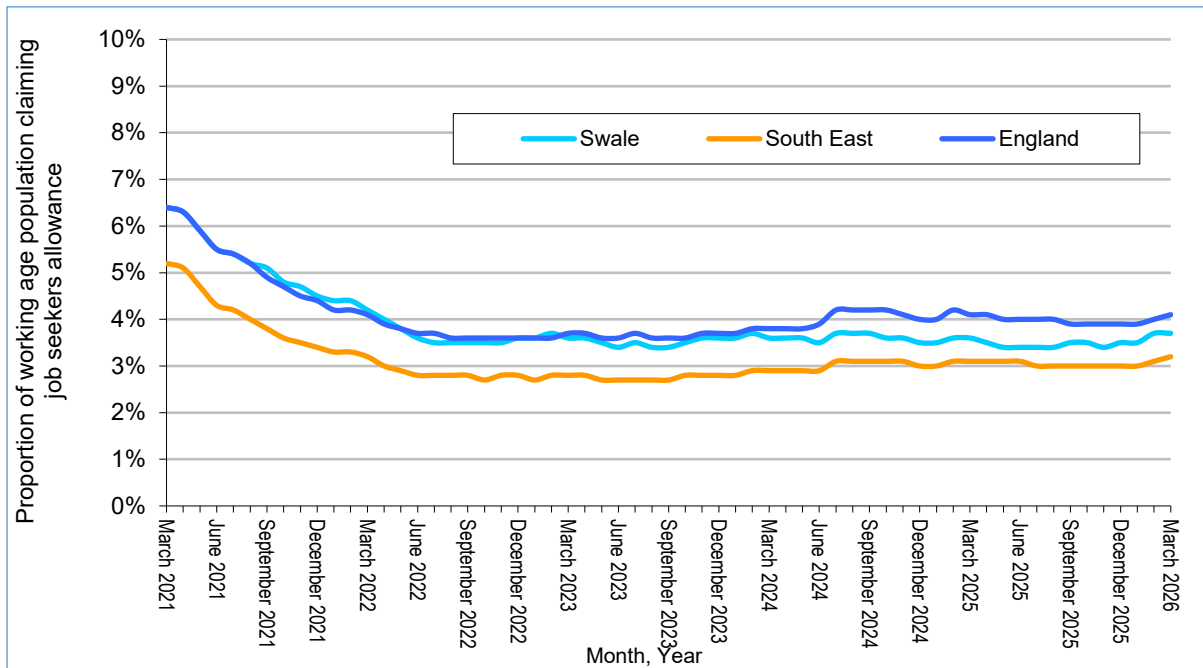
noting that all the figures produced by this data source are rounded to the nearest thousand so fluctuations will appear larger where there is a lower base population.

- 2.17 Data is also available from the ONS about the number of businesses in the area and how this has changed. This can provide an indication of the state of the economy as an increase in businesses would suggest either new companies moving to the area or an increase in local entrepreneurship. The ONS indicates that in 2025 there were 5,225 enterprises in Swale. A similar proportion of enterprises were micro (with 9 or fewer employees) across Swale (89.3%) as is found in the South East (89.6%) and England (89.2%). In Swale the number of enterprises has increased by 4.1% between 2020 and 2025 (a rise of 205), whilst regionally the number of enterprises reduced by 3.2% over this time period and nationally a decrease of 0.6% was recorded.

Employment profile of residents in Swale

- 2.18 Although the overall economic performance of the Borough provides important context, an understanding of the effect of the economic climate on the resident population is more pertinent to this study.
- 2.19 The ONS publishes, on a monthly basis, the number of people claiming Job Seekers Allowance. This provides a very up-to-date measure of the level of unemployment of residents in an area. The figure below shows the change in the proportion of the working age population claiming Job Seekers Allowance in Swale, the South East and England over the last five years. The figure indicates that, in all areas, the level of unemployment decreased since spring 2021, when restrictions that were in place in response to the coronavirus pandemic were reduced and the economy began to function in a more regular way again. The figure indicates that the unemployment level in Swale, whilst fluctuating, has reduced over the last few years from being in line with the national average to being between the regional and national averages. Currently (March 2026), 3.7% of the working age population in Swale are unemployed, compared to 3.2% regionally and the national average of 4.1%.

Figure 2.5 Level of unemployment (2021-2026)



Source: ONS Claimant Count

- 2.20 The Census presents a 'Standard Occupation Classification' which categorises all residents aged 16 years and over in employment the week before the census into one of nine groups depending on the nature of the skills that they use. These nine groups are graded from managerial jobs (Groups 1-3) to unskilled jobs (Groups 8-9). As the table below illustrates, some 40.2% of employed residents in Swale work in Groups 1 to 3, lower than the figure for the South East region and England as a whole. The proportion of people employed in Groups 4 to 5 and Groups 8 to 9 in Swale is higher than in the South East and England.
- 2.21 Further analysis shows that, since 2011, there has been a considerable increase in the number of people resident in Swale employed within Groups 1 to 3, and a fall in the number of people employed in Groups 4 to 5.

Table 2.4 Occupation structure (2021)

<i>Occupation Groups</i>	<i>Swale</i>	<i>South East</i>	<i>England</i>	<i>Change in # of people employed in Swale since 2011</i>
Group 1-3: Senior, Professional or Technical	40.2%	50.4%	46.4%	27.0%
Group 4-5: Administrative, skilled trades	22.3%	19.4%	19.4%	-3.2%
Group 6-7: Personal service, Customer service and Sales	16.4%	15.9%	16.7%	4.1%
Group 8-9: Machine operatives, Elementary occupations	21.0%	14.4%	17.4%	3.9%
Total	100.0%	100.0%	100.0%	-

Source: 2011 and 2021 Census

Qualifications

- 2.22 An important factor in the ability of any economy to grow is the level of skill of the workforce. Level 1 qualification is the lowest (equivalent of any grade at GCSE or O-Level) and Level 4 the highest (undergraduate degree or higher). The table below outlines the full classification of qualification levels used in the Census.

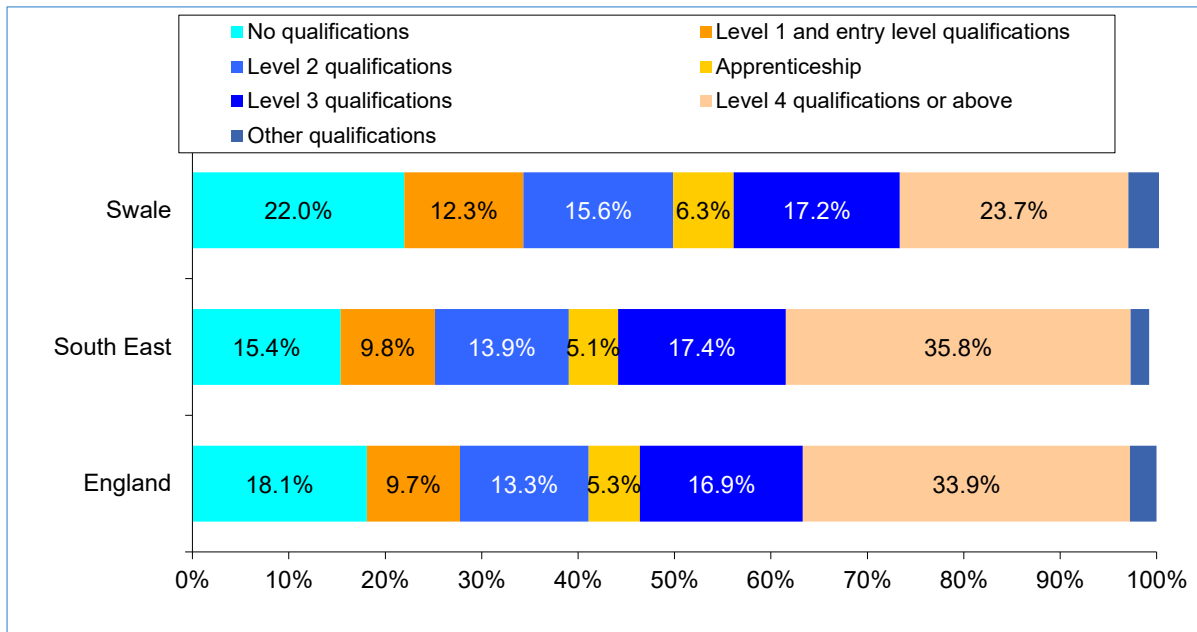
Table 2.5 Census qualification levels

<i>Qualification Group</i>	<i>Qualifications within the group</i>
Level 1 and entry level qualifications	1 to 4 GCSEs grade A* to C, Any GCSEs at other grades, O levels or CSEs (any grades), 1 AS level, NVQ level 1, Foundation GNVQ, Basic or Essential Skills
Level 2 qualifications	5 or more GCSEs (A* to C or 9 to 4), O levels (passes), CSEs (grade 1), School Certification, 1 A level, 2 to 3 AS levels, VCEs, Intermediate or Higher Diploma, Welsh Baccalaureate Intermediate Diploma, NVQ level 2, Intermediate GNVQ, City and Guilds Craft, BTEC First or General Diploma, RSA Diploma
Apprenticeship	Apprenticeship
Level 3 qualifications	2 or more A levels or VCEs, 4 or more AS levels, Higher School Certificate, Progression or Advanced Diploma, Welsh Baccalaureate Advance Diploma, NVQ level 3; Advanced GNVQ, City and Guilds Advanced Craft, ONC, OND, BTEC National, RSA Advanced Diploma
Level 4 qualifications or above	Degree (BA, BSc), higher degree (MA, PhD, PGCE), NVQ level 4 to 5, HNC, HND, RSA Higher Diploma, BTEC Higher level, professional qualifications (for example, teaching, nursing, accountancy)
Other qualifications	Vocational or work-related qualifications, other qualifications achieved in England or Wales, qualifications achieved outside England or Wales (equivalent not stated or unknown)

Source: 2021 Census

- 2.23 The figure below shows the highest qualification level of the working-age residents of Swale, compared to the regional and national equivalents as recorded in the 2021 Census. The data indicates that 23.7% of working-age residents in Swale have Level 4 or higher qualifications, substantially lower than the figures for the South East region (35.8%), and England (33.9%). Swale has more residents with no qualifications than is found regionally and nationally.

Figure 2.6 Highest qualification level of residents (2021)

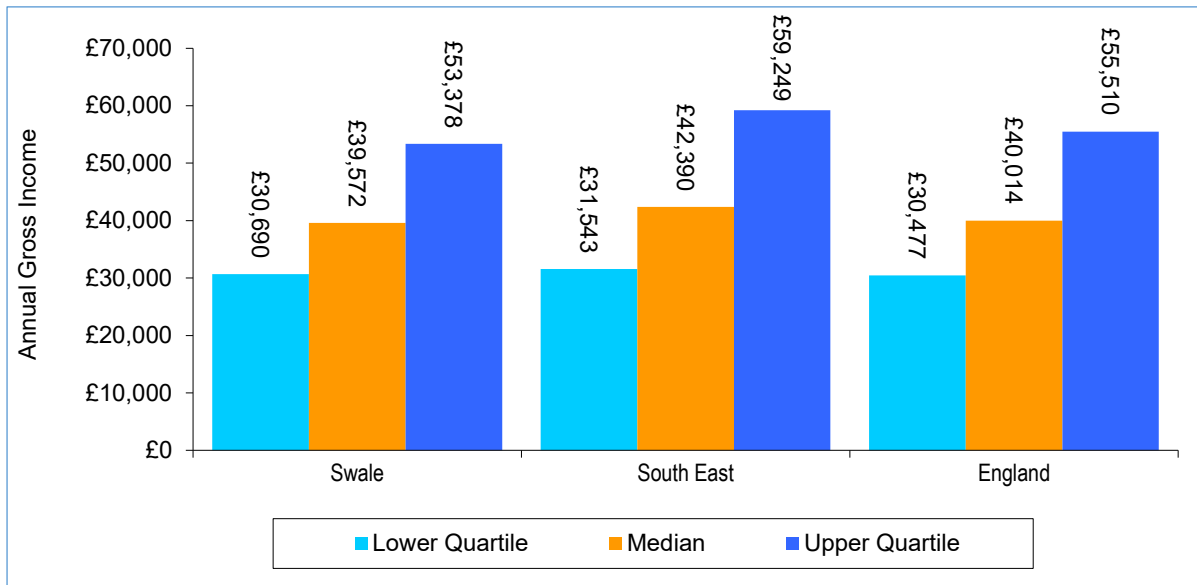


Source: Census, 2021

Income

- 2.24 Income is critical to the of choice a household has when determining their accommodation. The mean earned gross income for full-time employees resident in Swale in 2025 was £46,504, according to the ONS Annual Survey of Hours and Earnings. In comparison, the regional figure was £51,671 and the national average was £48,490. It is important to note that these figures assess individual incomes rather than household incomes. It should also be noted that the median figures (set out in the figure below) provide a more appropriate average than the mean figure, as they are less influenced by extreme values.
- 2.25 The figure below shows that, at all points on the distribution, annual gross income in Swale is lower than the regional equivalents. In Swale there is a relatively small difference between higher earners and lower earners (in comparison to nationally).

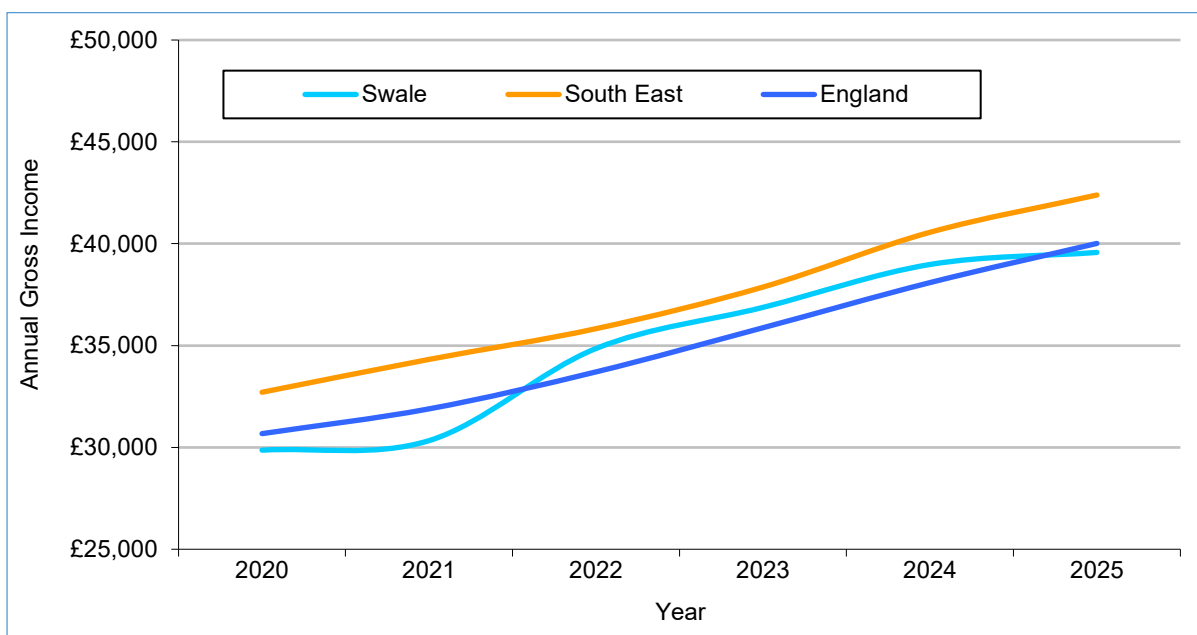
Figure 2.7 Annual gross income of full-time employed residents 2025



Source: ONS Annual Survey of Hours and Earnings (2025)

- 2.26 The figure below shows the change in the median income of full-time employees' resident in Swale, the South East region and England since 2020. Swale has recorded the highest increase over this period (at 32.5%) followed by England (30.4%) and the South East (29.6%). The data for Swale fluctuates over this period to a greater degree than the regional and national figures because the sample of data it is based on is smaller. It is therefore more susceptible to year-to-year variation than the national and regional figures where outlying figures are subsumed within a larger sample.

Figure 2.8 Change in median annual income of full-time employed residents 2020-2025

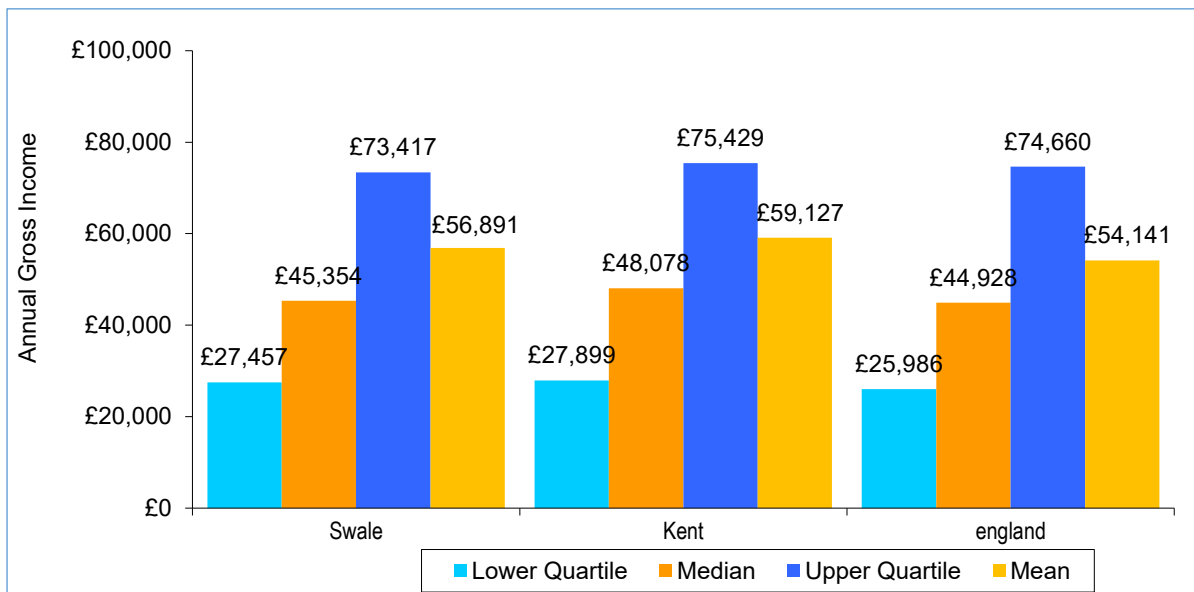


Source: ONS Annual Survey of Hours and Earnings (2020-2025)

Household income

- 2.27 CACI Paycheck⁹ estimates that the mean gross annual household income in Swale is £54,791, which is 1.2% above the equivalent for England (£54,141) and 4.3% below the figure for Kent (£57,227). The figure below shows household income at various points on the income distribution for the Borough alongside the national and regional equivalents. The data indicates that households in Swale are slightly more affluent than equivalent nationwide households at the lower quartile and median levels but those at the upper quartile of the distribution record a lower household income than the equivalent households in England.

Figure 2.9 Distribution of annual gross household income, 2026



Source: CACI Paycheck, 2026

Dwelling stock

- 2.28 The Census indicates that there were 66,200 dwellings in Swale in 2021¹⁰. The number of dwellings in the Borough grew by 14.2% between 2011 and 2021 (some 8,211 dwellings). This growth is higher than that recorded regionally (the number of dwellings grew by 9.0% across the South East between 2011 and 2021), and nationally (growth in dwellings of 8.5% over the same time period).
- 2.29 In 2021, some 8.6% of dwellings were empty or used as a second home, a higher vacancy rate than recorded for the South East (5.4%) and England (6.0%). There was an increase in

⁹ CACI is a commercial company that provides household income data.

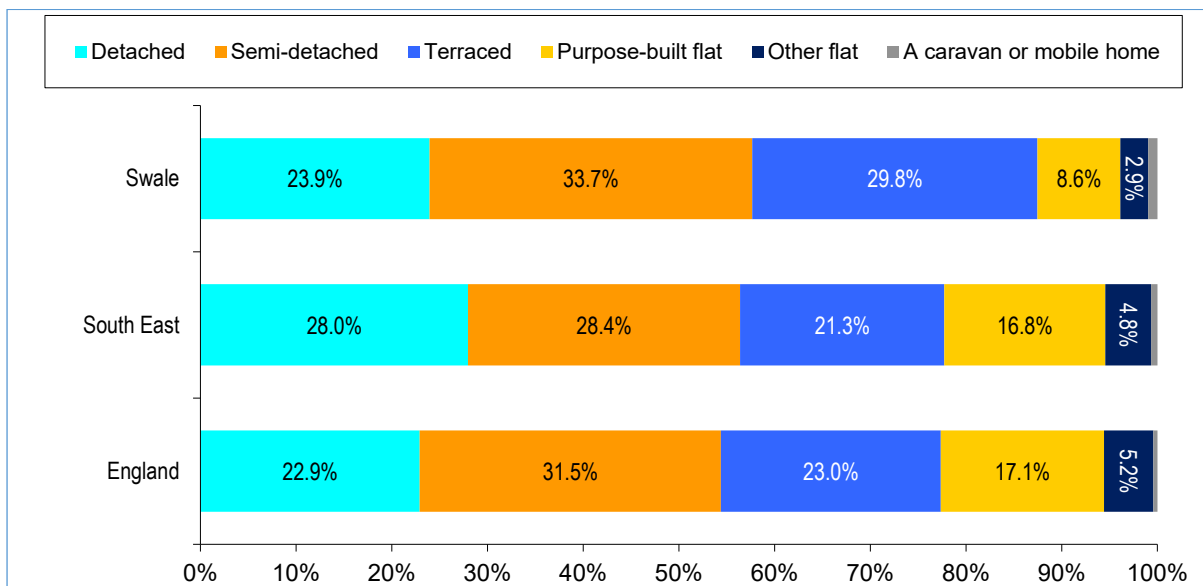
¹⁰ This is derived from table RM204 - Number of Dwellings. Not all these dwellings are occupied so there is a difference with the number of households recorded for Swale in the Census.

the vacancy rate recorded in the Borough in 2011 (4.3% of dwellings were empty or second homes at the time of the previous Census).

Accommodation profile

- 2.30 The figure below compares the type of accommodation in Swale in 2021 with that recorded for the South East and England. Swale contains fewer detached houses and flats than the regional and national averages with more semi-detached and terraced houses. The most common property type in Swale is semi-detached homes followed by terraced houses.

Figure 2.10 Dwelling type in Swale, South East and England, 2021



Source: 2021 Census

- 2.31 The table below compares the size of accommodation (in terms of bedrooms) in Swale with the South East and England. The table indicates that Swale has a smaller proportion of homes with four or more bedrooms and also fewer one bedroom dwellings than the South East and England as a whole. Overall, some 46.0% of homes contain three bedrooms, a figure notably higher than the regional and national averages.

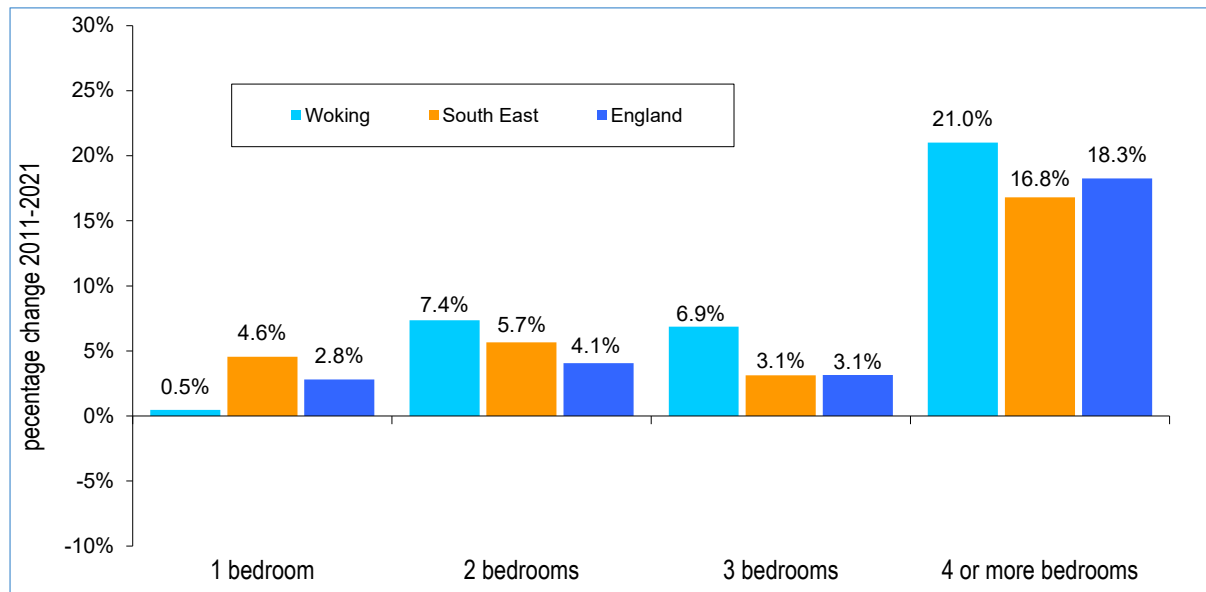
Table 2.6 Size of dwelling stock in Swale, South East and England, 2021

Property size	Swale	South East	England
1 bedroom	8.6%	11.6%	11.6%
2 bedrooms	26.4%	25.9%	27.3%
3 bedrooms	46.0%	37.5%	40.0%
4 or more bedrooms	19.1%	25.0%	21.1%
Total	100.0%	100.0%	100.0%

Source: 2021 Census

- 2.32 The figure below shows the change in the number of dwellings by number of bedrooms between 2011 and 2021. The figure shows that, in all areas, the number of four bedroom homes has increased the most and at a notably greater rate than any other property size. In Swale, the number of one bedroom homes recorded the smallest inter-Census growth.

Figure 2.11 Change in the number of homes by dwelling size 2011 and 2021

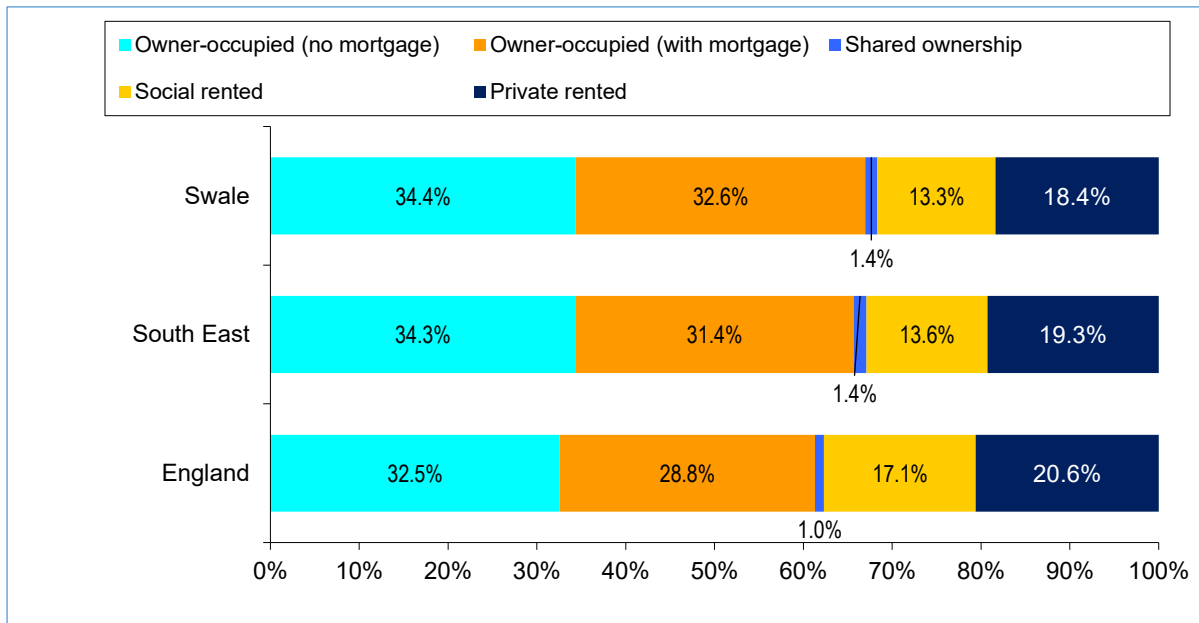


Source: 2011 and 2021 Census

Tenure

- 2.33 The figure below compares the tenure of households in Swale in 2021 with that recorded for the South East and England. 34.4% of households in the Borough are owner-occupiers without a mortgage, compared to 34.3% in the region and 32.5% nationally. The proportion of owner-occupiers with a mortgage in Swale (32.6%) is also higher than both the regional (31.4%) and national average (28.8%). In Swale the proportion of households in Shared Ownership accommodation (at 1.4%) is similar to the regional and national equivalents (1.4% and 1.0% respectively). Some 13.3% of households in Swale are resident in the Social Rented sector, lower than the figure for the South East (13.6%) and England (17.1%). Finally, some 18.4% of households in Swale live in private rented accommodation, compared to 19.3% in the South East and 20.6% in England.

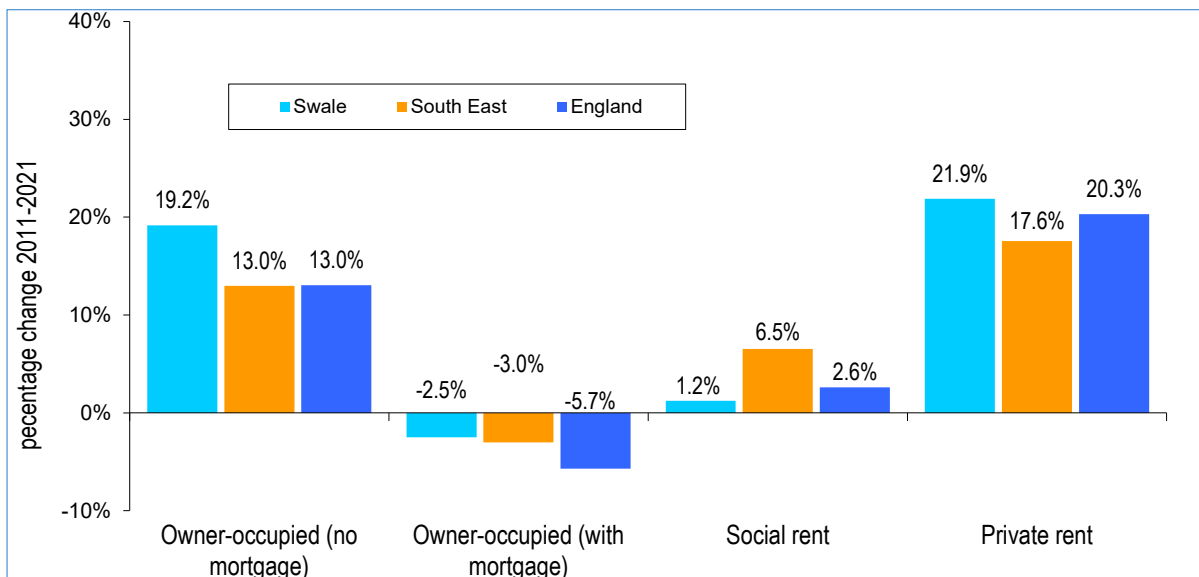
Figure 2.12 Tenure profile in Swale, South East and England, 2021



Source: 2021 Census

- 2.34 The figure below shows the change in the size of each tenure between 2011 and 2021. In all areas, the private rented sector has increased dramatically and the number of owner-occupiers with no mortgage has also grown. In comparison, the number of owner-occupiers with a mortgage has decreased. The Social Rented sector has recorded a modest growth. Generally, the trends recorded in Swale align with the regional and national trends.

Figure 2.13 Change in number of households in each tenure 2011 to 2021

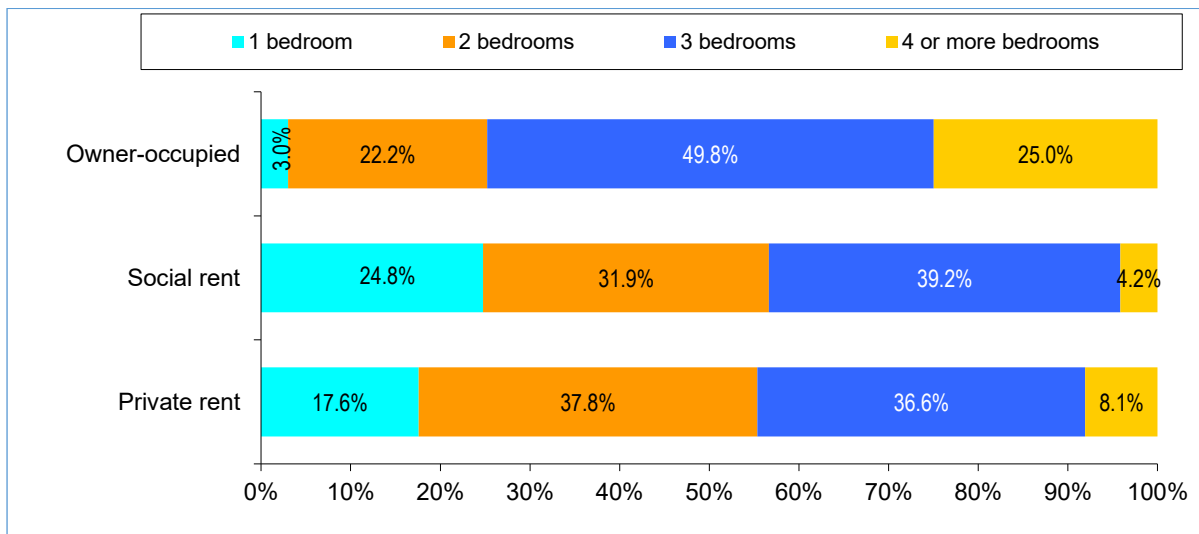


Source: 2011 and 2021 Census

Tenure by bedroom

- 2.35 Finally, it is useful to understand the size of accommodation within each tenure as recorded by the Census. This is shown in the figure below. In Swale, rented accommodation is smaller on average than owned dwellings. This pattern is common across the country and reflects of the profile of dwellings built in each sector alongside the size of homes lost from the affordable stock through Right-to-Buy, rather than the aspirations of those in the different tenures. Generally, the private rented stock is larger than that recorded in the social rented sector.

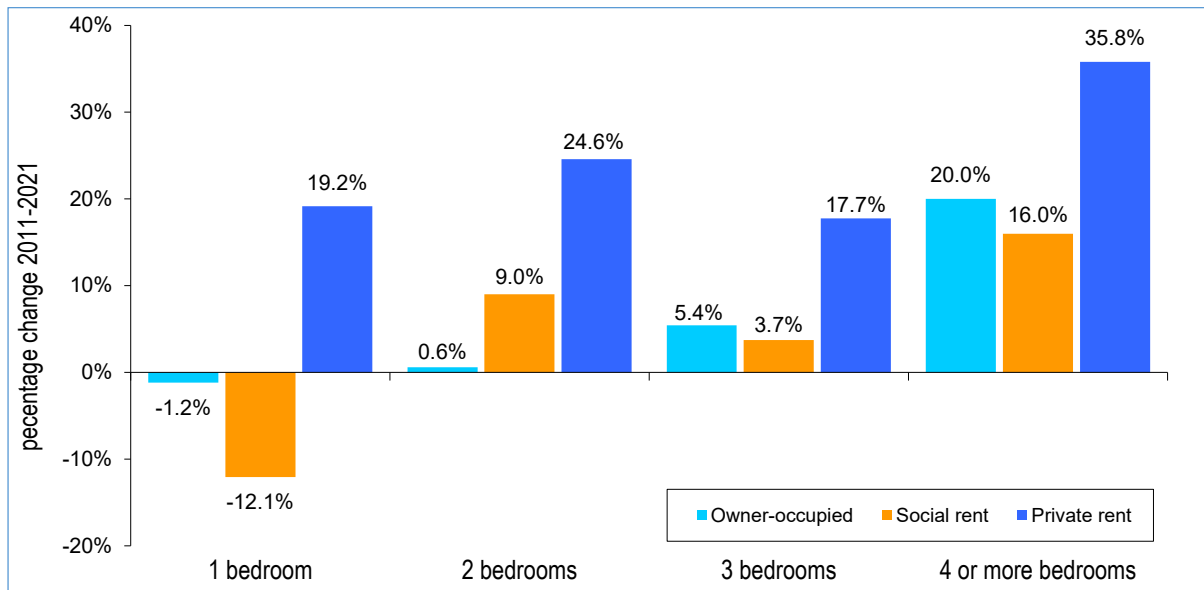
Figure 2.14 Dwelling size within each tenure in Swale, 2021



Source: 2021 Census

- 2.36 The figure below shows the change in the stock profile within each tenure in Swale between 2011 and 2021. The largest growth in the owner-occupied sector homes has been from homes with four or more bedrooms, which has occurred alongside a slight reduction in the number of one bedroom dwellings in this tenure in Swale since 2011. The private rented sector has recorded growth across all property sizes, with the biggest increase in four bedroom accommodation. Growth in the social rented sector has been concentrated amongst four bedroom homes (although from a relatively low base). The number of one bedroom social rented homes in Swale has reduced significantly since 2011, whilst the number of four bedroom properties has grown notably.

Figure 2.15 Change in the number of homes in Swale by tenure and dwelling size 2011 and 2021



Source: 2011 and 2021 Census

3. The cost and affordability of housing

- 3.1 An effective housing needs assessment is founded on a thorough understanding of local housing – what it costs and how this varies. This chapter initially considers the cost of market housing in Swale in a regional and national context. Subsequently, it assesses the entry-level costs of housing across the Borough. A comparison of the cost of different tenures will be used to identify the housing market gaps that exist. Finally, the chapter will report changes in affordability as well as the affordability of housing for different groups of the population currently.

Relative prices

- 3.2 The table below shows the average property price by dwelling type in 2023 in Swale, the South East and England as a whole as presented by the Land Registry¹¹. The overall average property price in Swale is 8.0% lower than the national figure and 26.1% lower than the figure for the South East. Prices in Swale are lower than national figures across all property types other than semi-detached homes.
- 3.3 The dwelling profile is not the same across the three areas (with Swale having a greater proportion of sales of detached houses and a smaller proportion of flats than regionally or nationally), so a mix adjusted average has therefore been derived to work out what the average price would be were the dwelling mix in Swale and the South East to be the same profile as is recorded across England. The mix adjusted average price indicates that equivalent properties in Swale are around 10.9% lower than those found nationally and 28.2% lower than those across the South East as a whole.

Table 3.1 Average property prices* 2024

Dwelling type	Swale		South East		England & Wales	
	Average price	% of sales	Average price	% of sales	Average price	% of sales
Detached	£468,457	26.7%	£693,008	27.1%	£507,388	25.4%
Semi-detached	£330,429	31.5%	£441,254	28.1%	£326,865	30.1%
Terraced	£272,622	33.2%	£364,949	26.2%	£305,201	28.3%
Flat	£178,016	8.6%	£246,736	18.6%	£310,684	16.2%
Overall average price	£334,926	100.0%	£453,167	100.0%	£363,969	100.0%
Mixed adjusted overall average price	£324,450	-	£452,112	-	£363,969	-

*This is the average price per sold property. Source: Land Registry (2025)

¹¹ <http://landregistry.data.gov.uk/app/standard-reports/report-design?utf8=%E2%9C%93&report=avgPrice>

- 3.4 The average property price in Swale has risen by 13.1% over the last five years compared to a rise of 11.3% nationally and a growth of 9.8% across the region. The number of sales in Swale over this period has fallen by 9.1% compared to a decrease of 13.0% in England & Wales and a fall of 8.9% for the South East.
- 3.5 The table below shows the average private rents by dwelling size in February 2026 in Swale, the South East and England as recorded by the Office of National Statistics. The overall average rental price in Swale is 21.7% lower than the national figure and 20.6% lower than the figure for the South East. The average rents in Swale have risen by 30.0% over the last five years, compared to an increase of 32.7% nationally and a growth of 31.3% across the wider region¹².

Table 3.2 Average private rents in February 2026 (price per month)

Dwelling size	Swale	South East	England
One bedroom	£782	£981	£1,170
Two bedroom	£1,033	£1,257	£1,307
Three bedroom	£1,249	£1,529	£1,456
Four bedroom	£1,872	£2,192	£2,124
Overall average rent	£1,119	£1,409	£1,430

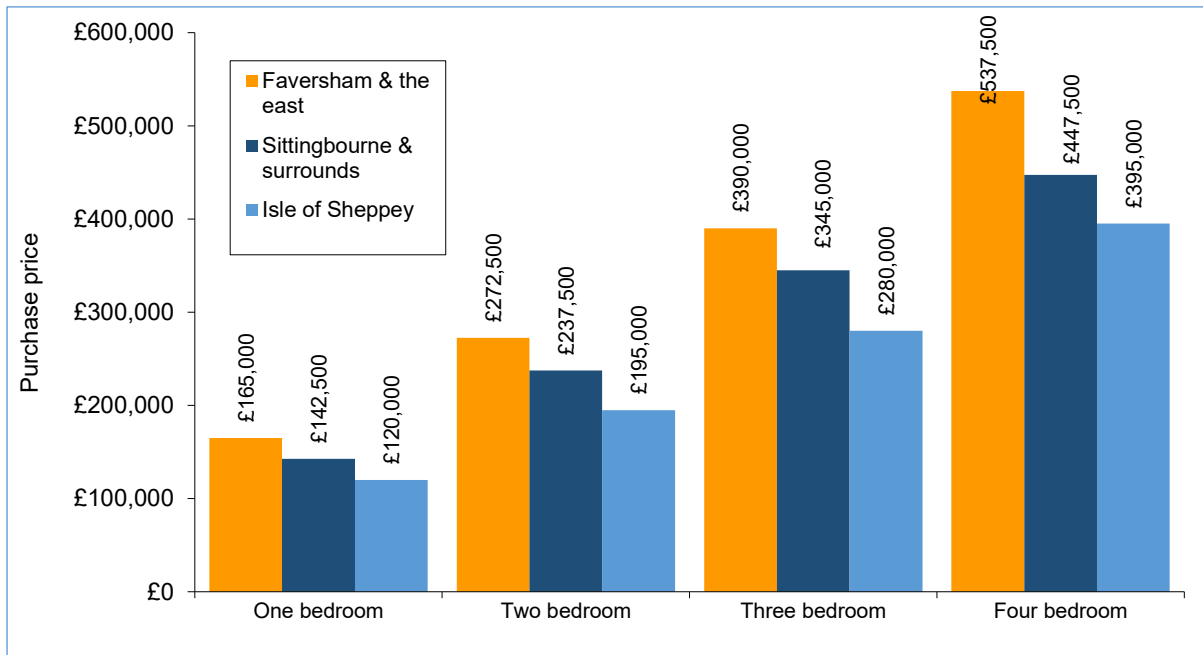
Source: Office of National Statistics (2026)

The cost of housing

- 3.6 To fully understand the affordability of housing within an area, it is necessary to collect data on the cost of housing by number of bedrooms. This ensures that it is possible to assess the ability of households to afford market housing of the size required by that particular household. No published secondary data contains this information at a local authority level. As part of this study a price survey was undertaken to assess the current cost of market (owner-occupied and private rented) and affordable housing in Swale. At the time of the price survey there were over 1,100 homes advertised for sale, and over 160 properties available to rent in Swale, providing a suitably large sample size for this process.
- 3.7 Median property prices by number of bedrooms were obtained in each of the three price markets in the Borough via an online search of properties advertised for sale during April 2026. The results of this online price survey are presented in Figure 3.1. The prices recorded include a discount to reflect that the full asking price is not usually achieved (with sales values typically 2.5% lower). The figure shows that prices in the Isle of Sheppey price market are cheapest and homes in the Faversham and the east price market are most expensive, with four bedroom homes here notably more expensive than in any other area.

¹² This is the change in mean overall rents.

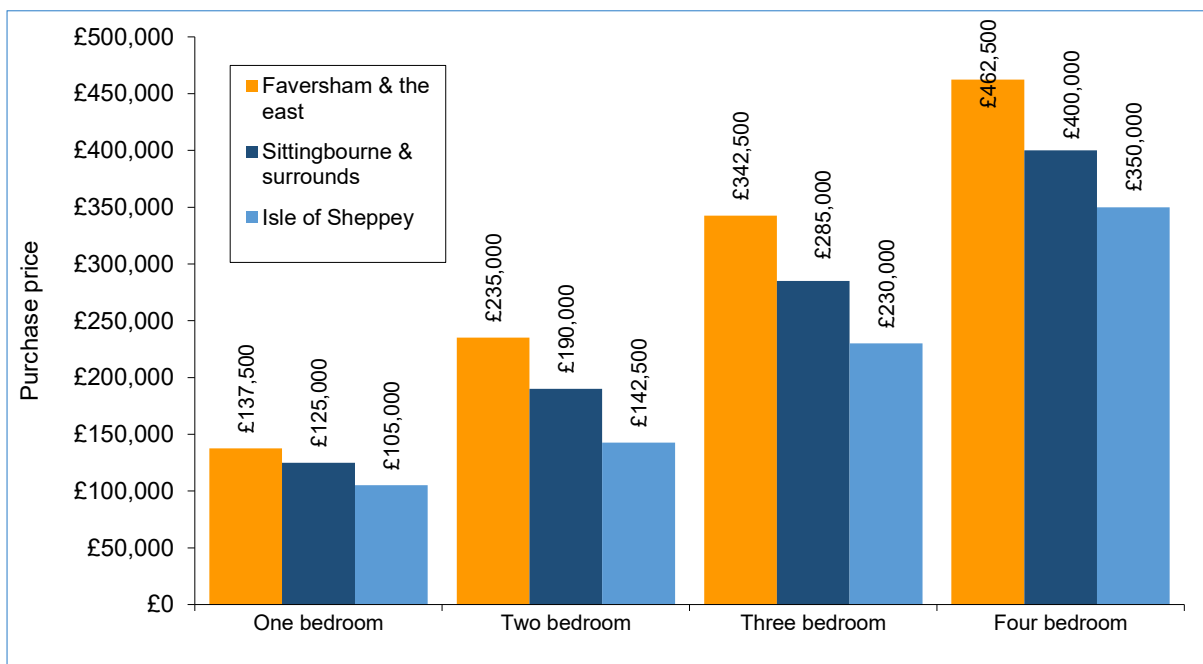
Figure 3.1 Median prices by size and price market



Source: Online estate agents survey (April 2026)

- 3.8 The online survey also collected information at different points of the price distribution. Entry-level property prices for each price market are presented in the figure below. In accordance with the PPG, entry-level prices are based on lower quartile prices (paragraph 021 Reference ID: 2a-021-20190220). This lower quartile price reflects the cost of a home in suitable condition for habitation, some of the properties available in the lowest quartile are sub-standard and will require modernisation and updating which will add further expense to the purchase price.

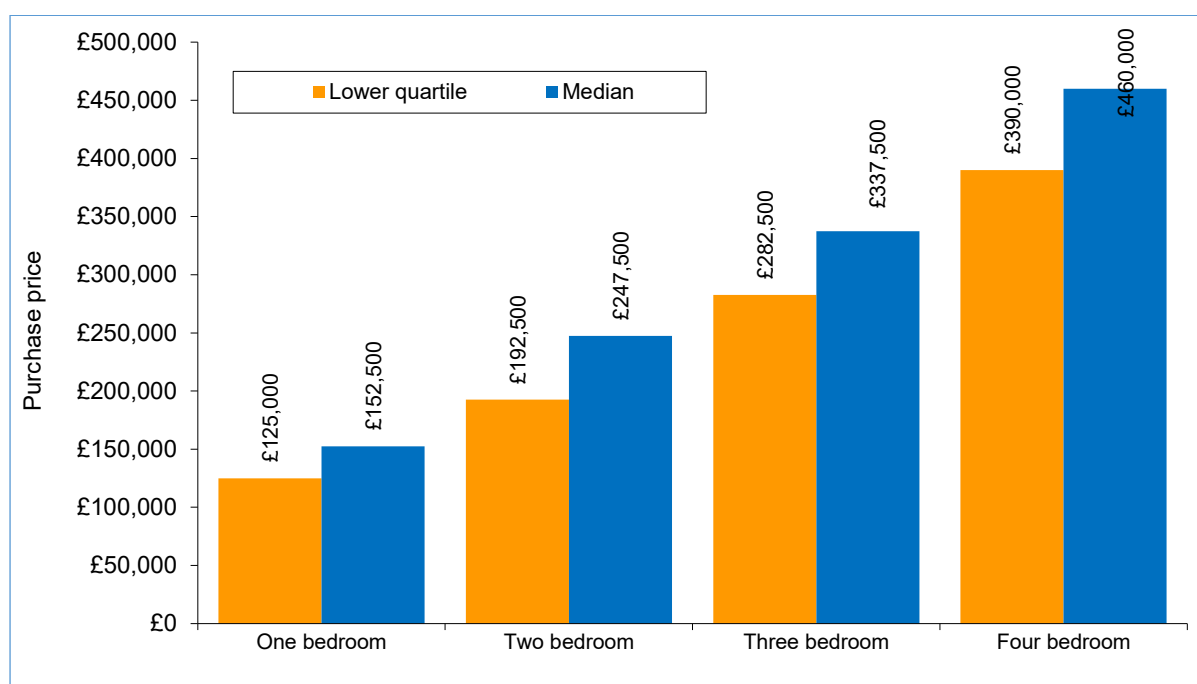
Figure 3.2 Lower quartile prices by size and price market



Source: Online estate agents survey (April 2026)

- 3.9 The analysis so far has considered price data by price market; however, it is useful to also present this information for the Borough as a whole. The figure below therefore shows median and entry-level (lower quartile) property prices by number of bedrooms across Swale. The figure indicates that entry-level prices in the Borough range from £125,000 for a one bedroom home up to £390,000 for a four-bedroom property. Median prices are generally around 15-30% higher than entry-level prices. In terms of market availability, the analysis showed that three-bedroom properties are most commonly available to purchase in Swale, with two-bedroom homes the next most widely available. The smallest supply is of one-bedroom homes or studios.

Figure 3.3 Property prices by size in Swale



Source: Online estate agents survey (April 2026)

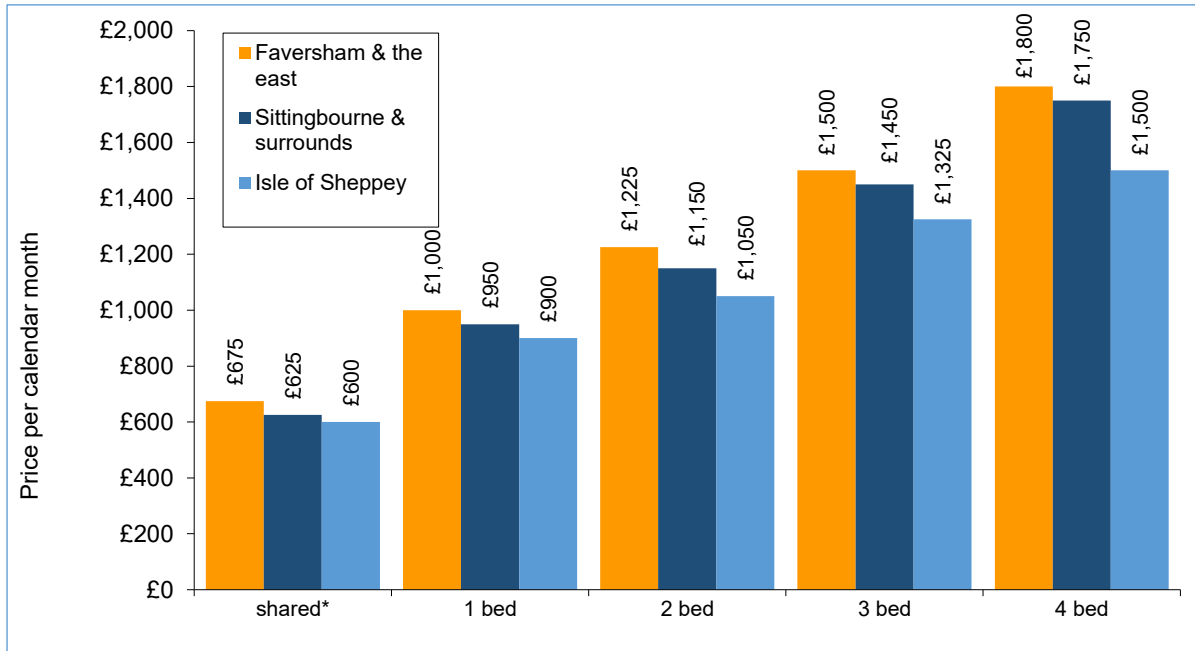
Private rents

- 3.10 Whilst private rent levels vary across the Borough, the distinction between the areas is less marked than with owner-occupation, reflecting that location is not as important a determinant in rent levels as the condition and quality of the property. The median price for private rented accommodation by property size in each price market is presented in the figure below. The figure also includes the cost of a room in a shared dwelling within the private rented sector¹³.

¹³ The Local Housing Allowance regulations, which indicates that single people 35 or under are only entitled to the shared accommodation rate rather than the rate for a one bedroom home, imply that these individuals are deemed suitable to meet their housing needs within the market in this way. The cost of a room within shared accommodation is therefore included as it represents appropriate accommodation for single person households of 35 or under and this group of households will be tested against its ability to afford this in the affordable housing needs model.

- 3.11 The overall pattern of price variation is similar to that recorded for the owner-occupied sector, although there is less difference between the rental levels in the price markets. The Sittingbourne & surrounds price market is closest in price to Faversham & the east price market rather than the Isle of Sheppey price market.

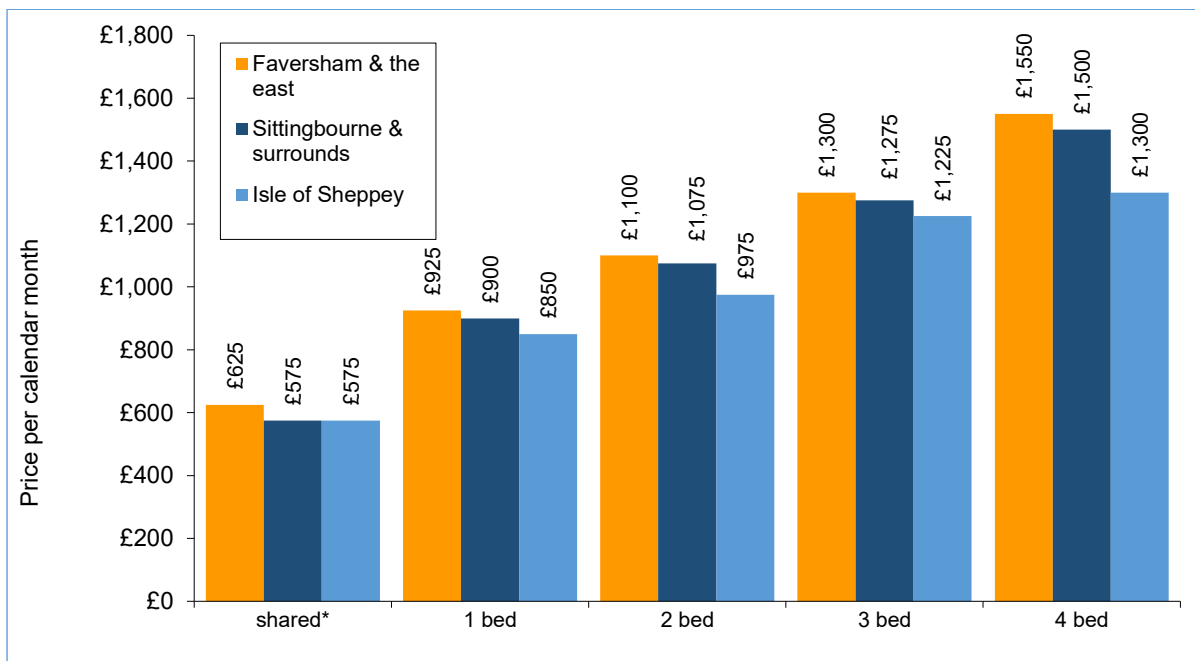
Figure 3.4 Median private rents by size and price market



* Shared is a room in a shared dwelling. Source: Online estate agents survey (April 2026)

- 3.12 Entry-level private rents for each price market are presented in the figure below.

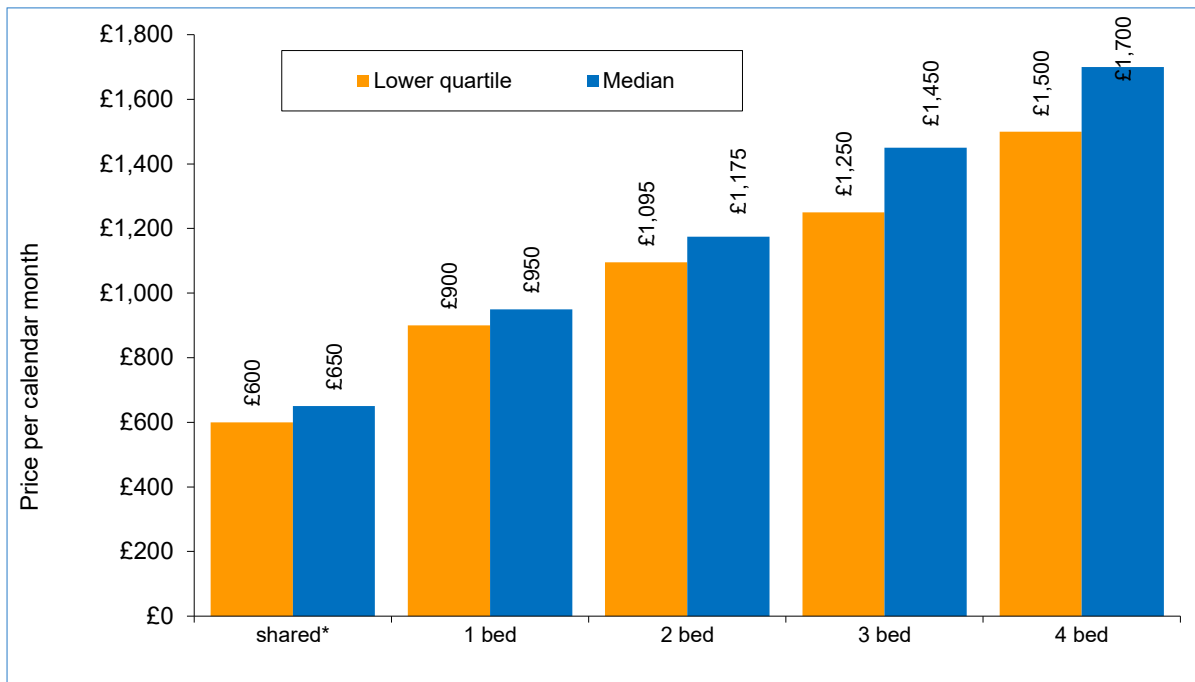
Figure 3.5 Lower quartile private rents by size and price market



* Shared is a room in a shared dwelling. Source: Online estate agents survey (April 2026)

- 3.13 The entry-level and median price for private rented accommodation by property size across the whole of Swale is presented in the figure below. The figure indicates that entry-level rents range from £900 per month for a one-bedroom home, up to £1,500 per month for a four-bedroom property. The profile of properties available is somewhat different to that for purchase, with a greater proportion of one and two-bedroom homes available to rent in the Borough.

Figure 3.6 Private Rents by size in Swale



* Shared is a room in a shared dwelling. Source: Online estate agents survey (April 2026)

Social and Affordable Rents

- 3.14 The cost of Social and Affordable Rented accommodation by dwelling size in Swale can be obtained from the Regulator of Social Housing's Statistical Data Return dataset¹⁴. The table below sets out the cost of Social and Affordable Rented dwellings in Swale. The costs are significantly below those for private rented housing, particularly for larger homes, indicating a significant gap between the Affordable Rented and market sectors.

¹⁴ <https://www.gov.uk/government/statistics/private-registered-provider-social-housing-stock-and-rents-in-england-2024-to-2025>

Table 3.3 Average Social and Affordable Rented costs (per month)

<i>Bedrooms</i>	<i>Social rent</i>	<i>Affordable Rent</i>
One bedroom	£487	£578
Two bedrooms	£530	£713
Three bedrooms	£575	£810
Four bedrooms	£649	£1,154

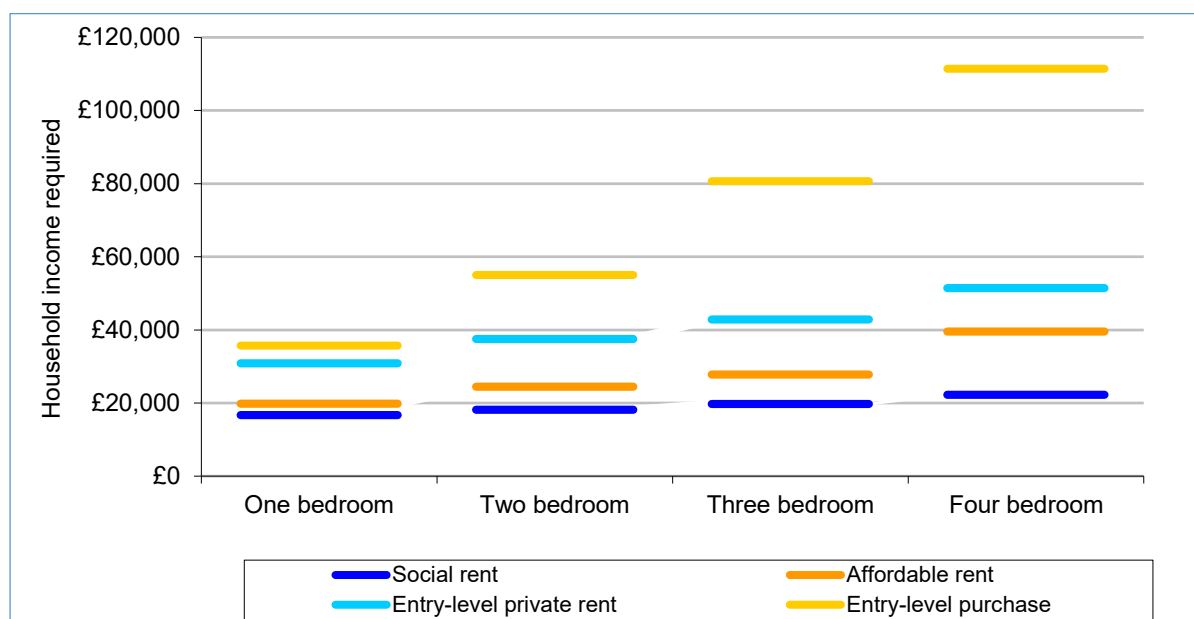
Source: Regulator of Social Housing's Statistical Data Return (2025)

Analysis of housing market 'gaps'

- 3.15 Housing market gaps analysis has been developed to allow comparison of the costs of different tenures. The figure below shows the housing ladder that exists for different sizes of property. The housing ladder is illustrated by comparing the different types of housing in terms of the income required to afford them.
- 3.16 To do this, the entry-level property price (set out in Figure 3.4) has been divided by 3.5¹⁵ to get an annual income figure (to reflect the likely minimum income required to be granted a mortgage on the property) and multiplied the annual rent by 2.857 to produce a comparable figure. This latter step was carried out for Social Rents and Affordable Rents (set out in Table 3.3) and market rents (set out in Figure 3.6). These approaches assume a household spends no more than 35% ($1/0.35 = 2.857$) of gross household income on rent. This figure is used as this reflects current practice in the market.
- 3.17 The figure shows a comparison of the indicative income requirements per household for different types of housing. Measurement of the size of the gaps between these 'rungs of the ladder' helps assess the feasibility of households moving between the tenures – the smaller the gaps, the easier it is for a household to ascend the ladder.

¹⁵ The most recent data available from the Bank of England suggests that the multiple of 3.5 for owner-occupation is most appropriate. (<https://www.bankofengland.co.uk/-/media/boe/files/statistics/mortgage-lenders-and-administrators/mlar-longrun-detailed.xlsx?la=en&hash=C19A1AC6C462416B0DA71926A744233793B8049B> (table 1.31)).

Figure 3.7 Household income required to access housing in Swale, by number of bedrooms



Source: Online survey of property prices (April 2026); Regulator of Social Housing's Statistical Data Return (2025)

- 3.18 For one, two and three bedroom homes, the gap between Social Rent and Affordable Rent is smallest, whilst for four bedroom properties the gap between Affordable Rent and entry-level private rent is smallest. The largest gap for two, three and four bedroom dwellings is between entry-level private rent and entry-level home ownership, whilst for one bedroom accommodation it is between Affordable Rent and entry-level private rent. The gaps for four bedroom accommodation are large; an additional £12,000 per year is required to access a four bedroom private rented home over the cost of a four bedroom Affordable Rented property, with a further £60,000 in household income required to move to an owner-occupied home.
- 3.19 The table shows the size of the gaps for each dwelling size in Swale, for example, three-bedroom market entry rents in the Borough are 54.4% higher (in terms of income required) than the cost of Affordable Rented. The notable gap recorded between Affordable Rents and market entry rents for most dwelling sizes indicates that intermediate housing could potentially be useful for many households. The large gap between market entry rents and market entry purchase indicate notable potential demand for part-ownership products for households.

Table 3.4 Scale of key housing market gaps

Property size	<i>Social Rent < Affordable Rent</i>	<i>Affordable Rent < entry-level rent</i>	<i>Entry-level rent < entry-level purchase</i>
One bedroom	18.7%	55.7%	15.7%
Two bedrooms	34.7%	53.5%	46.5%
Three bedrooms	40.8%	54.4%	88.3%
Four bedrooms	77.7%	30.0%	116.7%

Source: Online survey of property prices (April 2026); Regulator of Social Housing's Statistical Data Return (2025)

Intermediate products

- 3.20 A range of intermediate options are potentially available for households in Swale, the costs of these are profiled below.

Intermediate Rent/Rent-to-Buy

- 3.21 Rent-to-Buy is a route to home ownership where homes are let to working households at an Intermediate Rent (i.e. less than the full market rent) to give them the opportunity to save for a deposit to buy their first home. It is planned that, by landlords providing a discounted rent for tenants for a minimum of 5 years, they will have sufficient time to acquire a deposit so that they may purchase the home. It is set out that the Intermediate Rent must not exceed 80% of the current market rent (inclusive of service charge), however the product is distinct from Affordable Rent which is available to tenants on the same basis as Social Rent. Although the availability of Rent-to-Buy in the area is extremely limited currently, its potential suitability for households can be tested by modelling its theoretical cost.
- 3.22 The table below sets out the costs of Intermediate Rent in Swale, presuming that the rent is set at 80% of Borough-wide median market rents. The table shows that for all dwelling sizes, Intermediate Rent is cheaper than market entry rent and can be considered an affordable product. In all cases, it is also more expensive than the Affordable Rent currently charged within Swale. As in all instances Intermediate Rent is more expensive than Affordable Rent (and is therefore serving a separate portion of the housing market), it will be considered for its suitability for meeting those in housing need in Chapter 6.

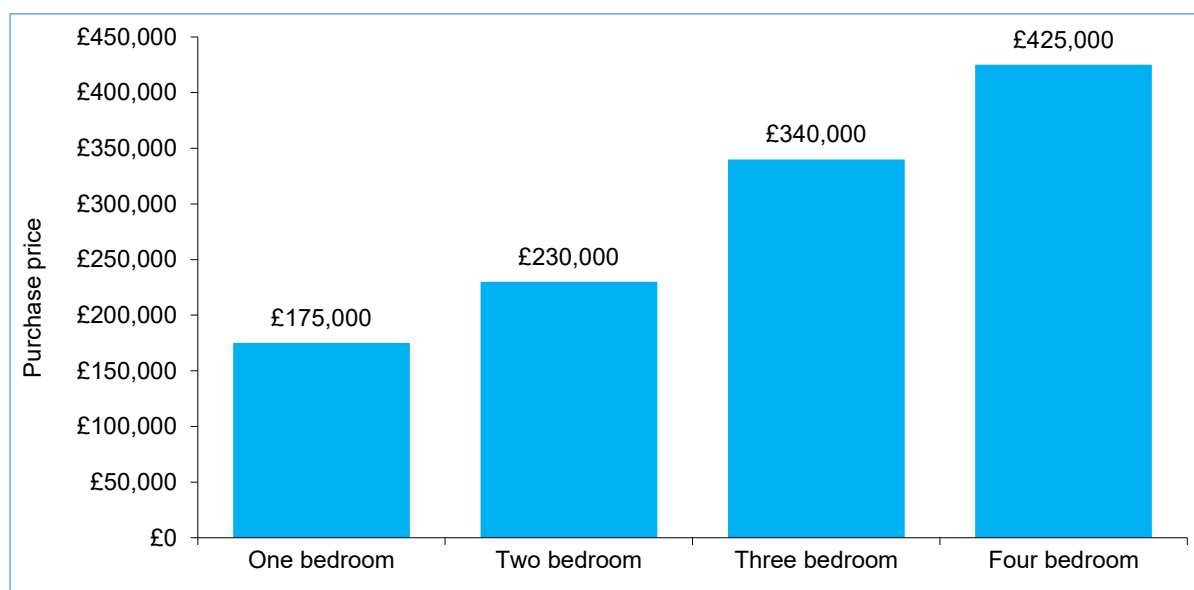
Table 3.5 Estimated cost of Intermediate Rent within Swale (monthly cost)

<i>Bedrooms</i>	<i>Intermediate Rent</i>	<i>Entry-level private rent</i>	<i>Affordable Rent</i>
One bedroom	£760	£900	£578
Two bedrooms	£940	£1,095	£713
Three bedrooms	£1,160	£1,250	£810
Four bedrooms	£1,360	£1,500	£1,154

Source: Online survey of property prices (April 2026); Regulator of Social Housing's Statistical Data Return (2025)

- 3.23 The remainder of the intermediate products profiled are principally available as a new home (whilst some products are available for resale, this supply is very limited). It is therefore useful to set out the purchase price of newbuild dwellings in Swale at the time of the price survey. These are set out in the figure below.

Figure 3.8 Average Newbuild Home Prices by Bedrooms



Source: Online estate agents survey (April 2026)

Shared Ownership

- 3.24 The table below presents the estimated costs of Shared Ownership housing in Swale as obtained from the online estate agent survey. The open market values are based on newbuild prices set out above. The monthly costs of purchasing the property with a 40% equity share and a 25% equity share are presented. The monthly costs are based on a 30-year repayment mortgage with an interest rate of 4.55%¹⁶ paid on the equity share owned and a rent payable at 2.75% on the remaining equity (i.e. the part of the house not purchased).
- 3.25 The table shows that a 25% equity share Shared Ownership home is cheaper than market entry rented housing for all dwelling sizes. A 40% equity share Shared Ownership home is also cheaper than market entry rented housing for all property sizes.

Shared Equity

- 3.26 Shared Equity is a product similar to Shared Ownership that is typically offered by the private sector rather than by Registered Providers. With Shared Equity a mortgage is offered on the equity owned but with no rent due on the remaining equity. The typical proportion of the equity sold for a Shared Equity product is 75%. The monthly costs of purchasing a Shared Equity property with a 75% equity share are set out in the table below. The monthly costs are based

¹⁶ This interest rate is available as a five-year fixed product to potential homeowners with a high loan to value ratio as at April 2026. It is also a rate with no additional product fee associated with it. Whilst there are lower interest rates available for those with lower loan to value ratios this report is principally assessing households looking to purchase a home for the first time who are likely to have higher loan to value ratios. Lower interest rates are available for those choosing a shorter fixed-term period, however the use of a five-year period provides a known cost for households becoming owners for a good amount of time.

on a 30-year repayment mortgage with an interest rate of 4.55% paid on the equity share owned.

- 3.27 Shared Equity accommodation with a 75% equity share is more expensive than entry-level market accommodation for all accommodation sizes other than two bedroom homes. It is also more expensive than all sizes of Shared Ownership accommodation. It is however cheaper than entry-level home ownership in Swale for two, three and four bedroom homes.

Table 3.6 Estimated cost of intermediate housing in Swale (monthly cost)

<i>Bedrooms</i>	<i>Shared Ownership – 40% equity</i>	<i>Shared Ownership – 25% equity</i>	<i>Shared equity</i>	<i>Entry-level private rent</i>	<i>Entry-level owner-occupation *</i>
<i>One bedroom</i>	£597	£524	£669	£900	£637
<i>Two bedrooms</i>	£785	£688	£879	£1,095	£981
<i>Three bedrooms</i>	£1,161	£1,018	£1,300	£1,250	£1,440
<i>Four bedrooms</i>	£1,451	£1,272	£1,625	£1,500	£1,988

*The monthly cost of entry-level owner-occupation presuming a 30-year repayment mortgage with an interest rate of 4.55%. Source: Online estate agents survey (April 2026)

First Homes

- 3.28 In May 2021, the Government published the First Homes Guidance¹⁷. First Homes are an initiative to help deliver discounted homes to local people. They are intended to be newly built properties sold with a discount of at least 30% below market value. It is anticipated that no interest will be paid on the un-bought equity, rather, when the home is sold on in the future, it will be available at the same proportion of discount for which it was originally bought. First Homes are subject to price caps – outside of London a First Home cannot be sold for more than £250,000 (once the discount has been applied). The cap only applies to the first time that a First Home is sold – it does not apply to subsequent sales of the property.
- 3.29 Local Planning Authorities can set specific local connection restrictions provided they are evidenced; however, these restrictions should only apply for the first three months the property is available for sale, to ensure First Homes do not remain unsold. First-time buyers are the target market for this product and this group is identified using the same definition that is used for Stamp Duty Relief for First-Time Buyers as set out in the Finance Act 2003. However, mechanisms also exist to help prioritise members of the armed forces and key workers.
- 3.30 Whilst the product is available to those with notable savings levels, First Homes can only be purchased using mortgage finance or equivalent which covers at least 50% of the purchase value. The product is not suitable for investors as a First Home can only be bought if it is the

¹⁷ <https://www.gov.uk/guidance/first-homes>

buyer's only home. Outside of London, households acquiring a First Home cannot have an income over £80,000. Whilst the Government does allow Local Planning Authorities to set lower income caps where the need and viability of this option can be evidenced, these local caps are time limited to the first three months that the property is for sale.

- 3.31 Under the previous NPPF regime there was an expectation that First Homes would represent a minimum of 25% of all affordable housing units secured through developer contributions. This requirement is no longer in place and there is no preference for any form of affordable accommodation within the current guidance; the proposed mix should represent the need for affordable housing that exists locally. As footnote 31 of the December 2024 NPPF notes *'Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need.'*
- 3.32 The guidance is clear that 30% is the minimum level of discount applied, however Local Planning Authorities will *'be able to require a higher minimum discount of either 40% or 50% if they can demonstrate a need for this'*¹⁸. It is useful therefore to understand whether a larger discount would be required in Swale currently. This is presented in the table below. The table suggests that a 30% discount will be sufficient to ensure newbuild properties are notably cheaper than entry-level owner-occupation for two, three and four bedroom dwellings. For one bedroom homes the 30% discount provides a cost below entry-level home ownership, but it is not a substantially lower price. A First Home with a 30% discount will address a gap in the housing market in Swale. The cost of a four-bedroom home with a 30% discount however is above the £250,000 threshold set out in the First Homes Guidance, whereas smaller homes (3 or fewer bedrooms) are within it.

Table 3.7 A comparison of the potential price of a First Home with entry-level owner-occupation

<i>Bedrooms</i>	<i>Newbuild prices</i>	<i>Newbuild prices with a 30% discount</i>	<i>Entry-level owner-occupation</i>
One bedroom	£175,000	£122,500	£125,000
Two bedrooms	£230,000	£161,000	£192,500
Three bedrooms	£340,000	£238,000	£282,500
Four bedrooms	£425,000	£297,500	£390,000

Source: Online survey of property prices (April 2026)

- 3.33 Four-bedroom homes with a 30% discount are still priced in excess of the cap level of £250,000 (a discount of 41.2% is required for a four-bedroom home to be priced at the cap level of £250,000). It is therefore presumed that the cap will be the limiting factor for four-

¹⁸ Paragraph: 004 Reference ID: 70-004-20210524

bedroom homes, rather than the level of discount, and all modelling done on the future demand for four bedroom First Homes will assume that they are available for £250,000.

Local Housing Allowance

- 3.34 Local Housing Allowance (LHA) is the mechanism for calculating Housing Benefit and the housing element of Universal Credit outside of the Social Rented Sector. It is designed to assist people in their ability to pay for their housing, however there is a limit as to how much financial assistance will be provided dependent on the location and size of the property. The LHA cap sets out what this maximum limit for the Broad Rental Market Area (BRMA) in which the claim is made as determined by the Valuation Office Agency. If the rent charged is in excess of this cap, it is the responsibility of the household to pay the shortfall.
- 3.35 The table below sets out the monthly LHA caps that apply in Swale, which is covered by three BRMAs: The Medway & Swale BRMA applies in the Isle of Sheppey and Sittingbourne, including Bapchild and Teynham. The Canterbury BRMA covers the eastern part of the Borough starting from the Faversham side of Teynham. The Maidstone BRMA applies to the villages on the top of the North Downs below the M2 motorway as far east as Doddington.
- 3.36 A comparison with the Affordable Rent levels in Swale (set out in Table 3.3) indicates that the local Affordable Rents are currently cheaper than the LHA caps. A comparison with the entry-level private rents in Swale (set out in Figure 3.6) suggests that the LHA caps are 10-30% lower than entry-level private rent. This means that households in receipt of the full LHA applicable in the private rented sector are likely to need additional income sources to be able to pay for their rent.

Table 3.8 Local Housing Allowance Cap (per month)

<i>Bedrooms</i>	<i>Canterbury BRMA</i>	<i>Maidstone BRMA</i>	<i>Medway & Swale BRMA</i>
Room in a shared dwelling	£424	£444	£409
One bedroom	£673	£748	£673
Two bedrooms	£893	£903	£848
Three bedrooms	£1,097	£1,197	£937
Four bedrooms	£1,311	£1,546	£1,296

Source: Valuation Office Agency (2026)

Affordability of housing

- 3.37 Assessing the affordability of market housing in an area is crucial to understanding the sustainability of the housing market. As discussed further in Chapter 4, the affordability ratio is currently 8.77 in Swale (with a figure over 4 indicating a market adjustment is required). In comparison, the affordability ratio in 2025 in the South East was 9.58, whilst the national figure

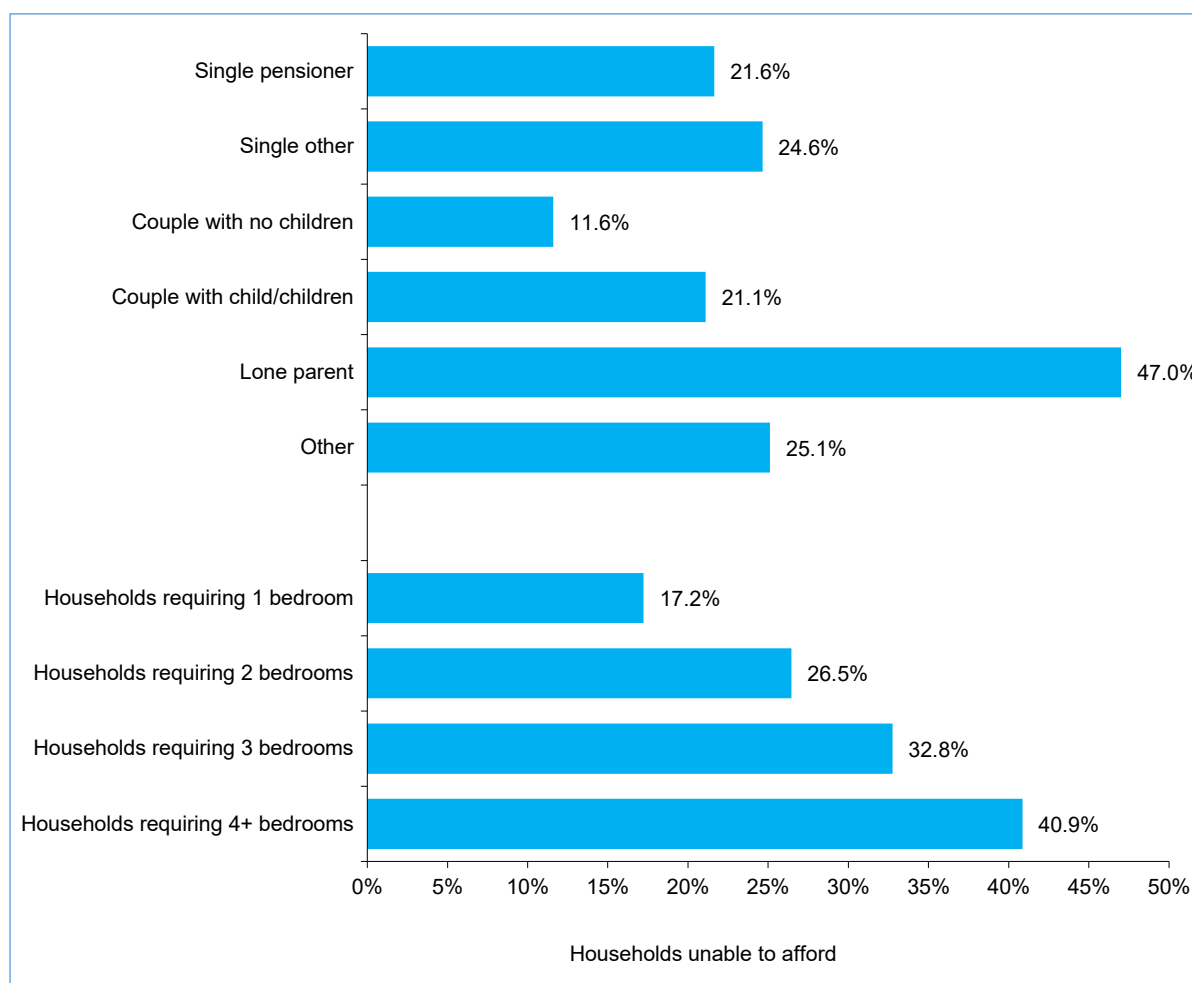
was 7.63. The affordability ratio in Swale has decreased from 69.31 since 2020. In comparison, over the same five-year period, the affordability ratio has fallen from 10.01 in the South East and reduced from 7.86 nationally.

Affordability for specific household groups

- 3.38 The household income distribution referred to in Figure 2.9, differentiated by household type, can be used to assess the ability of households in Swale to afford the size of home that they require (according to the bedroom standard¹⁹). The entry-level cost of housing by bedroom size is presented in Figures 3.3 and 3.6 and the test is based on the affordability criteria discussed above.
- 3.39 The figure below shows the current affordability of households in Swale by household type and number of bedrooms required. This is the theoretical affordability of households, as the analysis considers all households regardless of whether the household intends to move. It is used to demonstrate the comparative affordability of different household groups for contextual purposes and does not represent information that the Council needs to plan against.
- 3.40 The data indicates that 47.0% of lone parent households in Swale would be unable to afford market housing (if they were to move home now). Other and single person households are also relatively unlikely to be able to afford market housing, whilst couple households without children are most likely to be able to afford market housing in the Borough. Households requiring a four-bedroom home are least likely to be able to afford this size of market housing in Swale.

¹⁹ This is the number of bedrooms that is required and is calculated depending on the age, sex and relationship status of the members to the household. A separate bedroom is allocated for each couple and any single person aged 21 or over. Any children aged 10-20 of the same sex is presumed to be able to share a bedroom as are each pair of children under 10 (regardless of gender). Any unpaired child aged 10-20 is paired, if possible, with a child under 10 of the same sex, or, if that is not possible, they are counted as requiring a separate bedroom, as is any unpaired child under 10.

Figure 3.9 Theoretical affordability of market housing*



*Percentage of households unable to afford both entry-level private rent and entry-level home ownership Source: HDH affordability modelling based on price survey and household income profile.

4. Overall housing need

- 4.1 The NPPF requires that planning authorities should use the ‘Standard Method’ to establish the overall need for housing. The Standard Method was introduced in 2018 to allow a simple and transparent assessment of the minimum number of homes needed in an area. The full Standard Method was then set out within the PPG published in February 2019. In December 2024, the new Government published a new Standard Method to ensure the delivery of the Government’s ambition for 370,000 new homes per year nationally. The new method has been designed to provide a figure that is more stable (as it does not fluctuate so much on an annual basis), is simple to calculate, and responds to the locations where housing is least affordable. The approach is still based on a standardised calculation using publicly available data. As set out in Paragraph 001 of the PPG²⁰, *‘assessing housing need is the first step in the process of deciding how many homes need to be planned for.’*
- 4.2 This chapter describes the steps involved in the Standard Method, following the approach described in the PPG²¹. It is important to note that the use of the Standard Method is required. Unlike under the earlier iterations of the NPPF, the December 2024 NPPF does not include scope to deviate from the Standard Method except in very limited and specific circumstances (such as in a National Park in which not all the source data is available).
- 4.3 This does not mean that the Council cannot decide to pursue a figure higher than that indicated by the Standard Method, as Paragraph 2 of the PPG²² indicates the Standard Method identifies *‘a minimum annual housing need figure and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure.’*
- 4.4 The latest approach is followed to calculate the housing need figure for Swale. This chapter sets out the policy-off calculation of the Standard Method figure.

Step 1 – Setting the baseline

- 4.5 The baseline is set using the total existing housing stock for the area of the local authority sourced from the dwelling stock figures²³ published annually by the Ministry of Housing, Communities and Local Government. The PPG indicates that a baseline annual growth of 0.8% of the existing stock of the area is appropriate, with the total from the most recent

²⁰ Reference ID: 2a-001-20241212

²¹ All the steps are described in paragraph 004 (Reference ID: 2a-004-20241212).

²² Reference ID: 2a-002-20241212.

²³ [Dwelling stock \(including vacants\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/dwelling-stock-including-vacants) Paragraph 005 of the PPG (Reference ID: 2a-005-20241212) states that the dwelling stock is used to set the baseline as ‘housing stock provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share of the national total that is proportionate to the size of their current housing market.’

published data to be used. The most recent figures (published in May 2025) indicate that, as at the end of March 2024, there are 68,764 dwellings in Swale with the Council indicating that an additional 612 net completions were delivered between in the 2024/25 financial year, producing a total dwelling stock of 69,376 for the end of March 2025. Applying the proposed figure of 0.8% gives a baseline figure of 555. The table below sets out the results of Step 1 of the Standard Method.

Table 4.1 Calculating the baseline figure in Swale

<i>Local authority area</i>	<i>Totals dwellings in 2025</i>	<i>Baseline ratio</i>	<i>Baseline annual growth</i>
Swale	69,376	0.8%	555

Source: 2024 Dwelling stock figures (2025), Swale Council, 2026

Step 2 – An adjustment to take account of affordability

- 4.6 The baseline figure produced in Step 1 is then be adjusted to reflect the affordability of the area using the most recent median workplace-based affordability ratios. Paragraph 006 of the PPG describes that an affordability ratio is applied, to direct more homes to where they are most needed and to ensure that people aren't prevented from undertaking employment opportunities by the prohibitive cost of housing in the area near their proposed workplace.
- 4.7 The PPG is also absolute that the affordability adjustment also accounts for past under-delivery as described in Paragraph 011 of the PPG²⁴, which states that '*the standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.*'
- 4.8 An affordability adjustment is only required where the ratio is higher than 5 and '*for each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%.*' The full formula is detailed in the PPG:

$$\text{Adjustment factor} = \left[\frac{\text{five year average affordability ratio} - 5}{5} \right] * 0.95 + 1$$

- 4.9 The table below sets out the results of Step 2 of the Standard Method calculation for Swale. The baseline figure, adjusted to take account of the most recent five-year affordability ratio in the Borough, is 1,071.

²⁴ Reference ID: 2a-011-20241212

Table 4.2 Adjusting to take account of affordability - Swale

<i>Five year average of affordability ratio (2021 to 2025) (a)</i>	<i>Adjustment factor $((a-5)/5)*0.95)+1$</i>	<i>Baseline figure</i>	<i>Baseline figure adjusted for affordability</i>
9.89	1.9291	555	1,071

Source: Ratio of median house price to median gross annual workplace-based earnings by local authority (2026)

Overall level of housing need

- 4.10 The final housing need in Swale, as assessed using the Standard Method, is **1,071** dwellings per year based on the current year 2026. Paragraph 008 of the PPG²⁵ notes that whilst *‘the standard method may change as the inputs are variable..., local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.’*
- 4.11 As noted in Paragraph 012 of the PPG²⁶, this approach provides an annual figure which can be applied to a whole plan-period. The Local Plan for Swale is intended to run from 2022 to 2040 (18 years). The modelling of the Local Housing Need will therefore be presented up to 2040 to facilitate this.
- 4.12 Paragraph 40 of the PPG²⁷ makes it clear that the Standard Method output represents a minimum starting point in determining the number of homes needed in an area and that an authority can choose to pursue a higher figure where that is appropriate.

A suitable baseline

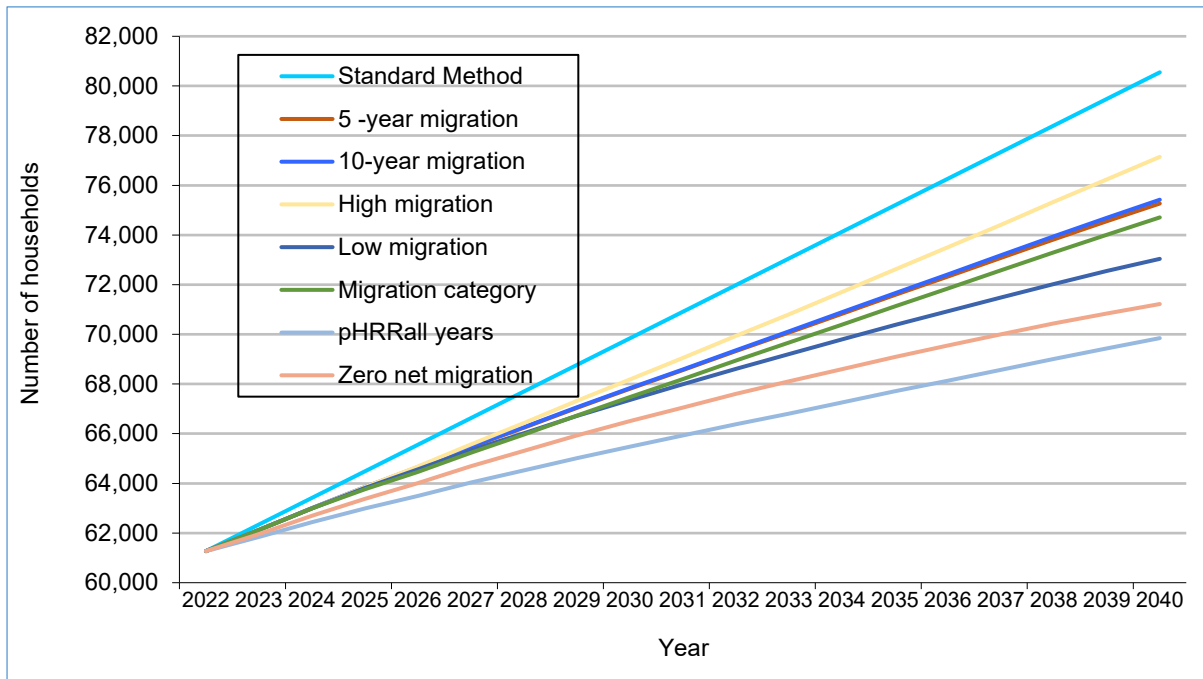
- 4.13 The figure of 1,071 is the final annual housing need figure in Swale. However, it is useful to compare the trajectory that it results in with the different scenarios in the recently published 2022-based household projections for the Borough. The figure below shows the projected household total in Swale for every year from 2022 through to the end of the modelling period in 2040. The figure shows the growth created by the Standard Method is notably in excess of all scenarios including both the *high migration category* variant and the *migration category* variant which the Office of National Statistics has been using as its baseline scenario. This is an ambitious level of growth for which to plan. This additional household growth has to be accurately modelled. This process is described in chapter 5.

²⁵ Reference ID: 2a-008-20241212

²⁶ Reference ID: 2a-012-20241212

²⁷ Reference ID: 2a-040-20241212

Figure 4.1 Projected number of households under different scenarios



Source: ONS 2022 household projections

Conclusion

- 4.14 The final housing need in Swale, as assessed using the Standard Method of December 2024, is 1,071 dwellings per year. The Standard Method will result in household growth is notably in excess of all scenarios including both the *high migration category* variant and the *migration category* variant which the Office of National Statistics has been using as its baseline scenario.

5. Type and tenure of future housing needed

- 5.1 The requirement within paragraph 63 of the NPPF to disaggregate the local housing need figure to ‘*assess the size, type and tenure of housing needed for different groups in the community*’ is reiterated in Paragraph 17 of the PPG. This chapter describes the Long-Term Balancing Housing Markets (LTBHM) model which determines the future demand for housing by size and tenure based on the profile of the population derived within the local housing need calculation (set out in the previous chapter).
- 5.2 There are two stages to this process, the first is to disaggregate the local housing need, as derived in Chapter 4, to produce a population profile for the Borough at the end of the modelling period in 2040. The second process uses secondary data to model the future demand for housing arising from this future population and compare it with the current housing stock so that a profile of new accommodation required can be determined.
- 5.3 The demand modelling is described in more detail subsequently; however, this chapter initially presents the process for disaggregating the future local population. The change in the household composition indicated within these projections drives the size and tenure demand profiles generated by the model.

Disaggregating the local housing need

- 5.4 The application of the Standard Method local housing need figure of 1,071 for Swale will result in higher household growth than in all variants of the 2022-based household projections. If these 1,071 homes per year are built, the number of households will be different to any of the official 2022-based household projections variants (as is shown in Figure 4.1). It is necessary to determine the profile of this household growth and disaggregate the total local housing need, using the NMSS model,²⁸ so that appropriate accommodation can be provided for the whole population of Swale up to and including 2040.
- 5.5 The model takes as its starting point the 2024 sub-national population estimates, which are used to inform the population profile and household composition in Swale in 2025, the start of the modelling period. The 2022-based population projections are re-based to account for the population profile in Swale recorded in 2024 by the most recent population estimates. The demographic flows within the 2022-based population projections are then used to model the future population within Swale. The 2022-based household projections are used to convert the population into a household typology, by accounting for the population living in communal housing and disaggregating the household population into household groups based on age of the household head and household composition.

²⁸ The model is detailed in Appendix 1.

5.6 The refreshed base-projections are then adjusted to align Swale’s local housing need figure through two key modifications: firstly, an uplift to the household headship rates for young adults to increase household formation rates and secondly an increase in in-migration to the Borough. This process is described below:

a. The 2022-based household projections show lower headship rates for those aged under 35 compared with the 2018-based projections, with this especially marked in the 16-18 age group. While the 2022-based rates reflect recent trends and behaviours, the uplift implied by the Standard Method provides scope for higher household formation among younger adults – an outcome that is likely if the national population remains as projected but housing supply increases beyond projected household growth. The ONS notes that the headship rates used in the 2022 based household projections are constant²⁹ (as were the equivalent 2018 based headship rates). To reflect a more realistic increase in household formation, the model assumes that:

- For those aged 19–24, 25–29, and 30-34 the headship rates rise linearly from the 2025 rate in the 2022-based projections to the 2030 rate in the 2018-based projections, remaining at the 2018-based level thereafter.
- For those aged 16–18, where the gap between the two projection sets is larger, headship rates rise linearly from the 2025 2022-based rate to the average of the 2018- and 2022-based rates by 2030, remaining at this level thereafter.

These adjustments increase the number of households generated from the base population, but not sufficiently to meet the full level of growth required under the Standard Method.

b. The remaining difference between the revised household total and the annual growth required under the Standard Method is met by increasing in-migration to the Borough. The age and gender profile of these additional in-migrants is informed by the differences between the in-migrants recorded within the migration-category scenario and the high-migration variant in the ONS projections. This adjustment is applied annually:

- In-migration is increased each year until the Standard Method total is reached.
- The resulting population is then aged forward to the next year, with births, deaths, and migration flows applied.
- In-migration is then increased again as needed to meet the Standard Method requirement for the following year, and so on.

²⁹

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/methodologyusedtoproducehouseholdprojectionsforengland2022based>

- 5.7 This process creates a demographic model where total household growth in Swale over the plan-period aligns to the Standard Method figure of 1,071 new households per year.

Total future population in Swale

- 5.8 The table below sets out the age profile of the population in Swale in 2040 according to these population projections, in comparison to the age profile of the Borough at the start of the plan-period (2025). Those aged 75 or over are going to constitute a greater section of the population by the end of the modelling period – those aged 75 or over will rise from 15,489 in 2025 to 19,757 in 2040, an increase of 27.6%. Some 26.8% of all people in Swale in 2040 will be aged 60 or over, with almost 30.0% aged under 30.

Table 5.1 Age of projected population in Swale in 2040 compared with current age profile

Age	2025 Population	2025 Percentage	2040 Population	2040 Percentage
0-14	31,083	19.4%	30,496	16.4%
15-29	24,076	15.1%	31,348	16.9%
30-44	32,688	20.5%	36,127	19.5%
45-59	30,371	19.0%	37,795	20.4%
60-75	26,116	16.3%	30,122	16.2%
75+	15,489	9.7%	19,757	10.6%
Total	159,823	100.0%	185,646	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections

Economically active population

- 5.9 The disaggregated Standard Method projections indicate that Swale's core working-age population (those aged 16–64) will increase by 17,944 people between 2025 and 2040. To translate this population growth into an estimate of the active labour force, the analysis first applies the Office for Budget Responsibility's (OBR) labour market participation rates³⁰. As defined by the OBR, the "*participation rate is the proportion of the population that is active in the labour force – that is they are either employed or unemployed and actively looking for work*". The OBR published updated participation rates in May 2025, providing national projections for every single year of age from 16 to 90 for the period 2022–2073.
- 5.10 To produce a locally relevant set of participation rates for Swale, these national projections are adjusted using Census 2021 data (table RM024), which records economic activity by age band at both national and local authority level. The difference between Swale's 2021

³⁰ <https://obr.uk/forecasts-in-depth/the-economy-forecast/labour-market/#participation>

participation rates and the national equivalent is applied to the OBR projections, generating a Swale-specific set of projected participation rates.

- 5.11 These adjusted participation rates are then applied to the projected population aged 16–90 across the plan period. This ensures the modelling captures economic activity among older workers, reflecting national expectations that participation among older age groups will rise as the population ages and state pension ages increase. The modelling indicates that the labour force in 2040 will contain 17,372 more economically active people than in 2025. Of this increase, 14,956 are aged 16–64 (a 20.4% rise) and 5,984 are aged 65 and over (an 67.7% rise), highlighting the growing importance of older workers in the future labour market.
- 5.12 A final adjustment is made to account for unemployment. Applying Swale’s most recent unemployment rate of 3.7% uniformly across all ages and years of the plan period results in an estimated 16,729 additional people in employment in 2040 compared with the start of the plan period. It is important to note that this figure does not take commuting patterns into account. Not all of these additional workers will be employed within Swale, and some residents of neighbouring areas will commute into the Borough. However, commuting is no longer a simple binary choice for most workers. Patterns of travel to work have changed significantly over the past five years, particularly with the rise of hybrid working. These shifts make it increasingly difficult to model future commuting behaviour with precision.

Household profile

- 5.13 This overall population projection is then converted into a household projection by:
- Removing from the population projection an estimate of those living in communal establishments such as residential care homes. This is done using the same assumptions as in the official projections. The resulting population is known as the household population.
 - Household formation rates are then applied to the household population to produce a household projection. The household formation rates are taken from the official 2022-based household projections with the adjustment for headship rates for those headed by someone aged under 35 as described above.
- 5.14 The table below sets out the number of households that will be resident in Swale in 2040 disaggregated by broad household type according to these projections. The 2025 household profile is also presented as a reference point, as 2025 is the base date for this model.

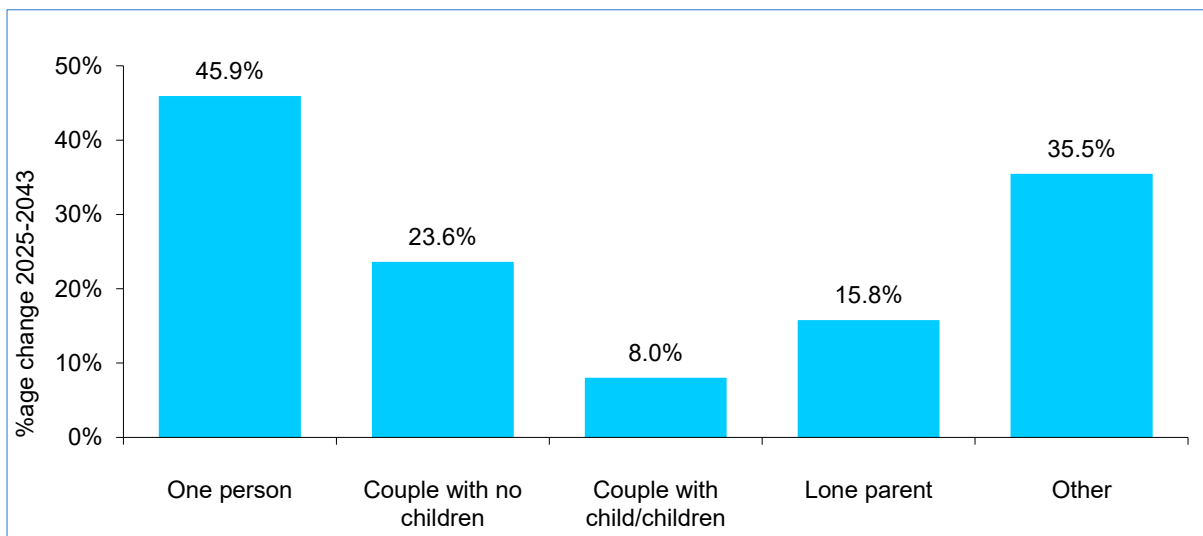
Table 5.2 Projected household population in Swale in 2040 by household type

<i>Household type</i>	<i>2025 Number</i>	<i>2025 Percentage</i>	<i>2040 Number</i>	<i>2040 Percentage</i>
One person	17,009	26.7%	24,822	31.1%
Couple with no children	17,931	28.1%	22,169	27.8%
Couple with child/children	17,458	27.4%	18,861	23.6%
Lone parent	7,260	11.4%	8,406	10.5%
Other*	4,133	6.5%	5,599	7.0%
Total	63,791	100.0%	79,856	100.0%

*Other households include multi-generational households, student households, households of unrelated people sharing accommodation as well as other groups. Source: Standard Method modelling based on ONS 2022 household and population projections

- 5.15 The figure below indicates the change in these household types that will occur between 2025 and 2040 in Swale. The figure indicates that the largest absolute and relative growth will be in one person. In contrast, the number of households with children is projected to decrease at a notably slower rate.

Figure 5.1 Change in household structure in Swale, 2025 – 2040



Source: Standard Method modelling based on ONS 2022 household and population projections

Methodology of the demand model

- 5.16 The demand model uses secondary data to determine the future demand for housing by size and tenure as derived from the profile of households resident in the area at the end of the modelling period in 2040. It is based on both an understanding of the current stock of housing in the Borough, and also the occupation patterns of households in Swale and how they are changing. It is driven by the changes projected to the composition of the population over the 15-year period, as set out above.

- 5.17 The Census provides information on the size (in terms of bedrooms) and tenure of accommodation in Swale in 2021. This has been adjusted to reflect the changes since 2021 to provide an accommodation profile in 2025.
- 5.18 The 2021 Census also provides detail on the occupational patterns of different household groups in Swale, which means that the profile of housing occupied by each household type can be determined. Rather than assuming the current usage patterns for each household type will apply to the future population of that household group, the model assesses the current trends in occupation patterns (recorded by the change in the tenure profile of each household type between the 2011 and 2021 Census in Swale, with the changes in the size of accommodation occupied within each tenure also accounted for), and models their continuation through to 2040. An affordability check is applied to ensure that this is a sustainable option. This approach is in line with the PPG.
- 5.19 A further adjustment is made to counter the existence of overcrowding, which the PPG indicates should be addressed. Households currently overcrowded will therefore be housed in adequately sized accommodation within the model³¹. In terms of households where at least one resident is in work, it is presumed that an additional bedroom (beyond that implied by the bedroom standard) is required as a home office in 43.9% of households³². This means that the future housing stock will better reflect the requirements of the future population in the area.
- 5.20 This profile of suitable accommodation for each household type is applied to the size of the household group in 15 years' time. The accommodation profile required in 2040 is then compared to the current accommodation profile and the nature of additional housing required is derived. It should be noted that the model works by matching dwellings to households, so the figures are based on the change in number of households identified within the housing need calculations.

First Homes

- 5.21 As discussed earlier, First Homes are an intermediate product that have been introduced specifically to help potential first-time buyers access home ownership. It is clear from the cost profile of First Homes, set out in Chapter 3, that their likely price-level will mean that they could be suitable for some households that would otherwise reside in the private rented sector. However, as it is a product that has only recently been introduced into the market, it cannot be modelled using the same trend data as is utilised for the rest of the LTBHM model.

³¹ Using the example of a lone parent household residing in a two bedroom property but requiring a three bedroom home, the modelled accommodation profile for this household group would assign this household a three bedroom property rather than a two bedroom dwelling. This means that it is anticipated that for equivalent households in the future, none would be expected to live in an overcrowded home.

³² This reflects the rate of home working recorded in Swale in the 2021 Census. Whilst theoretically this figure may be expected to increase over the plan period, it is likely that the 2021 Census figure was overinflated due to the fact it took place during the coronavirus pandemic.

- 5.22 The potential demand for this new product over the modelling period can be derived by making assumptions about the likelihood of different household groups within the private rented sector to try and acquire this form of housing, informed by an affordability analysis of the tenure and the length of time required to save a deposit.

Tenure of housing required

- 5.23 The tables below show the projected tenure profile in Swale at the end of the modelling period. The profile in 2025 at the start of the plan-period is also set out for context. The data shows that, in 2040, the housing stock across Swale should comprise 66.3% owner-occupied accommodation, 17.3% private rented homes, 0.7% First Homes, 2.2% Shared Ownership properties, 2.8% Affordable Rent and 10.7% Social Rented housing.

Table 5.3 Current tenure and tenure profile projected in Swale in 2040

<i>Tenure</i>	<i>Base tenure (2025)</i>		<i>Projected tenure (2040)</i>	
	<i>Number</i>	<i>Percentage</i>	<i>Number</i>	<i>Percentage</i>
Owner-occupied	42,444	66.5%	52,974	66.3%
Private rented	11,992	18.8%	13,796	17.3%
First Homes	0	0.0%	535	0.7%
Shared Ownership	1,114	1.7%	1,750	2.2%
Affordable Rent	1,588	2.5%	2,249	2.8%
Social Rent	6,653	10.4%	8,553	10.7%
Total	63,791	100.0%	79,856	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

- 5.24 The table below shows the tenure profile required by households resident in Swale in 2040, in comparison to the tenure profile recorded in the Borough at the start of the plan-period. The difference between these two distributions is the change required to the housing stock over this period. The results show that 65.5% of new housing in Swale should be owner-occupied, 11.2% private rented, 3.3% First Homes, 4.0% should be Shared Ownership, 4.1% Affordable Rent and 11.8% Social Rent.

Table 5.4 Tenure of new accommodation required in Swale over the 15-year modelling period

<i>Tenure</i>	<i>Base tenure profile (2025)</i>	<i>Tenure profile 2040</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupied	42,444	52,974	10,530	65.5%
Private rented	11,992	13,796	1,804	11.2%
First Homes	0	535	535	3.3%
Shared Ownership	1,114	1,750	636	4.0%
Affordable Rent	1,588	2,249	661	4.1%
Social Rent	6,653	8,553	1,900	11.8%
Total	63,791	79,856	16,065	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

Size of housing required within each tenure

- 5.25 The tables below present the size of owner-occupied accommodation required in Swale in 15 years' time in comparison to the size profile recorded in the sector at the base date. The implied change to the housing stock is also presented. The data shows that some 32.7% of new owner-occupied housing in Swale should be homes with four or more bedrooms, with 31.1% being for units of two bedrooms, 23.7% should have two bedrooms and 12.5% should be one bedroom accommodation.

Table 5.5 Size of new owner-occupied accommodation required in Swale over the next 15 years

<i>Size of home</i>	<i>Base size profile (2025)</i>	<i>Size profile 2040</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	1,242	2,556	1,315	12.5%
Two bedroom	9,162	12,441	3,279	31.1%
Three bedroom	20,941	23,434	2,493	23.7%
Four or more bedrooms	11,100	14,542	3,442	32.7%
Total	42,444	52,974	10,530	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

- 5.26 This analysis can be repeated for private rented housing and is presented in the table below. The data indicates that, of the 1,804 private rented homes required within Swale, 29.9% should be properties with three bedrooms, a further 25.1% should have one bedroom. Some 20.7% should be homes with four or more bedrooms and 24.3% should be two bedroom accommodation.

Table 5.6 Size of new private rented accommodation required in Swale over the next 15 years

<i>Size of home</i>	<i>Base size profile (2025)</i>	<i>Size profile 2040</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	2,085	2,537	452	25.1%
Two bedroom	4,574	5,013	439	24.3%
Three bedroom	4,319	4,858	539	29.9%
Four or more bedrooms	1,015	1,389	374	20.7%
Total	11,992	13,796	1,804	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

- 5.27 The table below shows the size of First Homes that would be required at the end of the plan period. The potential market for First Homes is largest for four bedroom properties as the difference between the cost of a First Home and entry-level owner occupation is notably large. Some 44.7% of the requirement for First Homes is for four or more bedroom properties, 29.9% for three bedroom homes, 15.1% for two bedroom dwellings and 10.3% is for one bedroom accommodation.

Table 5.7 Potential demand for First Homes in Swale over the next 15 years

<i>Size of home</i>	<i>Number of households in 2040</i>	<i>Proportion of households 2040</i>
One bedroom	55	10.3%
Two bedroom	81	15.1%
Three bedroom	160	29.9%
Four or more bedrooms	239	44.7%
Total	535	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

- 5.28 The table below sets out the equivalent analysis for Shared Ownership housing. The data indicates that of the 636 Shared Ownership dwellings required within Swale, 30.2% should be two bedroom properties with a further 26.9% three bedroom accommodation. Some 24.7% should have one bedroom and 18.2% should have four or more bedrooms.

Table 5.8 Size of new Shared Ownership accommodation required in Swale over the next 15 years

<i>Size of home</i>	<i>Base size profile (2025)</i>	<i>Size profile 2040</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	254	411	157	24.7%
Two bedroom	349	541	192	30.2%
Three bedroom	373	544	171	26.9%
Four or more bedrooms	138	253	115	18.2%
Total	1,114	1,750	636	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

- 5.29 The table below shows the size of accommodation required in the Affordable Rented sector. Of the 661 additional Affordable Rented units required within Swale over the 15-year modelling period, 44.5% should be properties with three bedrooms, with a further 23.4% as one bedroom accommodation. Some 19.6% should have two bedrooms and 12.6% should have four or more bedrooms.

Table 5.9 Size of new Affordable Rent required in Swale over the next 15 years

<i>Size of home</i>	<i>Base size profile (2025)</i>	<i>Size profile 2040</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	273	428	154	23.4%
Two bedroom	660	789	129	19.6%
Three bedroom	577	871	294	44.5%
Four or more bedrooms	78	161	83	12.6%
Total	1,588	2,249	661	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

- 5.30 The table below shows the size of accommodation required in the Social Rented sector. Of the 1,900 additional Social Rented dwellings required within Swale until 2040, 34.9% should be properties with four or more bedrooms and a further 25.1% should be one bedroom accommodation. Some 23.0% should have two bedrooms and 17.0% should have three bedrooms. The figures shown in the table below represent a net requirement for new Social Rented homes over the modelling period. It should be noted that this is the net requirement for new Social Rented homes over the modelling period. If there is loss of affordable stock, such as through units being required to be demolished due to being of unsuitable quality, these would also need to be replaced. Similarly, if there is loss of affordable stock through Right-to-Buy, this will also need to be replaced.

Table 5.10 Size of new Social Rent required in Swale over the next 15 years

<i>Size of home</i>	<i>Base size profile (2025)</i>	<i>Size profile 2040</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	1,898	2,375	477	25.1%
Two bedroom	1,999	2,436	438	23.0%
Three bedroom	2,589	2,912	322	17.0%
Four or more bedrooms	167	830	663	34.9%
Total	6,653	8,553	1,900	100.0%

Source: Standard Method modelling based on ONS 2022 household and population projections, Census trend data and affordability assessment

6. Affordable housing need

- 6.1 As required by the PPG, it is necessary to undertake a separate calculation of affordable housing need. Paragraph 18 (Reference ID: 2a-018-20190220) to Paragraph 24 (Reference ID: 2a-024-20190220) of the PPG details how affordable housing need should be calculated. The affordable housing need figure is calculated in isolation from the rest of the housing market and is used solely to indicate whether the Local Planning Authority should plan for more dwellings where it could help meet the need for affordable housing.
- 6.2 The model outlined in the PPG is an assessment of the housing market at a particular point of time (April 2026) and does not consider likely future changes to the housing market that may impact the results, i.e. it is based on what is known at the time of the assessment. The PPG (Paragraph 19) defines affordable housing need as *‘the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market’*.
- 6.3 Appendix 2 presents the three broad stages of the model used to calculate affordable housing need. This chapter sets out the overall annual estimate of the affordable housing need in Swale³³ as a consequence of following the steps detailed in the appendix, and the tenure of accommodation most appropriate to meet this need is discussed.

Estimate of net annual affordable housing need

- 6.4 Once all the steps of the calculation of the affordable housing needs model (detailed in Appendix 2) have been completed, it is necessary to bring this evidence together to determine the overall net annual affordable housing need. This is set out below.
- 6.5 Paragraph 024 of the PPG³⁴ states that the figures in the model need to be converted to annual flows to establish the total need for affordable housing. The first step in this process is to calculate the total net current need. This is derived by subtracting the estimated current affordable housing supply (Stage 3) from the current unmet gross need for affordable housing (Stage 1).
- 6.6 The second step is to convert this total net current need figure into an annual flow. The PPG indicates that annual flows should be based on the plan-period. For the purposes of this study the period of 14 years will be used to fit in with the remaining timeframe of the Local Plan (through to 2040). The final step is to sum the annualised net current need with the total newly arising affordable housing need (Stage 2) and subtract the future annual supply of affordable

³³ This will imply a figure for the amount of affordable accommodation required over the plan-period, however this is derived using a different approach and has a different purpose to the equivalent figure in Chapter 4, as described in Chapter 1, and the two should not be compared.

³⁴ Reference ID: 2a-024-20190220.

housing (Stage 4). The table below sets out this process. It leads to a total need for affordable housing of 604 per year in Swale. In accordance with paragraph 024 of the PPG, this figure should be compared with the local housing need identified following the Standard Method to determine whether an uplift to the local housing need is required. This is discussed in Chapter 8.

Table 6.1 Results of the affordable housing needs model in Swale

<i>Stage in calculation</i>	
Stage 1: Current unmet gross need for affordable housing (Total) (Table A2.3)	2,318
Stage 2: Newly arising affordable housing need (Annual) (Table A2.5)	721
Stage 3: Current affordable housing supply (Total) (Table A2.6)	2,169
Stage 4: Future housing supply (Annual) (Table A2.9)	428
Stage 5.1 Net current need (Stage 1 minus Stage 3) (Total)	149
Stage 5.2 Annualise net current need (Stage 5.1 divided by 18) (Annual)	11
Stage 5.3 Total need for affordable housing (Stage 2+ Stage 5.2 – Stage 4) (Annual)	304
Total gross annual need (Stage 1 divided by 18 + Stage 2) (Annual)	887
Total gross annual supply (Stage 3 divided by 18 + Stage 4) (Annual)	583

Source: Range of data – see appendix 2 for details

Overall households in affordable housing need by type (gross)

- 6.7 The table below gives a breakdown of the gross annual households in need, by household type, in Swale. The table shows that some 4.4% of lone parent households are in housing need compared with 0.9% of couple only households. Overall, lone parent households comprise over a 40% of all households in need.

Table 6.2 Annual need requirement by household type in Swale

<i>Household type</i>	<i>Need requirement</i>				
	<i>No. of h'holds in need (gross)</i>	<i>Not in need</i>	<i>Total Number of h'holds</i>	<i>% of h'hold type in need</i>	<i>As a % of those in need</i>
One person	177	16,832	17,009	1.0%	22.6%
Couple with no children	159	17,772	17,931	0.9%	20.4%
Couple with child/children	174	17,284	17,458	1.0%	22.3%
Lone parent	323	6,937	7,260	4.4%	41.3%
Other	53	4,080	4,133	1.3%	6.8%
Total	887	62,904	63,791	1.4%	113.3%

Source: Range of data – see appendix 2 for details

Type of affordable home required

- 6.8 As discussed earlier, a range of affordable products is available to meet affordable housing need in Swale. This section will consider the suitability of these different products for meeting affordable housing need.
- 6.9 As the relative cost of each product is not always the same (for example, in some instances, Shared Ownership housing with a 40% equity share is more expensive than Intermediate Rent, but in other cases the reverse is true), each product is tested individually. The table below illustrates how many households in affordable housing need in Swale are able to afford the different affordable products. Several intermediate options are affordable to some households, so the table presents the maximum number of households able to afford each product. Households can therefore be included in more than one row. The only exception is the final row which includes only households unable to afford a product more expensive than Social Rent. The Social Rented group also includes those unable to afford any accommodation without support from HB/LHA, as this is the tenure in which these households are most likely to reside.
- 6.10 The table shows that, of the 887 households in need each year in Swale, 8.7% could afford a First Home, 6.0% could afford shared equity, 13.3% could afford Shared Ownership with a 40% share, 26.5% could afford Shared Ownership with a 25% share, 5.2% could afford Intermediate Rent and 27.9% could afford Affordable Rent. Some 68.0% of households in affordable housing need can only afford Social Rent or require support. These figures are based on the products being available at the costs set out in Chapter 3.

Table 6.3 Size and type of affordable home required by those in need (per annum) in Swale

<i>Product</i>	<i>One bed</i>	<i>Two bed</i>	<i>Three bed</i>	<i>Four bed</i>	<i>Total</i>	<i>Total (%)</i>
First Homes	6	64	7	-	77	8.7%
Shared equity	6	41	7	-	54	6.0%
Shared Ownership – 40% equity share	19	78	16	5	118	13.3%
Shared Ownership – 25% equity share	54	117	43	21	235	26.5%
Intermediate Rent	-	16	17	13	46	5.2%
Affordable Rent	28	107	81	32	248	27.9%
Social Rent/requires assistance	200	209	111	83	603	68.0%
All households	255	325	192	115	887	100.0%

Source: Range of data – see appendix 2 for details

Sensitivity analysis - affordability threshold

- 6.11** The results presented in this chapter are based on using an affordability test where the cost of housing for those aspiring to rent privately can constitute up to 35% of gross income and still be affordable in Swale, reflecting the current market reality. The impact of adjusting this affordability threshold is considered in the table below, which details the results of the PPG affordable housing need model across Swale where the cost of housing those aspiring to rent privately could constitute no more than 25% of gross household income and 30% of gross household income, as well as the 35% of gross household income base scenario.
- 6.12** In paragraph 020 of the PPG, it is noted that households should be considered against their ability to afford owner-occupation, where that is their aspiration. We have modeled for this in all scenarios; however, it is possible that the assumptions around tenure aspiration may underestimate the demand for owner-occupation. Therefore, for reference a scenario is also included that presumes all households aspire to owner occupation. The final column in the table shows the results of the affordable housing need model if all households were tested for their ability to afford market entry owner-occupation rather than market rents.
- 6.13** The table indicates that the net requirement would increase from 304 to 358 affordable homes per year in Swale if 30% of gross household income could be spent on housing costs. This would increase further to 426 affordable homes per year if 25% of income could be spent on housing costs. If it was presumed that home ownership was the market access point, then there would be a need for 442 affordable homes per year.

Table 6.4 Impact of different affordability assumptions on affordable housing requirement in Swale

	<i>For those not aspiring to home ownership, rent payable constitutes no more than:</i>			<i>Market entry is based only on owner-occupation for all households</i>
	<i>Affordability threshold: 35% of gross household income</i>	<i>30% of gross household income</i>	<i>25% of gross household income</i>	
Stage 1: Current gross need	2,318	2,577	2,794	2,654
Stage 2: Newly arising need	721	759	809	835
Stage 3: Current supply	2,169	2,203	2,169	2,169
Stage 4: Future supply	428	428	428	428
Stage 5.1 Net current need	149	375	625	485
Stage 5.2 Annual net current need	11	27	45	35
Stage 5.3 Total annual need	304	358	426	442

Source: Range of data – see appendix 2 for details

7. Requirements of specific groups

- 7.1 Paragraph 61 of the NPPF seeks that ‘... *that the needs of groups with specific housing requirements are addressed ...*’, and then paragraph 63 requires:

... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but not limited to, those who require affordable housing, families with children, older people (including those who require retirement housing, housing-with-care and care homes), students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

- 7.2 This chapter considers the profiles of the specific groups of the population. For each group the analysis will present the relative prevalence of the population, the current accommodation situation and information on their future requirements. As stated in Paragraph: 001 (Reference I D: 67-001-20190722) of the PPG, ‘*Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area.*’ Whilst the LTBHM model (set out in Chapter 5 above) considers all household groups within the model, the results can be broken down to show the accommodation requirements of certain household groups of interest. It should be noted that, in the PPG, housing needs assessments are divided into three different elements: ‘housing and economic needs assessments’, ‘housing needs of different groups’ and ‘housing needs of older and disabled people’. This chapter will contain information that meets the requirements within each of these.
- 7.3 The chapter looks at the following groups of the population which all have an appreciable impact on the housing market in Swale and there is notable new data on these groups available since the previous report:
- Older persons
 - People with disabilities
 - Family households
 - The private rented sector
- 7.4 This previous report also profiled people wishing to build their own homes, however there is no new data available on these groups that impacts on the conclusions drawn from the analysis presented in the report. This group will therefore not be profiled again, and the reader can cross-reference back to the previous LHMA for details on them.

Housing Needs of Older People

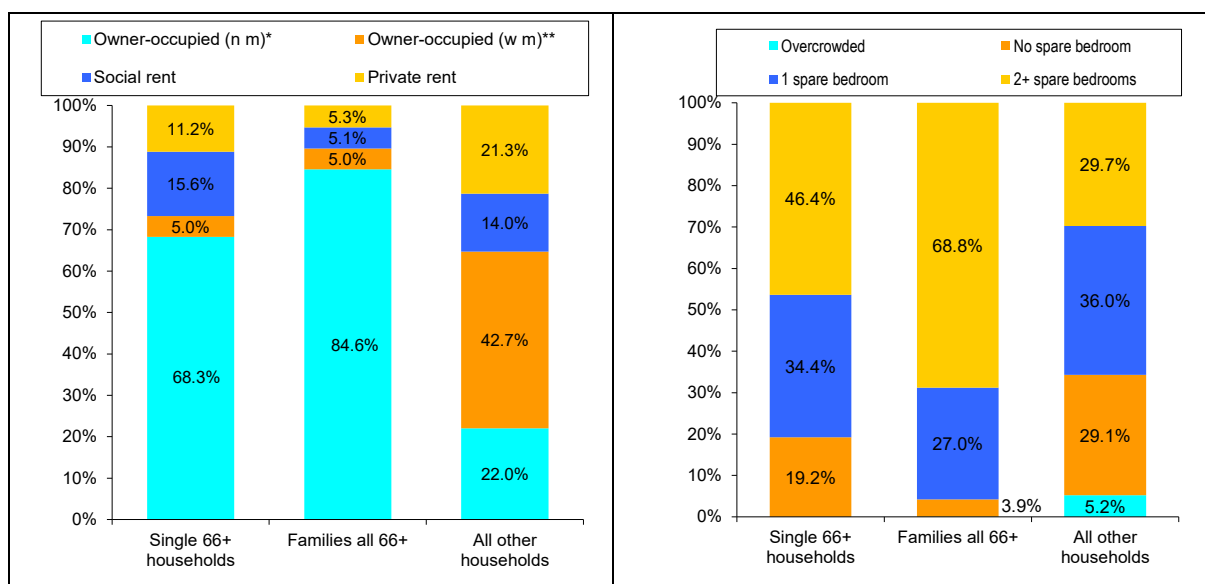
- 7.5 Paragraph: 001 of the PPG³⁵ recognises that *‘the need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing.... Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.’*
- 7.6 Page 76 of the NPPF provides the following definition of older people: *‘People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.’* The analysis of older people presented here will be focused on people aged 65 and over.

Current situation

- 7.7 The 2021 Census shows that some 19.1% of the population in the Borough were aged 65 or over. This compares to a figure of 19.4% across the South East region and 18.4% nationally. According to the 2021 Census, 23.1% of households in Swale were older person only households (households where all members are 66 and over), compared to 23.4% regionally and 22.0% nationally. Of these older person only households in Swale in 2021, 56.2% contained only one person, a figure lower than that recorded in the South East (56.6%) and England (58.3%).
- 7.8 The figure below shows the tenure profile of older person only households in Swale in 2021 compared to the remainder of the household population. The figures also set out the occupancy level of these groups. The results show that both of the older person groups record a higher level of owner-occupation than other households. Single older persons are also more likely to reside in social rented accommodation. Older person households were also more likely than average to have multiple spare bedrooms in their home.

³⁵ Reference ID: 63-001-20190626

Figure 7.1 Profile of accommodation for older person households in Swale



Source: 2021 Census *Owner-occupied no mortgage ** Owner-occupied with mortgage, includes Shared Ownership.

Future requirement

- 7.9 The disaggregated local housing need projections (set out in Chapter 5) indicate that the population aged 65 or over is going to increase notably in Swale over the modelling period; from 31,072 in 2025, to 39,550 in 2040, a rise of 27.3%. The projections also suggest that there will be an increase in the number of households headed by someone over 65 in Swale from 20,206 in 2025, to 26,050 in 2040, an increase of 28.9%. The projections indicate that the proportion of older persons living alone in Swale will increase from 44.5% in 2025, to 46.4% in 2040. The results of the LTBHM model can be disaggregated into different household groups within the whole population. The table below shows the projected accommodation profile for older person households in Swale in 2040 arising from that model.

Table 7.1 Type of accommodation projected for 'older person only' households in Swale in 2040*

Size of home	Owner occupied	Private rented	First Homes	Shared Ownership	Social/ Affordable Rented
1 bedroom	993	574	3	46	1,997
2 bedroom	6,807	960	1	27	1,006
3 bedroom	9,529	407	0	4	196
4+ bedrooms**	3,409	61	0	0	31
Total	20,738	2,002	4	76	3,229

*This represents housing demand within the market sector and includes a notable amount of under-occupying within the owner-occupied tenure, reflecting that some older persons households choose to remain in their home rather than downsize to a smaller property. **The requirement for four-bedroom homes reflects that there will multi-generational households headed by someone aged over 65 that will require a large dwelling and also that there will continue to be a small amount of under-occupation by older persons households (especially in the owner-occupied sector).

- 7.10 In line with the updated PPG that says '*offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems*' it will be necessary for the Council to consider how the requirements of these groups could be accommodated in the future. It is anticipated that the majority of older person households will reside in the general housing stock in Swale in 2040 (as they do now) so it is important that new housing is suitable for the widest range of groups.
- 7.11 There are a range of tools for achieving this, such as following the HAPPI³⁶ design principles so housing may be suitable for older people (although these design features will appeal more widely across the population), adoption of the Building for a Healthy Life 12³⁷ Standards (these are broad design principles) and adopting the Accessible and Adaptable Standards³⁸ of construction, as set out in the Building Regulations. The Council will need to determine which approach is most suitable for the Council's requirements and this may vary for different sites in the Borough.

Specialist accommodation

- 7.12 Given the notable growth in the older population, and the higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options. As Paragraph 004 of the PPG³⁹ notes '*the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed*'. This need has been assessed using the approach advocated by the Housing Learning and Improvement Network's (Housing LIN) Strategic Housing for Older People (SHOP) tool, which is the model recommended within Paragraph 004 of the PPG. It should be noted that this tool is only driven by demographic changes and does not consider people's choices or aspirations as to what form of accommodation they would prefer.
- 7.13 According to the latest published information and the latest Census data, there are 653 units of Sheltered housing for older people/retirement housing⁴⁰ in Swale currently, alongside 128 Extracare units/supported living housing⁴¹. It is worth noting that 67.7% of the Sheltered

³⁶ <https://www.housinglin.org.uk/Topics/browse/Design-building/HAPPI/>

³⁷ [BFL-2020-Brochure.pdf](#)

³⁸ See paragraph 63-009-20190626 of the PPG and <https://www.gov.uk/guidance/housing-optional-technical-standards>.

³⁹ Reference ID: 63-001-20190626

⁴⁰ A collection of self-contained units of accommodation (usual bedsits within a communal block), which have on-site warden support (usually daytime only with on call service at night) and communal social areas and activities. This is very similar to the housing type '*Retirement living or sheltered housing*' as defined in the PPG.

⁴¹ Extracare housing is similar to sheltered accommodation, but with enhanced provision for personal care of frailer older people. On-site support is usually provided on a 24 hour rather than daytime only basis. Extracare housing is often focused on addressing the needs of people with dementia. This housing type is similar to the '*Extra care housing or housing-with-care*' definition in the PPG.

housing for older people/retirement housing is in the affordable sector, as is all of the Extracare units/supported living housing, despite the overwhelming propensity of older persons only households to be owner-occupiers.

- 7.14 The current prevalence of Sheltered housing for older people/retirement housing in Swale is 42 per thousand head of population aged 75 or over, with the prevalence rate for Extracare units/supported living housing being 8 per thousand head of population aged 75 or over. The SHOP model helps authorities to plan to deliver more of this type of accommodation in response to the growth of the population that utilizes it (principally those aged 75 or over). The SHOP model uses these prevalence rates as the key variant when modelling future demand.
- 7.15 For the purposes of this study, it is presumed that these prevalence rates will move towards the latest trends in the occupation of this accommodation nationally. Demand for Extracare units/supported living housing has notably expanded as the demand for registered care (discussed below) has reduced. The target prevalence rates for Swale are 80 per thousand head of population aged 75 or over for Sheltered housing for older people/retirement housing and 25 per thousand head of population aged 75 or over for Extracare units/supported living housing.
- 7.16 To establish the potential demand for these accommodation types in Swale at the end of the modelling period, these target prevalence rates are applied to the total number of people aged 75 or over in Swale in 2040 according to the disaggregated local housing need projections. The demand that is derived is then compared to the current stock. This process is summarised in the table below. The future tenure profile of this specialist stock takes account of the modelling that indicates that over three quarters of all older person households will live in market accommodation in 2040, as evidenced in Table 7.1.
- 7.17 To meet likely future demand rates in 2040, the model identifies a requirement for 928 additional units of Sheltered housing for older people/ retirement housing and 267 additional Extracare units/ supported living housing in Swale over the modelling period. Of the 928 new units of Sheltered housing for older people/retirement housing, some 54.8% should be market accommodation, with the remainder affordable. Of the 267 new Extracare housing/ supported living housing, 58.9% should be market and 41.1% affordable. These are Class C3 dwellings.

Table 7.2 Projected requirement for specialist accommodation for older person households in Swale over the modelling period

<i>Type of specialist accommodation</i>	<i>Tenure</i>	<i>Base profile (2025)</i>	<i>Profile 2040</i>	<i>Additional units required</i>
Sheltered housing for older people/retirement housing	Market	211	719	508
	Affordable	442	862	420
	Total	653	1,581	928
Extracare housing/supported living housing	Market	0	157	157
	Affordable	128	238	110
	Total	128	395	267
All specialist accommodation for older person households	Market	211	876	665
	Affordable	570	1,099	529
	Total	781	1,976	1,195

- 7.18 The requirement for 1,195 additional specialist units for older person households represents 7.4% of the total household growth in Swale for the period 2025 to 2040. The actual numbers and type of specialist accommodation needed may depend on changes in patterns of demand and expectations. It is therefore appropriate to consider this level of need with the acknowledgement that the form of accommodation delivered should not be too prescriptive.
- 7.19 As well as the need for specialist housing for older people, there will also be an additional requirement for Registered Care⁴². According to the latest published figures, there are around 758 spaces in nursing and residential care homes in Swale currently. It is estimated that around 31% of these are in the affordable sector, with the remaining being market tenure.
- 7.20 As part of the process of projecting the future household typology within the disaggregation of the overall housing need figure (as described in Chapter 5), the population that will reside in communal establishments is calculated. The model identifies that, in 2040, there will be 1,118 people aged 65 and over in Swale that will be resident in Registered Care⁴³. This implies that there will be a requirement for 360 additional Registered Care spaces between 2025 and 2040, of which 55.9% should be in the affordable sector and 44.1% within a market tenure. The table below details these calculations.

⁴² Residential care homes and nursing homes: These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes. This is the same as the definition in the PPG.

⁴³ This figure is dependent on the communal population rates (separated by age and gender), that have been produced through to 2040 as part of the 2018-based household projections dataset, which has been adjusted to reflect what the 2021 Census showed was the situation in Swale. The Census revealed that nationally demand for registered care has reduced amongst older persons between 2011 and 2021.

Table 7.3 Projected requirement for Registered Care for older persons in Swale over the modelling period

<i>Tenure</i>	<i>Base profile (2025)</i>	<i>Profile 2040</i>	<i>Additional units required</i>
Market	520	679	159
Affordable	238	439	201
Total	758	1,118	360

- 7.21 The table below brings together the analysis, presented in the previous three tables, to show the full profile of accommodation required by older persons in Swale at the end of the modelling period.

Table 7.4 Type of accommodation required for older persons in Swale in 2040

<i>Size of home</i>	<i>Market</i>			<i>Affordable</i>		
	<i>General housing*</i>	Sheltered housing/retirement housing	Extra care housing/supported living housing	<i>General housing*</i>	Sheltered housing/retirement housing	Extra care housing/supported living housing
1 bedroom	1,147	331	89	1,273	596	177
2 bedrooms	7,312	388	68	707	265	61
3 bedrooms	9,935	-	-	199	-	-
4+ bedrooms	3,470	-	-	31	-	-
Total in households	21,864	719	157	2,210	862	238
Residential care	679			439		

This includes 'age-restricted general market housing' as defined in the PPG (the type of housing is generally for people aged 55 and over and the active elderly) as well as general housing available to all people. This analysis is focused only on those where all household members are aged 65 or over, there is likely to be additional requirement for age-restricted general market housing from those aged between 55 and 64.

- 7.22 The majority of older person households in Swale are likely to remain in general housing, as the Paragraph 012 (ID: 63-012-20190626) of the PPG notes '*Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs.*' The next section looks at the role of adaptations to help households remain in their own home.
- 7.23 It should be noted that the general housing that older people aspire to reside in includes age-restricted general market housing. This is non-specialist housing located on sites that are exclusively used by older people, typically those aged 55 or over. It is hard to gauge the future demand for this accommodation as there is limited evidence of the current supply in Swale, however it is envisaged that this will increase as the population ages over the modelling period and the Council should monitor whether the existing provision is able to meet demand.

People with disabilities

- 7.24 Paragraph: 002 of the PPG⁴⁴ notes that *‘The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in ensuring that they live safe and independent lives.... Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives.’* Page 70 of the NPPF provides the following definition of disabled people: *‘People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.’* Due to a lack of accurate data on the individual groups within this population, the analysis in this section will consider all those with a specific need unless otherwise stated.

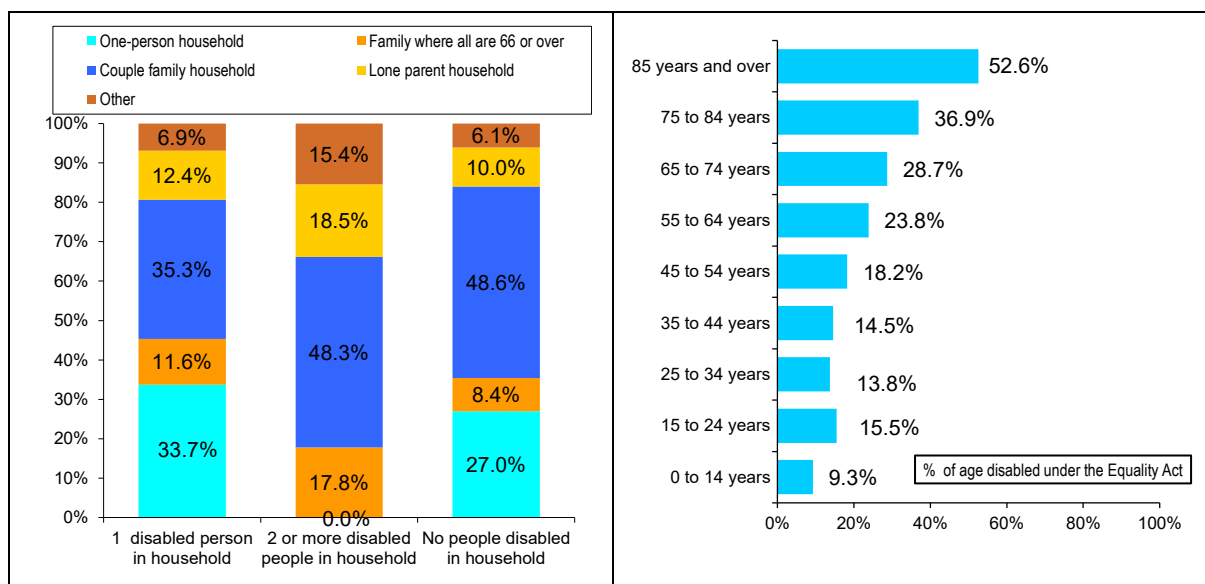
Current situation

- 7.25 As is noted in paragraph 005 (Reference ID: 63-005-20190626) of the PPG, *‘Multiple sources of information may need to be considered in relation to disabled people who require adaptations in the home, either now or in the future. The Census provides information on the number of people with a long-term limiting illness.’* The 2011 Census collected data under this definition, however the 2021 Census has collected slightly different data on disability. It identified people who were disabled under the Equality Act, separated between those whose day-to-day activities were limited a lot and those whose day-to-day activities were limited a little, and those not disabled under the Equality Act but who have a long term physical or mental health condition that limits their day-to-day activities. The data from the 2021 Census is therefore used as a starting point.
- 7.26 The Census shows that, in 2021, some 19.5% of the resident population in Swale are disabled under the Equality Act, compared to 16.1% in the South East and 17.3% nationally. Further analysis shows some 42.8% of all residents disabled under the Equality Act in Swale had a condition that limited day-to-day activities a lot, with 57.2% having a condition that limited activities a little. In the South East, 38.8% of all residents disabled under the Equality Act had a condition that limited day-to-day activities a lot and 61.2% had a condition that limited activities a little, with the equivalent national figures being 42.4% and 57.6% respectively. Finally, the 2021 Census shows that 7.3% of residents in Swale are not disabled under the Equality Act but have a long term physical or mental health condition but day-to-day activities are not limited, compared to 7.5% regionally and 6.8% nationally.
- 7.27 The figure below shows the household profile of people disabled under the Equality Act in Swale in 2021 compared to the remainder of the population. The figure also sets out the prevalence of a disability in the different age groups of the population. The results show that

⁴⁴ Reference ID: 63-002-20190626

in Swale, some 33.7% of households with a single disabled resident are one person households, whilst households with two or more disabled people are more likely than average to be a family in which every member is 66 and over. The analysis also reveals a strong correlation between age and disability.

Figure 7.2 Household type and age profile of people disabled under the Equality Act in Swale



Source: 2021 Census

Number of people in receipt of relevant benefits

- 7.28 The PPG indicates that an up-to-date estimate of the number of people with a disability can be acquired by looking at the number of people in an area that are in receipt of Personal Independence Payment or Attendance Allowance. Personal Independence Payment (PIP) helps with some of the extra costs caused by long-term disability, ill-health or terminal ill-health. Data from the Department of Work & Pensions indicates that, as at January 2026, there were 12,222 people in Swale in receipt of PIP, which equated to 7.6% of the population in the Borough. In comparison, some 4.7% of the population across the South East and 6.2% of the population of England were in receipt of PIP.
- 7.29 Attendance Allowance is a benefit for people over the age of 65 who are so severely disabled, physically or mentally, that they need a great deal of help with personal care or supervision. The Department of Work & Pensions data shows that, as at August 2025, there were 4,653 people in Swale in receipt of Attendance Allowance, which equated to 2.9% of the population in the Borough. In comparison, some 2.6% of the population in the South East and 2.8% of the population nationally were in receipt of Attendance Allowance.
- 7.30 The PPG notes that *'whilst these data sources can provide a good indication of the number of disabled people, not all of the people included within these counts will require adaptations in the home.'*

Projected health of the future population

- 7.31 The Projecting Older People Information System (POPPI) website⁴⁵ and the parallel Projecting Adult Needs and Service Information (PANSI) website⁴⁶ model the current and likely future incidence of a range of health issues for each authority in England. The table below sets out the number of people estimated to have one of five health conditions currently as determined by these data sources. The table also indicates the number of people projected to have these conditions in 2040, derived by applying the future prevalence rates used by the POPPI and PANSI modelling to the disaggregated future population for Swale in 2040, as identified within the local housing need calculation. The table then goes on to report the current and future population in Swale that require assistance with activities. These figures are derived using the same approach as described for the health condition modelling. The data from PANSI and POPPI is based on current and recent prevalence rates and, whilst these may vary in the future, the figures provide a useful baseline estimate.
- 7.32 The table shows that the number of those aged 65 or over disabled under the Equality Act, is expected to increase by 28.7% between 2025 and 2040 in Swale. This compares to an increase of 15.6% in the number of people aged 18-64 in the Borough with impaired mobility, a rise of 18.9% in the number of people aged 18-64 in Swale with a common mental health disorder, an increase of 42.0% in the number of people aged 65 or over with dementia⁴⁷, and an increase of 21.1% in the number of people in Swale with a moderate or severe learning disability.
- 7.33 The table also shows that the number of those aged 65 or over that are unable to manage at least one mobility activity on their own, is expected to increase by 49.8% between 2025 and 2040, compared to an increase of 60.7% in the number of people aged 65 and over who need help with at least one domestic task, an increase of 46.2% in the number of people aged 65 and over who need help with at least one self-care activity and an increase of 15.6% in the number of people aged 18-64 with a serious personal care disability. It should be noted that these changes better reflect the projected change in the demographics of the population (an ageing population) rather than a notable change in the overall health of people.

⁴⁵ <https://www.poppi.org.uk/>

⁴⁶ <https://www.pansi.org.uk/>

⁴⁷ Paragraph 019 (Reference ID: 63-019-20190626) of the PPG notes that 'Evidence has shown that good quality housing and sensitively planned environments can have a substantial impact on the quality of life of someone living with dementia. People with dementia need to have access to care and support to enable them to live independently and homes need to be designed with their needs in mind.'

Table 7.5 Number of people with particular health issues projected over the modelling period in Swale

Condition	2025	2040	Total change	% change
Health condition				
People aged 65 or over disabled under the Equality Act	10,781	13,870	3,089	28.7%
People aged 18-64 with impaired mobility	7,607	8,790	1,183	15.6%
People aged 18-64 with a common mental health problem	17,775	21,140	3,365	18.9%
People aged 65 and over with dementia	2,116	3,004	889	42.0%
People all ages with a learning disability	3,071	3,719	647	21.1%
People requiring assistance with activities				
People aged 65 and over that are unable to manage at least one mobility activity on their own*	4,967	7,441	2,474	49.8%
People aged 65 and over who need help with at least one domestic task**	7,198	11,568	4,370	60.7%
People aged 65 and over who need help with at least one self-care activity***	7,815	11,424	3,609	46.2%
People aged 18-64 with a serious personal care disability****	834	965	130	15.6%
All people	159,823	185,646	25,823	16.2%

*Activities include going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed. **These are activities which, while not fundamental to functioning, are important aspects of living independently such as doing routine housework or laundry, shopping for food, doing paperwork or paying bills. ***These are activities relating to personal care and mobility about the home that are basic to daily living. ****Their physical disability means that they require someone else to help from getting in and out of bed, or getting in and out of a chair, dressing, washing, feeding, and use of the toilet. Source: The Projecting Older People Information System and Projecting Adult Needs and Service Information, 2025, disaggregated local housing need figures, 2025.

Accessible and adaptable housing

- 7.34 The Nationally Described Space Standards (which set out national minimum space standards) published by the Department for Communities and Local Government in 2015⁴⁸ detail the minimum gross internal floor areas required in new dwellings and also the size of storage area required. The Nationally Described Space Standards also provide detail on the requirements

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

of dwellings to meet the Accessible and Adaptable dwellings M4(2) and Wheelchair user dwellings M4 (3) standards⁴⁹.

- 7.35 Paragraph 008 of the PPG⁵⁰ sets out that ‘*Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future.*’ The same paragraph then goes on to clarify that ‘*accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs.*’
- 7.36 The PPG⁵¹ also details the data sources that can be used to provide evidence of the need in local planning authorities for dwellings that meet higher accessibility, adaptability and wheelchair housing standards. All of these have been researched, and whilst some have been used to provide the contextual information presented above, others have been used to model the future requirement for adaptable and accessible housing. The most important data input into the model is the CORE LA Area Lettings Reports which provide details about the accessibility requirements of those that have moved into affordable accommodation – both general needs and specialist homes. The other data sources used in the model include the age profile of people in receipt of Disability Living Allowance in the Borough, the Council’s housing register, LTBHM modelling outputs on the current and future tenure profile of different household groups, the POPPI and PANSI projections (set out above) and analysis in the English Housing Survey.
- 7.37 The steps followed in the model to derive the future requirement for adaptable and accessible housing are set out below:
- The CORE LA Area Lettings Reports for the last three years (2022/23 to 2024/25) were examined and the total number of lettings that required a home to meet a mobility need was totalled alongside the total number of lettings (of all types). This was done within the general housing stock and separately within the supported housing⁵² stock.
 - It is presumed that all of the requirement for adapted housing in the supported housing stock is from older persons households. To determine the requirement for adapted housing within the general stock that arises from households over 65, the proportion of adults in receipt of the higher rate of the Disability Living Allowance that are aged

⁴⁹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_P_DF_AD_M1_2015_with_2016_amendments_V3.pdf

⁵⁰ Reference ID: 63-008-20190626

⁵¹ Reference ID: 56-007-20150327

⁵² Supported housing in this context refers to specialist housing for households (mainly older person households), such as that listed in Table 7.2.

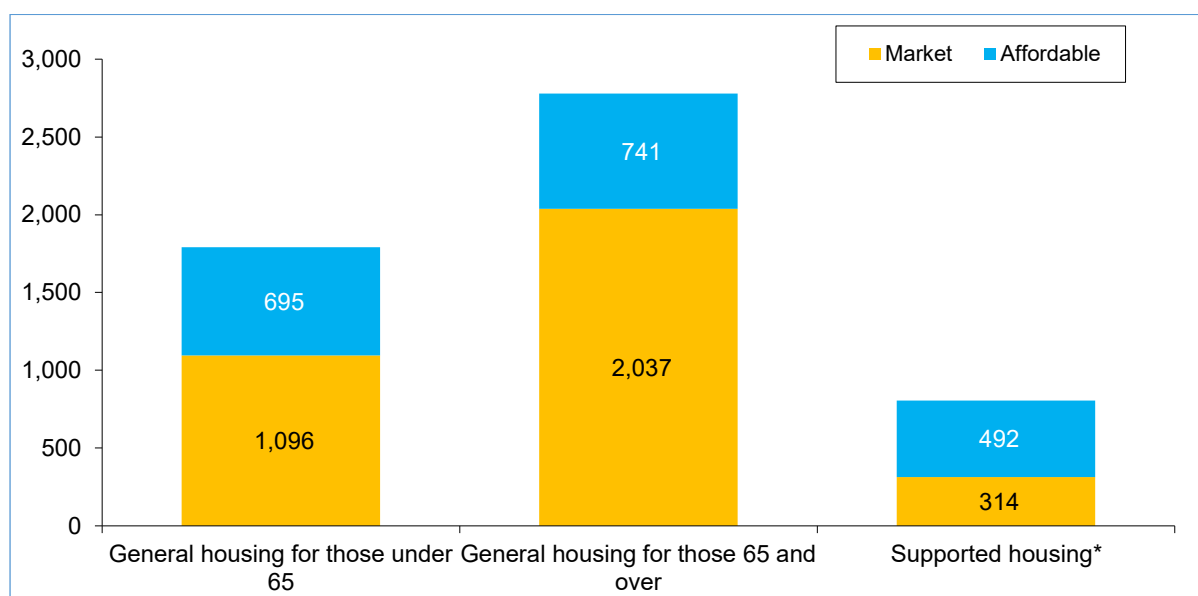
65 or over in the authority, as at November 2025, is calculated using the data published by the Department for Work and Pensions⁵³. In Swale this figure is 68.2%. It is therefore presumed that this proportion of the demand for adapted housing within the general stock arises from households over 65, with the remainder arising from younger households.

- The total of the number of lettings of adapted housing over the last three years to these three groups; (those in sheltered accommodation, older person households in general housing and households under 65 in the general stock) are then compared to the total number of lettings to each of these groups over the last three years, to generate a requirement rate for adapted housing for these three household groups in the affordable sector.
- To produce an equivalent requirement rate for adapted housing amongst the same groups of households resident in the market sector, the rate identified for each of these three groups in the affordable sector is adjusted by the difference between the proportion of affordable homes with adaptations nationally and the proportion of market homes with adaptations nationally as recorded by the Survey of English Housing.
- The requirement rate for these three groups across the two broad tenures are then applied to the total number of households in these groups in 2025 as indicated by the LTBHM model. This provides an estimate of the current requirement for accessible and adaptable housing, differentiated both by the three household groups and the two broad tenures.
- To profile the future requirement, the total number of households under 65 in the general stock that require an adapted home currently is multiplied by the projected change in the number of people aged 18-64 with an impaired mobility in Swale as modelled using the PANSI data set out in Table 7.5 above.
- The total number of households aged 65 and over in the general stock that require an adapted home currently is multiplied by the projected change in the number of people aged 65 and over that are unable to manage at least one mobility activity on their own in Swale as modelled using the POPPI data set out in Table 7.5 above. The total number of households in sheltered accommodation that require an adapted home currently is also multiplied by this figure derived from the POPPI modelling.
- This provides a total requirement for accessible and adaptable housing in 2040 in Swale for the three different household groups. These are then divided by tenure, based on the tenure profile of these groups recorded in 2025, but also taking account of the changes in the tenure profile for each group that are projected to happen by 2040 according to the LTBHM model.

⁵³ <https://stat-xplore.dwp.gov.uk>

7.38 The figure below shows the final results of this model.

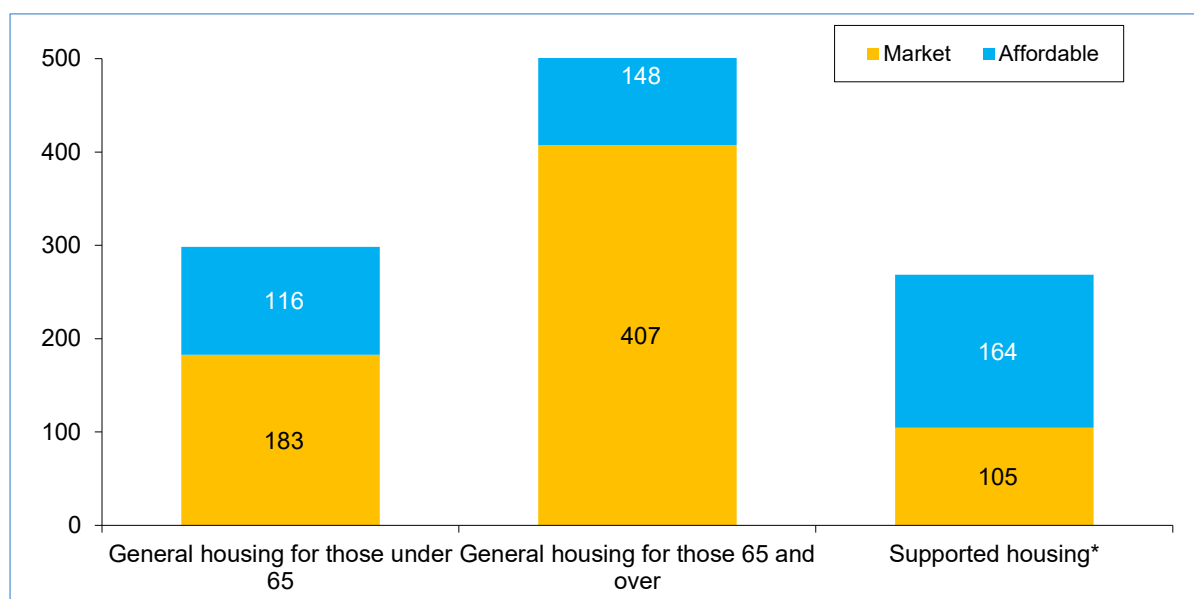
Figure 7.3 Number of accessible and adaptable homes required in Swale in 2040



*Supported housing is specialist housing for older person households, such as those listed in Table 7.2.

- 7.39 The figure indicates the requirement, for accessible and adaptable homes, in Swale in 2040, differentiated by setting, age group and tenure. In total, 5,376 accessible and adaptable homes are required in 2040 in Swale, of which 3,447 should be in the market sector and 1,929 in affordable accommodation. Of the 5,376 accessible and adaptable homes required, 4,570 should be in the general housing stock and 806 in supported accommodation.
- 7.40 The outputs of the LTBHM model and the older person accommodation modelling have compared the future requirement with the current stock to identify the net change required to be delivered over the modelling period. Whilst the future requirement for accessible and adaptable homes has been identified, there is limited information on the number of dwellings that fulfil this criteria in Swale currently, and therefore there is not a detailed profile of the current stock from which to derive a net requirement.
- 7.41 Overall, the requirement for 5,376 accessible and adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently and, that by the end of the modelling period, around 8.4% of the total stock should be available to meet this criteria. This is an estimated requirement for M4(2) Category 2 accessible and adaptable homes.
- 7.42 There is also a requirement for M4(3) Category 3 homes - wheelchair user dwellings. Using the same data sources (but focusing on the requirement for a fully wheelchair accessible housing within those that require a property with mobility adaptations as indicated in the Council's housing register), it is possible to follow the same method to produce equivalent results that identify the future requirement for a wheelchair accessible home in Swale in 2040.

Figure 7.4 Number of wheelchair user dwellings required in Swale in 2040



*Supported housing is specialist housing for older person households, such as those listed in table 7.2.

- 7.43 The figure indicates the requirement for wheelchair user dwellings in Swale in 2040, differentiated by setting, age group and tenure. In total, 1,123 wheelchair user dwellings are required in 2040 in Swale, of which 695 should be in the market sector and 428 in affordable accommodation. Of the 1,123 wheelchair user dwellings required, 854 should be in the general housing stock and 269 in supported accommodation. Overall, the requirement for 1,123 wheelchair user dwellings will mean that, by the end of the modelling period, around 1.58% of the total stock should be available to meet this criteria.
- 7.44 It is important to note that the PPG⁵⁴ is clear that the suitability of these requirements should be assessed to determine whether they are viable, and also that the authority should not impose any further requirements to the building regulations beyond what is set out in the building regulations for M4(2) and M4(3) dwellings.

Adaptations and support

- 7.45 In addition to specialist accommodation, the Council helps people to remain in their current home by providing support and assistance. Any adaptations to dwellings provided through this mechanism could reduce the requirement for new homes meeting the M4(2) standard, depending on the nature of the adaptation work completed. In this context, paragraph 005 of the PPG⁵⁵ notes that '*Applications for Disabled Facilities Grant (DFG) will provide an indication of levels of expressed need, although this will underestimate total need, as there may be a large number of people who would want or need an adaptation, but would not have applied to*

⁵⁴ Reference IDs: 56-003-20150327 & 56-008-20160519

⁵⁵ Reference ID: 63-005-20190626

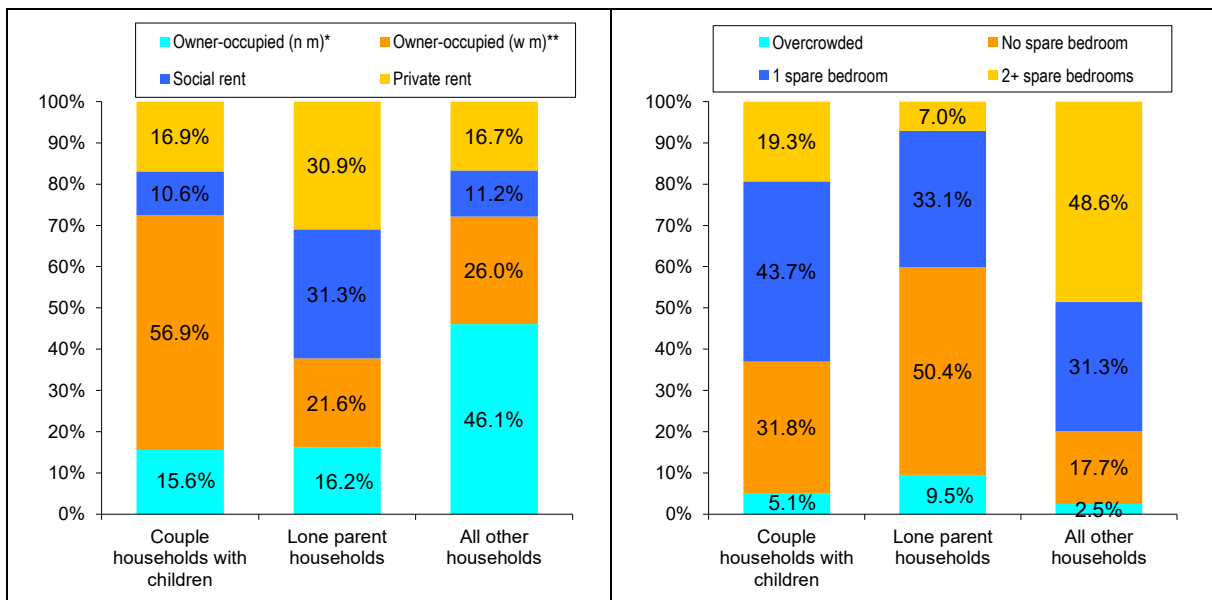
the DFG. The provision of M4(2) homes would reduce the need for these adaptations to be applied to existing dwellings retroactively and make the housing stock more responsive to the evolving needs of the local population.

Families with children

Current situation

- 7.46 The Census provides detail on the housing situation of households with children at a local level. It is worth noting that in 2021, according to the Census, 38.7% of households in Swale were families with children, a figure higher than both the regional average (36.8%) and the national average (36.3%).
- 7.47 The figure below shows the tenure profile of the two main types of 'family with children' households in Swale in 2021 compared to the remainder of the household population. The figure also set out the occupancy level of these groups.
- 7.48 The data shows that there are notably fewer owner-occupiers with no-mortgage amongst couple households with children than amongst other households in Swale. Lone parents are notably more likely than other households to be in both Social Rented and private rented accommodation. Family households with children are also more likely to be overcrowded and less likely to be under-occupied in Swale.

Figure 7.6 Profile of accommodation for family households in Swale



Source: 2021 Census *Owner-occupied no mortgage ** Owner-occupied with mortgage, includes Shared Ownership.

Future requirement

- 7.49 The disaggregated local housing need projections indicate that the total population of families with children is going to rise from 24,718 in 2025 to 27,627 by 2040, a growth of 10.3%. It is

estimated that the proportion of lone parent families within this group will grow from 29.4% in 2025 to 30.8% in 2040.

- 7.50 The table below shows the projected accommodation profile for family households in Swale in 2040 derived from the LTBHM model, presuming that households do not have to reside in overcrowded accommodation. This identifies that intermediate housing will be particularly useful for family households. It is estimated that, by 2040, 51.5% of Shared Ownership dwellings and 60.3% of First Homes will be occupied by family households.

Table 7.6 Type of accommodation projected for households with dependent children in 2040 in Swale

<i>Size of home</i>	<i>Owner occupied</i>	<i>Private rented</i>	<i>First Homes</i>	<i>Shared Ownership</i>	<i>Social/ Affordable Rented</i>
1 bedroom	0	0	0	0	0
2 bedroom	1,975	537	28	290	1,646
3 bedroom	10,082	1,029	108	430	2,950
4+ bedrooms	6,660	531	187	182	632
Total	18,717	2,097	323	901	5,228

The private rented sector (PRS)

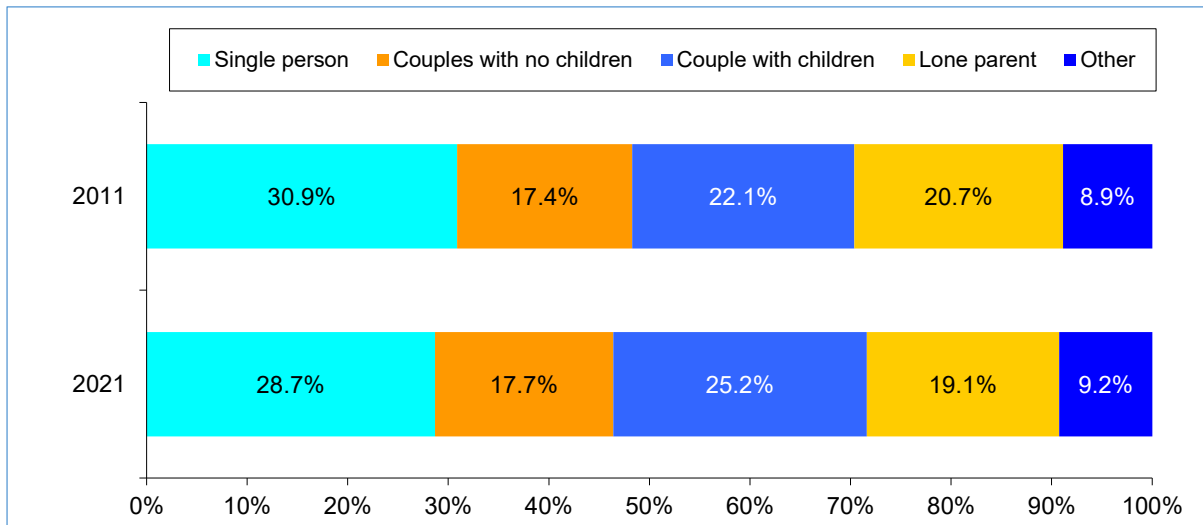
Growth

- 7.51 The current tenure profile in the Borough was modelled as part of the LTBHM model. This estimated that there are 20,079 private rented households in Swale in 2025, which represents 17.5% of households in the Borough. The private rented sector (PRS) is becoming increasingly important in Swale; as shown in Figure 2.13, the data indicates that it increased by 21.9% in the Borough between 2011 and 2021 and at a greater rate than was recorded regionally and nationally. The proportion of households in the private rented sector in Swale is lower than in the South East and England as a whole.

Those resident in the tenure

- 7.52 The figure below compares the household composition of the private rented sector in Swale in 2021, with the profile of households who are resident in the private rented sector in Swale in 2011. The data shows that not only has the tenure grown, but it has become more diverse with a decrease in the common household group, single persons, and an increase in all other household types within the sector (with the exception of lone parent households which have also reduced).

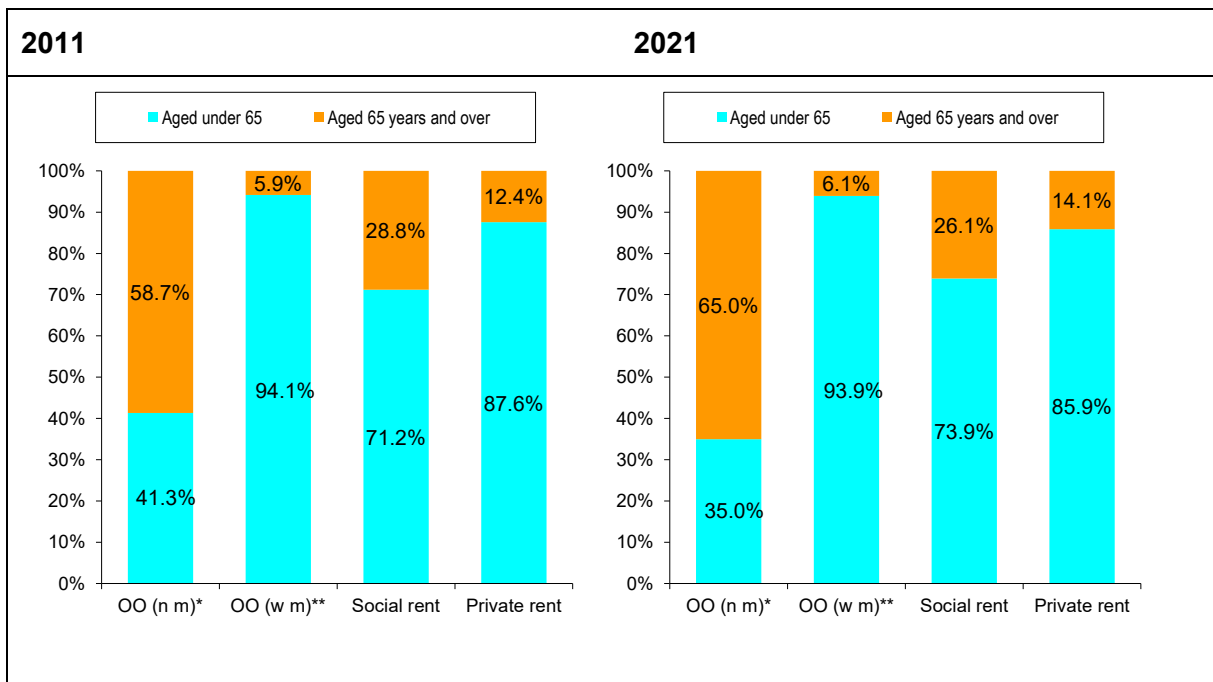
Figure 7.7 Change in the household composition of the PRS in Swale



Source: 2011 and 2021 Census

- 7.53 The figure below shows that whilst the private rented sector has diversified, it is still notably unlikely to be occupied by older households, with over 85% of household reference persons aged 64 or under. The proportion of older households in this tenure has however increased between 2011 and 2021.

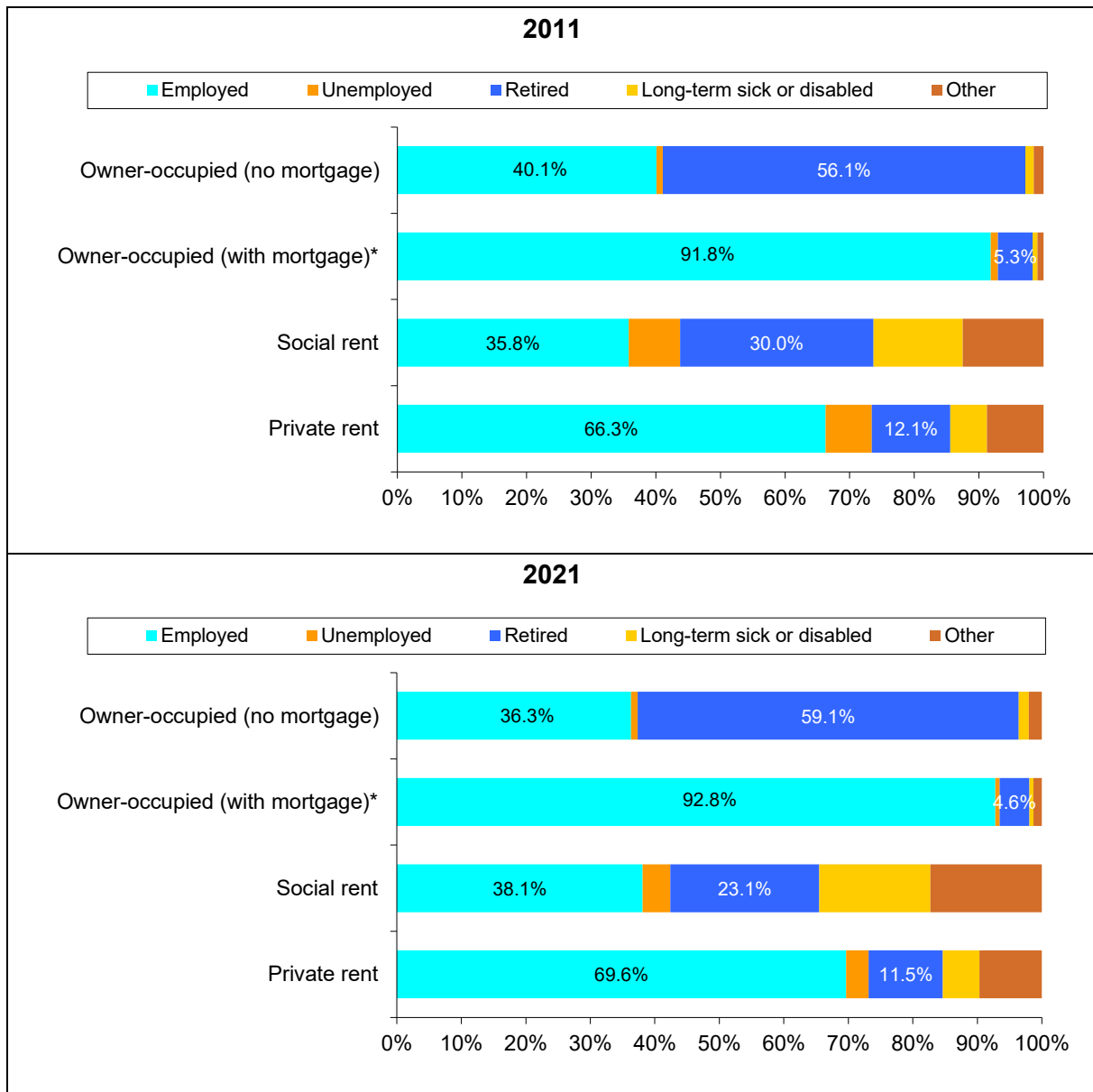
Figure 7.8 Age of household reference person within each tenure in Swale, 2011 & 2021



Census *Owner-occupied no mortgage ** Owner-occupied with mortgage, includes Shared Ownership. Source: 2011 and 2021 Census

- 7.54 The figure below shows that whilst the majority of household heads in the private rented in Swale are in work, there are a number where the household head is unemployed or retired. It is also clear that the proportion of employed household heads in the private rented sector has increased slightly over the last decade.

Figure 7.9 Change in the economic activity of household reference person by tenure in Swale, 2011 to 2021



*Includes Shared Ownership, Source: 2011 and 2021 Census

- 7.55 The LTBHM model set out earlier has been used to model the future housing market. This indicates that the private rented sector is likely to grow further in importance in Swale over the plan-period with the number of homes in the tenure projected to increase by 1,84 households by 2040, a growth of 15.0%.

Current trends

- 7.56 The PPG suggests that ‘*market signals reflecting the demand for private rented sector housing could be indicated from the level of changes in rents.*’ Therefore, to assess the stability of the sector currently it is useful to consider how the private rent levels charged vary over time. The table below shows the change in mean private rents over the last five years. This data is disaggregated by accommodation size and location. The table shows for example that, between 2021 and 2026, mean two bedroom rents increased by 30.1% in Swale.
- 7.57 Overall, the data suggests that the private rented sector is not under unusual pressure in Swale, as rent levels have not risen at a greater rate to that recorded regionally and nationally. The rises in one and three bedroom rents in Swale are overall the highest, but there is not a great difference between different size homes.

Table 7.7 Change in mean private rents charged in Swale, the South East and England between 2021 and 2026

Area	One bedroom	Two bedrooms	Three bedrooms	Four+ bedroom
Swale	30.8%	30.1%	30.8%	28.2%
South East	31.9%	30.9%	31.7%	29.7%
England	32.7%	32.3%	33.3%	31.3%

Source: Office of National Statistics, February 2021 and February 2026

The benefit-supported private rented sector

- 7.58 Data available from the Department of Work & Pensions⁵⁶ indicates that there were 5,763 households in the private rented sector in Swale who were either in receipt of Housing Benefit or were receiving the Housing Element of Universal Credit in November 2025. This represents 48.1% of all households in the tenure and is notably higher than the equivalent proportion of households in the sector both regionally and nationally (some 30.1% of private rented households in the South East were in receipt of one of these benefits as were 33.3% of private rented households across England).
- 7.59 Further analysis shows that the number of private rented tenants in receipt of assistance with their housing costs in Swale has increased by 10.9% between 2020 and 2025, in comparison to a regional reduction of 4.1% and a national decrease of 4.3% over the same period.
- 7.60 It is important to recognise the role that the benefit-supported private rented sector plays in alleviating the pressure on the affordable housing stock, by housing some households that would otherwise be resident within the sector; however, it is not an official form of affordable housing as defined by the NPPF. In addition, a comparison of the entry-level private rents with the LHA caps, as set out in Chapter 3, showed there is a notable gap between the two.

⁵⁶ <https://stat-xplore.dwp.gov.uk>

The housing costs of households in need would not be fully met if they were to reside in this sector, as noted earlier in Chapter 3.

8. Conclusions and Summary

8.1 Chapter 4 documented the derivation of the overall housing need in Swale following the revised Standard Method set out in paragraph 004 of the PPG⁵⁷. This indicated that the requirement is for 1,071 dwellings per year which equates to 16,065 new homes over the 15-year plan-period (2025 to 2040). The report has not found any evidence to suggest that the Standard Method should be deviated from in Swale.

8.2 The report has presented two main models, the Long Term Balancing Housing Markets (LTBHM) model (Chapter 5), which disaggregates the revised Standard Method local housing need calculations to identify the tenure and size of housing that should be sought over the plan period to best accommodate the future population, and the Affordable Housing Need model (Chapter 6), an unconstrained estimate of the amount of affordable housing required. The affordable housing need figure is calculated in isolation from the rest of the housing market and is only used to indicate whether the Standard Method local housing need figure should be increased. On completion of the calculation of the need for affordable housing paragraph 024 of the PPG⁵⁸ says:

'The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.'

8.3 Planning Authorities should consider whether the housing target in the Local Plans should be increased to assist with meeting the need for affordable housing. Once this has been established, the future mix of all housing required over the plan-period should be identified. In accordance with the PPG this is derived using a separate approach.

8.4 The total annual affordable housing need in Swale of 304 per year (as set out in Chapter 6) represents 28.4% of the annual planned growth in the Borough of 1,071 dwellings per year. It would be reasonable to expect this proportion of new housing as affordable to be delivered on housing sites in Swale, where a figure of 30% would be plausible (subject to viability).

8.5 To determine the size and tenure of the new housing required within the Standard Method local housing need to accord with the PPG, the LTBHM model outputs are used (the change required between 2025 and 2040). This model provides the profile of housing appropriate to meet the population over the plan-period and is directly derived from the calculations used to determine the Standard Method local housing need.

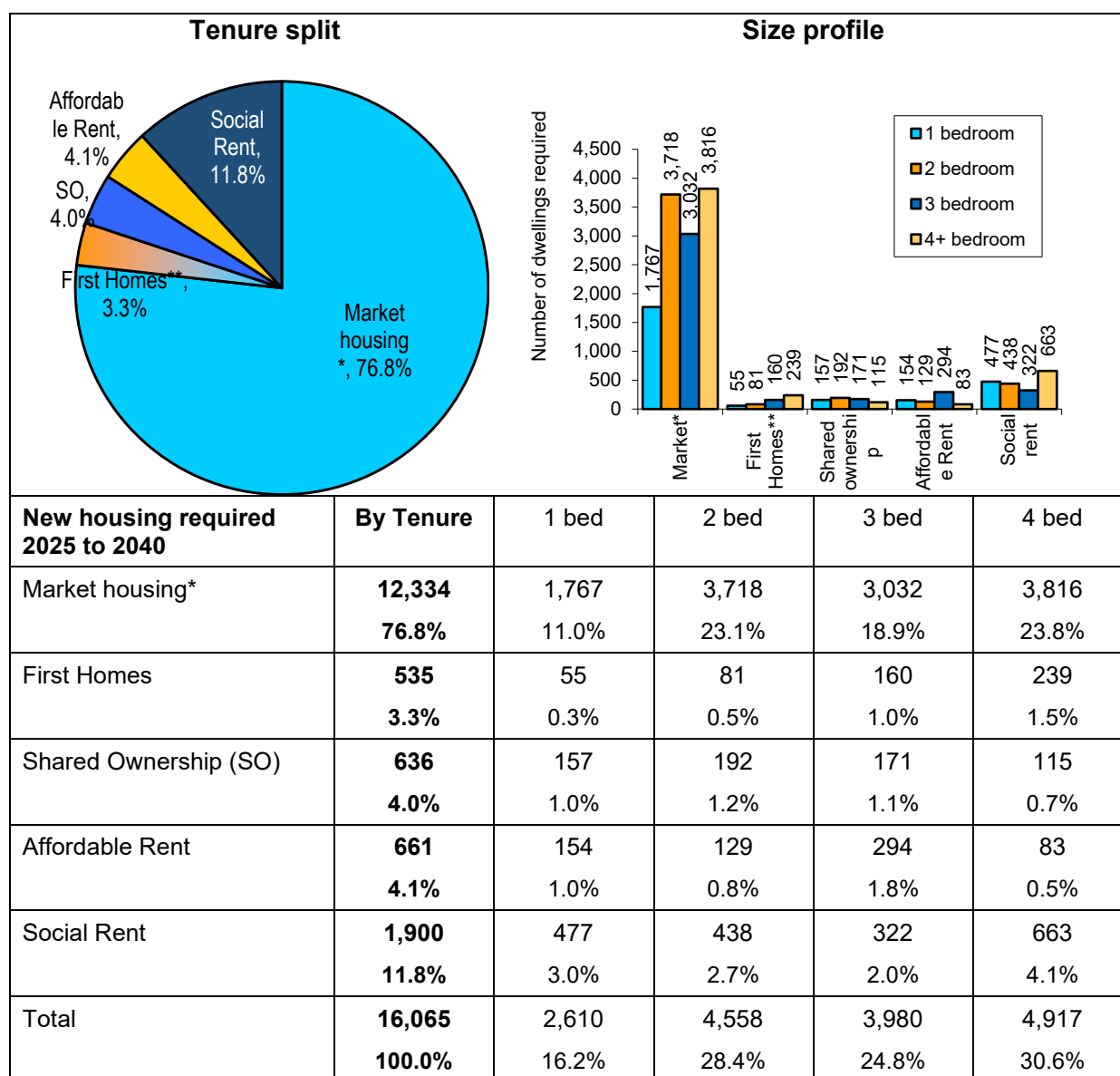
⁵⁷ Reference ID: 2a-004-20241212

⁵⁸ Reference ID: 2a-024-20190220

- 8.6 Figure 8.1 sets out the size and tenure requirement for the 16,065 dwellings (1,071 per annum) to be delivered between 2025 and 2040. The overall requirement for 15.9% of housing to be Affordable Rented/ Social Rented and 7.3% affordable home ownership (of which 4.0% could be Shared Ownership⁵⁹ and 3.3% First Homes) reflects the mix of housing that would best address the needs of the local population. It does not take into account the funding that will be available to help provide subsidised housing. The First Homes requirement will only be realised if First Homes are made available at the prices identified in Chapter 3. If this is not possible then Shared Ownership is a more suitable tenure.
- 8.7 Within the Affordable Rented/ Social Rented sector it is clear that Social Rented housing is notably cheaper than Affordable Rent. The affordability analysis of households requiring affordable housing presented in chapter 5 indicates that around 79% of all affordable housing at the end of the plan-period in 2040 should be Social Rented with the remainder Affordable Rented. Social Rented accommodation is appropriate for the majority of households in this sector.
- 8.8 The profile set out is a guide to the overall mix of accommodation required in Swale although it is acknowledged that the Council may wish to divert away from this profile in particular instances. It should also be noted that the potential demand for First Homes is less robustly evidenced than for the other tenures and should therefore be treated with caution.

⁵⁹ Shared Ownership refers to the version with a 25% equity share as this has been evidenced to cost less than market entry housing in Chapter 3.

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



*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

8.9 Chapter 7 considered the housing requirement of particular groups of the population. Paragraph 006 of the PPG⁶⁰ notes that ‘*Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people....They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.*’

⁶⁰ Reference ID: 63-006-20190626

- 8.10 In terms of specialist dwellings for older persons (Class C3), it is evidenced that in Swale, 928 additional units of Sheltered housing for older people/ retirement housing⁶¹ and 267 additional Extracare units/ supported living housing⁶² are required over the plan-period within the housing target (they form part of the 1,071 dwellings per year). Chapter 7 also identifies that an additional 360 Registered Care spaces (nursing and residential care homes) will be required over the next 15 years in Swale (Class C2). These units are required in addition to the 1,071 new homes required each year. There is also a notable potential demand for age-restricted general market housing (which will also form part of the 1,071 new homes required each year).
- 8.11 In addition, it is calculated that adapted housing M4(2) Category 2 will be required for 5,376 households by 2040 in Swale, of which around 1,123 dwellings should be M4(3b) Category 3 homes - wheelchair adaptable dwellings.

⁶¹ See footnote 51.

⁶² See footnote 52.

Appendix 1. Details of the NMSS model

Overview

The NMSS model is an Excel spreadsheet model which seeks to replicate as closely as is reasonably practicable the methods used by MHCLG and ONS in producing the official population and household projections. It was developed by Neil McDonald to support local authorities and others in estimating objectively assessed housing needs. It has been widely used in Local Plan preparation; Local Plan examinations; and S78 planning appeals and inspectors have been happy to rely on its conclusions.

The model takes as its starting point a set of official projections – current the 2022-based projections. It is a ‘stepping model’ which means it takes one year’s population figures and estimates of births, deaths and migration flows in the ensuing 12-month period to produce an estimate of the following year’s population. That process is then repeated year by year until the end of the projection period is reached.

The estimates of births, deaths and migration flows are based on flow rates derived from official projections and these can be adjusted to produce variant projections. The flow rates are applied to the previous year’s population which means that if the model is being used to explore, say, the consequences of assuming higher outflows of students than envisaged in the official projections, the impact this will have on births, deaths and migration flows is automatically taken into account.

Appendix 2. Detail of the calculation of the affordable housing need

This appendix sets out the results of the three broad stages of the model used to calculate affordable housing need. Within each of the three stages there are a number of detailed calculations many of which themselves have a number of components. This appendix presents details of how each of these stages is calculated using locally available data for Swale.

Stage 1: Current unmet gross need for affordable housing

The first stage of the model assesses current need. This begins with an assessment of housing suitability, before the affordability test is applied to determine the number of these households that require affordable housing and are therefore in current need.

The PPG sets out four particular categories of unsuitable housing that should be specifically identified. These are presented in the table below for Swale, which also indicates the number of households in each category and the source of the data. The final column represents the revised total for each of these categories once any double counting between them has been taken into account. Households can be unsuitably housed for more than one reason, so it is important that they are only counted once.

The first table shows that there are 4,575 households currently in unsuitable housing or lacking their own housing in Swale and the most common reason for unsuitability is overcrowding. This figure of 4,575 represents 7.2% of all households in the Borough.

Table A2.1 Current households who lack their own housing or live in unsuitable housing in Swale

<i>Element</i>	<i>Source</i>	<i>Number of households</i>	<i>Revised number of households</i>
Homeless households	The Council's housing register as of March 2026.	85	85
Households in temporary accommodation	The Council's housing register as of March 2026.	240	240
Overcrowded households	2021 Census modelled to March 2026. This was done by calculating the annual change in the number of overcrowded households recorded in Swale between the 2011 and 2021 Census by tenure and applying this to the tenure profile for 2026.	2,787	2,787
Concealed households	2021 Census modelled to March 2026. This was done by calculating the annual change in the number of concealed households recorded in Swale between the 2011 and 2021 Census and applying this the number of concealed households identified in the 2021 Census.	1,628	605
Other groups	The Council's housing register as of March 2026. Only households that are on the register due to a category of unsuitable housing are included (excluding overcrowded, temporary, concealed and homeless households accounted for above).	859	859
Total		5,598	4,575

Source: 2021 Census data modelled to 2026, the Council's Housing Register

Affordability

Some of these households in unsuitable housing are likely to be able to afford alternative accommodation in the market sector without requiring subsidy. Initially, we identify the likely tenure aspiration of households in unsuitable housing. The tenure distribution of newly forming households recorded in the 2023/24 English Housing Survey⁶³ as a proxy for aspirations among current concealed households. This implies that 50.4% of new households aspire to own and 49.6% aspire to rent privately (households accessing affordable housing in the EHS are excluded). For currently overcrowded households and other household groups in unsuitable housing, it is assumed that they aspire to remain within their existing tenure. Homeless households and households in temporary accommodation are assumed to aspire to whatever is the cheaper of entry-level private rent and entry-level owner-occupation. For households assumed to aspire to private renting, an affordability threshold of 35% of gross income is applied.

⁶³ [English Housing Survey data on new households and recent movers - GOV.UK](#) Table FA4301

The ability of these households to afford the cost of entry-level market housing (within their aspired tenure) of the appropriate size (set out in Figures 3.3 and 3.6) is therefore tested. The housing register details the size of accommodation required by homeless households, households in temporary accommodation and households unsuitably housed for other reasons. For overcrowded and concealed households, the household composition recorded for these households in the Census is used to determine the size requirement profile.

To test overcrowded households the income distribution for each dwelling size requirement, identified using the CACI income profile for the Borough, is adjusted to reflect that nationally the income of overcrowded households is 104.6% of the figure for all households (according to the English Housing Survey). Similarly, for homeless, concealed and 'other' unsuitably housed households the income distribution is adjusted to reflect that nationally the income of Social Rented households is 51.7% of the figure for all households (according to the English Housing Survey).

These households in unsuitable housing or lacking their own housing are therefore tested for their ability to afford their aspired tenure of market housing in their authority using an affordability test where the cost of entry-level private rent can constitute up to 35% of gross income and still be affordable in Swale (for those aspiring to access this tenure).. The impact of using other thresholds is examined in the analysis in Chapter 6. The table below shows the number of unsuitably housed households requiring different dwelling sizes and the proportion of these households unable to afford the market-entry point of their aspired tenure. The number of households that are therefore in current need is shown in the final column.

Table A2.2 Affordability of households in unsuitable housing in Swale

<i>Number of bedrooms required</i>	<i>Unsuitable housed households</i>	<i>Percentage unable to afford both entry-level private rent and entry-level owner-occupation</i>	<i>Households in current need</i>
One bedroom	891	61.1%	544
Two bedroom	1,408	46.6%	656
Three bedroom	1,266	47.2%	598
Four or more bedrooms	1,011	51.4%	520
Total	4,575	50.7%	2,318

Some 50.7% (2,318 households) of unsuitably housed households or households lacking their own housing in Swale are in current need. For the purposes of the housing needs assessment, households considered to be in housing need have been split into two categories: current occupiers of affordable housing in need that would make the property available when they move (this includes occupiers of Social Rented and Shared Ownership accommodation that are not living with another household currently), and other households. It is estimated

that some 1,490 households in need in Swale currently live in affordable housing that would become available for reuse⁶⁴.

Total current need

The table below summarises the first stage of the assessment of affordable housing need as set out by PPG. The data shows that there are an estimated 2,318 households in current need in Swale.

Table A2.3 Stage 1: Current unmet gross need in Swale

<i>Component</i>	
Homeless households and those in temporary accommodation	321
Overcrowded and concealed households	1,263
Other groups	734
Total current housing need (gross)	2,318

Stage 2: Newly arising affordable housing need

In addition to Current Need, there will also be Newly Arising (ongoing) Need. This forms the second stage of the affordable housing need model. This calculation, as per paragraph 021 of the PPG (Reference ID: 2a-021-20190220), is based on two elements:

- Number of newly forming households each year (× proportion unable to afford market housing)
- Plus existing households falling into need per year

Need from newly forming households

One of the outputs produced within the process of disaggregating the total housing need into a future population and household typology (as described in Chapter 5) is the calculation of the number of households that will form over the modelling period in Swale. This figure is then averaged to provide an annual estimate for the number of newly forming households. Using this methodology, it is estimated that 1,453 new households will form per year in Swale. This represents a household formation rate of 2.3%, higher than the figure of 1.4% recorded nationally by the English Housing Survey⁶⁵.

⁶⁴ For those households who lack their own housing or live in unsuitable housing it was necessary to not only establish the number of households in each category, but also their current tenure.

⁶⁵ It is also worth noting that whilst the figure of 2.3% may appear high, the household formation rate nationally was above 2% between 1995/96 and 2000/01 (and also in 2004/05) and it is only more recently that it has dropped below 1.8% for a sustained period (it was most recently 1.8% in 2012/13).

To assess the ability of these households to afford the aspired entry-level market housing it is again presumed that the tenure aspiration reflects that recorded for newly forming households recorded in the 2023/24 English Housing Survey (as described above). The household composition for these new households identified within the disaggregation process are used to determine the appropriate size requirement profile. To test newly forming households' ability to afford market housing, the income distribution for each dwelling size requirement is adjusted to reflect that nationally the income of newly forming households is 89.5% of the figure for all households (according to the English Housing Survey).

The table below details the derivation of newly arising need from newly forming households. It shows that 27.4% of newly forming households will be unable to afford market housing in Swale (both private rent and owner-occupation), which means that there will be an annual affordable housing requirement from 398 newly forming households.

Table A2.4 Newly arising need from new household formation (per annum) in Swale

<i>Component</i>	
Number of newly forming households	1,453
Proportion unable to afford entry-level market housing (both entry-level private rent and entry-level owner-occupation)	27.4%
Number of newly forming households requiring affordable accommodation	398

Existing households falling into need

The current PPG does not provide detail on how this step should be calculated, however the previous version (of the PPG) recommended that this figure is derived by looking at recent trends in households applying for affordable housing. Analysis of the lettings of affordable accommodation within Swale over the last three years indicates that there were an average of 323 households that fell into need per year in Swale, excluding those that were newly forming households (which have featured in the previous step).

Total newly arising need

The table below summarises the second stage of the assessment of affordable housing need as set out by the PPG. The table indicates that 721 (398+323) households will be in newly arising need per annum in Swale.

Table A2.5 Stage 2 Newly arising need (per annum) in Swale

<i>Component</i>	
New household formation (gross per year)	1,453
Proportion of new households unable to buy or rent in the market	27.4% (398)
Existing households falling into need	323
Total newly arising housing need (gross per year)	721

Stage 3: Current affordable housing supply

Paragraph 022 (Reference ID: 2a-022-20190220) of the PPG indicates that the current supply of stock available to offset the current need includes stock from current occupiers of affordable housing in need, surplus stock from vacant properties and the committed supply of new affordable units. Units to be taken out of management are removed from the calculation.

Current occupiers of affordable housing in need

It is important when considering net need levels to discount households already living in affordable housing. This is because the movement of such households within affordable housing will have an overall nil effect in terms of housing need. As established when calculating current need, there are 1,490 households currently in need already living in affordable housing in Swale.

Surplus stock

A certain level of vacant dwellings is normal as this allows for transfers and for work on properties to be carried out. Established good practice suggests that if the vacancy rate in the affordable stock is in excess of 3%, some of the vacant units should be considered as surplus stock which can be included within the supply to offset housing need. The Regulator of Social Housing's Statistical Data Return and the Local Authority Housing Statistics data returns indicates that Swale in 2025 records a vacancy rate in the affordable sector of 1.7%. As the vacancy rate is lower than the 3% benchmark⁶⁶, no vacant dwellings are considered available to be brought back into use to increase the supply of affordable housing in Swale.

Committed supply of new affordable units

The PPG indicates that '*the committed supply of new net affordable homes at the point of the assessment (number and size)*' be taken into account within the model. The Council has provided its list of affordable housing units expected to be delivered on the housing permissions as at March 2026. In total, there are 679 new affordable homes committed across Swale currently.

Planned units to be taken out of management

The PPG states that the 'units to be taken out of management' should be quantified. The Council has indicated that there are currently no affordable dwellings planned to be demolished. Therefore, a figure of 0 is used for this stage.

⁶⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11812/Strategic_Housing_Market_Assessments-Practice_Guidance.pdf (page 47)

Total current affordable housing supply

Having been through the four components in order to assess the current affordable housing supply, the stage of the model is summarised in the tables below. The data shows that there will be an estimated 2,169 affordable homes available in Swale.

Table A2.6 Stage 3 Affordable housing supply in Swale

<i>Component</i>	
Affordable dwellings occupied by households in need	1,490
Surplus stock	0
Committed supply of affordable housing	679
Units to be taken out of management	0
Total affordable housing stock available	2,169

Stage 4: Future housing supply of social re-lets and intermediate affordable housing

The future supply of affordable housing is the flow of affordable housing arising from the existing stock that is available to meet future need⁶⁷. It is split between the annual supply of social re-lets and the annual supply of re-lets within the intermediate sector⁶⁸.

The future supply of Social/Affordable Rented housing

This is an estimate of likely future re-lets from the existing RSL rented stock (both Social Rent and Affordable Rent). Data on the affordable accommodation lettings within Swale over the last three years as recorded in the CORE LA Area Lettings tables⁶⁹ is used for this figure. The table below sets out the number of rented lettings that have occurred in the last three years, excluding lets made within brand new properties (the figures only include re-lets). The average number of re-lets across the Social and Affordable Rented sector over the three-year period was 377 per annum in Swale.

⁶⁷ Whilst this is not a step that is detailed in the current PPG, it is logically required to reflect that there is a flow of housing becoming available to meet need as well as a flow of households requiring affordable housing (Stage 2 of the model). This stage has also been included in all previous iterations of this model that have been published in Government guidance.

⁶⁸ The intermediate sector includes all affordable tenures other than Social Rented and Affordable Rented.

⁶⁹ CORE (Continuous REcording) is a national information source funded by the Department for Communities and local Government that records information on the characteristics of both private registered providers and local authority new social housing tenants and the homes they rent and buy.

<https://www.gov.uk/government/collections/rents-lettings-and-tenancies>

Table A2.7 Past RSL rented supply (re-lets only)

<i>Year</i>	<i>Number of re-lets</i>
2022/23	290
2023/24	415
2024/25	426
Average	377

Source: Social Housing Lettings in England 2022/23, 2023/24 and 2024/25

Supply of intermediate housing

In most local authorities, the amount of intermediate housing (mostly Shared Ownership) available in the stock is fairly limited (as is the case in Swale). However, it is still important to consider to what extent the supply may be able to help those in need of affordable housing. Therefore, an estimate of the number of intermediate units that become available each year is included, based on applying the estimated re-let rate for the Social Rented sector⁷⁰ (4.5% in Swale) to the estimated stock for each form of intermediate housing. This is set out in the table below. It is estimated that around 51 units of intermediate housing will become available to meet housing needs from the existing stock each year in Swale.

Table A2.8 Estimated intermediate supply in Swale

<i>Intermediate tenure</i>	<i>Stock</i>	<i>Annual re-lets</i>
Shared Ownership	1136	51

Source: Regulator of Social Housing's Statistical Data Return 2025

Annual future supply of affordable housing

The total future supply of affordable housing is the sum of the Social Rented supply and the intermediate supply as set out in the table below.

Table A2.9 Stage 4 Future supply of all affordable housing (per annum) in Swale

<i>Component</i>	
Annual supply of Social/Affordable Rented re-lets	377
Annual supply of intermediate housing available for re-let or resale at sub-market levels	51
Annual supply of all affordable housing	428

⁷⁰ This is calculated by dividing the average number of relets (377 as set out in the previous step) by the total stock of social and affordable housing as set out in the Regulator of Social Housing's Statistical Data Return 2025.

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- Housing market area wide and site specific Viability Analysis
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Planning and Transportation Policy Working Group	
Meeting Date	27 th May 2026
Report Title	Local Plan Review - Regulation 18 Representations, Summaries and Draft Responses
EMT Lead	Emma Wiggins – Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Natalie Earl – Planning Manager (Policy)
Classification	Open
Recommendations	That members note the representations received to the Regulation 18 Local Plan consultation and the draft responses, and provide comment as appropriate.

1 Purpose of Report and Executive Summary

- 1.1 This report presents the representations, summaries and draft responses to the recent Regulation 18 Local Plan consultation.
- 1.2 Once the responses are noted, officers will use them to make amendments to the relevant sections and policies before the Regulation 19 Local Plan is brought to members for agreement to go out to consultation.

2 Background, Context and Proposals

- 2.1 Members reviewed the draft Regulation 18 Local Plan at Planning and Transportation Policy Working Group (PTPWG) on 4th November 2025, at Policy and Resources committee (P&R) on 18th November 2025 and it was approved for consultation purposes at Full Council (FC) on 10th December 2025.
- 2.2 The document was out for consultation between Monday 12th January 2026 and Monday 23rd February 2026. The consultation could be viewed and responded to via the Council's consultation portal: <https://swaleconsult.objective.co.uk/kse/>. Alternatively, comments could be submitted by email or post.
- 2.3 The comments that were received have now been made viewable on the consultation portal so that all stakeholders can see all of the comments received. They can be viewed at [Local Plan Review \(Regulation 18\), January 2026 - What people say - Keyplan](#)

- 2.4 Officers have summarised the representations and drafted responses to all of the comments received. These were made viewable on the portal alongside the publishing of the working group papers. Only those representations where officers propose making changes in response are set out in Appendix I of this report. All of the summaries and draft responses which don't propose a change are available to view on the Objective portal. A guide on how to do this is set out in Appendix II.
- 2.5 The number and complexity of the representations received was greater than expected and therefore the summaries and responses in Appendix I may require further work in terms of formatting and spelling, etc before the Council submits all the background information to the Planning Inspectorate at the end of the year.
- 2.6 As set out in the PTPWG report on 12th March 2026, the representations received covered a wide range of topics and themes. Whilst many comments will help positively shape the Reg 19 consultation draft, none were considered to be 'showstoppers.' The table below provides a flavour of the main issues arising and feedback given under the different topics areas.

Topic Area/Policy	Summary of Feedback From Representations Received
General Comments	• How will the policies be reviewed/amended when the new NPPF is published? • Retaining right to comment further until whole Local Plan is produced, including wanting more information on strategic policies, site allocations and proposals maps and limited value of only DM policies. • Ensure the key elements of the evidence base it as up to date as possible and ready for Regulation 19. • Some evidence is becoming dated. • Conflict between Plan approach on DM policies that may affect windfall sites and what happens at the planning application stage. For example, the policies on agricultural and important Local Countryside gaps need more flexibility. • Praise for the consultation approach and availability of documents. • Site promoters resubmitted their potential site which have already gone through the HELAA process.
Opening Chapters	• Comments on the ambitious timetable to submit a Local Plan by December 2026. • Some suggestions that the Reg 19 consultation period should be extended beyond six weeks, due to it being over the summer holiday period. • Comments setting out the history of the Local Plan review. • No identified housing requirement – therefore the plan cannot demonstrate how future needs will be addressed.

Topic Area/Policy	Summary of Feedback From Representations Received
	• Absence of a spatial strategy – and it doesn't allocate land or identify locations for new housing, • Recognition of the delays caused by the Highsted Park inquiry extension. • No housing trajectory or housing supply position. • Concerned that it is not realistic or procedurally sound to progress directly to a Regulation 19 without an intermediate consultation stage covering spatial strategy and site allocations. • Cross boundary and inter-authority issues need to be set out. • The section appropriately sets out what has influenced the plan and references are noted. It also recognises what underpins the local plan. • The absence of Spatial Strategy and not setting out preferred option cuts out interested parties from consultation stage as they have no opportunity to comment.
Key Issues and Challenges	• Broad support for the issues and challenges as set out. • Housing and transport are the key issues which affect the lives of most residents. • The main issues and challenges raised were access to health facilities, schools and water supply. • Culture should be added as a key issue (in terms of importance and identity). • Affordable housing is a key challenge and issue. The Council's acknowledgement that the shortfall in affordable housing represents one of the principal challenges of the draft Plan is welcomed. • Welcome the high priority given to active travel.
Vision	• Broadly supported. • Some criticism that it is unrealistic. • Term "Government imposed targets" is not positive. • Greater detail requested on local areas, especially by Parish Councils in rural areas. • Provide specifics on environmental issues and how the Plan will deliver environmental enhancement. • Greater detail on infrastructure provision is needed.
Objectives	• Broad support. • Request considerable detail on specifics within objectives. • Concern that environmental, climate change and landscape objectives have been watered down.
Policy G1 – General	• General support for this policy. • Further suggestions were made for inclusion to strengthen the policy, namely; greenspace, active travel, design codes,

Topic Area/Policy	Summary of Feedback From Representations Received
Development Criteria	carbon reduction, countryside gaps, infrastructure, services, BMV, national landscapes and Neighbourhood Plans. • Developers expressed concern over the TCPA Healthy Homes Principles and requested that its scope was reduced to ensure it only meets the valid planning objectives within it.
Design	
Policy GD1 – Local Design Principles	• No reference to Neighbourhood Plans - should be signposted as NPs often have more detailed locally specific design principles. • Support the preamble. • Supports the strong emphasis on high quality design, local distinctiveness and place-making. • The recognition that good design contributes to civic pride, economic vitality and environmental quality is welcomed. • The reference to national guidance, Design Codes and the use of Design Review Panels is supported, particularly for developments of significant scale or sensitivity. • Its effectiveness is undermined by its length and the breadth of the criteria. The policy is not easy to read or interpret. • Overly prescriptive text.
Policy GD2 – Alterations and Extensions	• Sensitive alterations and extensions must respect the character and setting of existing buildings. • The preamble appropriately recognises that alterations, extensions and conversions can extend the life of buildings and respond to changing needs, whilst also acknowledging the potential for harm where such changes are poorly designed or overly concentrated. • The emphasis on responding positively to the style, scale and character of the existing building, preserving features of interest, reinforcing local distinctiveness and safeguarding residential amenity is welcomed. • Respondents sought greater emphasis on neighbourhood plans, local needs, and Parish Council input. • Concerns raised that existing SPD/guidance is outdated.
Policy GD3 – Shop Fronts, Signs and Advertisements	• Welcome the clear statement that development proposals that remove, replace or substantially harm shop-fronts of historic interest will not be supported. • The policy could reverse incremental harm and this is strongly supported. • Agree that the design of shop front signs and advertisements have a major influence on an area's appearance, in particular in conservation areas or on Listed Buildings. business.
Housing	

Topic Area/Policy	Summary of Feedback From Representations Received
Policy H1 - Affordable Housing	• Broadly supported. • Questions on accuracy of viability including the need for an update for Reg 19. • More flexibility on tenure and housing mix requested where viability is challenging. • Some preference for existing Local Plan Bearing Fruits approach as higher levels are sought in more viable areas and would result in loss of needed affordable housing. • Housing SPD will no longer be a planning consideration. How will alternative guidance be presented? • Policy is needed to help with affordable housing need in the borough.
Policy H2 - Small and medium sites for housing development	• Broadly supported. • Ensure policy compliant requirement of sites identified as small and medium as set out in NPPF and draft NPPF. • More flexibility on considering windfall sites for the type of development. • More flexibility on tenure requirement as viability could be an issue. • Viability is challenging for SMEs. • Sites maybe subdivided and then sold on after outline consent and so these types of site should be open to other types of developer looking to support SME.
Policy H3 - Rural exception and community-led housing development	• Broadly supported. • Questions on appropriateness of affordable housing on sites of this nature. • Need for these types of schemes in rural areas. • Meet local needs including sustaining communities.
Policy H4 – Self-Build and Custom Build	• Policy could create an overprovision. • Locating self builds within a development disregards the underpinning of self-build and custom house building because they are usually in rural areas where there are less restrictions on design. • Comments suggesting a marketing period.
Policy - H5 Park Homes	• Broadly supported. • Should be considered for all age ranges not just older persons. • Could make contribution to all housing needs including affordable. • Should consider naming the policy residential mobile homes/caravans to make clear type of accommodation. • Ensure site is properly managed for the purposes of the policy. • Council over reliant on windfalls to meet the needs of the borough.

Topic Area/Policy	Summary of Feedback From Representations Received
Policy H6 – Gypsy, Traveller and Travelling Showpeople Accommodation	• Support for the criteria-based policy, rather than an intention to allocate land to accommodate a longer-term need for pitches. • Pleased to see recognition that there may be circumstances where need arises for the provision of affordable Gypsy and Traveller pitches, as well as bricks and mortar affordable housing.
Policy H7 - Dwellings for rural workers	• Broadly supported. • Ensure the need is evidenced. • Ensure the policy is enforceable and that property is retained in perpetuity for rural use.
Policy H8 - Extensions to, & the replacement of, dwellings in the countryside	• Broadly supported. • Seeking criteria that would duplicate other policies, particularly on design and environment and landscape constraints. • Reiterating building regs for rainwater runoff into fowl sewer.
Policy H9 - Extending the garden of a dwelling in the countryside	• Broadly support. • Concern on cumulative impact from all garden extensions in an area. • Seeking criteria that would duplicate other policies particularly on design and environment and landscape constraints. • Local context for example matters specific to an area of the borough.
Economic Development	
Policy E1 – Loss of Employment Floorspace and Land	• Support for the policy as it protects existing employment across the borough and supports diversification for rural business and enterprise, including for locally grown food production. • Supports the strong presumption in favour of retaining employment land and premises. Protecting employment floorspace is essential to maintaining a resilient local economy, supporting local jobs and reducing the need for out-commuting. • The requirement for robust marketing evidence prior to the release of employment land is welcomed, as is the cautious approach toward mid-plan release of allocated sites. • Marketing a property to prove lack of demand or unsuitability is not always the best or feasible approach. Reliance on professional RICS opinion should also be accepted particularly in the case where no employment activity has existed on the site and the landowner has no intention of providing. • The proposed marketing requirements to justify the loss of employment sites and allocations is excessive.

Topic Area/Policy	Summary of Feedback From Representations Received
Policy E2 – The Rural Economy	• A mixture of support and objection to this policy. • The policy attempts to override permitted development rights for change of use of rural buildings to other uses and is not in compliance with national policy. • The policy is too restrictive and does not allow for other forms of new employment land to come forward in rural areas that can make valuable contributions to the rural economy. • Supports the Council's ambition to encourage the sustainable growth of rural businesses and enterprise. • Is concerned about the requirement for a minimum six month period of extensive, proactive marketing before residential development will be permitted.
Policy E3 – Proposals for Main Town Centre Uses	• While flexibility in use classes is supported, additional reference to encouraging community-based uses (such as health services, small business hubs, cultural or heritage facilities) within both town centres and rural service centres would improve resilience and vitality. • The requirement for impact assessments for out-of-centre retail proposals is welcomed. It would be helpful to emphasise the need to consider cumulative impacts not only on principal town centres but also on smaller urban and rural local centres. • Supports the policy as it aims to strengthen town centres and direct main town centre uses to appropriate locations in accordance with the retail hierarchy. • Notes that Faversham is identified as a secondary town centre in the hierarchy, matching the Faversham Neighbourhood Plan policy 'FAV1 Faversham Town Centre' which includes a clearly defined area and seeks to support the viability and vitality of the diverse town centre offer. • States that Swale has supported business movement away from the town centres and high streets which has led to town centres on Sheppey not being supported through planning and other work covered by the local plan in the past. • Parking should be free in town centres and business rates lower.
Policy E4 - New Holiday Parks or extensions to existing parks & the occupancy of holiday parks	• Broadly support. • Ensure definitions of caravans is correct. • Sites could contribute more to development needs by being mixed use not just park homes but including bricks and mortar, more flexibility on what could be developed. • Will existing holiday parks have policy retention set out in Local Plan Bearing Fruits.

Topic Area/Policy	Summary of Feedback From Representations Received
	- Local context for example matters specific to an area of the borough. - Seasonal local issues on the Isle of Sheppey. - Make sure policy is enforceable particularly on months of occupation.
Infrastructure	
Policy INF1 - Managing Transport Demand & Impact	- Policy is laudable for prioritising sustainable transport. - Current congestion issues. - Existing travel plan initiatives have not produced desired outcome. - Infrastructure should be in place before development. - Concerns for wildlife when roads are built.
Policy INF2 - Vehicle Parking	- Broadly supported. - Why do Swale parking standard differ from KCC? - What are Swale's parking standards? - Swale Parking Standards SPD is quite old. - Local area specific parking problems matters. - Limit increase of on street parking. - Ensure delivery of EV charging points. - Dedicated parking for houses.
Policy INF3 - Open Space, Sport and Recreation Provision	- Council's continued commitment to provide, protect and enhance areas of open space across the borough is welcomed. - Relies on out-of-date documents. - There should also be a policy that covers the provision of Suitable Alternative Natural Greenspace (SANG). - Support for emphasis on multi-functional green and blue infrastructure. - Increased requirements have implications for site capacity and housing delivery. - Allowance for the pooling of offsite contributions as an alternative to onsite delivery would be welcomed.
Policy INF4 Local Green Spaces	- Allotment should have their own policy. - No reference to LNRS. - LGS 119 no longer meets the requirements of paragraph 106 of the NPPF. - Welcomes the inclusion of the policy. - De-designation does not need to be justified by reference to exceptional circumstances.
Climate Change, Pollution and the Water Environment	
	The Council is to be particularly commended for this ambitious suite of environmental policies.

Topic Area/Policy	Summary of Feedback From Representations Received
	• Whilst recommending improvement, Natural England either 'supports' or 'strongly supports' the policies that it commented on. • Generally, comments on these policies can be split into two broad camps. • The majority of developers argued that the policies in this section (in particular the requirements for overheating assessments, the use of energy metrics (as opposed to the approaches used within Building Regulations), thresholds for post-occupancy evaluation, embodied carbon reporting, heat networks and water efficiency standard of 100litres/person/day, reference to 20% Biodiversity Net Gain) are considered unsound as unviable and not in conformity with the December 2025 draft NPPF which seeks to limit the number of standards that local plans can set. Some parish councils and neighbouring authorities also argued that some policy requirements, whilst desirable, may be unviable. • Others (including most individual responders, most parish councils and community groups) recognised the climate emergency and generally supported the policies as set out or argued that they should be more stringent and made more locally specific and relatable. • The statutory agencies (the Environment Agency, Natural England, Historic England) broadly supported the policies and offered comments to strengthen them. Kent County Council (as the Lead Local Flood Authority) and Southern Water (as the wastewater provider and one of the water supply providers to the borough) offered support for elements of the policies and made extensive comments with regard to amendments, particularly to policies C9 Sustainable Drainage and C10 Water Quality and Water Resources. South East Water did not comment on these policies. • The issue of adequate water supply and wastewater capacity was a significant one, which reflects the public concern around this subject. The importance of local chalk streams was raised as well as the need for policy to more closely reflect national standards for sustainable drainage. • The reference on dark skies should be strengthened.
Biodiversity and Landscapes	
Policy B1 Biodiversity & Geodiversity Conservation & BNG	• Integration with the LNRS. • Support for 20% Biodiversity Net Gain (BNG) on new development.

Topic Area/Policy	Summary of Feedback From Representations Received
	- Concerns about requirement to achieve a 20% biodiversity net gain and impact on viability and lack of evidence and consideration for draft NPPF. - Policy doesn't go far enough in the protection of locally designated sites.
Policy B2 Conserving & Enhancing Valued Landscapes	- New duty to "seek to further" the purpose of conserving and enhancing the natural beauty of the area. - Strong agreement that the borough's landscapes, rural character and tranquillity must be protected and enhanced. - Tranquillity and dark skies should have its own policy. - More restrictive approach to landscape protection than the adopted Policy DM24.
Policy B3 Kent Downs National Landscape Management Plan	- Levelling-up and Regeneration Act 2023 imposes a strengthened duty to 'seek to further' the conservation and enhancement of the natural beauty of National Landscapes. - Incorporate tranquillity as a material consideration.
Policy B4 - The separation of settlements - Important Local Countryside Gaps	- Mixed support (community support could go further – developer objections as too restrictive.) - Policy does not align with anything specific in the NPPF. - Too much weight applied to the policy in the HELAA. - Too restrictive on windfall development when there is not a 5 year housing land supply. - The whole of the land between Faversham and Boughton should be a gap. - Need to consider statutory body infrastructure needs that could occur in gaps and the requirement to release land for those needs.
Policy B5 – Woodland, Orchards, Trees and Hedgerows	- Broadly supported. - Seeking 50m buffer around trees as a minimum rather than 15m in national guidance. - Misunderstanding between the value of orchards in terms of the impacts on climate change and character as set out in policy and their grading between modern and ancient orchard conservation. - None of these assets should be lost in any circumstance. - Support these assets outside of any development impact. - Restrictive approach that replacing trees through development should be only native species rather than the policy's slightly more flexible approach of preferably native. - Seeking "doubling up" of criteria from other policies in the local plan.
Policy B6 - Agricultural Land	Mixed support (community support could go further – developer objections as too restrictive.)

Topic Area/Policy	Summary of Feedback From Representations Received
	• No development on agricultural land as it's a key resource that needs to be protected; including no allocated sites. • Too restrictive on windfall development when there is not a 5 year housing land supply and other higher level policy constraints. • Site area assessment threshold should be raised to 5ha as 1ha is too restrictive.
Policy B7 – The Coast	• Broad support. • It includes many special landscape features and rural characteristics. • Supports the objectives of the policy to appropriately control development on the large area of coastline. • Welcome the inclusion of information on England Coast Path, now known as the King Charles III England Coast Path. • Re-assess damage by pollutants as well as the need for Nutrient Neutrality action. • No significant adverse effects on the Port's operations and area should be allowed and it must be protected for future expansion of industrial and employment use.
Policy B8 – Rural Lanes	• Development that affects rural lanes during or post-construction should be considered in the application. • Outdated Evidence. • Stronger reference to traffic impact, protection of tranquillity and PROW. • Policy should be omitted.
Policy B9 – Keeping & Grazing of horses	• General support for this policy. • Concerns were raised over cumulative impacts on landscapes and protecting the agricultural landscape character. • Links to biodiversity and landscape policies were suggested, as well as reference to groundwater zones.
Historic Environment	
Policy HE1 – Development Involving a Listed Building	• Support for the preamble, which provides a clear and well-reasoned statement of policy on development involving Listed Buildings. • Listed Buildings should be protected against internal division into HMO housing, where historic features are removed. • Appropriate weight should be given to an asset's longevity and potential lifespan. Modest heritage assets accumulate historical and cultural significance over time, and this compounding value should be properly considered in the planning process.

Topic Area/Policy	Summary of Feedback From Representations Received
	• Supports the strong emphasis on protecting and enhancing Listed Buildings as irreplaceable heritage assets. • Clearer alignment required with national policy and more precise wording. • Greater emphasis on treatment of cumulative change required. • Clearer requirements like heritage statements and impact assessments required.
Policy HE2 – Development Affecting a Conservation Area	• General support. • To make the preamble more focused and relatable have a stronger emphasis on local identity. • The preamble could more clearly reference the importance of Conservation Areas in maintaining village identity and historic character and their role in supporting tourism and local pride. • For rural Conservation Areas especially, the preamble could more explicitly reference the importance of countryside setting, key views into and out of the area and the relationship between historic buildings and surrounding farmland or open space. • It seeks additional burdens to developers, that are not in line with the NPPF.
Policy HE3 – Parks and Gardens	• Agrees with the preamble and supports the recognition and protection of historic parks and gardens within the borough. • Suggestions to improve the focus and relatability.
Policy HE4 – Non-designated Heritage Assets	• Provides a clear description of and policy approach to Non-designated Heritage Assets. • The preamble should acknowledge the significant variation in heritage value within this category. • Incorporate local heritage and culture into the policy. • Support the positive wording of the policy to seek to retain and conserve these assets. • It is important that any local list is reviewed regularly for completeness and accuracy.
Policy HE5 - Archaeology	• Welcomes the requirement for community involvement in clause 4 of 'Policy HE5 Archaeological heritage'. Their involvement at the earliest stages of planning and design could lead to better outcomes for archaeology and its documentation, understanding and knowledge of assets. • To improve focus and relatability, the preamble would benefit from clearer connections to community identity, vulnerability of assets (particularly coastal and aviation heritage), and the educational and wellbeing value of archaeology to residents today.

Topic Area/Policy	Summary of Feedback From Representations Received
	• It is treating archaeology as just something that is buried. It would be more useful to use the terms like 'heritage asset' rather than 'archaeology' and 'evaluation' and 'mitigation' rather than 'archaeological fieldwork.' • Add reference to local and specific examples within the borough.

Table I: Main issues arising and feedback given to the Regulation 18 Local Plan consultation

Equalities Questions

- 2.7 The equalities survey that sat alongside the consultation was optional and 21 people responded. Nine females and eleven males responded with one respondent preferring not to say. The two most selected age groups by respondents were 65 - 74 and 75 - 84 with five each while the least selected was the 25 - 34 and 45 - 54 age groups with two in each. Three respondents selected yes to the question asking if they had a disability with another three selecting prefer not to say. In the Ethnic Origin category 20 respondents selected the White English, Welsh, Scottish, Northern Irish/ British category and one respondent selected the prefer not to say option. These results will feed into the Equalities Impact Assessment as the Council continues to fulfil its equalities duties through the plan making process.

Next Steps

- 2.8 As set out above in paragraph 1.2, once the draft responses are noted, officers will make amendments to the relevant sections and policies before the Regulation 19 Local Plan is brought to members for agreement to go out to consultation.

3 Recommendations

- 3.1 That members note the representations received to the Regulation 18 Local Plan consultation and the draft responses and provide comment as appropriate.

4 Alternative Options Considered and Rejected

- 4.1 The alternative option is for members not to note the responses received, however, a key component of the Local Plan process is that all representations received are considered by the Council. Members could also choose not to note the draft responses. This option is not recommended because officers need to use the responses to amend policies and sections with the emerging Local Plan so that the Regulation 19 is ready for consultation. Members are invited to provide comment on the draft responses.

5 Consultation Undertaken or Proposed

5.1 A consultation strategy on the Regulation 18 Local Plan, in line with the recently adopted Statement of Community Involvement, was implemented including:

- Emails sent out setting out the forthcoming dates to those on the Council's Local Plan consultation database ahead of the start of the consultation;
- Officers attended two Swale Local Parish Council Liaison Forum meetings – one ahead of the consultation launch to allow any additional meetings to be programmed by the Town and Parish Councils and one during the consultation to allow Parish and Town Councillors to raise any questions with officers that they may have had on the document;
- Printed copies of the documents were placed at all of Swale's libraries, including the mobile ones, and at The Swallows Leisure Centre, Sittingbourne whilst Sittingbourne library was shut for refurbishment. They were also provided with posters to display advertising the consultation;
- For the first time the team produced a video explaining the consultation document, what a Local Plan is and how to get involved with the consultation. The team have received positive feedback on the video;
- Emails were sent to Swale's Green Grid contacts;
- An article was included in the Swale Means Business newsletter;
- An article was included in the new resident newsletter and in Inside Swale;
- Posters were made available to Parish and Town Councils and were available to download from Swale's website for other community groups to share;
- The communications team shared regular social media posts promoting the consultation;
- Regular email reminders were sent throughout the consultation period to those on the database;
- The team produced Regulation 18 Frequently Asked Questions to assist stakeholders; and
- The documents were available to read on the Objective portal or could be downloaded and printed, or a copy could be purchased.

6 Implications

Issue	Implications
Corporate Plan	The Local Plan supports the delivery of the Corporate Plan, aligning with the following priorities: • Environment - To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead. • Community - To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience.

	• Economy – Working with our businesses and community organisations to work towards a sustainable economy which delivers for local people. • Health and Housing - To aspire to be a borough where everyone has access to a decent home and improved health and wellbeing. The Corporate Plan contains a specific objective to ‘progress a Local Plan with local needs and capacity at its heart.’
Financial, Resource and Property	The Local Plan work programme is fully funded across a combination of base budget, committed reserves and a contribution from the government’s Local Plans Delivery Fund.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	There are no direct crime and disorder impacts arising from this decision.
Environment and Climate/Ecological Emergency	As part of the Local Plan, there will be a Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making and these assess the environmental impact of the Local Plan as a whole.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.
Local Government Reorganisation	The current Local Plan timetable expects the Local Plan to be submitted for its Examination in Public and to be adopted before local government reorganisation is expected to be complete.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Schedule of representations, summaries and proposed changes to the Regulation 18 Local Plan consultation (where changes are proposed.)

- Appendix II: A guide to viewing representations, summaries and draft responses on Objective portal (where changes are not proposed.)

8 Background Papers

8.1 PTPWG Report - High Level Early Feedback on the Regulation 18 Local Plan Consultation

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

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2026Reg18/58	1	Question 001 Do you have any comments on section 1 of the draft Local Plan which will inform the Plan's progression?				Hernhill Parish Council			It should be made clear that the NPPF Dec 2025 will have an effect on this plan.		
2026Reg18/131	2	Question 003 Have all the key issues and challenges been taken into consideration?				Environm ent Agency		.	We note that the Infrastructure Delivery Plan (IDP) will next be published alongside the Regulation 19 Local Plan. We are interested in having early conversations regarding the Medway Estuary and Swale Strategy and the role of Strategic Flood defences in the plan. We also note that the Strategic Flood Risk Assessment (SFRA) will be published before the Regulation 19 consultation. We would like to highlight the importance of the SFRA in informing the policies and site allocations within the plan. Especially as the SFRA provides the basis for applying the Sequential Test, which should be done at the earliest possible stage of the plan-making process. For paragraph 3.2.15 we suggest flood defences are also listed within the physical infrastructure category, as this is likely to be required within the IDP. ANSWER DUPLICATED AT Q.63 PLEASE SEE ATTACHMENT		
2026Reg18/31	57	Question 003 Have all the key issues and challenges been taken into consideration?				CPRE Kent	CPRE	Kent	CPRE campaigns from Parish to Parliament on a range of issues including: prioritising genuinely affordable homegiving the principle of 'brownfield-first' development some teethprotecting best and most versatile agricultural land (food security); andprotecting our landscapes as we transition to (rooftop) renewables. Accordingly, we recognise and support in principle the identification of the key issues and challenges facing the Council. In terms of infrastructure delivery our members and supporters consistently ask that infrastructure be provided up-front, in order that existing communities are not prejudiced in terms of the demands placed on existing services and facilities by new residents. With regard to affordable housing, we would like to see every effort made to hold developers to account in securing the provision of affordable housing in accordance with policy H1. It often seems to be the case that once planning permission has been granted developers seek to renegotiate what they've previously committed to. In addition to the issues and challenges identified, we would like to see details with regard to delivery rates (from nationwide and SME builders) to enable a better understanding of the rate at which allocated (and windfall) sites are being built out. We would like to see paragraph 3.2.19 amended to make reference to the use of Community Infrastructure Levy payments, and if not, an explanation given as to the reasons why reliance is placed instead on Section 106 Agreements. Having a non-negotiable standardised levy would avoid the issue of developers seeking to renegotiate S.106 Agreements. Reference is made at paragraph 3.2.51 to the cost implications of CIL and the impact this would have on the whole plan viability, when the Council doesn't actually have a current CIL scheme. This needs to be corrected.		

Appen

We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/58	The respondent stats that it should be made clear that the NPPF Dec 2025 will have an effect on this plan.	Once the NPPF is adopted, the Local Plan will be updated to reflect any changes in national policy. The Reg 19 will include a sentence on the current status of the NPPF. Change Proposed.
2026Reg18/131	Note IDP will be published with Local Plan. Would like to have discussions regarding Medway Estuary and Swale Strategy and the role of Strategic Flood defences. Note SFRA will be published ahead of Regulation 19 consultation. SFRA should inform policies and allocations and is basis for Sequential Test, which should be done at earliest stage of plan making. Seeks amendment to add flood defences to paragraph 3.2.15 in physical infrastructure.	Swale Borough Council has regular meetings with the MEASS team regarding the MEAS strategy and role of flood defences and this has led to formulation of Policy C7. These discussions will continue as the Regulation 19 document is produced. SBC would be happy to meet with EA officers to inform the preparation of the IDP. The SFRA is being produced alongside the Local Plan and is feeding into the site selection process and being used to inform the Sequential Test. The Council agrees to add flood defences to paragraph 3.2.15 with the physical infrastructure category. Change proposed.
2026Reg18/31	The respondent recognises and supports in principle the identification of the key issues and challenges facing the Council. Ask that infrastructure be provided up-front. Would like to see every effort made to hold developers to account in securing the provision of affordable housing in accordance with policy. Would like to see details with regard to delivery rates (from nationwide and SME builders) to enable a better understanding of the rate at which allocated (and windfall) sites are being built out. Requests paragraph 3.2.19 be amended to make reference to the use of Community Infrastructure Levy payments. States that reference is made at paragraph 3.2.51 to the cost implications of CIL and the impact this would have on the whole plan viability, when the Council doesn't have a current CIL scheme.	Noted. The Local Plan assesses the impacts of proposed development, including on the transport network, schools and health services. The Council works in partnership with those organisations responsible for these services to ensure that they are accounted for and the Infrastructure Delivery Plan (IDP), which sits alongside the Local Plan sets out all of the required infrastructure needs. The phasing of infrastructure is set out in the IDP. Noted. This would be too detailed for the Local Plan and would be set out in the evidence base documents such as the Whole Plan Viability Assessment and the Housing Market Assessment. Paragraph 3.2.19 will be amended to make reference to the use of Community Infrastructure Levy payments. Change Agreed. This paragraph is talking about viability generally rather than in Swale. Partial Change Agreed.

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

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2026Reg18/33	19	Question 003 Have all the key issues and challenges been taken into consideration?				Queenbor ough Town Council	Town	Clerk	3.1.2 Queenborough would not be considered for good rail links when trains only run one every hour and after midnight you cannot travel to from the mainland by train. Often resulting in people stranded at mainland train stations with no way back by train to the Isle of Sheppey. 3.1.11 There is disagreement with these figures for Sheerness can this be reviewed and it is expected to be higher. 3.2.2 Support town centres making parking free and business rates lower, consider extending the one-year free rate to 75%, 50% and 25% over the following years to support the building of businesses in this time. 3.2.15 All Infrastructure should be key and in place before any new homes are built in Swale 3.2.16 The emphasis on transport/issues and infrastructure raise concerns about the impact development on the lack of infrastructure on the Isle of Sheppey, for highways, lack of school places, health services etc. 3.2.19 The emphasis on transport/issues and infrastructure raise concerns about the impact development on the lack of infrastructure on the Isle of Sheppey, for highways, lack of school places, health services etc. 3.2.20		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/33	Disagree with para 3.1.2 as Queenborough would not be considered for good rail links. State that the figures for Sheerness in para 3.1.11 are incorrect. State that parking should be free in town centres and business rates lower. All Infrastructure should be in place before any new homes are built in Swale Suggests that the Sheppey Light Greenway should be included in paragraph 3.2.29. Notes that Swale is renowned for its bird population around the estuary; therefore, this area should be made a protected area.	Noted. When talking about good rail links in paragraph 3.1.2 it is talking about rail links in all of Swale. The specific mention of Queenborough is just stating that it has a train station. Council colleagues have undertaken surveys for updated vacancy rates within the last month and the updated figure for Sheerness is 8.69% so slightly different. All of the figures in this paragraph will be updated for the Reg 19. This is not a Local Plan issue. An Infrastructure Delivery Plan will accompany the Local Plan which will detail all of the required infrastructure and when it needs to be delivered. The Sheppey Light Greenway is in the newly adopted Swale LCWIP but this paragraph is about Kent LCWIP cycle routes which begin/end in Swale which this isn't. This area is a protected area, both nationally and internationally. Partial Change Proposed.

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2026Reg18/76	3	Question 003 Have all the key issues and challenges been taken into consideration?				Five Parishes Oppositio n Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG commends this section and particularly we value the heritage, ecological, The Swale, North Kent Marshes, The Creeks and other water courses and the Kent Downs National Landscape designations. These are all characteristics of the borough that must be preserved and enhanced by the Local Plan. Paragraph 3.1.1 – mentions that “Swale lies on the North Kent Coast” but there does not seem to be a policy on the “Coastal/Waterways including creeks, streams or other waterways” policy. Medway has commenced a strategy on the River Medway Strategy: https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id&#61;85787 Paragraph 3.1.2 – Is Selling Railway Station in Swale? We think that it is. Paragraph 3.1.3 fails to mention all the ports in Swale including Ridham, Queenborough, Faversham, to the smaller ports of Conyer, Milton, Lower Halstow and Oare. Paragraph 3.1.13 – In table 3.1.3 should there be reference to the National Nature Reserves (NNR), Swale has 3 NNR's.. Is the number of Grade II* listings correct? Does this include Bexon Court which Swale constantly seems to have down as the incorrect listing. Paragraph 3.2.2 – The key issues and challenges are well summarised. However the main issue that is the excessively high residential building target approx 17,000 homes set by Government, on top of the current provision of 64,250 homes in Swale. That's an astonishing 27% increase in stock. There's no mention of the existing appalling shortfall in infrastructure including healthcare provision, education, public transport provision etc. We do not understand how this infrastructure deficit can be made up. Swale must have an “infrastructure first policy” and it must have a model s106 agreement that developers use to draft the s106 and provide on lodging a planning application not on the night of a planning committee or afterwards. We have seen how many mistakes are made in drafting these s106 agreements		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/76	Representation received after the deadline. Commends this section. The rep sets out a number of specific comments: Paragraph 3.1.1 - mentions that "Swale lies on the North Kent Coast" but there does not seem to be a policy on the "Coastal/Waterways including creeks, streams or other waterways." Paragraph 3.1.2 - Selling Railway Station is missing. Paragraph 3.1.3 fails to mention all the ports in Swale including Ridham, Queenborough, Faversham, to the smaller ports of Conyer, Milton, Lower Halstow and Oare. Paragraph 3.1.13 - In table 3.1.3 should there be reference to the National Nature Reserves (NNR), Swale has 3 NNR's.. Is the number of Grade II* listings correct? Does this include Bexon Court? Paragraph 3.2.2 - The key issues and challenges are well summarised. States that the main issue that is the excessively high residential building target set by Government and that there's no mention of the existing shortfall in infrastructure. States that Swale must have an "infrastructure first policy" and it must have a model s106 agreement that developers use to draft the s106 and provide on lodging a planning application not on the night of a planning committee or afterwards. Paragraph 3.2.5 mentions water scarcity and a better policy for protecting the aquifer and water protection zones is required. Sets out that the Local Plan needs to include control mechanisms that ensure the funding and infrastructure agreed is delivered. That mechanism must make sure that the Council has sufficient resources to properly supervise and enforce the delivery of agreements. Describes current infrastructure issues:* Lack of GP Services in Swale, particularly Sittingbourne* No prescribing facility at the Sittingbourne Memorial Hospital* Failure to deliver new secondary school provision to the North of Sittingbourne* Increased pollution events in Milton Creek around the Sittingbourne Waste Treatment Works States that paragraph 3.2.24 mentions Active Travel and the improvements that can be achieved, but this fails when it comes down to individual Planning Applications. Paragraph 3.2.52 mentions the mental health crisis in Swale, but there is no provision from Kent County Council for Mental Health Safe Havens in Swale.	Noted. Noted. The creeks and waterways are covered in a number of policies in the Plan. Most notably, Policy C6 'Costal Change Management', Policy C7 'Implementing the Medway Estuary and Swale Coastal Risk Management Strategy' and Policy B7 'The Coast.' There will also be a Strategic Policy, ST11 'Conserving and Enhancing the Natural Environment' in the Reg 19 Local Pln. Selling Railway Station will be added to paragraph 3.1.2. Change Proposed. This paragraph only mentions Sheerness due to it's strategic importance and was not intended as a list of all of Swale's ports. Swale's 3 National Nature Reserves will be added to table 3.1.3. The number of Grade II* listings is correct an includes Bexon Court. Noted. A Local Plan can't deal with an infrastructure deficit, only with the needs arising from development allocated in the Plan itself. The Local Plan assesses the impacts of proposed development, including on the transport network, schools and health services. The Council works in partnership with those organisations responsible for these services to ensure that they are accounted for and the Infrastructure Delivery Plan, which sits alongside the Local Plan sets out all of the required infrastructure needs. Model s106 agreements for developers to use to draft their s106s are not something for the Local Plan to provide. Policy C10 'Water Quality and Water Resources' addresses these water issues. The Local Plan is not the vehicle to provide a control mechanism to ensure funding and infrastructure agreed is delivered and to ensure the Council has sufficient resources to enforce the delivery of agreements. This is for the planning permission and S106 and wider resourcing discussions within the Council. Noted. The Swale Local Cycling and Walking Infrastructure Plan has now been adopted by the Council, so alongside the policies in this Plan, have the weight for officers and members to ensure that active travel is a key component of planning proposals. This section is setting out the challenges for the Local Plan and not the answers. Through partnership working and responses to the Reg 18, this has not been raised as a requirement by KCC. Partial Change Proposed.

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2026Reg18/105	5	Question 003 Have all the key issues and challenges been taken into consideration?				Creative Estuary			(See attached document) Heritage and Ecological Assets 3.1.14 Swale is the proud home to a range of heritage and ecological designations, as follows: Designation Asset Ramsar (wetlands) Medway Estuary; Swale Estuary and Marshes The Swale; Medway Estuary and Marshes; Sheppey Cliffs and Foreshore; Church Woods; Ellenden Wood; Queendown Warren; Purple Hill. Site of Special Scientific Interest (SSSI) Special Area of Conservation Queendown Warren; The Blean complex Swale SPA; Medway Estuary and Marshes SPA; Outer Thames Estuary SPA Special Protection Area Marine Conservation Zone Swale Estuary; Medway Estuary The Medway Estuary; The Swale, Milton Creek, Conyer Creek, Oare Creek, Faversham Creek Rivers and waterways Scheduled Monument 23 Listed Buildings 1,440 (37 Grade I; 93 Grade II*) Conservation Areas 51 Historic Parks and Gardens 4 Table NB. Include the Cultural assets and clusters as assets in the borough. 3.1.33.1.15 Swale includes an extensive stretch of the Kent Downs National Landscape (formerly known as the Kent Downs Area of Outstanding Natural Beauty).NB. Include paths and transport to support culture and natural landscape tourism development, eco-tourism, and linked to pubs and cafes. 3.2 Key issues and challenges3.2.1 Reviewing the Local Plan provides an opportunity to celebrate the richness of the borough but also to address key challenges. The challenges below have been identified by the evidence compiled and by consultation responses during previous stages of Local Plan development. They may be the subject of complementary documents, such as Swale Borough Council's Corporate Plan, the Climate and Ecological Emergency Declaration, and the Affordable Housing Emergency Declaration. 3.2.2 The key challenges being addressed by this Local Plan Review are: Delivering a net zero carbon borough by 2045; Embedding active travel within new and existing developments to improve air quality, reduce road traffic accidents, reduce congestion and improve overall health and wellbeing; The significant shortfall in the supply of affordable homes leading to a growing		
2026Reg18/59	3	Question 008 Do you support or object to Policy G1? What would you add, remove or amend to support it further or to remove your objection?				Home Builders Federation	M	Behrendt		Neither	9. It is not clear why this policy is necessary as it just states development must accord with policies in the local plan and then broadly reiterates the requirements of specific policies in the local plan. HBF would recommend it is deleted as it is unnecessary. However, if it is maintained certain elements would need to be deleted as they are unsound. 10. With regard to part 3, the Council should be aware supplementary planning documents and guidance and not planning policy. The Council can state that all development should have regard to supplementary guidance, but it cannot seek to give them the status of a local plan policy. This distinction must be recognised in G1. 11. The Council should delete part 4 which requires a statement demonstrating the degree to which a development meet the TCPAs health homes principles. Development must provide evidence as to how it meets national and local planning policy which have been assessed as being sound. When taken together these policies should ensure that development delivers against both national and local objectives without the need for further state-ments relating to principles put forward by the TCPA.

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/105	The respondent requests that cultural assets and clusters are included in the section on Heritage and Ecological Assets in the borough. Suggests including culture as part of the solution of High Street decline - the diversification of the high street is a trend that the cultural sector has led nationally and there are many examples of re-use of empty shops for artists studios and cultural centres. Design and maintenance of high streets should also include consideration and reinvestment in cultural infrastructure, to support cultural events, festivals, and parades.	The Council agrees and will add cultural assets and clusters in the section on Heritage and Ecological Assets in the borough. The Council agrees that culture has a role in revitalising town centres and will add a paragraph into DM Policy E3 'Proposals for Main Town Centre Uses' which sets out this issue. This will be into DM Policy E3 'Proposals for Main Town Centre Uses' which sets out this issue. Change Proposed.
2026Reg18/59	1. Recommends that this policy is deleted as it broadly reiterates the requirements of other specific policies contained within the local plan. 2. If the policy is retained, certain elements would need to be deleted as they are unsound. 3. The Council cannot seek to give Supplementary Planning Documents the status of a local plan policy, and this should be recognised in Policy G1. 4. Seeks the deletion of point 4, which refers to the provision of a statement demonstrating the degree to which a development meets the TCPAs Healthy Homes Principles.	1. The Council believes that Policy G1 provides a suitable framework for development and is not to be read in isolation but read in conjunction with all other relevant policies in the Local Plan and Supplementary Planning Documents and Guidance, as a whole. 2. The Council is unclear as to which elements are deemed to be unsound. 3. The Council will seek to differentiate between Planning Policy and SPDs within Policy G1. (Consider "Accord with policies and consider guidance in the Supplementary Planning Documents and Guidance, unless material considerations indicate otherwise.") 4. The Council disagrees and seeks to retain that all development proposals will include a statement to demonstrate the degree to which it accords with the TCPA Healthy Homes Principles. This policy is ambitious and aspirational but offers consideration and flexibility within the policy wording 'as appropriate'. Change Proposed.

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2026Reg18/77	4	Question 008 Do you support or object to Policy G1? What would you add, remove or amend to support it further or to remove your objection?	Pegasus Group	P	Atkin	Prudential Assurance Co. Ltd				Object	(See attached document) 6.1. Policy G1 is unnecessary and a clear duplication of other policies within the plan. 6.2. Moreover, the policy seeks to unreasonably elevate the status of Supplementary Planning Documents (SPDs) and external / Third Party guidance which are not subject to the same rigor as the statutory Development Plan and is therefore inconsistent with national planning policy and should be deleted.
2026Reg18/101	3	Question 008 Do you support or object to Policy G1? What would you add, remove or amend to support it further or to remove your objection?	Tetlow King	Iain	Warner	Palm Developments		Palm Developments		Neither	Whilst we have no issues with the general approach of this policy it is not considered necessary to have this set out as a specific development plan policy as all of the criteria are general requirements such as part 1 relating to the need to comply with the local list of requirements for validation. Conflict with that would by virtue result in an invalid application such that it becomes superfluous. The policy should not however have reference to SPD/SPGs given that they are not planning policy documents themselves but only used to reinforce policies.
2026Reg18/108	5	Question 008 Do you support or object to Policy G1? What would you add, remove or amend to support it further or to remove your objection?	Savills	C	Leckie			Owners Land Old Ferry Road, Iwade		Neither	The Policy identifies 11 criteria that proposals will comply with, where appropriate. These include the need for proposals to accord with policies and guidance within Supplementary Planning Documents (SPD) and Guidance (SPG) (criteria 3), and to provide a statement demonstrating the extent to which a proposal accords with the TCPA Healthy Homes Principles (criterion 4). Other criteria relate to conserving and enhancing the natural, built and historic Environment (criterion 5), responding to climate change and environmental constraints and opportunities (criterion 6), and ensuring development is well-sited and of a sympathetic scale, design and appearance (criterion 7). Several of these criteria are broad and overlap with existing design and environmental policies, particularly those relating to the natural and historic environment. In places, the Policy also duplicates requirements already contained within Policy GD1. This repetition reduces clarity and conflicts with NPPF paragraph 16, which requires policies to be clear, unambiguous, and avoid unnecessary duplication. With regard to Criteria 3, it is important to note that SPDs and SPGs should not be given the same status as Local Plan policy, and this policy should be amended to reflect this point. The requirement for applicants to submit a statement demonstrating compliance with the TCPA Healthy Homes Principles (criteria 4) is not part of national policy. If the Council intends to retain this requirement, the Policy must clearly define which types and scales of development it applies to, ensuring that it remains proportionate and does not delay decision-making. While the TCPA Principles are referenced, it is important to note that the TCPA acts in an advisory capacity and is not a statutory consultee. Their inclusion within policy is therefore not fully justified and raises concerns in relation to NPPF paragraph 36. PLEASE SEE ATTACHMENT

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We are aware

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2026Reg18/77	1. Objects to this policy and deems it an unnecessary duplication. 2. Seeks that SPDs and third party guidance are removed as they are inconsistent with national planning policy.	1. Noted but the Council believes that this policy adds value to the Development Plan by providing a framework. 2. The Council will consider amending the wording in criteria 3 to reflect the differences between SPD/SPGs and planning policy documents. (Consider "Accord with policies and consider guidance in the Supplementary Planning Documents and Guidance, unless material considerations indicate otherwise.") Change Proposed.
2026Reg18/101	1. It is not considered necessary to set out the general approach as a specific development plan policy as all of the criteria are are general requirements, resulting in an invalid application should conflict arise. 2. SPD/SPGs should not be referenced as they are not planning policy documents themselves.	1. The Council disagrees as these criterion provide an overarching framework for Policy G1. 2. The Council will consider amending the wording in criteria 3 to reflect the differences between SPD/SPGs and planning policy documents. (Consider "Accord with policies and consider guidance in the Supplementary Planning Documents and Guidance, unless material considerations indicate otherwise.") Change Proposed.
2026Reg18/108	1. Seeks to reduce the repetition contained within the policy to ensure clarity (currently many criteria are broad and overlap) and reduce duplication (especially with regards to Policy GD1), as per NPPF paragraph 16. 2. Seeks that the policy be amended to ensure that SPDs and SPGs are not given the same status as Local Plan policy.	1. The Council disagrees as the purpose of Policy G1 is to provide a framework of General Development Criteria. 2. The Council will consider rewording criteria 3 to take account of the difference in status of SPDs/SPGs and Local Plan Policy. (Consider "Accord with policies and consider guidance in the Supplementary Planning Document and Guidance, unless material considerations indicate otherwise.") Change Proposed.

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2026Reg18/14	8	Question 009 Do you have any specific comments on this preamble?				Faversham Town Council			'Policy GD1 Local Design Principles' No reference to Neighbourhood Plans here. Should it signpost? As NP's often have more detailed locally specific design principles. FNP includes many policies that include locally specific design elements. Also, Nationally Described Space Standards are included. This does not allow for change, should the standards be re-named. This comment is relevant to a number of other policies throughout the Plan where the policy includes external documents as explained above.		
2026Reg18/16	8	Question 009 Do you have any specific comments on this preamble?				Boughton under Blean Parish Council	Sarah	Muteham	5 Should be 'topographical features' or 'features of topography'.§ 10 'Separately, they must formally address future occupiers by having their local council approvea new postal address, ensuring street and property names and numbers are clearly displayed, and then informing purchasers/tenants of their new address.' How on earth is this relevant to 'local design'?Add 'Where commercial development is proposed in proximity to residential areas, steps should be taken to safeguard residential amenity e.g. by the imposition of height restrictions and vegetative screening.'		
2026Reg18/62	6	Question 009 Do you have any specific comments on this preamble?				Maidstone Borough Council			Paragraph 6.0.3 suggested amendment: '...with all other policies in the Plan and any relevant, and associated national, regional and local design guidance...'		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/14	Seeks amendment to signpost neighbourhood plans because there is no reference to them, but they can contain more detailed and specific design principles. The plan mentions Nationally described space standards which does not allow for change should it be renamed.	Although the preamble references relevant and associated national, regional and local design guidance, relevant Design Codes, development briefs and Masterplans an explicit reference to Neighbourhood Plans can be made. Partial Change Proposed. The Nationally Described Space Standard (NDSS) provides a consistent framework for the minimum gross internal floor area (GIA) and storage space for new homes in England. While not mandatory on its own, the NPPF enables local authorities to adopt these standards via Local Plans hence its reference in the document.
2026Reg18/16	Seeks amendment to "topographical features" or "features of topography," Seeks amendment to remove the requirement about obtaining a council-approved postal address and notifying occupants as it is not relevant to the local design section. Seeks amendment to add a policy that commercial development near residential areas should protect residential amenity, for example through height restrictions and vegetative screening.	This response appears to relate to the policy and therefore Question 10. The Council agrees that under criterion 5 the wording needs to be updated for grammatical reasons. Change proposed. The Council agrees to remove the section on the postal address as it does not relate to design. Change proposed. The Council disagrees, as this is considered within the policy and elsewhere within the plan. No change proposed.
2026Reg18/62	Seeks an amendment to paragraph 6.0.3 '...with all other policies in the Plan andany relevant, andassociated national, regional and local design guidance...'	Comment noted. The Council agrees for the following reasons: To future-proof the sentence and make it more comprehensive. Changes proposed.

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2026Reg18/73	100	Question 009 Do you have any specific comments on this preamble?				Eastchurch Parish Council	Sarah	Poole	Eastchurch Parish Council has reviewed the preamble to Policy GD1 (Local Design Principles). The Parish Council agrees with the content of the preamble and supports the strong emphasis on high quality design, local distinctiveness and place-making. The recognition that good design contributes to civic pride, economic vitality and environmental quality is welcomed. The reference to national guidance, Design Codes and the use of Design Review Panels is also supported, particularly for developments of significant scale or sensitivity. To make the preamble more relatable and locally focused, Eastchurch Parish Council suggests that greater emphasis could be placed on: The importance of reflecting the character and setting of rural and coastal communities, including smaller villages such as Eastchurch; The need to respect landscape context, including open countryside and coastal environments; and The value of early engagement with parish councils as part of the pre-application process, particularly in rural areas where local context is critical to achieving appropriate design outcomes. Including a clearer acknowledgement of rural and coastal distinctiveness would strengthen the link between high-level design principles and the lived character of settlements across the borough. Subject to these observations, Eastchurch Parish Council agrees with and supports the preamble to Policy GD1.		
2026Reg18/108	6	Question 009 Do you have any specific comments on this preamble?	Savills	C	Leckie			Owners Land Old Ferry Road, Iwade	This policy sets out the Council's expectations for high quality, well designed development across the Borough. It requires all proposals to positively respond to local character, be well integrated with their surroundings, and create attractive, distinctive and sustainable places. The policy also requires developments with 'significant design implications' to be referred to a Design Review Panel (DRP). We support the need to incorporate good design principles into development proposals, and the intention behind Policy GD1 is clear. However, its effectiveness is undermined by its length, density, and the breadth of the criteria. The policy is not easy to read or interpret, particularly given the number of overlapping and sometimes repetitive requirements. This results in a policy that is overly detailed and difficult to navigate. The requirement for DRP for proposals with 'significant design implications' is unclear and subjective, as the Plan provides no definition or threshold. Without measurable criteria, applicants cannot predict whether their scheme triggers this requirement, creating uncertainty and risking inconsistent decision-making. To ensure clarity and proportionality in line with NPPF paragraph 16, the policy should specify the types or scales of development that require a Design Review. PLEASE SEE ATTACHMENT		

Appen

We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Seeks amendment to the preamble to make it more relatable and locally focused with reference to character and settings of rural and coastal communities, landscape such as open countryside and coastal environments and early engagement with parish Council's. Should include clearer acknowledgment of rural and coastal distinctiveness would strengthen the link between design principles and character across the borough.	The Council (partially) agrees that local distinctiveness and character could be strengthened in the preamble. Partial changes proposed. The Council (partially) agrees that local distinctiveness and character could be strengthened in the preamble. Partial changes proposed.
2026Reg18/108	Supports the need to incorporate good design into development however the policy is difficult to read. The section on DRP for proposals with 'significant design implications' is subjective and unclear because the plan does not provide a definition or threshold. With this, applicants cannot interpret if their development triggers this requirement. Seeks amendment for the policy to specify the types or scales of development that require a Design Review.	Comment noted. Consideration will be given to the wording. The Council is currently preparing a Design Review protocol that will provide the procedural framework for design review. However, it is agreed that the policy wording requires a partial change. Partial change proposed.

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2026Reg18/3	10	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your				Dunkirk Parish Council				Support	Mostly support. Again, should include neighbourhood plans and argue for higher NDSS to show the Council really has aspirational values for the Borough and its residents.
2026Reg18/16	9	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?				Boughton under Blean Parish Council	Sarah	Muteham		Neither	5 Should be 'topographical features' or 'features of topography'.§ 10 'Separately, they must formally address future occupiers by having their local council approvea new postal address, ensuring street and property names and numbers are clearly displayed, and then informing purchasers/tenants of their new address.' How on earth is this relevant to 'local design'?Add 'Where commercial development is proposed in proximity to residential areas, steps should be taken to safeguard residential amenity e.g. by the imposition of height restrictions and vegetative screening.'
2026Reg18/33	10	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to				Queenbor ough Town Council	Town	Clerk		Object	Development proposals should include evidence of the use of robust materials used and assurances of the longevity of the structures/ buildings.
2026Reg18/59	4	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?				Home Builders Federatio n	M	Behrendt		Neither	12. There is a potential for conflict in the approach being set out by the Council that should be addressed in the local plan. For example, there is a strong focus on high quality design that respects the local character of the area (part 2 and 8) whilst also required development to minimise energy consumption. The Council must recognise that it is not always possible to resolve both of these matters. Minimising energy consumption and the provision of renewable technologies can require the use of materials that are not in keeping with the character of the area. The use of solar panels on roofs or materials that are lower in embodied carbon may not be may not be in keeping with the character of the area but will be necessary to reduce carbon emissions. The Council must be clear that it will take a flexible approach to decision making with regard to local design principles, or other policies, where there is a conflict. 13. HBF would also recommend that the reference to robust material s is removed from part 8 as there is no agreed definition as to what robust would constitute with regard to building materials and this could prevent developers from using new materials and design processes that speed up delivery or reduce embodied carbon. 14. Finally, it is not clear why part 10 of the policy includes reference to the approval of new postal addresses and why this needs to be included as a policy in the local plan

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/3	Seeks amendment to include neighbourhood plans and for a higher NDSS.	Partially agree with neighbourhood plans now explicitly referenced in preamble. The Nationally Described Space Standard (NDSS)provides a consistent framework for the minimum gross internal floor area (GIA) and storage space for new homes in England. While not mandatory on its own, the NPPF enables local authorities to adopt these standards via Local Plans hence its reference in the document.
2026Reg18/16	Seeks amendment to "topographical features" or "features of topography,". Seeks amendment to remove the requirement about obtaining a council-approved postal address and notifying occupants as it is not relevant to the local design section. Seeks amendment by adding a policy that commercial development near residential areas should protect residential amenity, for example through height restrictions and vegetative screening.	The Council agrees that under criterion 5 the wording needs to be updated for grammatical reasons. Partial Change Proposed. The Council agrees to remove the section on postal addresses. Change proposed. Residential amenity is considered under criterion 9. No change proposed.
2026Reg18/33	Development proposals should include evidence of the use of robust materials used and assurances of the longevity of the structures/ buildings.	The Council (partially) agrees for clarity and completeness. Partial change proposed.
2026Reg18/59	Neither supports or objects the policy Brings attention to potential conflict within the policy, for example, high quality design that respects the local character can conflict with minimising energy consumption. The latter can require materials that are not in the character of the local area like solar panels. Seeks amendment to part 8 of the policy to remove robust material as there is no agreed definition on robust materials and this could prevent developers from using new materials and design processes that speed up delivery or reduce embodied carbon. Seeks amendment to part 10 to remove the reference to approved postal addresses.	Comment noted. No change proposed. Comment noted. Both aspects - sustainability and character - remains key aspects of the Government's approach to design and inclusion within the policy is therefore consistent with that approach. No change proposed. The Council (partially) agrees for clarity and completeness. Change to include durability shown under Criterion 8 above. Partial change proposed. The Council agrees to remove the section on postal addresses. Change proposed.

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2026Reg18/60	6	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	Lichfields	Sally	Furminger	Taylor Wimpey				Object	Generally, Taylor Wimpey do not object to the current draft of Policy GD1 (Local Design Principles), notwithstanding the point made above in the representations, that it is likely the Council will need to ensure all development management policies in the Plan do not conflict with the new NPPF during the course of the Local Plan's emergence. However, it is not clear why part 10 of Policy CD1 includes reference to the approval of new postal addresses – this would not appear to be a planning matter and therefore Taylor Wimpey question why this needs to be included as a policy in the Local Plan. It is recommended that this is deleted. Further, it is recommended that part 9 of the policy is updated to reflect the sequence of assessment that takes place when bringing forward a planning application (additions in bold/underline): “Demonstrating that there is no significant adverse impact that cannot be appropriately mitigated on nearby properties by noise, dust, odour or light pollution or that new development does not prejudice or undermine existing surrounding uses”. Further, part 8 of the policy refers to the need for materials to be ‘robust’. Taylor Wimpey use high quality materials in all of its developments; however, it is recommended that reference to ‘robust’ is removed from the policy text – the term is a subjective and unmeasurable in respect of building materials and could cause unintended delays at the detailed design stage.
2026Reg18/73	48	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?				Eastchurch Parish Council	Sarah	Poole		Support	Eastchurch Parish Council supports Policy GD1. The Parish Council welcomes the comprehensive and detailed approach to securing high quality design across the borough. In particular, the emphasis on reinforcing local character, integrating development with its surroundings, promoting inclusive and safe environments, delivering biodiversity net gain, and ensuring high standards of accommodation is strongly supported. The requirement to comply with Nationally Described Space Standards and to demonstrate design quality through Design and Access Statements is also welcomed. The policy provides a robust framework for achieving well-designed, sustainable places and aligns appropriately with national planning policy and the Healthy Homes principles. To strengthen the policy further, Eastchurch Parish Council suggests the following additions or clarifications: Stronger recognition of rural and coastal character: Whilst the policy refers to coastal and creek environments, additional emphasis could be placed on protecting the character, setting and landscape of smaller rural villages, including their relationship with open countryside and agricultural land. Cumulative impact and infrastructure context: The policy could reference the need to consider cumulative impacts where areas already accommodate significant infrastructure or energy development, ensuring that further proposals do not erode local distinctiveness. Infrastructure integration: Greater clarity that high quality design must also account for infrastructure capacity particularly highways, healthcare and school provision so that design excellence is supported by functional sustainability. Protection and enhancement of active travel corridors: Explicit recognition of

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/60	Seeks amendment to part 10 to remove the reference to the approval of new postal codes as this is not a planning matter. Seeks the following amendment to part 9 "Demonstrating that there is no significant adverse impactthat cannot be appropriately mitigatedon nearby properties by noise, dust, odour or light pollution or that new development does not prejudice or undermine existing surrounding uses". Seeks amendment to part 8 to remove the term robust as this is subjective and unmeasurable.	The Council agrees to remove the section on postal addresses. Change proposed. The Council (partially) agrees for clarity and completeness. Change shown under Criterion 9 above. Partial change proposed. The Council (partially) agrees for clarity and completeness. Change to include durability shown under Criterion 8 above. Partial change proposed.
2026Reg18/73	Supports policy. seeks amendment to strengthen the policy by adding emphasis on stronger recognition of rural and coastal character. seeks amendment to strengthen the policy by adding cumulative impact and infrastructure context. seeks amendment to strengthen the policy by adding infrastructure integration and protection. seeks amendment to strengthen the policy by adding enhancement of active travel corridors.	Noted. The Council agrees the that local character can be more closely woven into the policy wording. Partial change proposed. Noted - This appears to be a landscape point. No change proposed. Noted - This appears to be relevant to S106 and/or energy point. No change proposed. Noted and considered under criterion 4. No change proposed.

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2026Reg18/74	8	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?				Faversham Society	Planning	Faversham Society		Neither	We could also add the need for durability and strength required for future developments, adaptability to global warming, more social/communal housing projects and aesthetics combined according to professional standards.No 7 should include the following: Providing a high standard of accommodation that does not differentiate between the design quality of market and affordable housing and is sustainable in design by minimising energy consumption by optimising the orientation of the dwellings, providing adequate levels of insulation, maximising opportunities for passive solar energy and integrating renewable and low carbon technologies. Additionally, superficial copying of traditional models should be avoided and contemporary designs that incorporate renewable and low carbon technologies will be welcomed.
2026Reg18/88	5	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	Cameron	Chapman	Malro Homes (c/o Agent)		Malro Homes		Neither	See attached document 5 DEVELOPMENT MANAGEMENT POLICIES5.1 POLICY G1: GENERAL DEVELOPMENT CRITERIA5.1.1Criterion (4) sets out a requirement for Applications to demonstrate accordance with the TCPA Healthy Homes Principles (HHP). Whilst we support the aspirations of the HHP, we would comment that the requirement for all homes to be designed as inclusive, accessible, and adaptable (i.e., the provision of M4(2) and M4(3) dwellings) is overly onerous and not justifiable. This is especially the case on the Isle of Sheppey, where scheme viability is already a huge concern.5.1.2As currently drafted Criterion (9) sits at odds with national guidance and the consultation NPPF, this is as a result of setting out increased restrictions for developments and their associated impacts on amenity. To ensure a justified Policy that is consistent with national guidance we recommend that the Policy be worded as follows:“Preserve amenity and cause no significant harm to other sensitive uses or areas”.
2026Reg18/91	2	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?				Southern Housing	Charles	Glover-Short		Neither	While we support the broad themes running through the policy, we believe the policy could be made more concise to ensure it remains accessible and easily understood by all users and sizes and types of developers. Since the design review panel is referred to in the supporting text, the Council should consider removing or amending the last paragraph of the policy wording. At present, the last paragraph states that: “where significant design implications are identified in development proposals, these will be referred to a Design Review Panel.” The current wording does not therefore specify any criteria and instead leaves some ambiguity regarding when a scheme will go before a design review panel. More specific criteria should therefore be added to either the supporting text, policy or to a supporting document to ensure certainty for developers.

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We are aware

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2026Reg18/74	Seeks amendment to add the need for durability and strength for future development, adaptability to global warming, more social/communal housing projects and aesthetics combined according to professional standards. Seeks amendment to criteria 7 to include 'Providing a high standard of accommodation that does not differentiate between the design quality of market and affordable housing and is sustainable in design by minimising energy consumption by optimising the orientation of the dwellings, providing adequate levels of insulation, maximising opportunities for passive solar energy and integrating renewable and low carbon technologies. Additionally, superficial copying of traditional models should be avoided and contemporary designs that incorporate renewable and low carbon technologies will be welcomed.'	The Council partially agrees and has included reference to durability in the preamble and policy body (Criterion 8 below). Partial change agreed. The Council partially agrees and has included reference to the design quality of affordable housing and sustainable design and construction principles within Criterion 7 (above). Outstanding or innovative design is addressed in Criterion 9 (below). Partial change agreed.
2026Reg18/88	Supports the aspirations of the Healthy Homes Principles, but thinks it can be onerous, especially in the case of the Isle of Sheppey because viability is already a concern. Seeks amendment to criterion 9 to "Preserve amenity and cause no significant harm to other sensitive uses or areas" so it is consistent with national policy.	Comment noted. The Council (partially) agrees for clarity and completeness. Change proposed.
2026Reg18/91	Seeks amendment to make the policy more concise. Seeks amendment to remove or change the reference of the design review panel in the last paragraph of the policy since it is mentioned in the supporting text. Seeks amendment for specific criteria relating to the passage "where significant design implications are identified in development proposals, these will be referred to a Design Review Panel."	Partially agreed and revisions above have made the policy more concise. Council disagrees as including Design Review within the policy anchors the process to the development plan, giving it more weight. Partially agreed, the Council is currently preparing a Design Review protocol that will provide the procedural framework for design review.

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2026Reg18/112	4	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	D	Lawrence (DHA Planning)	Sheppey Gateway Ltd				Neither	1.5.5 The Policy as currently drafted as it is unnecessarily lengthy, with elements of the Policy being able to be located within the pre-amble or be secured by validation requirements to ensure an effective Policy. 1.5.6 To ensure consistency with national guidance we would recommend that the Policy wording of Criterion (7) be amended to remove “by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies”. We would however note that the aspirations of Policy GD1 with regard to sustainable design and minimising energy consumption are broadly covered by Policy C1. SBC should therefore review the Policy wording to reduce any unnecessary repetition. 1.5.7 Criterion (10), states that developers must ensure new housing must have an approved new postal address which is outside the remit of the Planning process and can be appropriately secured by Planning Condition or Informative. 1.5.8 The Policy continues to set out the requirements to undertake a Design Review Panel (DRP). We would object to the current wording of this on the basis of the requirement being unacceptable and unjustified. We raise significant concern over the inclusion of “where significant design implications are identified” as this is currently very ambiguous. 1.5.9 Should SBC maintain that the requirement for DRP to be included within Policy, then we would recommend that this be amended to be included within the pre-amble providing generic comments on how DRPs can assist in achieving high standards of design. We would additionally affirm that at a minimum, SBC should seek to enforce a threshold number of dwellings to trigger the requirement for DRPs. We would recommend that this should be a minimum of 300 dwellings. PLEASE SEE ATTACHMENT
2026Reg18/113	8	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	A	Day (DHA Planning)	Pentland Homes				Neither	2.2.3This policy is generally supported, however we comment that the need for developers to ensure the Council approve new postal addresses is outside the remit of planning and as such does not need to form part of planning policy. If SBC continue to require this then it could be secured via planning condition or informative on any decision. Additionally, this could be included within the pre-amble and not detract from providing a clearly worded policy with a clear purpose.

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/112	Supports GD1, but believes it is lengthy. Seeks amendment to policy by placing elements of the policy in the preamble or secured by validation requirements. Seeks amendment that the examples in criterion 6 and 7 should be moved to the preamble. Seeks amendment to criterion 7 to remove "by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies". Seeks amendment in criterion 10 to move further guidance beyond how dwellings should incorporate Nationally Described Space Standards (NDSS) to the preamble. Additionally, approved new postal addresses are not within the remit of planning. Seeks amendment for criterion 10 to be reworded to "The (NDSS) Nationally Described Space Standards or any subsequent document". Raises concerns over Design Review Panel (DRP) and how ambiguous the wording "where significant design implications are identified" is. DRPs should be assessed on a case-by-case basis. If SBC maintains the requirement of DRP within policy, then seeks amendment that the preamble includes generic comments on how DRPs can assist in achieving high standards of design. Seeks an amendment to enforce a minimum of 300 dwellings for a DRP.	The Council responded to a similar point above and agreed to tighten policy criteria with some elements moved to preamble. Partial change proposed. As above. Partial change proposed. The Council partially agrees and has amended criterion 7 to refer sustainable design and construction principles in accordance with Policy C1. Partial change proposed. The Council agrees to remove the section of postal addresses in criteria 10. Partial change proposed. The Council is currently preparing a Design Review protocol that will provide the procedural framework for design review. However, it is agreed that the policy wording requires a partial change. Partial change proposed. As above. Partial change proposed.
2026Reg18/113	Supports policy, but the need for developers to ensure council approve new postal address is outside the remit of the planning system. If this is required, then it could be secured via planning condition or informative on any decision. Seeks amendment to move it to the preamble.	The Council agrees to remove the section on postal addresses. Change proposed.

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2026Reg18/114	7	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	LRM Planning	T	Whipps			W.T. Lamb Holdings Ltd			(See attached document) 5.5This policy seeks to ensure that new development responds and enhances local character and distinctiveness through a series of requirements, in summary these are:1. Promotion of high-quality design2. Is of an appropriate destiny3. Creates a sense of place4. Integrates with surrounding streets and open spaces 5. Provide high quality opens spaces and public realm6. Provide public spaces that are inclusive, safe and accessible7. Provides high standard of accommodation that is sustainable and minimises energy consumption8. Is appropriate for the area9. There is no loss of amenity for neighbouring residents10. New development meets the Nationally Described Space Standards For development with significant design implications, applications will be referred to a Design Review Panel. 5.6 As this policy is broad and generalised, there are limited comments to make, and the policy is generally supported. However, the requirements at Policy GD1(10) for developers to approve a new postal address with the Council is not a valid planning consideration and falls outside of the remit of the planning system. It is considered that the need to refer a development proposal to a Design Review Panel should relate to major applications only and the policy wording should be amended accordingly.
2026Reg18/120	6	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	L	Sinden (DHA)	Persimmon Homes				Support	4.2.1 Persimmon broadly supports the aspirations of Policy GD1 which seeks to further the aims of Policy G1 by ensuring developments demonstrate they have incorporated good design principles. However, as currently drafted the Policy is unnecessarily lengthy. This could be simplified by inserting elements of the Policy within the pre-amble or be secured by validation requirements to ensure an effective Policy. 4.2.2 For example, both Criterion (6) and (7) include examples of achieving the policy objectives. To ensure a clearly written Policy, with a clear purpose that is consistent with national policy, these examples should be moved to the pre-amble. 4.2.3 Criterion (7) sets out how new development should be sustainable in design through minimising energy consumption “by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies”. To ensure consistency with national guidance we would recommend that the Policy wording of Criterion (7) be amended to remove “by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies”. 4.2.4 Criterion (10) sets out how dwellings should incorporate Nationally Described Space Standards (NDSS). We however note that the Policy continues on to provide further guidance that should be included within the pre-amble, in the interests of providing a clearly worded Policy with a clear purpose. Indeed, further requirements are set out by Criterion (10), including having an approved new postal address which is outside the remit of the Planning process and can be appropriately secured by Planning Condition or Informative. Criterion (10) should be reworded to “The (NDSS) Nationally Described Space Standards or any subsequent document”. 4.2.5 The Policy continues to set out the requirements to undertake a Design Review Panel (DRP). We raise significant concern over the inclusion of “where significant design implications are identified” as this is currently very ambiguous. It is imperative Policies are clear and unambiguous so that it is evident how the decision maker should react to proposals, invariably pushing developments to

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/114	Supports the policy in general, but criterion 10 regarding developers to approve a new postal address falls out the remit of the planning system. Seeks amendment so the need of a design review panel should only be for major applications.	Comment Noted. The Council is currently preparing a Design Review protocol that will provide the procedural framework for design review. The Council agrees to remove the section on postal addresses. Change proposed.
2026Reg18/120	Supports GD1, but believes it is lengthy. Seeks amendment to policy by placing elements of the policy in the preamble or secured by validation requirements. Seeks amendment that the examples in criterion 6 and 7 should be moved to the preamble. Seeks amendment to criterion 7 to remove "by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies". Seeks amendment in criterion 10 to move further guidance beyond how dwellings should incorporate Nationally Described Space Standards (NDSS) to the preamble. Additionally, approved new postal addresses are not within the remit of planning. Seeks amendment for criterion 10 to be reworded to "The (NDSS) Nationally Described Space Standards or any subsequent document". Design Review Panel (DRP) is ambiguous. DRPs should be assessed on a case-by-case basis. If SBC maintains the requirement of DRP within policy, then seeks amendment that the preamble includes generic comments on how DRPs can assist in achieving high standards of design. Seeks an amendment to enforce a minimum of 300 dwellings for a DRP.	The Council agrees that consideration can be given to the wording to tighten policy criteria and supported by a preamble that supports context.Partial change proposed. The Council (partially) agrees for clarity and to reduce policy wording.Partial change proposed. The Council (partially) agrees for clarity and to reduce policy wording.Partial change proposed. The Council (partially) agrees for clarity and to reduce policy wording and removing. The Council agree to remove the part of postal addresses from the policy.Partial change proposed. The Council is currently preparing a Design Review protocol that will provide the procedural framework for design review. However, the Council agrees that the policy wording requires a partial change. Partial change proposed.

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2026Reg18/124	7	Question 010 Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent				Support	See attached document 5.3.1 Fernham Homes broadly support the aspirations of Policy GD1 which seeks to further the aims of Policy G1 by ensuring developments demonstrate they have incorporated good design principles. In response to Questions 9 and 10 of the Consultation document we provide comment on the wording of the Policy as currently drafted as it is unnecessarily lengthy, with elements of the Policy being able to be located within the pre-amble or be secured by validation requirements to ensure an effective Policy. 5.3.2 Criterion (6) sets out how public spaces in and out of buildings should be inclusive, safe and accessible for all. The Policy sets out examples of achieving this. To ensure a clearly written Policy, with a clear purpose that is consistent with national policy, these examples should be moved to the pre-amble. 5.3.3 Criterion (7) sets out how new development should be sustainable in design through minimising energy consumption "by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies". However, as above, examples demonstrating compliance with Policy should be included within the pre-amble to ensure a clearly written Policy. To ensure consistency with national guidance we would recommend that the Policy wording of Criterion (7) be amended to remove "by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies". We would however note that the aspirations of Policy GD1 with regard to sustainable design and minimising energy consumption are broadly covered by Policy C1. SBC should therefore review the Policy wording to reduce any unnecessary repetition. 5.3.4 Criterion (10) sets out how dwellings should incorporate Nationally Described Space Standards (NDSS). We however note that the Policy continues on to provide further guidance that should be included within the pre-amble, in the interests of providing a clearly worded Policy with a clear purpose. Indeed, further requirements are set out by Criterion (10), including having an approved ~~new spatial address which is outside the remit of the Planning process and can~~
2026Reg18/58	12	Question 012 Do you support or object to Policy GD2? What would you add, remove or amend to support it further or to remove your objection?				Hernhill Parish Council				Support	See answer to question 11. 'Support and should also include that it must be be appropriate for the local community. There needs to be greater emphasis on deferring to Neighbourhood Plans, Design Guides and the Parish Councils for local needs.' ANSWER DUPLICATED AT QUESTION 11.

Appen

We are aware

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2026Reg18/124	Supports policy, but it is unnecessarily long Seeks amendment to move examples of how public spaces can achieve inclusivity, safety and accessibility should be moved to the preamble. Seeks amendment to remove "by maximising opportunities for passive solar energy and integrating renewable and low carbon technologies" from the policy and add examples on how to do this to the preamble. Seeks amendment so that further guidance regarding criterion 10 and to be reworded to the following "The (NDSS) Nationally Described Space Standards or any subsequent document". Raises concerns regarding the Design Review Panel because the wording "where significant design implications are identified" is ambiguous. Seeks amendment so the policy is clear and unambiguous or removed as this DRPs should be a case-by-case basis. However, if SBC maintain this requirement, then an amendment should be included within the preamble providing generic comments on how DRPs can assist in achieving high standards of design. Seeks further amendment so that SBC should enforce a minimum of 300 dwellings to trigger a DRP. Seeks amendment to include an alternative DRP, which is reviewed by an independent design consultancy appointed by the applicant.	Comment noted. Change proposed. Partially agreed for clarity and conciseness. Partial change proposed. As above. Partial change proposed. Agreed for clarity and futureproofing. Change proposed. The Council is currently preparing a Design Review protocol that will provide the procedural framework for design review. However, it is agreed that the policy wording requires a partial change. Partial change proposed. As above, the DRP will be independent and procedure set out in the DRP protocol.
2026Reg18/58	Supports policy Seeks amendment so that it includes that it must be appropriate for the local community and greater emphasis on deferring to neighbourhood plans, design guides and the parish councils for local needs.	Comment noted. Partially agreed, in so far as the preamble can reference other plans and guides. Partial change proposed.

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2026Reg18/127	9	Question 018 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.4 Housing2.4.1 H2 Small and medium sites for housing development2.4.1.1 Policy criteriaNatural England notes that this policy includes the requirement for a minimum of 20% biodiversity net gain (BNG) to be achieved for small and medium sites for housing development (criterion 5). We refer you to our advice regarding the evidence base required to implement a 20% net gain requirement in paragraph 2.8.1.4 of this letter. The Draft Plan includes an overarching Policy B1 which sets out the BNG requirements for all developments. We refer you to our overarching comments in paragraph 2.1. It would be Natural England’s preference to remove criterion 5 from policy H2 and rely on strong overarching policies in the Draft Plan. Should the Council choose to retain criterion 5, we advise that a link could instead be made to Policy B1 to ensure that all of the criteria for BNG are covered, and this criterion should be added to all other policies that BNG would apply to for consistency. If criterion 5 is retained, we would suggest the following amended wording: “5. Proposals include measures to achieve a biodiversity net gain in accordance with Policy B1 Biodiversity and geodiversity conservation and biodiversity net gain of a minimum of 20%;
2026Reg18/62	14	Question 018 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?				Maidstone Borough Council				Support	Broad support for the policy and the recognition of the contribution that SME builders make to meeting housing needs. Criterion 4 – may read better as follows ‘...is designed in a way that preserves residential amenity, designated heritage assets, environmental assets, and is landscape-led where appropriate, and environmental assets; Criterion 8 – may read better as follows ‘The provision of Affordable housing will be provided on site in accordance with Policy H1 Affordable Housing unless there is clear evidence...’

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Seeks amendment of this policy/pre-amble as follows 1. Proposals should include measures to achieve a biodiversity net gain in accordance with Policy B1 Biodiversity and geodiversity conservation and biodiversity net gain of a minimum of 20%	The Council agrees for the following reasons 1. A link to policy B1 would allow easier navigation through the document Change Proposed
2026Reg18/62	1 Broad support for this policy 2. Supports this policy and proposes minor wording amendments to make the policy criteria clearer	The Council agrees for the following reasons: The amendments make the policy criteria clearer and amendment to criteria 4 and 8 as follows Criterion 4 -...is designed in a way that preserves residential amenity, designated heritage assets, environmental assets, and is landscape-led where appropriate,; Criterion 8 - Affordable housing will be provided on site in accordance with Policy H1 Affordable Housing unless there is clear evidence...' Change Proposed

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2026Reg18/114	9	Question 018 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?	LRM Planning	T	Whipps			W.T. Lamb Holdings Ltd			(See attached document) 5.11 The preamble of this policy notes that the NPPF states that Small and Medium Enterprise (SME) house builders can make a significant contribution to housing supply. It notes that paragraph 73 (erroneously labelled as 68) requires the Council to ensure that 10% of its housing requirement is met on sites which are no larger than 1Ha. 5.12 The policy text states that the proposals for small and medium sites will be supported subject to a number of criteria. Most notably these requirements are that it must deliver sustainable development following the settlement hierarchy, must be brought forward by an organisation or company that identifies itself as an SME and must not be part of a larger site. The remaining requirements of the policy repeat requirements from other policies in relation to such matters of design etc (and are therefore not strictly necessary). The policy has been written in such a way that it is does not conflict with the NPPF. 5.13 As an SME, WTL supports Policy H2 in principle. However, it should be clarified within the policy whether it relates to a site area of no larger than 1 hectare, or a threshold of between 10 – 60 dwellings (as referred to at paragraph 10.0.2 of the supporting text). This is not currently clear. Given that paragraph 10.0.3 of the supporting text commits to achieving 10% of the housing requirement on sites no larger than 1 hectare through allocations in the next Regulation 19 version of the plan (to comply with paragraph 73 of the NPPF), it appears logical that Policy H2 is based upon supporting alternative proposals on small and medium sized sites of between 10-60 dwellings (as opposed to a site area threshold). 5.14 It is noted that Policy H2 refers to compliance with a settlement hierarchy which will not be clarified until the next Regulation 19 version of the plan. WTL therefore requests the right to comment further on Policy H2 at the Regulation 19 stage. On a general point, and for the sake of completeness, it is assumed that the next Regulation 19 version of the plan will include all Development Management Policies, thereby allowing further comments to be made on these

Appen

We are aware

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2026Reg18/114	1. Supports this policy 2. Comments it should be clarified within the policy whether it relates to a site area of no larger than 1 hectare, or a threshold of between 10 - 60 dwellings 3. Comments that the respondent reserves the right to comments further on this policy when the whole local plan is consulted upon at Regulation 19.	1. Noted 2. It is consider the Policy seeks development by SMEs and site approaches are provided in the preamble to guide the range of sites sizes this type of developer has preference for. 3. Noted No change proposed.

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2026Reg18/124	3	Question 018 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent					See attached documents 2.1 OVERVIEW 2.1.1 Fernham Homes is an award-winning regional housebuilder based in West Malling, Kent. Fernham has a strong track record and reputation for delivering high quality residential and mixed-use developments in sustainable locations in Kent, East Sussex and southeast London over the last 26 years. Fernham have been recognised for excellence in housebuilding; achievements include the Evening Standard New Homes Award 2021 and 2022, the In-House Gold Award for Customer Satisfaction five years running, the Outstanding Achievement Award in 2024 and the What House Gold Award for Small Housebuilders in November 2025. In addition to this, Fernham have been regularly rewarded for health and safety performance including Small Builder Regional Winner at the Homebuilder Safety Awards and RoSPA Gold Award 2025. 2.1.2 The business is led by experts in their fields, with decades of experience in planning, design, and the delivery of new homes and places. Strong progress is being made on Fernham Homes' business plan to deliver around 425 homes per year in the next five years. Fernham's vision is to be the homebuilder of choice in Kent for all stakeholders, including the communities within which they build, the supply chain, their customers and the Local Planning Authorities (LPAs) they work with. 2.1.3 SME / regional housebuilders are recognised – including by the Planning Inspectorate1 - as making an important contribution to meeting the housing requirements of an area and being able to build out relatively quickly. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources, and is demonstrated below. This provides significantly more flexibility than national and other regional housebuilders and allows Fernham Homes to deliver housing rapidly and to a high-quality sustainable standard. See P11 of attached - Speed of Delivery ~~2.1.4 The support for SMEs such as Fernham Homes is recognised within~~
2026Reg18/126	10	Question 018 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Neither	Policy H2 Small and Medium Sites for Housing Development Investment TeamThe County Council notes that there is no mention of its Developer Contributions Guide and would ask that this is included.
2026Reg18/14	13	Question 020 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?				Faversham Town Council				Support	FTC strongly support 'Policy H3 Rural exception and community-led housing development'.This is reflective of FNP policy 'FAV 3 Residential Mix and Standards' clause 3 which supports community-led housing. It may be appropriate in the glossary to add reference to 'community-led' housing and community land trusts, including a sentence on how this can be an alternative way to deliver affordable housing.
2026Reg18/62	15	Question 020 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your				Maidstone Borough Council				Support	Broad support for the policy. Criterion 3d – is there clarification on what might a Statement of Community Involvement might need to include, beyond the 'significant input of the parish council'? As the evidence of the support of the Parish Council is also required under criterion 3a.

Appen

We are aware

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2026Reg18/124	1. Provides context behind the development company as an SME and seeks to promote its sites through the Local Plan process. 2. Supports this policy 3. Seeks amendment of Criteria 1 of this policy to "It can be demonstrated that the proposals will deliver sustainable development, following the Swale settlement hierarchy, unless material considerations justify a departure" 4. Seeks to amendment Criteria 2 to remove the reference to identification as a SME developers and the wording be amended to further support for the delivery of small and medium sites by SME developers. 5. Criterion (3) the wording needs to be reviewed to ensure a positively prepared and unambiguous, clearly written Policy, this is because many larger sites are subdivided into phases after attaining an Outline Planning Permission. 6. Criterion (5) we firmly object to SBC seeking to require the delivery of a minimum of 20% Biodiversity Net Gain (BNG) 7. Criterion (6) should be amended to the following:"All dwellings meet National design standards and have had regard to relevant Policies within this Plan". 8. Seeks an amendment as follows to Criterion (7) to remove the term bespoke as it is overly prescriptive and onerous. 9. Seeks an amendment to Criterion (8) as currently worded sets out unnecessary duplication with Policy H1. 10. Seeks amendment to Criterion (9), to remove the reference to the requirement for Applications to include schemes of hard and soft landscaping for brevity and to include within the preamble.	1. Noted 2. Noted 3. The Council disagrees for the following reasons that the additional wording would conflict with the Local Plan and national planning objectives of sustainable development 4. The Council disagrees for the following reasons the wording in the policy for criteria 2 is appropriate as it actively supports those who identify as SME developers. 5. The Council disagrees for the following reasons the wording as presented in the policy allows for consideration of sub division at the planning application stage that could include outline or detailed planning. 6. The Council disagrees for the following reasons the council wishes to seek a higher BNG than the minimum set out in national policy and has viability tested the preferred approach against a range of site sizes and locational typologies. 7. The Council disagrees for the following reasons this is unnecessary wording clarification as the local plan should be read as a whole include policies on these matters 8. Propose change to remove the word bespoke from criteria 7 9 and 10 The Council disagrees for the following reasons as this type of housing development is more specialist in focus differing from larger types of site it is considered appropriate to keep the these criteria as presented in the Policy and they are still appropriate for small and medium sized sites.
2026Reg18/126	1. Neither supports or objects to the policy. 2. Requests reference to KCC Developer Contributions guide be added	1. Noted 2. the KCC developer contributions guide would be best referenced in the preamble to this policy. Change proposed to preamble
2026Reg18/14	Supports this policy for the following reasons: That this policy is reflective of Faversham Neighbourhood Plan Policy FAV3 Suggest to add reference to 'community-led' housing and community land trusts, including a sentence on how this can be an alternative way to deliver affordable housing int eh glossary.	The Council agrees for the following reasons: A definition of community led housing development would further inform readers of the Plan. Partial Change Proposed
2026Reg18/62	1. Supports this policy 2. Seeks clarification of Criteria 3d clarification on what might a Statement of Community Involvement might need to include	1. Noted 2. The Council agrees for the following reasons To set out in the preamble evidence requirements what a Statement of Community Involvement is for the purposes of this policy Change proposed

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2026Reg18/29	6	Question 021 Do you have any specific comments on this preamble? What would help make it more focussed, relatable or complete?				Calpark Estates Ltd.	John	McGee	A more robust way to ensure compliance with the 2015 act is to insist upon a suitably worded Unilateral Undertaking rather than just a pro forma as this is not permitted where proposals are applications for permissions in principle. The Council is wrong to state at 12.0.1 that the initial "landowner" must have primary input into the final design and layout. The definition in section 1(A1) and (A2) of the 2015 Act (as amended) is unrelated to land ownership. Even rented accommodation can qualify. Policy H4 is too narrow to consistently deliver CSB over the plan period and is not underpinned by evidence of demand as advised in Government guidance. Specifically, that local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the housing and economic development needs guidance), to understand and consider future need for this type of housing in their area. Reliance on exception sites and a 5% threshold for sites over percentage 10 and 20 homes and strategic allocations will not address existing and future demand for this type of housing in the borough over the plan period. There must be specific site allocations to complement this policy and a more holistic strategy to delivery. More specifically reference in H4 that plots be required to "be designed and laid out by the first occupier" is inconsistent with the definition of self and custom housebuilding and will cause confusion if adopted. The layout of a plot on a site does not need to be designed by the occupier. Plots must meet the definition of being serviced under the law but can be laid out by a developer. It is only the home which must be designed by the occupier. There is also no reference to the need for a design code where plots are made available for self-builders which is essential to provide clarity and deliver high		
2026Reg18/40	82	Question 021 Do you have any specific comments on this preamble? What would help make it more focussed, relatable or complete?				Bredgar Parish Council	Teresa	Hudson	BPC have no specific comments on the preamble. Could it be more complete by explaining how such sites are monitored and managed after approval? Is there a higher risk of failure to complete all developments on a self build site with multiple owners?		
2026Reg18/76	21	Question 021 Do you have any specific comments on this preamble? What would help make it more focussed, relatable or complete?				Five Parishes Opposition Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG have no specific comments on the preamble. Could it be more complete by explaining how such sites are monitored and managed after approval? Is there a higher risk of failure to complete all developments on a self-build site with multiple owners?		

Appen

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2026Reg18/29	A unilateral undertaking would be a more robust way of ensuring compliance with the 2015 act. Pro formas are not permitted when proposals are applications for permission in principle. Notes that the Council is wrong to state that the initial landowner must have primary input. Policy is too narrow to consistently deliver over the plan period and is not underpinned by government guidance. A holistic strategy including strategic allocation to address existing and future demands. Concerns that 'be designed and laid out by the first occupier' is inconsistent with the definition and can cause confusion. There is no reference to design code. Swale has failed to deliver upon its statutory duties and a change is needed.	The Council disagrees because this is unnecessary against the requirements of the act and accompanying guidance. No change proposed. The Council agrees national guidance say 'initial home owner'. Change proposed. Government guidance is to use the register to assess the needs of the area. No change proposed. Comment noted. No change proposed. The Council agrees as this should 'initial home owner'. Change proposed. The whole plan should be interpreted including the good design policies. No change proposed. Comment noted. No change proposed.
2026Reg18/40	Seeks amendment to the preamble to explain how sites are monitored and manages after approval. Questions if there is a higher risk of failure to complete all developments on a self-build site with multiple owners.	The Council agrees with this amendment as self-build and custom house build are monitored however after approval the Council does not manage the site. Partial change proposed. The Council has set of this Policy to meets its needs. No change proposed.
2026Reg18/76	Seeks amendment to the preamble to explain how sites are monitored and manages after approval. Questions if there is a higher risk of failure to complete all developments on a self-build site with multiple owners.	The Council agrees with this amendment as self-build and custom house build are monitored however after approval the Council does not manage the site. Partial change proposed. The Council has set of this Policy to meets its needs. No change proposed.

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2026Reg18/59	7	Question 022 Do you support or object to Policy H3? What would you add, remove or amend to support it further or to remove your objection?				Home Builders Federatio n	M	Behrendt			24. The Council evidence on housing needs from the Self Build register is that since 2016 there has bene an ex-pressed need for 162 plots – around 16 per year. However, more evidence must be provided as to how many self-build plots have come forward over the last 10 year and whether windfall is largely meeting needs for plots in Swale. The fact that the demand for plots appears to be waning would suggest that those looking to find a plot either have done so and there is little need for plots to be provided on development sites of 20 or more homes. If the Council are to have such a policy, it must be justified and at present this is not the case. 25. If there is demand for self-build homes, then the Council must first consider alternative options for providing self-build plots it has considered before placing the burden of meeting these needs on house builders. PPG sets in paragraph 57-025 that planning authorities should not only use planning policies to meet needs but also whether they could use their own land to meet those needs, how have they engaged directly with landowners to try and bring forward specific sites for self-build. It is essential that these mechanism are considered prior to setting requirements in local plans for plot delivery on larger sites. 26. The Council also needs to consider the difficulties in providing self-build plots on new housing developments and how there are coordinated with the development of a wider site. At any one time, there are often multiple contractors and large machinery operating on-site and therefore from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. It may also be the case that it is unfeasible to provide self-build plots on sites taking into account topography and access and the degree to which self-build and the rest of the side can be developed separately. HBF would therefore recommend that in part 2 of the policy that where developer can show that provision of plots is either unfeasible or unviable then they will not need to be provided. 27. Finally, as with policies on self-build in other local plans the Council will need to set out what happens should the development not be able to sell these

Appen

We are aware

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2026Reg18/59	Notes the self-build register, but believes more information should be given on how many self-build plots have come forward in the last 10 years believes plots on developments of 20 or more homes is not justifiable. Notes the PPG and the need for the Council to consider alternative options before placing the burden on house builders. Notes the Council should consider the difficulties in providing these plots on housing developments. Seeks amendment to part 2 to add where developer can show that provision of plots is either unfeasible or unviable then they will not need to be provided. Seeks amendment to add to the policy a section on marketing period.	The Council disagrees because the Council has a need of 130 individuals seeking 131 plots and 5 associations seeking 32 and only 14 self-build and custom house build have been granted permission, considering the shortfall the Council consider 5% appropriate.No change proposed. Although the PPG does say this, it does not mention a hierarchy in an approach to meet needs for self-build and custom house build, therefore the Council has decided to take a policy approach. No change proposed. The Council disagrees the whole plan viability assessment 2024 notes that requirement for self-build plots is unlikely to impact viability. No change proposed. The Council agrees to add a marketing period for these plots, but 6 months is too short. Partial change proposed.

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

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2026Reg18/60	2	Question 022 Do you support or object to Policy H3? What would you add, remove or amend to support it further or to remove your objection?	Lichfields	Sally	Furminger	Taylor Wimpey				Object	TW objects to Policy H4 (self-build and custom build), as it is currently drafted. The policy requires that sites of 20 or more homes will provide at least 5% serviced plots for sale to self builders. However, level of requirement does not appear to have been appropriately justified within the published evidence base. The SHMA (2020) includes one paragraph - 6.51, which recognises 'The Self Build Portal presents a limited amount of self-build data at a Local Authority level (it contains more information on the national situation).' The Council's evidence on housing needs from the Self Build register is that since 2016 there has bene an ex-pressed need for under 20 dwellings per year, however no evidence is included on how many plots have come forward to meet this need. The policy is therefore not currently justified. On this basis, there is no evidence that Swale needs to increase its delivery of self-build housing above that which is currently being provided. In fact, to over-burden development with yet further policy requirements risks undermining viability and overall deliverability of the Plan, particularly when considering the other requirements placed on housing sites in the remainder of the Plan – e.g. BNG, net zero carbon and affordable housing. Anecdotally, Taylor Wimpey's experience indicates that interest in self-build plots tends to be for larger plots in rural locations or in smaller settlements, and not so typically on plots within larger housing sites. As such, it is not clear that even the annual 'need' figure derived from people putting their names on waiting list would all seek a plot on a larger housing scheme on an urban extensions site, for example. As a minimum, the policy should include greater flexibility linked to demonstrated need within a particular locality. Taylor Wimpey also consider that a threshold of 10 homes is very low – this is not evidenced and it must be. It would be prudent for the Council to estimate, based on allocated sites and the expected size of windfall sites, how many self-build plots it estimates this policy will generate (averaged, per year) and how this compares with the historic trend in number of applicants on its Register. This is likely to show that the number of plots yielded by the policy is substantially higher than is likely to be needed, and

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/60	Notes the policy and believes it is not justifiable. Raises concerns on viability. Notes that interest in plots are usually larger plots in rural locations or in smaller settlements Notes a need for a marketing period of 6 months. Seeks amendment to add where developer can show that provision of plots is either unfeasible or unviable then they will not need to be provided.	The Council disagrees because the Council has a need of 130 individuals seeking 131 plots and 5 associations seeking 32 and only 14 self-build and custom house build have been granted permission, considering the shortfall the Council consider the policy appropriate. No change proposed. The Council disagrees because the whole plan viability assessment say it is unlikely that self-build plots will impact viability.No change preposed. National guidance only requires the Council to supply plots regardless of location.No change proposed. The Council agrees that a marketing period can be added to this policy, but considers 6 months too short. Partial change proposed. The Council disagrees because the whole plan viability assessment say it is unlikely that self-build plots will impact viability.No change preposed.

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2026Reg18/109	9	Question 022 Do you support or object to Policy H3? What would you add, remove or amend to support it further or to remove your objection?	Esquire Developm ents	E	Bonthron (Esquire Dev)	Kent SME Network		x		Object	Policy H4 Self-build and custom build Question 22 – Do you support or object to Policy H4? What would you add, remove or amend to support it further or to remove your objection? 3.18 The triggers for sites to deliver self/custom build housing are restrictive at thresholds of the provision of 5% of homes for self-builders in sites over 10 homes in rural areas and settlements. The requirement on 10-unit developments within the rural area and smaller settlements requiring 2 homes (10%) imposes self-build on small sites which would impact viability and deliverability, contrary to Policy H2. 3.19 If there is evidence of a significant demand of self-build homes, the Council should consider an alternative delivery mechanism before burdening housebuilders and impacting site viability. Therefore, we recommend that the self-build requirement is either removed or that the policy is reworded whereby a developer can demonstrate delivery is unviable that plots are not provided. 3.20 An alternative to a borough wide self-build requirement would be specific site allocations to meet demand. This would alleviate tension between commercial and self-build units on the same site. 3.21 Finally, we recommend that a marketing period is set for self-build plots. The marketing period can be a minimum of 6-months and if any plot remains unsold for the minimum period they are returned to the landowner to sell without restriction. 3.22 To conclude, the Network are concerned that the requirement of self-build plots would impact the delivery of sites across the Local Plan and mean the plan is found unsound. The Council should consider allocating land specifically to meet the self-build demand, which are more suitable for individuals than plots on a site mixed with commercial housebuilding. Lastly, a marketing period should be incorporated should a development not be able to sell any plots.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/109	Notes the triggers for self-build and custom house build. seeks amendment to remove or reword policy to reflect viability. suggests an alternative approach with site allocations for self-build and custom house building. Recommends a marketing period of 6-months.	Comment noted. No change preposed. The Council disagrees because the whole plan viability assessment say it is unlikely that self-build plots will impact viability. No change preposed. The Council disagrees and additional support for self-build can be found in Policy H2 Small and medium sites for housing development. No change preposed. The Council agrees that a marketing period can be added, but 6 months is too short. Partial change proposed.

Page 210

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2026Reg18/110	4	Question 022 Do you support or object to Policy H3? What would you add, remove or amend to support it further or to remove your objection?	Esquire Developm ents	E	Bonthron (Esquire Dev)	Kent SME Network		x		Neither	Policy H4 – Self-build and Custom Build3.10 The triggers for sites to deliver self/custom build housing are restrictive at thresholds of theprovision of 5% of homes for self-builders in sites over 10 homes in rural areas andsettlements. The requirement on 10-unit developments within the rural area and smaller settlements requiring 2 homes (10%) imposes self -build on small sites which would impactviability and deliverability, contrary to Policy H2.3.11 If there is evidence of a significant demand of self -build homes, the Council should consideran alternative delivery mechanism before burdening housebuilders and impacting site viability.Therefore, we recommend that the self-build requirement is either removed or that the policyis reworded whereby a developer can demonstrate delivery is unviable that plots are not provided. 3.12 An alternative to a borough wide self -build requirement would be specific site allocations tomeet demand. This would alleviate tension between commercial and self -build units on thesame site.3.13 Finally, we recommend that a marketing period is set for self -build plots. The marketing periodcan be a minimum of 6-months and if any plot remains unsold for the minimum period theyare returned to the landowner to sell without restriction.3.14 To conclude, the Network are concerned that the requirement of self -build plots wouldimpact the delivery of sites across the Local Plan and mean the plan is found unsound. TheCouncil should consider allocating land specifically to meet the self -build demand, which aremore suitable for individuals than plots on a site mixed with commercial housebuilding. Lastly,a marketing period should be incorporated should a development not be able to sell any plots.
2026Reg18/22	6	Question 028 Do you support or object to Policy H6? What would you add, remove or amend to support it further or to remove your	Finn's	Mollie	Lay	Finn's				Support	Support but point 3 refers to provision of ‘additional’ dwelling – many farms have no dwellings. Should remove the word ‘additional’.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/110	Notes the policy and believes it will impact viability and deliverability. Seeks amendment to add developer can demonstrate delivery is unviable that plots are not provided. Notes that specific site allocations to meet the demand. Seeks amendment to add a marketing period for 6 months.	The Council disagrees because the Council has a need of 130 individuals seeking 131 plots and 5 associations seeking 32 and only 14 self-build and custom house build have been granted permission, considering the shortfall the Council consider 5% appropriate.No change proposed. Comment noted.No change proposed. The Council agrees that a marketing period should be added, but 6 months is too short.Partial change agree.
2026Reg18/22	Supports this policy Recommends amendment Policy H7 criteria 3 to allow for instances where a farm may not have an existing dwelling.	Noted Propose amending Policy H7 criteria 3 to: 3. There is confidence that the enterprise will remain viable for the foreseeable future and that the provision of a dwelling or an additional dwelling on site is essential for the continued vitality of a farming business through the farm succession process; Partial Change Proposed

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2026Reg18/73	36	Question 029 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	Eastchurch Parish Council has reviewed the preamble to Policy H8 (Extensions to, and the replacement of, dwellings in the countryside). The Parish Council agrees with the intent of the preamble and supports the balanced approach it sets out. It is reasonable that residents in the countryside should be able to extend or replace dwellings where appropriate, and the emphasis on protecting the tranquillity, beauty and character of Swale's countryside is welcomed. The reference to ensuring extensions and replacement dwellings are proportionate in scale, mass and appearance, and that they do not harm the character of the countryside, is particularly important in rural parishes such as Eastchurch. The continued relevance of the Supplementary Planning Guidance is also supported. To make the preamble more complete and locally relatable, the Parish Council suggests: Reinforcing the importance of protecting rural character and avoiding incremental suburbanisation of the countryside; Emphasising that cumulative extensions over time should be carefully assessed to prevent disproportionate enlargement of original dwellings; and Highlighting the need for replacement dwellings to reflect the vernacular style and landscape context of the parish. Overall, Eastchurch Parish Council agrees with the preamble and considers it clear and appropriate, subject to minor emphasis on safeguarding rural identity and cumulative impact.		
	17	Question 036 Do you support or object to Policy E2? What would you add, remove or amend to support it further or to remove your objection?				Creative Estuary				Neither	(See attached document) E1-4 Economy Include the creative and cultural industries in place-making development particularly around transport hubs, new estates, and high street developments. ANSWER DUPLICATED AT Question 34, 36, 38 and 40
	5	Question 036 Do you support or object to Policy E2? What would you add, remove or amend to support it further or to remove your objection?				Kent Wildlife Trust				Neither	Development in rural locations has the capacity to detrimentally impact on biodiversity and result in a loss of green infrastructure that plays an important role in nature connectivity at a landscape scale. While the wording of the policy and its explanatory text generally seeks to avoid these impacts, it is our view that Policy E1(d) and E2(d) should be amended to read "result in no significant harm to the [...] biodiversity [...] of the area". It is also our view that Part 3 of the policy should support the sustainable growth and expansion of agricultural and forestry sectors to enable regenerative agroecological practices (including agroforestry) where appropriate.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Supports this pre-amble for the following reasons that it is sets out a balanced approach and with the principles of residents being allowed to extend or replace dwelling with the appropriate considerations. Seeks additions to the pre-amble as follows:	The Council partial agrees to the preamble additions in that the third bullet point should be amended a more general area rather than stated parish. The bullet points in the submission to be included towards the end of the Policy H8 preamble as a sentences rather than bullet points.
	Reinforcing the importance of protecting rural character and avoiding incremental suburbanisation of the countryside;	Reinforcing the importance of protecting rural character and avoiding incremental suburbanisation of the countryside;
	Emphasising that cumulative extensions over time should be carefully assessed to prevent disproportionate enlargement of original dwellings; and	Emphasising that cumulative extensions over time should be carefully assessed to prevent disproportionate enlargement of original dwellings; and
	Highlighting the need for replacement dwellings to reflect the vernacular style and landscape context of the parish.	Highlighting the need for replacement dwellings to reflect the vernacular style and landscape context of an area Partial Change Proposed
2026Reg18/105	Requests that the creative and cultural industries are included in place-making development, particularly around transport hubs, new estates, and high street developments.	Reference to this will be added to Strategic Policy ST5 Building a strong, competitive economy at the next stage of the Local Plan, Reg 19. Change Proposed.
2026Reg18/121	Neither supports nor objects to this policy. States that development in rural locations has the capacity to detrimentally impact on biodiversity and result in a loss of green infrastructure that plays an important role in nature connectivity at a landscape scale. Notes that the wording of the policy and its explanatory text generally seeks to avoid these impacts, request that that Policy E1(d) and E2(d) should be amended to read "result in no significant harm to the [...] biodiversity [...] of the area". States that Part 3 of the policy should support the sustainable growth and expansion of agricultural and forestry sectors to enable regenerative agroecological practices (including agroforestry) where appropriate.	Noted. Noted. Point 1d of the policy uses the suggested wording already "result in no significant harm to the historical, architectural, biodiversity, landscape or rural character of the area;" already. The Council agrees that the suggested wording would add value to the policy and it will be added to part 3 of the policy. Partial Change Proposed.

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2026Reg18/126	14	Question 036 Do you support or object to Policy E2? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Neither	Development Investment TeamThe County Council recommends specific mention of access to, from and between tourism sites within the policy to assist with the realisation of the Council's tourism objectives.Tourism is an important industry for Kent and the landscape is a key attractor of visitors – sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services and local economies. The PROW network and the ROWIP have a critical role in this; for example, promoted walking routes have been variously developed within the borough, including the King Charles III England Coast Path, the Saxon Shore Way and several 'Food Trails'.
2026Reg18/127	13	Question 040 Do you support or object to Policy E4? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.5.2 E4 New Holiday Parks or extensions to existing parks & the occupancy of holiday parks2.5.2.1 Policy criteriaNatural England supports this policy and its reference to policies C6 and C7 relating to the coast and the coastal change management area in criterion 2a.We note that the policy includes an additional criterion 2g related to impacts to the local environment. We advise that the Draft Plan has overarching policies related to impacts to the natural environment. We refer you to our overarching comments in paragraph 2.1. It would be Natural England's preference to remove criterion 2g from policy E4 and rely on strong overarching policies in the Draft Plan. Should the Council choose to not to rely on the overarching policies and to include criterion 2g, we advise that a link could instead be made to relevant overarching policies such as Policy B1 and any others the Council deems relevant. We would suggest the following wording, and advise that this should be included in all other relevant policies as well as added to criterion 3 of this policy for consistency. We would suggest the following wording:"2. In circumstances where land is lost to coastal erosion, minor extensions to existing static holiday caravan sites will be permitted where...g. there is no unacceptable impact on the local environment, in accordance with Policy B1 Biodiversity & geodiversity conservation & BNG...3. Where new or improved facilities are proposed within the existing boundaries of the Holiday Park areas, as shown on the Proposals Map (to be illustrated in later stages of the Local Plan), planning permission will be granted provided they are...d. in accordance with Policy B1 Biodiversity & geodiversity conservation & BNG."We support criterion 4d of this policy related to potential disturbance to over-wintering birds of Special Protection Areas (SPAs). Our understanding is that the criterion relates to the need for appropriate financial contributions to be made to the Strategic Access Management and Monitoring Strategy (SAMMS) to mitigate recreational disturbance from developments within the 6 km zone of influence of the SPAs. If this is the case, we suggest that the wording is amended to make this clearer and suggest the following wording:4. Applications to extend

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We are aware

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2026Reg18/126	The respondent recommends specific mention of access to, from and between tourism sites within the policy to assist with the realisation of the Council's tourism objectives. Sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services and local economies and the PROW network and the ROWIP have a critical role in this.	The Council agrees that access to, from and between is important. The pre-amble references the business credentials of rural tourism and this includes "the transport opportunities and choices available." Point 2a of the policy requires applicants to reference these principles. The Council proposes adding wording to paragraph 19.0.9: "the transport opportunities and choices available and access to, from and between tourism sites." Noted. Change Proposed.
2026Reg18/127	1. Neither supports or objects to this policy 2. Comments that the Draft Plan has overarching policies related to impacts to the natural environment 3. Seeks amendment to criteria 2.g to include reference to Policy B1 Biodiversity & geodiversity conservation & BNG 4. Seek amendment to an additional criteria to 3 as 3.d in accordance with Policy B1 Biodiversity & geodiversity conservation & BNG." 5. Seeks to amendment to criteria 4d to reference 6km zone of influence of the SPA to reads as where located within 6 km of adjacent to or in close proximity of the North Kent Special Protection Areas (SPAs), an assessment has been undertaken to determine the level of disturbance to over-wintering birds and identified mitigation measures, including securing financial contribution to the Strategic Access Management and Monitoring Strategy (SAMMS), where appropriate"	1. Noted 2. the Regulation 19 Local Plan will have strategic policies that will cover a range of over arching matters 3. Proposed change to criteria 2.g to include reference to Policy B1 Biodiversity & geodiversity conservation & BNG 4. Proposed change to additional criteria to 3 as 3.d in accordance with Policy B1 Biodiversity & geodiversity conservation & BNG." 5. Proposed change to criteria 4d to reference 6km zone of influence of the SPA to reads as where located within 6 km of adjacent to or in close proximity of the North Kent Special Protection Areas (SPAs),

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2026Reg18/62	28	Question 041 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Maidstone Borough Council			Maidstone Borough Council is unclear as to why Department for Transport Circular 1/2022 Strategic road network and the delivery of sustainable development has not been mentioned in the preamble as this sets a new vision led approach to the transport planning. on a similar note, has Kent County Council's 2025 guidance on Transport Assessment & Travel Plan been considered as part of the policy development? The Council is also keen to understand the outcomes of the transport modelling for the proposed new local plan so that it can understand the impacts of the proposals on the highway network within its own borough boundary.		
2026Reg18/74	13	Question 041 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	We acknowledge Faversham Council's Active Travel Committee's views and support their opinion in relation to the Reg 18 document that: "there is an urgent need to prioritise sustainable transport and active travel and the transport hierarchy proposed. Reference to Faversham LCWIP out of date. Town Council signed off revised version Autumn 2024."We also support the Active Travel Committee's suggestions as follows: "(Para 22.0.20) Development proposals should incorporate 20mph speed limits to reduce traffic speeds in residential areas. Schemes must provide for walking, wheeling and cycling through well-designed site layouts and continuous, coherent links to the wider active-travel network, services and facilities. Transport Assessments and Travel Plans will be rigorously evaluated against these requirements.(Para 22.0.22) Developer contributions may support new or enhanced public transport services. Policies should acknowledge the current inadequacy of bus provision and set expectations for minimum service levels, recognising that bus use is strongly dependent on service availability and frequency." Their meeting records can be found on FTC's website.		

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We are aware

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2026Reg18/62	Gives qualified support for this preamble for the following reasons: Unclear how Transport Circular 1/2022Strategic road network and the delivery of sustainable development and Kent County Council's 2025 guidance on Transport Assessment & Travel Plan been considered as part of the policy development? Council is also keen to understand the outcomes of the transport modelling for the proposed new local plan.	The Council (partially) agrees for the following reasons: The documents will be referenced and incorporated as part of the strategic policy on transport at the Reg 19 stage of plan making. Transport modelling is being prepared and will be made public for Reg 19 local plan consultation. Change proposed
2026Reg18/74	Gives qualified support for this policy/pre-amble for the following reasons: urgent need to prioritise sustainable transport and active travel and the transport hierarchy proposed. Reference to Faversham LCWIP out of date. Town Council signed off revised version Autumn 2024. Development proposals should incorporate 20mph speed limits to reduce traffic speeds in residential areas. Schemes must provide for walking, wheeling and cycling through well-designed site layouts and continuous, coherent links to the wider active-travel network, services and facilities Policies should acknowledge the current inadequacy of bus provision and set expectations for minimum service levels	The Council (partially) agrees for the following reasons: Noted This will be changed and updated. Speed limit is evidence - led and is set by local traffic authorities based on local needs and conditions. KCC is the primary traffic authority in Kent and determines this. Noted Noted, this is considered as part of the Infrastructure delivery plan Partial Change Proposed.

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2026Reg18/76	40	Question 041 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Five Parishes Opposition Group			FPG commend the preamble, which clearly describes the local plan principles for managing transport demand and impact. We particularly support paragraph 22.0.24 which indicates the Council's intent for the local plan's policies to accommodate new adaptations to the way we travel, work and shop. This policy should be aligned with Kent County Council as they are the Highways authority acting for Swale.Perhaps through the use of new technologies the recently withdrawn bus services to rural villages can be replaced by new flexible low-cost services in the not-too-distant future. Such a service may be more appealing to passengers of all ages, increasing demand and success in Promoting Sustainable Transport and Active Travel, with all the environmental benefits that will accrue. For example, reductions in congestion, emissions and pollution, harm from cars used for short journeys, (such as to Doctors, Supermarkets, Libraries, etc.). Please note we are not endorsing a busway which was part of the Highsted South application this was a complete red herring and a “novel mode” of transport that has no national design standards and most terrifyingly was implemented in Cambridgeshire with little consideration of the design during planning of the service – this resulted in several deaths as this novel transport mode did not include sufficient health and safety standards – it rsulted in the local authority being prosecuted and paying a fine of £6m. Therefore any new provision must adhere to national design standards and be demonstrated to have a track record of safe delivery/provision. After this was pointed out by us at the public inquiry the desire for a busway rapidly evaporated!Swale needs to align itself with Kent County Council Bus Service Improvement Plan and in addition how to release the Section 106 funding received back into the community in a timely manner. An example of this is with Stones Farm where none of the Section 106 monies have been released and Bus Services have gone from 4 services an hour to 1 service. There are also no bus services on a Sunday (Service X3) between Sittingbourne and Maidstone or Sittingbourne and Canterbury.Paragraph 22.0.25 is a clear statement which the FPG fully support. During the Highsted Park Inquiry there was no evidence presented regarding		

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We are aware

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2026Reg18/76	Gives qualified support for this preamble for the following reasons: Preamble clearly describes the local principles for managing transport demand and impact highlighting council's intent to accommodate new ways of travel. Recently withdrawn bus services to rural villages can be replaced by new flexible low-cost services in the not-too-distant future. Should noted that busway which was part of the Highsted South application is not endorsed Swale needs to align itself with Kent County Council Bus Service Improvement Plan and in addition how to release the Section 106 funding received back into the community in a timely manner. Supports Paragraph 22.0.25 Focus should be on delivering improved rail and bus infrastructure Policy INF1 makes no mention of rail freight - it only mentions freight (ie lorries). It is important that Swale includes policies to replace key infrastructure such the rail bridges on Crown Quay Lane and Milton Road. Policies should be included in the local plan to deliver this improvements.	The Council (partially) agrees for the following reasons: Noted Noted Noted The bus service improvement plan has been considered for the IDP and will be reflected in the document. Noted Noted In 22.0.23 the council acknowledges the importance of rail in the movement of freight. The IDP will capture and itemise the infrastructure required to support the development envisioned in the plan including priorities and timeline of delivery. No Change proposed

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2026Reg18/126	2	Question 041 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				KCC Strategic Planning		KCC Strategic Planning	Highways and Transport The County Council, as the Local Highway Authority (LHA), recognises the continued need to ensure that the transport network is safe, resilient, and capable of supporting future growth.The County Council considers that the Regulation 18 document shows positive progress, particularly in relation to active travel, sustainable mobility and the embedding of climate considerations into transport planning. However, several areas require further clarification, strengthening or evidence ahead of the Regulation 19 stage.It is therefore considered that:•Evidence is still incomplete and key modelling and infrastructure planning work must be delivered before the County Council can fully support the Plan.•The completion of strategic transport modelling to test all reasonable growth scenarios is requested.•Evidence that the development strategy avoids severe residual cumulative impacts on the road network.•The County Council would like to emphasise that the Plan must ultimately show how development will be supported by a coordinated package of transport improvements that align with both local and strategic transport priorities in Kent.•The Local Plan will require a more detailed, fully costed and deliverable transport strategy at Regulation 19 stage including a robust and fully costed Infrastructure Delivery Plan (IDP).•The County Council is committed to working collaboratively with SBC to ensure that development is supported by a safe, sustainable and well-functioning transport network. In addition to the above the County Council undertakes regular HGV overnight parking surveys across Kent and Medway. Our most recent survey (September 2025) showed that Swale is the borough with the highest average number of HGVs parking overnight outside of official lorry parking facilities (which is considered inappropriate parking). The average was 134 HGVs, with Ashford being second highest at 49. A comparable result was found in the June 2025 survey and since the survey began in 2017, it has been Swale with the highest number of HGVs inappropriately parked. Within Swale, the most highly affected areas were the Furlink Industrial Estate and Trinity Trading Estate in		

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2026Reg18/126	Gives qualified support for this policy/pre-amble for the following reasons: Reg 18 document shows positive progress particularly around active travel, sustainable mobility and climate consideration into transport planning. Evidence incomplete - Modelling and Infrastructure Evidence that development avoids residual cumulative impact, coordinated package of transport improvement aligning with local and strategic priorities. Detailed costed IDP. Committed to working with SBC In Recent HGV survey Swale highest in average number of HGVs parking overnight outside of official lorry parking facilities, affecting Eurolink Industrial Estate and Trinity Trading Estate in Sittingbourne, Queenborough on the Isle of Sheppey and laybys on the A249 and A2/A299 corridors. Policy should address this. Protect public right of way Objective 6 can limit application of Active Travel The Rights-of-Way-Improvement-Plan-2018-2028.pdf will be Included future development proposals will need to be mindful of the NPPF	Gives qualified support for this policy/pre-amble for the following reasons: Work is being undertaken on this will be available at the next stage of plan making. Noted Noted Noted To be considered INF1 part 3e applies to this INF1 part 3 makes it clear this applies to all trip generating proposal to be included Include Rights-of-Way-Improvement-Plan-2018-2028.pdf Noted Change proposed

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

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2026Reg18/126	16	Question 042 Do you support or object to Policy INF1? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Neither	Policy INF1 – Managing Transport Demand and Impact Highways and TransportationThe County Council considers that Policy INF1 forms the backbone of the Local Plan's transport strategy. The County Council supports its principles but considers that the policy should be strengthened in several areas.Transport Assessment RequirementsThe Plan correctly references the use of Transport Statements (TS) and Transport Assessments (TA). However, the County Council requires:•Confirmation that all TAs must be scoped with the County Council at the pre-application stage to ensure consistency of approach and robust technical outputs.•Explicit reference to the need for cumulative assessment, incorporating committed development, planned growth, and background traffic growth.•A requirement for developments that may impact the Strategic Road Network (SRN) to engage both the County Council and National Highways at an early stage. Strategic Transport ModellingThe County Council notes that a bespoke transport model is being prepared to test Local Plan growth. The County Council must emphasise:•Modelling must be completed before Regulation 19 so that the draft Local Plan includes a justified and deliverable transport strategy.•Scenario testing must reflect a range of assumptions on mode share, active travel uptake, and public transport viability.•Outputs must clearly identify pinch points, mitigation packages, costs, and responsible delivery agencies.•The County Council will not be able to support the Local Plan at Regulation 19 without this evidence. Active Travel ImprovementsThe County Council welcomes the emphasis on walking, cycling and wheeling and agrees that the LCWIPs (Faversham, Kent-wide, and emerging Swale-wide) should inform infrastructure delivery. To strengthen deliverability:•Active travel schemes should be mapped, prioritised and costed within the IDP.•Policy should highlight that connections to schools, town centres and rail stations are particularly critical.•Developers should be required to demonstrate continuous, direct, safe and attractive active travel connections into surrounding networks, not only within site boundaries. The

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/126	Supports this policy for the following reasons: supports the interface between Policies INF1/INF2 and the climate/air quality policies (C1-C12). Gives qualified support for this policy/pre-amble for the following reasons: Confirmation that all TAs must be scoped with the County Council at the pre-application stage to ensure consistency of approach and robust technical outputs. Explicit reference to the need for cumulative assessment, incorporating committed development, planned growth, and background traffic growth. A requirement for developments that may impact the Strategic Road Network (SRN) to engage both the County Council and National Highways at an early stage. Active travel schemes should be mapped, prioritised and costed within the IDP. Policy should highlight that connections to schools, town centres and rail stations are particularly critical. Developers should be required to demonstrate continuous, direct, safe and attractive active travel connections into surrounding networks, not only within site boundaries. The County Council encourages the Plan to reference Cycle Infrastructure Design (LTN 1/20) more explicitly to ensure active travel facilities meet national standards. The Local Plan should identify corridors with the greatest potential for enhanced bus frequency, bus priority or demand-responsive transport. The viability of extending existing routes or creating new ones must be tested through modelling and discussions with operators. Larger developments should be required to provide mobility hubs incorporating bus stops, shared mobility modes, EV charging and cycle parking. Growth allocations that may materially increase flows on the SRN must be supported by evidence agreed with National Highways. Opportunities to enhance junction capacity must be assessed early, including M2 J5, A249 and key junctions on the A2 corridor. The Local Plan should explicitly safeguard key freight corridors and wharves serving the Port of Sheerness and wider Thames Estuary area. Industrial and logistics proposals must include an HGV routing strategy demonstrating how sensitive locations will be avoided. reference the Kent Minerals and Waste Local Plan's freight principles. Air Quality, Climate Change and Transport	Noted The Council (partially) agrees for the following reasons: to ensure consistency of approach and robust technical outputs. it is proposed that for item 1 of the policy include: All transport assessments must be scoped with the county council at the pre-application stage. Proposed to wording for item 1: should include cumulative impact on on the transport network Proposed to include in Item 2: and an early stage engagement with Kent County Council highway an National Highways. Noted Noted Proposed to include item 3 i : Ensuring continuous and safe active travel connections into surrounding networks, not only within site boundaries. Noted - policy already covers relevant aspect. Noted Noted The council is currently preparing additional evidence work including transport modelling in support of the plan. Noted Noted Wharfs HGV Strategy The Kent minirals and waste Partial Change Proposed.

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2026Reg18/127	15	Question 042 Do you support or object to Policy INF1? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	Natural England supports this policy which highlights the need to prioritise sustainable and active travel in the preamble.2.6.1.2 Policy criteria We welcome the inclusion of criterion 3 which reflects the requirements for all trip generating development proposals to prioritise sustainable and active travel, including criterion 3e to ensure existing public rights of way are enhanced.By way of clarification, we recommend including reference to National Trails and the King Charles III England Coast Path and specifically, a requirement to consider adding links to such existing routes, to ensure the policy aligns with NPPF paragraph 105. We would also like to clarify that this criterion should apply to all development proposals rather than just trip generating development proposals. We therefore suggest including an additional criterion to apply to all development proposals, and suggest the following wording:"8. All development proposals should protect and enhance existing public rights of way, including National Trails and the King Charles III England Coast Path, to improve connectivity to the wider network and take opportunities to support biodiversity through enhancing green corridors"Transport infrastructure also provides opportunities to enhance biodiversity, for example through the creation of biodiverse highway verges, which should be recognised and promoted. We therefore suggest that an additional policy criterion could be added and suggest the following wording: "9. All development proposals should promote and support opportunities to create and enhance green and blue infrastructure and create and connect habitats in the transport network in accordance with Natural England's Green Infrastructure Framework standards."
2026Reg18/15	4	Question 045 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or				Sport England	Bob	Sharples	The reference to the playing pitch strategy is confusing - we have 2025-2040 version of an action plan, which was published in October 2025.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Gives qualified support for this policy for the following reasons: Inclusion of criterion for all trip generating development proposals to prioritise sustainable and active travel and ensuring enhancement of public right of way. Seeks amendment of this policy as follows: Include additional criteria: All development proposals should protect and enhance existing public rights of way, including National Trails and the King Charles III England Coast Path, to improve connectivity to the wider network and take opportunities to support biodiversity through enhancing green corridors. All development proposals should promote and support opportunities to create and enhance green and blue infrastructure and create and connect habitats in the transport network in accordance with Natural England's Green Infrastructure Framework standards.	Noted Include additional criteria: The Council agrees for the following reasons: Amendment is In line with the NPPF. The Council disagrees for the following reasons: Repeats Policy B1 Biodiversity& Geodiversity conservation & BNGItem 6 Partial Change Proposed. Inclusion of new Criterion 3i 3i. All development proposals should protect and enhance existing public rights of way, including National Trails and the King Charles III England Coast Path, to improve connectivity to the wider network and take opportunities to support biodiversity through enhancing green corridors.
2026Reg18/15	reference to the playing pitch strategy is confusing - as there is 2025-2040 version of an action plan	This will be updated in the version of the plan, the Reg 18 version was published shortly before the latest playing pitch strategy was published. Change Proposed

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2026Reg18/127	16	Question 046 Do you support or object to Policy INF3? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.6.2 INF3 Open space, sport and recreation provision 2.6.2.1 Policy criteria Natural England welcomes this policy which supports paragraphs 88d and 98a of the NPPF in relation to open space provision. We particularly welcome the inclusion of provision targets (including green space) and the commitment to providing multi-use of open space and recreation facilities "with particular emphasis on contributing towards the Green and Blue Infrastructure Strategy (2020)" as stated in criterion 5. We welcome the intention to strengthen the requirement to use the recommendations within the GBI Strategy, by the inclusion of a supporting strategic policy within the next Regulation 19 stage of the Local Plan Review, as stated in criterion 5. We would also support the use of Natural England's Green Infrastructure Framework in open space, sports and recreation facilities proposals and suggest that criterion 5 is strengthened to include this with the following wording:"5. Provide for the multi-use of open space, sports and recreation facilities as appropriate, in accordance with Natural England's Green Infrastructure Framework and with particular emphasis on contributing towards the Green and Blue Infrastructure Strategy (2020)122 , set out in a strategic policy in the next stage of the Local Plan Review, Regulation 19, so as to achieve benefits for both communities and biodiversity."
2026Reg18/16	17	Question 049 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Boughton under Blean Parish Council	Sarah	Muteham	§ 1a In 'upgrading existing structures may be more sustainable than building new.' substitute 'may'with 'is generally'???Why not require BREEAM 'Excellent'?		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Gives qualified support for this policy/pre-amble for the following reasons: supports paragraphs 88d and 98a of the NPPF and welcome the inclusion of provision targets (including green space) and the commitment to providing multi-use of open space and recreation facilities welcome the intention to strengthen the requirement to use the recommendations within the GBI Strategy, by the inclusion of a supporting strategic policy within the next Regulation 19 We would also support the use of Natural England's Green Infrastructure Framework in open space, sports and recreation facilities proposals. Seeks deletion/amendment of this policy/pre-amble as follows: in accordance with Natural England's Green Infrastructure Framework and	Noted Noted Noted The Council (partially) agrees for the following reasons: Includes NR Framework in policy Partial Change Proposed.
2026Reg18/16	Neither supports nor objects to this policy, but comments: Suggests word change: 1a In 'upgrading existing structures may be more sustainable than building new.' substitute 'may'with 'is generally' Why not require BREEAM 'Excellent'?	The Council (partially) agrees, as follows: Agree. 'May' will be amended to 'generally' in C1, point 1a. BREEAM 'Excellent' is required in policy C1 where viable. Partial Change Proposed

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2026Reg18/40	76	Question 050 Do you support or object to Policy C1? What would you add, remove or amend to support it further or to remove your objection?				Bredgar Parish Council	Teresa	Hudson		Support	BPC support Policy C1. The wording of the two opening paragraphs would be stronger if the word "should" is replaced with "must" and it was indicated that such documentation will be assessed for all applications. We do not have the expertise to question the rating or assessment systems identified for large/major developments but our brief investigation of them leads us to support their use. It would be helpful to define what are large/major developments (reading ahead it seems to be developments of 50 units or more?), and where these systems are required to be used or is it best left to planning officers to decide (with decision scrutiny)? Will the proposed Planning Guidance set out more detail about what constitutes a large development and the systems applicable?
2026Reg18/76	49	Question 050 Do you support or object to Policy C1? What would you add, remove or amend to support it further or to remove your objection?				Five Parishes Opposition Group				Support	(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG support Policy C1. The wording of the two opening paragraphs would be stronger if the word "should" is replaced with "must" and it was indicated that such documentation will be assessed for all applications. We do not have the expertise to question the rating or assessment systems identified for large/major developments but our brief investigation of them leads us to support their use. It would be helpful to define what are large/major developments (reading ahead it seems to be developments of 50 units or more?), and where these systems are required to be used or is it best left to planning officers to decide (with decision scrutiny)? Will the proposed Planning Guidance set out more detail about what constitutes a large development and the systems applicable?

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/40	Gives qualified support for this policy, with comments: Would be stronger if word 'should' is replaced with 'must'. Make clear that documentation is required for all applications Define what large/major developments are/where systems are to be used (will this be set out in Planning Guidance?)	The Council (partially) agrees for the following reasons: Agree. It is clear from the opening paragraph of C1 that the criteria set out are 'a requirement'. However, 'should' will be replaced with 'must' or 'will'. Policy C1 makes clear that all residential and non-residential schemes will require a Climate, Energy and Waste Statement. Agree. The definitions of large and major development will be added to the glossary, as follows: Minor development: includes between 1 and 9 dwellings/ covers up to and including 0.5 hectares/ commercial development less than 1,000 square metres. Major development: includes 10-49 dwellings/ from 0.51 hectares up to and including 2 hectares/ commercial development between, 1000 and 4,999 square metres. Large major development: includes 50-249 dwellings/ from 2.1 hectares up to and including 5 hectares/ commercial development between 5,000 to 9,999 square metres. For information, Strategic major development: includes 250+ dwellings/ covers more than 5 hectares/ commercial development of 10,000 square metres or more- Definitions of large and major development will be added to the glossary, as follows: Minor development: includes between 1 and 9 dwellings/ covers up to and including 0.5 hectares/ commercial development less than 1,000 square metres. Major development: includes 10-49 dwellings/ from 0.51 hectares up to and including 2 hectares/ commercial development between, 1000 and 4,999 square metres. Large major development: includes 50-249 dwellings/ from 2.1 hectares up to and including 5 hectares/ commercial development between 5,000 to 9,999 square metres. For information, Strategic major development: includes 250+ dwellings/ covers more than 5 hectares/ commercial development of 10,000 square metres or more Partial Change Proposed.
2026Reg18/76	Gives qualified support, with comments: In two opening paragraphs 'should' should be amended to 'must'. Define what large/major developments are. Questions if Planning Guidance will set out more detail about scale of development and applicable systems?	The Council (partially) agrees for the following reasons: Agree. It is clear from the opening paragraph of C1 that the criteria set out are 'a requirement'. However, 'should' will be replaced with 'must' or 'will'. Definitions of scales of development will be added to the glossary, as follows: Minor development: includes between 1 and 9 dwellings/ covers up to and including 0.5 hectares/ commercial development less than 1,000 square metres. Major development: includes 10-49 dwellings/ from 0.51 hectares up to and including 2 hectares/ commercial development between, 1000 and 4,999 square metres. Large major development: includes 50-249 dwellings/ from 2.1 hectares up to and including 5 hectares/ commercial development between 5,000 to 9,999 square metres. For information, Strategic major development: includes 250+ dwellings/ covers more than 5 hectares/ commercial development of 10,000 square metres or more See point 2. above. The Council aims to produce Planning Guidance to assist in interpretation and application. Partial Change Proposed

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2026Reg18/126	20	Question 050 Do you support or object to Policy C1? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Support	Policy C1 – Sustainable Design and Adaptation Principles Energy and AdaptationThe County Council would ask SBC to consider providing a hyperlink to the Swale Climate and Ecological Emergency Action Plan where mentioned. The County Council strongly supports this policy overall and is pleased to see how thoroughly adaptation has been considered – particularly for overheating risk.The County Council would, however, make the following comments:Point 1a: consider defining ‘carbon footprint’ and whether this includes lifecycle and/or operational emissions (and/or refer to the detail in Policy C4). SBC could also consider defining ‘fabric first’, perhaps in the glossary, to indicate the value of sufficient insulation and window glazing ahead of, or complementary to, technology such as solar PV, battery storage and heat pumps.Point 1(c): The County Council would agree with the requirement to set out within a Climate, Energy and Waste Statement how overheating risk measures have been incorporated in accordance with the cooling hierarchy. This policy will ensure that passive measures are prioritised, reducing energy consumption and the statement will ensure compliance with this requirement.Point 1(d) – The County Council supports the requirement for developments to complete CIBSE TM59 as opposed to the Simplified Method in Part O of the Building Regulations as this provides a more robust assessment of overheating risk and will enable more resilient residential buildings. Similarly, the County Council supports the requirement for the CIBSE TM52 to be completed for non-residential buildings.Point 1(e): The County Council is pleased to see reference to other relevant policies regarding flood risk, water resources and SuDS, as well as nature-based solutions. Sub-point (v) could potentially benefit from being moved to other areas of the policy. It is suggested that the water elements are either included in, or placed next to, the sub-point (i) and that reference to the changing climate conditions is listed/merged with the beginning text of this point (e). Additionally, it is strongly agreed that this should be a requirement for all developments.
2026Reg18/127	18	Question 050 Do you support or object to Policy C1? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Support	2.7 Climate Change, Pollution & The Water Environment2.7.1 C1 Sustainable design and adaptation principles2.7.1.1 Policy criteriaNatural England supports this policy. In regard to the policy criteria, we agree with most of the wording and only suggest that under e. Resilience and adaptation to climate change point iii. could be strengthened with the following wording:"Ensure cool streets and paths, through green & blue infrastructure (such as tree planting) and nature-based solutions, including the enhancement of existing water features".

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/126	Supports this policy, with comments: Include hyperlinks to Swale Climate and Ecological Emergency Action Plan where mentioned. Pleased how thoroughly adaptation has been consider, especially overheating (Climate, Energy and Waste Statement). Define 'carbon footprint' and include 'fabric first' further in policy or glossary. Supports the requirement for developments to complete CIBSE TM59 as opposed to the Simplified Method in Part O of the Building Regulations as this provides a more robust assessment of overheating risk and will enable more resilient residential buildings. Similarly supports the requirement for the CIBSE TM52 to be completed for non-residential buildings. Welcomes reference to flood risk, water resources, SuDs and nature-based solutions in policy. Suggests minor reordering of 1(e), but agrees should be requirement for all development. Welcomes reference to sustainable choices for travel and emphasises importance of Public Rights of Way. Questions omission of policy on 'Health and Well being'.	The Council (partially) agrees for the following reasons: Noted - hyperlinks have been included throughout the document. This will be checked again when the next iteration of the draft Local Plan is proof-read. Noted Agreed. Definitions will be added to glossary, as follows Fabric-first: An approach which focuses on enhancing a building's physical fabric (including insulation and window glazing), ahead of advanced technologies and renewable energy systems (such as solar PV, battery storage and heat pumps). Carbon Footprint: the total amount of greenhouse gases, primarily carbon dioxide, emitted by an individual, organisation or product (eg a building) or activity. Noted. Noted. The benefits of reordering this section are not clear so no change is proposed. Noted. Noted. It is intended that Health and Well-being will be a Strategic Policy in the forthcoming Regulation 19 Local Plan. Partial Change Proposed
2026Reg18/127	Supports this policy, with comments: Strengthen policy at 1.e.iii with inclusion of reference to green & blue infrastructure.	Supports this policy, with comments: Strengthen policy at 1.e.iii with inclusion of reference to green & blue infrastructure. The Council agrees, as follows: Amend 1.e.iii: 'Ensure cool streets and paths,through green and blue infrastructure (such astree planting)and nature-based solutions, including the enhancement of existing water features. Partial Change Proposed

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2026Reg18/34	19	Question 052 Do you support or object to Policy C2? What would you add, remove or amend to support it further or to remove your objection?				Croudace Homes	Emily	Comber		Object	Firstly, Croudace Homes supports and acknowledges the need to reduce carbon emissions, particularly in the context of the UK's legally binding target of net zero carbon by 2050 and acknowledging the forthcoming Future Homes and Building Standards. The principle of improving the energy efficiency and environmental performance of new homes is therefore fully supported. However, the specific requirements set out in Policy C2 are highly ambitious and may present practical challenges for developers and deliverability, particularly on complex sites or smaller schemes. It is therefore recommended that the policy include flexibility for site specific circumstances and alternative compliance mechanisms where the targets are exceptionally difficult to meet. Such an approach would help ensure that the policy remains deliverable, viable, and supportive of sustainable development across the borough. The policy further contains on site annual renewable energy generation capacity that is equal to the predicted annual total energy use. This is also overly prescriptive for certain types of development. The installation of effective solar generation will not be feasible for every site, for example due to orientation and site size, or due to heritage considerations. In these circumstances it may not be possible to achieve a net zero operational energy balance. Finally, fixing an energy offset price at £2.31/kWh within the policy is problematic, as the policy itself acknowledges that this figure will need to be revised annually. It would therefore be more appropriate for the policy to be reworded to allow for flexibility over time, rather than embedding a fixed sum within the Local Plan which is likely to become outdated.
2026Reg18/74	19	Question 052 Do you support or object to Policy C2? What would you add, remove or amend to support it further or to remove your objection?				Faversham Society	Planning	Faversham Society		Object	Some elements here are strong and very specific about what must be done; others are weaker and relapse into the language of "should." The latter should be strengthened wherever possible so that they are requirements.
2026Reg18/16	18	Question 055 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Boughton under Blean Parish Council	Sarah	Muteham	Should there be a presumption that buildings will be re-used instead of demolished full-stop –something that RIBA has long advocated. Existing policy DM 19 (c) recognises that retrofitting offers a more sustainable option than redevelopment so this would mark a logical next step consistent with the Council's net zero aspirations.		

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2026Reg18/34	Objects to this policy for the following reasons: Acknowledges need to reduce carbon emissions and supports the principle of improving energy efficiency and environmental performance. However, requirements of C2 present challenges to delivery, particularly for small/complex sites. Policy should be adjusted to include flexibility. Requirement for on site annual renewable energy generation to equal predicted total annual energy use is over prescriptive for some sites. Including energy offset price within policy is problematic as it will need to be revised annually.	The Council disagrees for the following reasons: Noted. It is welcome that this comment implies that the requirements of C2 are considered achievable for all but small and complex sites. The complexity of small and complex sites can be discussed on a case by case basis at the planning application stage. The requirement for energy use to be met by energy generation on site is a fundamental aspiration of the climate change policies in the Local Plan document. However, in exceptional circumstances, offsetting will be acceptable. Agreed. Reference to the offset price will remain in the policy but detail will be moved to the preamble. Partial Change Proposed.
2026Reg18/74	Objects to this policy for the following reasons: Make language strong and consistent - use 'must' rather than 'should'.	The Council (partially) agrees for the following reasons: The inconsistency is noted, across this and other policies in the Regulation 18 document. This will be reviewed and amended where necessary for the Regulation 19 Document. Partial Change Proposed.
2026Reg18/16	Comments on the preamble as follows: Should there be a presumption that buildings will be re-used instead of demolished? Existing policy DM 19 (c) recognises that retrofitting offers a more sustainable option than redevelopment so this would mark a logical next step consistent with the Council's net zero aspirations.	Noted. Policy C1 will be amended to encourage retention rather than demolition where this is the more sustainable choice. A brief explanation of the benefits of retrofitting versus demolition and rebuilding will be added to the preamble to C4. Partial Change Proposed.

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2026Reg18/73	35	Question 055 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	Eastchurch Parish Council agrees with the intent and direction of the preamble and supports the inclusion of embodied carbon and waste within the Local Plan. The justification is strong and clearly linked to national carbon budgets, the Climate Change Act 2008, and Swale's declared Climate and Ecological Emergency. To make the preamble more focussed, relatable and complete, the Parish Council suggests the following refinements: 1. Strengthen the Local Context Whilst the national and international context is well set out, the preamble would benefit from clearer reference to: The scale of development proposed across Swale during the plan period; The cumulative embodied carbon impact of new housing and commercial growth; The specific vulnerability of coastal communities to climate change impacts. Making the link between embodied carbon and local development pressures would help communities understand why this policy is necessary now. 2. Clarify the Practical Purpose The preamble could more clearly explain that: Measuring embodied carbon is the first step towards reducing it; Early-stage design decisions (retention, reuse, material choice) have the greatest impact; Demolition and rebuild often carry significantly higher embodied carbon than retrofit. This would help applicants and residents see that the policy is about better design, not just additional paperwork. 3. Emphasise Reuse and Retrofit Greater emphasis could be placed on: Retention and retrofit of existing buildings where feasible; Adaptive reuse of rural and agricultural structures; Designing buildings for longevity and adaptability. In rural areas, reuse of existing buildings is often more sustainable than new		

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2026Reg18/73	Comments on the preamble as follows: Agrees with intent and justification. Strengthen local context (including vulnerability of coastal communities) and link between development pressures. Clarify practical purpose (measure first, early-stage design, retrofit first) Emphasise reuse and retrofit. Make waste policy more accessible (plain language, cost savings and supply chain resilience, on site recycling) Reassure small applicants that requirements are scaled appropriately. Link to Circular Economy (concept, design for disassembly and material recovery, local sourcing).	Noted - Noted - Noted - Noted - an additional comment about reuse/retrofitting will be added to preamble. Noted - This is already covered in 29.0.16. Noted - a reference to the Circular Economy will be added to preamble. Partial Change Agreed.

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2026Reg18/73	37	Question 056 Do you support or object to Policy C4? What would you add, remove or amend to support it further or to remove your objection?				Eastchurch Parish Council	Sarah	Poole		Support	Eastchurch Parish Council supports the principle and overall direction of Policy C4. Reducing embodied carbon and construction waste is necessary if Swale is to meet its carbon reduction commitments and respond effectively to the Climate and Ecological Emergency. However, the Parish Council has significant concerns regarding ongoing illegal waste activities at two sites within Eastchurch. Whilst this policy focuses on construction waste and embodied carbon, it should also recognise the real impacts that waste mismanagement and unlawful operations have on rural communities. To strengthen the policy and address local concerns, the following amendments and additions are suggested: 1. Stronger Reference to Waste Enforcement and Prevention The policy could include wording that: Confirms that waste arising from development must be managed in accordance with environmental permitting and waste regulations; States that development must not facilitate unlawful waste activities; Requires clear site management plans for construction waste handling, storage and removal. Given the existing illegal waste problems in Eastchurch, stronger preventative wording would provide reassurance to communities. 2. Construction Environmental Management Plans (CEMP) For major developments, the policy could require: A Construction Environmental Management Plan that includes waste handling, storage, transport routes and monitoring;
2026Reg18/3	57	Question 057 Do you have any specific comments on the preamble above? What would help make it more				Dunkirk Parish Council			Support. But this is based on 2008 climate change act. Surely there should be a more up to date document to use.		
2026Reg18/14	25	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Town Council			'Policy C5 Renewable energy development and infrastructure' includes a number of clauses including dealing with cumulative impacts and wider impacts in particular clause 1,bViii should be updated to include vibration to the list that currently reads 'noise, dust, odour, air quality, tranquillity, shadow flicker'. The policy does not currently address restoring a landscape or agricultural land. This may be appropriate in cases on greenfield sites.		

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We are aware

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2026Reg18/73	Gives qualified support for the policy: Issues is important in context of climate emergency, however concerns around illegal waste activities in Eastchurch. Issue of waste mismanagement has an impact on rural communities. Ask for stronger reference to waste enforcement and prevention, including clear site plans for construction waste and request for Construction Environmental Management Plans for major developments and details of licensed carriers and recycling facilities. Cross reference to transport and amenity policies to ensure waste movements are acceptable. Clarification on demolition and site clearance. Eg time limits for storage of demolition waste. Supports circular economy principles. Supports proportionality for smaller sites.	Noted - Noted - An additional point on sound management of waste on sites and disposal will be added to C4 and the preamble. Noted - An additional point on sound management of waste on sites and disposal will be added to C4 and the preamble. Noted - An additional point on sound management of waste on sites and disposal will be added to C4 and the preamble. Noted - Noted - Partial Change Proposed.
2026Reg18/3	Support preamble but request update to 2008 Climate Change Act.	Agree. Reference to 2050 Target Amendment will be added to preamble. Change Proposed.
2026Reg18/14	Vibration should be added to clause 1b.viii Welcomes clause on co-benefits. Applications should be clear on detail.	Agreed. Vibration will be added to 1b.viii Noted. Partial Change Proposed.

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2026Reg18/16	19	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Boughton under Blean Parish Council	Sarah	Muteham	§ 2a. Substitute ‘encouraged’ with ‘should??’ NESO announced in December that it was removing speculative energy projects so-called ‘zombie’ solar farms from the grid connection queue.§ 4 Consider reinstating from DM 20 the following: ‘where schemes are demonstrated as necessary on agricultural land, that they explore options for continued agricultural use’ Should solar panels be installed on rooftops – especially on public and commercial buildings – or above car parks as a priority. Should areas of landscape sensitivity or of importance to biodiversity be protected from industrial solar developments.		
2026Reg18/31	40	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				CPRE Kent	CPRE	Kent	CPRE campaigns for rooftop renewables and has been one of the driving forces behind the government announcing plans for all new-build homes to be fitted with solar panels from 2027 under the Future Homes Standard. However, we remain concerned about the loss of countryside (including generational loss of best and most versatile agricultural land) in relation to ground-mounted solar farms, as well as the impact this has on the landscape. The plan provides no guidelines as to the siting of such development, which should as a minimum be steered away from environmentally or ecologically sensitive areas. Specific reference should be made to the impact of renewable energy on land designated as being a national landscape (cross-referenced to policy B2), rather than referring to only valued landscapes at C5(b)(iv). Reference should be made to the impact of renewable energy on land designated as being a national landscape (and cross-reference made to policy B3). We understand that the Kent Downs National Landscape unit is currently updating its 2011 Renewable Energy Statement. Pending its publication your attention is drawn to the position statement of the High Weald National Landscape unit (2025). Namely that, ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations. Ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations. Solar farms (and other energy schemes) should not be approved unless there is evidence that the grid has capacity to connect them. How does this policy relate to a corresponding decision-making policy in the draft NPPF? Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?		

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/16	In 2a. suggest substitute 'encouraged' with 'should'. Reinstate clause from Adopted Local Plan about schemes on agricultural land. Solar should be on rooftops. Areas of landscape sensitivity/biodiversity should be protected.	The point about grid capacity is being discussed with evidence base consultants. The point about protection of agricultural land is covered in point 7 and policy B6. Further reference to designated landscapes and areas of ecological sensitivity will be added to 1b. Partial Change Agreed.
2026Reg18/31	CPRE campaigns for rooftop renewables but are concerned about loss of countryside to solar farms due to loss of agricultural land and impact on landscape. Plan provides no steering of siting of such development away from environmentally or ecologically sensitive areas. Specific reference should be made to National Landscape and guidance for High Weald - ie that ground mounted solar will not be acceptable. Evidence of grid capacity should be included in policy. How does this policy relate to a corresponding decision-making policy in the draft NPPF? Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?	Noted. Agree. Recognition of designated landscape and ecologically sensitive sites will be added to 1b. Agree. Reference will be added to National Landscape and guidance. Agree. Wording is being discussed with consultant. Policies will be reviewed once draft NPPF is updated. Yes, where possible. Have a strong policy with clear criteria will assist this going forward. Partial Change Agreed.

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2026Reg18/73	74	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council agrees with the overall direction and ambition of the preamble to Policy C5. The justification for renewable energy development is clearly linked to the Climate Change Act 2008, national net zero targets and the Council's 2045 carbon neutral commitment, which is welcomed. To make the preamble more focussed, relatable and complete, the following points are suggested: 1. Clearer Local Context Whilst the national policy background is comprehensive, the preamble would benefit from: More explicit reference to local grid capacity constraints in Swale and on the Isle of Sheppey; Recognition of the increasing number of renewable and battery storage proposals coming forward in rural parishes; A clearer explanation of how renewable infrastructure will be spatially distributed across the borough. This would help communities better understand how national ambitions translate into local impacts. 2. Community Impacts and Co-Benefits Paragraph 30.0.6 refers to mitigating adverse impacts, which is supported. The preamble could be strengthened by: Explicit reference to landscape sensitivity, particularly in coastal and open countryside locations; Recognition of cumulative visual and traffic impacts;		
2026Reg18/76	56	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Five Parishes Opposition Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG have seen that this policy area is weak with the impact of Pitstock Solar Farm being passed without consideration of the Grid Connection and the timely manner of making that connection. When permission was granted the grid connection date was in 2035, some 11 years in the future, but this evidence was not supplied by the Applicant or requested by Swale. The impact of the grid connection should be considered with the planning application and sufficiently documented in the Environmental Impact Assessment, as one cannot exist without the other. It is "irrational" to take into account the benefits of a renewable energy development while ignoring the environmental impacts of the grid infrastructure needed to deliver those benefits.		
2026Reg18/82	13	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?					SARAH	MOAKES	The plan provides no guidelines as to the siting of such infrastructure contrary to draft NPPF policy W2 which requires it to identify 'areas which are suitable for renewable and low carbon energy development.' The Council's policy is worryingly non specific. It should as a minimum besteer this type of development away from environmentally or ecologically sensitive areas such as designated landscapes or habitats sites. In particular, consideration should be given to the fact that BESS are a known potential fire risk.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Agrees with overall direction and justification of preamble/policy but suggests improvements. Clearer local context eg grid capacity constraints, rural impact, spatial distribution. Community impacts and co-benefits - strengthen reference to landscape sensitivity (coastal/open locations), cumulative visual and transport impacts, meaningful community benefits, reference to BNG and habitat enhancements. Battery storage and safety (acknowledgement of risks, and emergency planning considerations, proximity to residential development, need to consult emergency services. Agricultural land and rural character (encourage use of lower grade agricultural land, support dual-use, protect BMV). Grid infrastructure and visual impact (acknowledge associated infrastructure (substations, pylons/overhead lines, reinforcement works and that they must be sensitively designed. Welcomes reference to heat networks - asks for clarity as to where they are most likely (urban over rural). Make stronger link to energy security (role of renewable energy in improving resilience, especially if community-owned.	Noted - Noted - Preamble will be updated with reference to renewable energy generation in Swale and grid capacity issues. Noted - Preamble will be updated with additional reference to designated landscapes/ecologically sensitive sites Noted - Preamble will be updated with reference to battery storage and safety. Noted - Policy/preamble will be updated with reference to Agricultural land and policy B6. Noted - Preamble will be updated with reference to associated infrastructure. Noted - Preamble will be updated with further reference to heat networks. Role of energy security is set out in 30.0.11. Partial Change Proposed.
2026Reg18/76	Impact of grid connection needs to be included in policy/preamble.	Agreed. Wording on grid capacity is being discussed with consultant who prepared evidence base. Change Proposed.
2026Reg18/82	Plan provides no guidelines on siting of renewable infrastructure, contrary to draft NPPF (W2). Policy should be steering renewable energy development away from environmentally and ecologically sensitive area (landscape/habitat sites). Consideration should be given to BESS and fire risk.	The Regulation 18 has been prepared under the existing NPPF where there is no strict requirement to identify areas for renewable development. This is a significant piece of work that has been undertaken for Swale in previous years. Agree - additional wording on designated landscapes and ecologically sensitive sites will be added to policy C4/preamble. Agree - additional wording on battery fire risk will be added to policy C4/preamble. Partial Change Proposed.

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2026Reg18/91	13	Question 057 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Southern Housing	Charles	Glover-Short	Please see our responses to questions 51, 52, 55 and 56 relating to the Climate, Energy and Waste Statement. The guidance referred to in relation to draft policies C3 and C4 does not appear to be referenced in the supporting text for Policy C5. It is important that clear guidance is provided to ensure that the statement is appropriate for meeting its aims, provide certainty and avoid duplication between the other necessary reports required to support a planning application. It is also not clear whether the requirements of Policy C5 apply to renewable energy developments only or to mixed use developments comprising a significant element of renewable energy. ANSWER DUPLICATED AT Q.58		
2026Reg18/31	14	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?				CPRE Kent	CPRE	Kent		Neither	CPRE campaigns for rooftop renewables and has been one of the driving forces behind the government announcing plans for all new-build homes to be fitted with solar panels from 2027 under the Future Homes Standard. However, we remain concerned about the loss of countryside (including generational loss of best and most versatile agricultural land) in relation to ground-mounted solar farms, as well as the impact this has on the landscape. The plan provides no guidelines as to the siting of such development, which should as a minimum be steered away from environmentally or ecologically sensitive areas. Specific reference should be made to the impact of renewable energy on land designated as being a national landscape (cross-referenced to policy B2), rather than referring to only valued landscapes at C5(b)(iv). Reference should be made to the impact of renewable energy on land designated as being a national landscape (and cross-reference made to policy B3). We understand that the Kent Downs National Landscape unit is currently updating its 2011 Renewable Energy Statement. Pending its publication your attention is drawn to the position statement of the High Weald National Landscape unit (2025). Namely that, ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations. Ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations. Solar farms (and other energy schemes) should not be approved unless there is evidence that the grid has capacity to connect them. How does this policy relate to a corresponding decision-making policy in the draft NPPF? Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?
2026Reg18/32	8	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?				Historic England	Alan	Byrne		Neither	Note the section's/policy's references to the historic environment and heritage assets, but new large scale renewable energy generation has potential for impacts on historic landscape character and the setting of heritage assets; policy should make specific reference to the requirement for Landscape and Visual Impact Assessment and Heritage Impact Assessment where appropriate

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We are aware

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2026Reg18/91	Planning Guidance referenced in other climate policies not mentioned in preamble to C5. Guidance is needed. Not clear if C5 applies to renewable energy or mixed used developments.	Agreed. Reference to Planning Guidance will be added to preamble. C5 works in conjunction with other policies across the plan, in particular C2 and C3 - as explained in 30.0.12. Partial Change Agreed.
2026Reg18/31	Neither supports nor objects to this policy, but comments: CPRE campaigns for rooftop renewables but are concerned about loss of countryside to solar farms due to loss of agricultural land and impact on landscape. Plan provides no steering of siting of such development away from environmentally or ecologically sensitive areas. Specific reference should be made to National Landscape and guidance for High Weald - ie that ground mounted solar will not be acceptable. Evidence of grid capacity should be included in policy. How does this policy relate to a corresponding decision-making policy in the draft NPPF? Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?	The Council comments as follows: Noted. Agree. Recognition of designated landscape and ecologically sensitive sites will be added to 1b. Agree. Reference will be added to National Landscape and guidance. Wording is being discussed with consultant. Policies will be reviewed once draft NPPF is updated. Yes, where possible. Have a strong policy with clear criteria will assist this going forward. Partial Change Agreed.
2026Reg18/32	Neither supports nor objects to this policy but requests amendments: Requests policy makes specific reference to requirement for Landscape and Visual Impact Assessment and Heritage Impact Assessment.	The Council agrees for the following reasons: Reference to Landscape and Visual Impact Assessment and Heritage Impact Assessment will be added to C5, point 1. Change Proposed.

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2026Reg18/76	57	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?				Five Parishes Oppositio n Group				Neither	(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). Amendment required. Proposals for solar photovoltaic (PV) development will be supported where they are located on previously developed land, non-agricultural land, or lower-grade agricultural land (Grades 3b, 4 and 5). Development on Best and Most Versatile (BMV) agricultural land (Grades 1, 2 and 3a). Swale should not allow PV development on BMV land.Most recently it has permitted so called temporary schemes of 40 years yet failed to secure full restoration of the land to its original quality at the end of the operational period.All applications for renewable or low-carbon energy developments must be accompanied by a comprehensive Grid Connection Strategy. This strategy shall:a) identify the proposed point(s) of connection to the electricity network;b) demonstrate that early engagement has taken place with the relevant network operator;c) outline the technical, environmental, and land requirements for the connection route;d) set out a realistic programme for securing and delivering the connection in line with the operational start date of the development.
2026Reg18/81	26	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?				Borden Parish Council				Neither	Whilst the local plan recognises the requirements to provide sufficient energy from renewable generation and storage, and has made progress in appreciating the value of enhancing biodiversity, providing space for nature and public open space, it avoids the critical questions of increasing sustainable local resilient and affordable food supply for the growing population. The principle resource for both renewable energy and food is land, so careful consideration must be given to location, land classification, aspect and balance The UK government prefers to reassure us that the food supply is resilient and can be readily provided or substituted by imports. In doing so it ignores the impacts of climate change on UK and overseas supplies, ignores the negative impacts on the UK balance of payments, inflation, rural employment, healthy nutrition and reducing yields, both domestic and international. The food industry is now calling for a change in this approach and a shift towards more UK production. Swale hosts much of the best and most versatile land in Kent, and the most favourable climate for high value horticultural crops. Unfortunately planning policy over many years has permitted the erosion of this area by readily permitting development on the grade 1 soils adjacent to the A2, and the proximate grade 11 and 11a soils principally to the South. In this context we believe that it has become prudent to revisit the current division of land between development, food production and renewable energy. It is our view that the first choice for solar farms and housing should be on those areas of grade 111 land of no wildfowl or habitat value, and wind turbines should be sensitively located on industrial sites, again where there is no negative impact on wildlife or habitat. ANSWER DUPLICATED AT Q.57

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We are aware

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2026Reg18/76	Neither supports nor objects to this policy, but comments: Proposals for PV development will be supported on previously developed land, non-agricultural land or low grade agricultural land, but not on BMV land. The Council has permitted temporary schemes yet failed to secure restoration conditions. All applications for renewable energy must be accompanied by a Grid Connection Strategy which shall: identify the proposed point(s) of connection to the electricity network;b) demonstrate that early engagement has taken place with the relevant network operator;c) outline the technical, environmental, and land requirements for the connection route;d) set out a realistic programme for securing and delivering the connection in line with the operational start date of the development.	The Council (partially) agrees for the following reasons: Noted - Policy B6 deals with agricultural land and the Local Plan must be read as a whole. Noted - see Point 4d of policy. Agreed - policy will be reviewed with consultant to amend references to grid capacity. Partial Change Proposed.
2026Reg18/81	Neither supports nor objects to this policy, but comments: Local Plan avoids critical question of sustainable food supply and land as a finite resource. UK Government assures food supply is resilient, but food industry calling for shift to more UK production. Swale hosts some of country's BMV land, and this resource has been eroded by planning policy. Solar farms and housing should be directed to grade 3 land with no wildlife or habitat value, with windfarms of industrial sites.	The Council (partially) agrees, for the following reasons: The issue of agricultural land is dealt with in policy B6, which prioritises lower grades of land over higher grades and only where there is an overriding need. Reference to that policy will be added to C5/its preamble as will reference to the Government's Land Use Framework and loss of agriculturally productive land. Partial Change Proposed.

Page 246

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2026Reg18/82	14	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?					SARAH	MOAKES		Neither	The plan provides no guidelines as to the siting of such infrastructurecontrary to draft NPPFpolicy W2 which requires it to identify 'areas which are suitable for renewable and low carbonenergy d evelopment.' The Council's policy is worryingly non specific. It should as a minimum besteeering this type of development away from environmentally or ecologically sensitive areas such asdesignated landscapes or habitats sites. In particular, consideration n should be given to the fact that BESS are a known potential fire risk.
2026Reg18/91	14	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?				Southern Housing	Charles	Glover-Short		Neither	Please see our responses to questions 51, 52, 55 and 56 relating to the Climate, Energy and Waste Statement. The guidance referred to in relation to draft policies C3 and C4 does not appear to be referenced in the supporting text for Policy C5. It is important that clear guidance is provided to ensure that the statement is appropriate for meeting its aims, provide certainty and avoid duplication between the other necessary reports required to support a planning application. It is also not clear whether the requirements of Policy C5 apply to renewable energy developments only or to mixed use developments comprising a significant element of renewable energy. ANSWER DUPLICATED AT Q.57
2026Reg18/107	6	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?		Rachel	Harrison	Peel Land & Property and Peel Ports (C/O Agent)					(See attached document) Policy C5 - Renewable Energy Development and Infrastructure 2.16.Policy C5 outlines the requirements for renewable energy development. The PoSL endorses the broad support for the development of renewable energy infrastructure within the Local Plan area.2.17.Part 1a of the policy refers to proposals being 'appropriate for its location'; this is relatively ambiguous and as such the language should be tightened or part 'a' removed, as part 'b' goes on to consider an analysis of impacts.2.18.Part 4a of Policy C5 notes: "Proposals for renewable energy generation over 20MW are required to provide an option to offer 5% community ownership to the local community (e.g. Parish Council area)". It is not clear how this would be sought or managed, and indeed if local communities such as Parish Councils have the interest, capacity or knowledge to take on such a position. This text should be amended to ensure flexibility; for example, by adding "When appropriate" to the beginning, or changing "required" to "encouraged".
2026Reg18/124	19	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent					See attached document 5.16.1In response to Questions 57 and 58 of the Consultation document Fernham Homes generally support the aspirations of Policy C5 in terms of setting out Policy specific to renewable energy development and infrastructure.5.16.2We however comment that the Policy wording for Criterion (9c) is not currently clear on the location of growth and regeneration areas. As a result of the associated impacts on developments of more than 50no. homes, Fernham Homes would reserve the right to provide further comments on any future iterations of the Policy once the growth and regeneration areas are confirmed. In the interests of completeness, it is recommended that SBC demonstrate these growth and regeneration areas on a subsequent Policy proposals map.5.16.3With this in mind, it is highlighted that the consultation NPPF does not set out guidance on the creation of new heat networks for residential developments.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/82	Neither supports nor objects to this policy, but comments: Plan provides no guidelines on siting of renewable infrastructure, contrary to draft NPPF (W2). Policy should be steering renewable energy development away from environmentally and ecologically sensitive area (landscape/habitat sites). Consideration should be given to BESS and fire risk.	The Council (partially agrees), as follows: The Regulation 18 has been prepared under the existing NPPF where there is no strict requirement to identify areas for renewable development. This is a significant piece of work that has been undertaken for Swale in previous years. Agree - additional wording on designated landscapes and ecologically sensitive sites will be added to policy C4/preamble. Agree - additional wording on battery fire risk will be added to policy C4/preamble. Partial Change Proposed.
2026Reg18/91	Neither supports nor objects to this policy, but comments: The preamble to C5 does not reference the Climate, Energy and Waste Statement. Clear guidance is important. Not clear whether C5 applies to renewable energy developments or mixed use developments comprising renewable energy.	The Council comments as follows: Noted. Reference to the Climate, Energy and Waste Statement will be added to the preamble. Policy C5 applies to all renewable energy development and infrastructure, in conjunction with other policies in the plan, particularly C2 and C3, as explained in 30.0.12. Partial Change Proposed.
2026Reg18/107	Gives qualified support for this policy and seeks amendments: Broad support. Part 1a of the policy refers to proposals being 'appropriate for its location'; this is relatively ambiguous and as such the language should be tightened or part 'a' removed, as part 'b' goes on to consider an analysis of impacts. Part 4a of Policy C5 notes: "Proposals for renewable energy generation over 20MW are required to provide an option to offer 5% community ownership to the local community (e.g. Parish Council area)". It is not clear how this would be sought or managed, and indeed if local communities such as Parish Councils have the interest, capacity or knowledge to take on such a position. This text should be amended to ensure flexibility; for example, by adding "When appropriate" to the beginning, or changing "required" to "encouraged".	The Council (partially) disagrees, as follows: Noted. Point 1a and 1b will be linked in the next draft of the Local Plan, Regulation 19. This point will be discussed with consultants, but is considered a detailed point that can be resolved at the planning application stage. Partial Change Proposed.
2026Reg18/124	Gives qualified support for this policy, but seeks amendments: Criterion 9c is not clear on the location of 'growth and regeneration areas', which should be shown on a map. NPPF consultation does not set out guidance on the creation of heat networks for residential developments.	The Council (partially) agrees, for the following reasons: Agree, the clarity of 9c could be improved. Reference to 'growth and regeneration areas' will be amended to 'strategic sites'. Strategic sites will be shown in the Regulation 19 Local Plan. Noted. Partial Change Proposed.

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2026Reg18/126	24	Question 058 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Neither	Policy C5 – Renewable Energy Development and Infrastructure Energy and AdaptationThe County Council considers that SBC could add greater and/or earlier emphasis on the energy security, affordability and resilience benefits of supporting renewables rollout, perhaps prior to discussion of net zero and emissions through this policy. It is also suggested that adding a reference to the Kent Design Guide - Kent County Council would be appropriate.
2026Reg18/73	18	Question 059 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council agrees with the preamble and supports the strong emphasis on coastal change, given Swale's particular vulnerability as a coastal borough. The reference to the NPPF, Planning Practice Guidance, Shoreline Management Plans and updated modelling is welcomed and appropriate. However, the following points would help make the preamble more focused, relatable and complete: 1. Clearer Local Context While the national policy framework is well set out, the preamble could be strengthened by: More explicit reference to the local impacts already being experienced in Swale (e.g. erosion at Warden and Leysdown, cliff instability, infrastructure pressure); A clearer explanation of what the updated CCMA boundary could mean for existing communities; Plain-English summaries of what inclusion within Erosion Zone 1 or 2 means for residents. This would make the policy more understandable to affected communities. 2. Greater Emphasis on Managed Retreat and Relocation The preamble refers to relocation but could: Expand on how relocation will realistically be facilitated; Clarify what support mechanisms may exist for affected landowners or communities; Explain how infrastructure (roads, utilities, services) will be managed where risk increases over time.		
2026Reg18/100	27	Question 059 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?					Minster on Sea	Parish Council	C6–C8 Flood/coast – Strong support Ask: Prioritise nature-based coastal solutions and ensure relocation/rollback tools are practical for vulnerable uses.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/126	Neither support nor object to this policy, but suggest amendments: Increase emphasis on the energy security, affordability and resilience benefits of supporting renewables rollout It is also suggested that adding a reference to the Kent Design Guide - Kent County Council would be appropriate.	The Council agrees for the following reasons: Energy security is already referenced in the preamble (30.0.11), but the preamble to C5 will be reviewed to ensure incorporation of all elements mentioned. Reference to Kent Design Guide will be added to the preamble. Change Proposed.
2026Reg18/73	Seeks amendments to this pre-amble, as follows: Agrees with the preamble generally, but it could be strengthened. Include more explicit reference to local impacts eg erosion at Warden/Leysdown. Clearer explanation of what the updated CCMA boundary could mean for existing communities. Plain English summaries of what can be included in Erosion Zones 1 and 2. Expand on how relocation will be realistically facilitated. Clarify support mechanisms for those affected. Explain how infrastructure (roads, utilities, services) will be managed where risk increases. Explain impact on roads, utilities, PROW, community facilities. The need for co-ordinated planning between the Council, the EA, DEFRA, infrastructure providers. Confirmation of how applicants can identify whether their lands falls within the CCMA. Clarify expectations regarding scale and cost of Vulnerability Assessments - providing that they can be proportionate to the development scale. Acknowledge uncertainty of long-term climate modelling. Need for precautionary decision making where projections are severe. Recognise potential concern for affected communities. Confirm that engagement and communication will be ongoing as mapping becomes available.	The Council (partially agrees) for the following reasons: Noted. More explicit reference to local impacts will likely be included once the SFRA is completed. Clearer explanation of what the updated CCMA could mean for existing communities will likely be included in the preamble/policy once the SFRA is completed. The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and wording on what can be included in Erosion Zones 1 and 2 may be revised. The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and the matter of relocation will be considered in this review. The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and the matter of support will be considered in this review. The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and the matter of management of infrastructure will be considered in this review. The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and the matter of impacts on infrastructure/community facilities will be considered in this review. The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and the matter of coordinating a response across councils/agencies will be considered in this review. The adopted Local Plan will contain a Proposals Map which will set out a clear boundary for the Coastal Change Management Area, which applicants will be able to reference. When the SFRA is published (anticipated summer 2026), a boundary will also be shown on that. The Planning Practice Guidance (paragraph 74) Flood risk and coastal change - GOV.UK set out that vulnerability assessments should be 'appropriate to the degree of risk and the scale, nature and location of the development' and agreed in advance with the local planning authority. As such, they can be proportionate to the scale of development. Reference to para 74 of the PPG is already included in the preamble. The Council cannot advise on the cost of such an assessment. Paragraph 31.0.8 acknowledges that the 'definition of the erosion boundaries of the CCMA have been relatively high level in nature' and that if new evidence is presented it will be considered in consultation with the Environment Agency. Noted. Noted. ~~It is anticipated that the SFRA (with details of the Coastal Change Management Area boundary) will be published ahead of the~~
2026Reg18/100	Supports the preamble, with comment: Asks to prioritise nature-based coastal solutions and ensure relocation/rollback tools are practical for vulnerable uses.	The pre-amble/policy will be reviewed in the light of the forthcoming SFRA, discussions with the consultant, the EA and other Council teams and the matter of relocation will be considered in this review. Partial Change Proposed (details of which will be set out once the SFRA is complete and discussions with the SFRA consultants, the Environment Agency and other Council teams have taken place).

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2026Reg18/73	56	Question 060 Do you support or object to Policy C6? What would you add, remove or amend to support it further or to remove your objection?				Eastchurc h Parish Council	Sarah	Poole		Support	The Parish Council supports the intention of Policy C6, particularly the restriction on permanent new residential development within the CCMA. However, there are serious and genuine concerns regarding the scale and speed of coastal erosion already being experienced. In some locations, erosion has already resulted in land being lost to the sea, and there are several other areas where further loss is anticipated within the coming years. This creates significant anxiety for residents and raises important questions about long-term safety, infrastructure and community sustainability. To strengthen the policy, the following amendments and additions are recommended: 1. Stronger Recognition of Current Coastal Loss The policy should explicitly acknowledge that: Coastal erosion is not a future-only risk it is already happening. Some sections of coastline have already been lost. Certain communities are at immediate and ongoing risk. This would make the policy more grounded in current reality rather than framed solely around projected modelling. 2. Clearer Position on Existing Residential Properties Whilst new permanent residential development is resisted, the policy should provide clearer guidance regarding: What support exists for existing homeowners in high-risk zones; Whether adaptation or protection measures are supported; ~~How decisions will be made where properties approach the 20 year risk.~~
2026Reg18/127	21	Question 060 Do you support or object to Policy C6? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Support	2.7.3.2 Policy criteriaWe support the policy wording for C6 but advise that criterion 1 regarding the England Coast Path could be strengthened, as the legislation that underpins the England Coast Path (now known as King Charles III England Coast Path) also allows for rollback if erosion causes the loss of the current route. We therefore suggest the following wording:Page 13 of 35“1. It being demonstrated that the proposal will...d) not hinder the creation of the King Charles III England Coast Path. Where rollback has been identified, the proposal should seek to avoid these areas;”

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Gives qualified support for this policy for the following reasons: There are serious and genuine concerns about the speed and scale of coastal erosion, which creates anxiety for the community and raises questions about long-term safety, infrastructure and community sustainability. The policy should explicitly set out existing and immediate/urgent risk - to make it more grounded in current reality. The policy should set out support for existing homeowners, views on adaptation and protection measures, decision making process for properties approaching the 20 year risk threshold. Residents need clarity and reassurance. The relocation elements of the policy need to be more practical and deliverable - setting out clear mechanisms, flexibility around sustainable locations outside built up area boundary, and confirmation that procedural barriers will not delay process. Policy should clarify 'planned lifetime'. The 50 year test for domestic extensions may be unrealistic in high-risk areas. More precautionary language may be needed in Erosion Zone 1. Needs stronger reference to: impacts on roads, utilities, PROW, emergency access; protection of critical infrastructure; coordinated planning with the EA and other authorities. Avoid unintended consequences by ensuring: development allowed in Erosion Zone 2 does not become permanent; holiday/caravan uses are genuinely temporary and safely managed; development does not increase erosion elsewhere.	
2026Reg18/127	Gives qualified support, for the following reasons: Include reference to rollback and suggests amended wording.	The Council agrees for the following reasons: To improve clarity/comprehensiveness, amend wording of C6 1d) to 'not hinder the creation of the King Charles III England Coast Path. Where rollback has been identified, the proposal should seek to avoid these areas;' Change Proposed.

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2026Reg18/73	44	Question 061 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council agrees with the overall intent of the preamble and supports the implementation of the Medway Estuary & Swale Flood and Coastal Erosion Risk Management Strategy (MEAS). The preamble is comprehensive and clearly rooted in national policy and evidence. However, the following points would help make it more focused, relatable and complete: 1. Make the Local Impact More Immediate and Tangible The preamble is technically robust but would benefit from: Clearer reference to specific communities at risk (including low-lying coastal settlements); A stronger explanation of what flooding disruption would mean in practical terms (loss of homes, road closures, isolation of communities, pressure on emergency services); Explicit reference to the vulnerability of key infrastructure such as the A249 and access routes to the Isle of Sheppey. This would make the policy feel more grounded in lived reality rather than primarily strategic. 2. Clarify the Consequences of Funding Gaps Paragraphs 32.0.5–32.0.6 explain partnership funding well, but it would be helpful to state more directly: What happens if contributions are insufficient; Whether defence schemes could be delayed or scaled back; ~~The potential implications for development already permitted.~~		
2026Reg18/74	23	Question 061 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	Preamble is excellent, but as in other places in the document the language is too weak in places. In para 32.0.14, for example, contributions towards the MEAS strategy should be REQUIRED, not just sought, from the parties listed.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Comments on the preamble, as follows: Agrees with overall intent, which is comprehensive, but suggests amendments. Included clearer reference to specific communities at risk, with stronger explanation of what flooding disruption would mean in practical terms and risk to specific infrastructure. Clarify consequences/risks of funding gaps - eg what happens if funding is insufficient, defences are delayed/scaled back, implications for existing/permitted development. Explain rationale between contributions zones further. Strengthen reference to coastal squeeze and habitat compensation (delivery, obligations, managed realignment is evidence -led). Use subheadings to improve readability, with simple summaries. Emphasise need long-term strategic planning.	The Council responds, as follows: Noted - Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Partial Change Proposed (Preamble will be updated once evidence base is complete.)
2026Reg18/74	Gives qualified support for the preamble but suggests language is weak in places eg in 32.0.14 is should say 'be required', rather than 'should'.	Reference to 'should' in 32.0.14 can't be found but it is used in Policy C7. The Council agree this language could be strengthened and 'will' will replace 'should'. Partial Change Proposed.

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2026Reg18/127	22	Question 061 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	2.7.4 C7 Implementing the Medway Estuary & Swale Coastal Risk Management Strategy 2.7.4.1 Preamble Natural England strongly supports the inclusion of this policy to implement the Medway Estuary & Swale (MEAS) Coastal Risk Management Strategy. We welcome the inclusion of 32.0.2 which details potential impacts to designated sites due to sea level rise and coastal squeeze. We advise that freshwater and terrestrial habitats behind seawalls are also at risk of being lost, and suggest the paragraph could state this using the following wording: “32.0.2 Furthermore, much of the Medway Estuary and Swale is covered by national and international designations that protect important species and habitats. As sea levels rise, some of this important habitat will be lost as it is ‘squeezed’ against the existing flood defences (‘coastal squeeze’). Terrestrial and freshwater habitats behind seawalls that can no longer be sustainably protected in-situ will also be lost.” We welcome paragraph 32.0.3 which provides information on the MEAS Flood and Coastal Erosion Risk Management (FCERM) strategy (2019). This is an evidence-based strategy that looks at short, medium and long-term future flooding and builds on the policies established in the Shoreline Management Plans (SMPs), as detailed in Policies B7 and C6 of the Draft Plan. We advise that it could be helpful to provide the following link to the national SMP website https://environment.data.gov.uk/shoreline-planning in paragraph 32.0.3. We also welcome paragraph 32.0.4 of the preamble which states that the MEAS strategy includes actions to create new intertidal and freshwater habitat. We advise that nationally and internationally designated sites are present behind seawalls, and impacts to these need to be addressed as the coast rolls back and unsuitable defences fail or are removed. We suggest the preamble could state this and suggest the following wording: “32.0.4 As well as reducing flood risk to over 14,000 properties, commercial and industrial sites, critical infrastructure, agricultural land and conservation sites in the implementation plan, the MEAS strategy also includes actions to create new intertidal and freshwater habitat to address the loss of designated habitats due to		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Supports this preamble for the following reasons: Supports preamble but suggests amendments to include reference to terrestrial and freshwater habitats. Suggest addition of link to SMP.	The Council agrees for the following reasons: To aid clarity NE's suggested amendment will be included in 32.0.2 as follows: "32.0.2 Furthermore, much of the Medway Estuary and Swale is covered by national and international designations that protect important species and habitats. As sea levels rise, some of this important habitat will be lost as it is 'squeezed' against the existing flood defences ('coastal squeeze'). Terrestrial and freshwater habitats behind seawalls that can no longer be sustainably protected in-situ will also be lost." To aid clarity NE's suggested amendment will be included in 32.0.3 as follows (link added): The Medway Estuary and Swale (MEAS) Flood and Coastal Erosion Risk Management(FCERM) strategy (2019) 157 is an evidence-based strategy that looked at future flooding over the short, medium and long-term and builds on the policies established in the Shoreline Management Plans (SMPs) / https://environment.data.gov.uk/shoreline-planning Change Proposed.

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2026Reg18/73	2	Question 062 Do you support or object to Policy C7? What would you add, remove or amend to support it further or to remove your objection?				Eastchurc h Parish Council	Sarah	Poole		Support	The Parish Council supports Policy C7 in principle, recognising the critical importance of implementing the Medway Estuary & Swale Flood and Coastal Risk Management Strategy (MEAS) to protect homes, infrastructure, agricultural land and designated habitats. However, given the scale of flood and coastal risk facing the borough particularly low-lying coastal communities the following amendments and clarifications would strengthen the policy: 1. Greater Clarity on the Contributions Zone The policy refers to a “Contributions Zone” but does not define it within the policy wording itself. It would be helpful to: Clearly reference the spatial extent of the zone; Confirm how applicants will know whether they fall within higher or lower contribution areas; Ensure mapping is publicly accessible and easy to interpret. This would improve transparency and reduce uncertainty at application stage. 2. Stronger Wording on Securing Contributions The current wording states applicants “should” liaise and contribute. Given the strategic importance of MEAS, the Parish Council recommends replacing “should” with “must” where legally appropriate, to avoid ambiguity. For example: “Applicants must liaise...” “Applicants must contribute through planning obligations...” ~~This would strengthen delivery and consistency.~~
2026Reg18/127	23	Question 062 Do you support or object to Policy C7? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.7.4.2 Policy criteriaWe support criteria 1 and 2 of Policy C7. However, we are currently unclear about the proposed requirement for applicants under criterion 3. It is our understanding that compensation requirements for sea level rise and coastal squeeze will have been covered strategically by the Environment Agency, provided that the development is located in a stretch of coastline managed as ‘hold the line’. Whilst developers may be required to identify and provide measures for other impacts to designated sites under the Habitats Regulations and Policy B1 of the Draft Plan, it is our understanding that applicants would not be required to provide additional compensatory habitats associated with sea level rise and coastal squeeze. We would like to know if developers will be asked to provide these additional compensatory habitats. We recognise that the detail of this is perhaps in the MEAS Contributions Advice Note 2026, which we have not seen, but we would welcome the opportunity to discuss this with the Council prior to the Regulation 19 consultation to understand the criteria for Policy C7 and provide advice on the policy wording.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Gives qualified supports for this policy for the following reasons: Recognises importance of the Medway Estuary & Swale Flood and Coastal Risk Management Strategy. Seeks clarification on extent of Contributions Zone in policy wording and mapping is clear and accessible. Seeks stronger wording eg 'must' instead of 'should'. Seeks clarification in policy on whether development will be phased in line with delivery of flood defences and how risks are managed in mean time/safeguards if MEAS is delayed. Seeks clarification on who holds long-term responsibility/confirmation residents are not exposed to unmanageable liabilities/ensuring legal agreements secure maintenance for lifetime of development. Seeks clarification on how compensatory habitat will be secured and monitored/aligned with MEAS timescales/avoiding unintended consequences for existing rural land uses when habitat realignment occurs Seek stronger statements about MEAS primarily about protecting existing residents/safeguarding critical infrastructure/ensuring resilience for the future.	The Council (partially) agrees for the following reasons: Noted. The Contributions Zone will be included in the Local Plan's Proposals Map so will be clearly defined. Paragraph 32.0.14 sets out the intended geographical scope of the zone. The SFRA, once complete, is also likely to include more detail on the geographical extent of the zone. As the MEAS Contributions Advice Note progresses, this may include more detail, if considered necessary. Agree in principle. 'Should' in Policy C7 will be amended to 'will'. The MEAS is an EA project and the programme will be prioritised based on flood defence asset condition and risk to properties - not location etc of proposed development. Contributions cannot be used to justify inappropriate development, and sites will still need to demonstrate they are safe for the lifetime of the development. Furthermore, contributions do not confer a requirement on the EA to carry out works. Flood defences in the UK are multi-faceted involving national and local authorities and individual property owners, the detail of which is too complex to set out in this policy which is about gathering contributions to the MEAS. Compensatory habitat delivery will require planning permission and as such, this detail will be set out via the planning application process. The aspirations of MEAS are set out in paragraph 32.0.4. Partial Change Proposed.
2026Reg18/127	Neither supports nor objects to this policy, but comments: Supports criteria 1 and 2, but unclear about criteria 3 as it is their understanding that compensation requirements for sea level rise and coastal squeeze will be covered strategically by the EA, provided that the development is located in a stretch of coastline managed as 'hold the line'.	The Council agree for the following reasons: Noted. Revised wording has been agreed with the Environment Agency as follows: 3. Identify, and satisfy where relevant, the legal requirement...' Change Proposed.

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2026Reg18/73	20	Question 064 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council agrees with the content of the preamble and supports the clear explanation of the range of consents and permits that may be required alongside planning permission. The section is helpful and necessary. To make it more focussed, relatable and complete, the following refinements are suggested: 1. Emphasise Early Engagement The preamble would benefit from stronger wording encouraging early pre-application engagement with: The Environment Agency Kent County Council (Lead Local Flood Authority and Highway Authority) The Lower Medway Internal Drainage Board Southern Water and South East Water Early dialogue can prevent delay, redesign and increased costs later in the planning process. This is particularly important in coastal and low-lying areas such as Swale and the Isle of Sheppey. 2. Clarify the Difference Between Planning Permission and Other Consents Many applicants and residents do not clearly understand that: Planning permission does not remove the need for separate flood risk, drainage or marine consents. The preamble could more explicitly state that: Planning permission and flood risk activity permits or land drainage consents are separate regulatory regimes, and approval under one does not imply approval under the other.		
2026Reg18/119	12	Question 064 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Marine Management Organisation	Sir/Madam	.	Further points to noteWe welcome the references to the Marine Policy Statement, Marine and Coastal Access Act 2009 and the South East Marine Plan.We recommend a couple of suggested amendments within these sections:• 33.0.28 which references the need for consents from the MMO, it might be useful to mention the extent being “mean high water springs” and it relates to other works besides just construction and dredging.		
2026Reg18/127	24	Question 064 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	2.7.5 C8 Flood riskPage 14 of 352.7.5.1 PreambleNatural England supports this policy. We advise that it would be helpful to provide more information on natural flood management in the policy preamble, for instance links to local partnerships. Further information could be provided on both natural flood management and nature-based solutions, for instance on how slowing flow upstream can provide freshwater habitat in locations away from saline intrusion and coastal development. Further advice on natural flood management and nature-based solutions can be found in the following links:•Natural flood management programme - GOV.UK•Nature-based solutions: Environment Agency position statement - GOV.UK		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Comments on the preamble as follows: Agrees with content, which is helpful. Suggest refinements. Encourage early pre-application engagement with EA/KCC (LLFA and HA), Drainage Board, Water companies. Explain that other consents, on top of planning permission, may be needed. Explain further why 100/75 year lifetime assumptions are needed/role of emergency planning and evacuation routes/flood resilience and resistance designed from outset. Strengthen section on Emergency Planning. Reinforce role of SuDs. Explain climate change allowance and lifetime assumptions.	The Council response as follows: Noted. This is already set out in 33.0.33. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Further detail will be included once evidence base is complete. Partial Change Proposed (Preamble will be updated once evidence base is complete.)
2026Reg18/119	Comments on the pre-ample as follows: Welcomes the references to the Marine Policy Statement, Marine and Coastal Access Act 2009 and the South East Marine Plan. Recommend in33.0.28 which references the need for consents from the MMO, it might be useful to mention the extent being "mean high water springs" and it relates to other works besides just construction and dredging.	The Council agrees: Noted. Agree. Underlined text to be added to 33.0.28: Marine Management Organisation- for works including construction and dredging in English inshore and offshore areas, including waters up to up to mean high water spring. Change Proposed.
2026Reg18/127	Supports this preamble, and comments: Provide more information on natural flood management in the preamble eg links to local partnerships/ nature-based solutions/ slowing the flow/ providing freshwater habitat and includes links.	Noted. Preamble will be adjusted to include reference to natural flood management in the preamble eg links to local partnerships/ nature-based solutions/ slowing the flow/ providing freshwater habitat and will include appropriate links from Gov.Uk (Natural Flood Management and Nature Based Solutions (EA Position Statement)). Change Proposed.

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2026Reg18/40	67	Question 065 Do you support or object to Policy C8? What would you add, remove or amend to support it further or to remove your objection?				Bredgar Parish Council	Teresa	Hudson		Support	BPC support Policy C8. Due to climate change this will be a growing future risk and an extremely important risk to be managed, whilst safeguarding and retaining our important coastal environment. An additional policy aim could be added to mitigate flooding risks on the Kent Downs dip slope by restoration of hedgerows and woodland planting.
2026Reg18/120	17	Question 065 Do you support or object to Policy C8? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	L	Sinden (DHA)	Persimmon Homes				Object	4.13.1 Persimmon generally supports the inclusion of Policy C8 which broadly reflects the requirements for managing development within flood risk areas as set out in national guidance. However, the Policy needs reviewing to ensure it is justified and effective. 4.13.2 In the interests of ensuring consistency with national policy Criteria (2) should be amended as follows: "Avoid inappropriate development in accordance with the NPPF and PPG in areas at risk of flooding. Where development is necessary in areas of flood risk, the development must be made safe for its lifetime, not increase flood risk elsewhere and seek opportunities to reduce the causes and impacts of flooding". 4.13.3 Criterion (3) sets out how the Sequential Test and Exception Test will be applied (when required), which is to be guided by SBC's 'The Application of the Sequential & Exception Tests for Planning Applications in Swale'. In this regard, we would recommend that national guidance (and the consultation NPPF) should take precedence over SBC's guidance document in the interests of providing a justified and consistent Policy that can be applied effectively. 4.13.4 With this in mind, we would recommend that the Policy should be amended to relate to the most up-to-date Environment Agency (EA) flood mapping, as this sees more regular updates and would seek to relieve pressure on SBC to ensure the Borough's Strategic Flood Risk Assessment remains consistently up-to-date throughout the Plan period. This in turn would allow for future flexibility with up-to-date evidence rather than utilising a document that will become outdated.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/40	Support this policy for the following reasons: Due to climate change this will be a growing future risk and is an important risk to be managed. An additional policy aim could be added to mitigate flooding risks on the Kent Downs dip slope by restoration of hedgerows and woodland planting.	The Council agrees for the following reasons: Noted. An extra reference to Natural Flood Management will be added to preamble. Partial Change Proposed.
2026Reg18/120	Objects to policy for the following reasons: Seek inclusion of reference to NPPF and PPG in Criteria 2. National guidance should take precedence over local guidance (on the Sequential Test) referred to in Criteria 3. Policy should be amended to relate to up to date EA mapping, over SFRA.	The Council partially agrees for the following reasons: Agree that reference to the NPPF and PPG should be included in Point 2. The PPG sets out that 'for individual planning applications subject to the sequential test, the area to which the test needs to be applied will be governed by local circumstances relating to the catchment area for the type of development proposed and the needs it is proposing to address.' As such it is appropriate for local guidance to be used and referred to in point 3. Agree, reference to EA mapping will be added to Policy C8. Partial Change Proposed.

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2026Reg18/124	21	Question 065 Do you support or object to Policy C8? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent				Object	(See attached documents) 5.18.1Fernham Homes generally supports the inclusion of Policy C8 which broadly reflects the requirements for managing development within flood risk areas as set out in national guidance. In response to Questions 64 and 65 of the Consultation document we however comment that the Policy needs reviewing to ensure it is justified and effective. 5.18.2In the interests of ensuring consistency with national policy Criteria (2) should be amended as follows:“Avoid inappropriate development in accordance with the NPPF and PPG in areas at risk of flooding. Where development is necessary in areas of flood risk, the development must be made safe for its lifetime, not increase flood risk elsewhere and seek opportunities to reduce the causes and impacts of flooding”. 5.18.3Criterion (3) sets out how the Sequential Test and Exception Test will be applied (when required), this sets out how this will be guided by SBC’s ‘The Application of the Sequential & Exception Tests for Planning Applications in Swale’. In this regard, we would recommend that national guidance (and the consultation NPPF) should take precedence over SBC’s guidance document in the interests of providing a justified and consistent Policy that can be applied effectively. 5.18.4With this in mind, we would recommend that the Policy should be amended to relate to the most up-to-date Environment Agency (EA) flood mapping, as this sees more regular updates and would seek to relieve pressure on SBC to ensure the Borough’s Strategic Flood Risk Assessment remains consistently up-to-date throughout the Plan period. This in turn would allow for future flexibility with up-to-date evidence rather than utilising a document that will become outdated.

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2026Reg18/124	Objects to policy for the following reasons: Seek inclusion of reference to NPPF and PPG in Criteria 2. National guidance should take precedence over local guidance (on the Sequential Test) referred to in Criteria 3. Policy should be amended to relate to up to date EA mapping, over SFRA.	The Council partially agrees for the following reasons: Agree that reference to the NPPF and PPG should be included in Point 2. The PPG sets out that 'for individual planning applications subject to the sequential test, the area to which the test needs to be applied will be governed by local circumstances relating to the catchment area for the type of development proposed and the needs it is proposing to address.' As such it is appropriate for local guidance to be used and referred to in point 3. Agree, reference to EA mapping will be added to Policy C8. Partial Change Proposed.

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2026Reg18/126	25	Question 065 Do you support or object to Policy C8? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Neither	Policy C8 – Flood Risk Flood and Water ManagementThe County Council, whilst generally content with the policy, considers that it could go further whereby SBC requires for sites proposed within catchments that are known to contribute to existing flood issues within the district (e.g. upstream of Swanley), they can only discharge at rate equivalent to or below Qbar, and that a staged discharge will not be acceptable. Qbar technically is the peak rate of flow from a catchment for the mean annual flood (a return period of approximately 1 in 2.3 years), whilst this would obviously not provide betterment for those events below the 1 in 2.3 year for all rainfall events of a 'size' larger than that the betterment would be significant and it would be these that are associated with the majority of risk. The LLFA would be happy to arrange a meeting to discuss should SBC so wish. The Local Flood Risk Management Strategy should also be taken into account.In June 2025 DEFRA) released its national standards for sustainable drainage systems (SuDS) which will supersede some of the guidance within the current policy. The LLFA advises that whilst its Drainage and Planning Policy Statement is largely still relevant – see link above. Until updated, all applicants submitting drainage strategies should aim to reflect these latest national standards within their drainage strategies. Any existing local plan policies should also be referenced within submissions. Energy and AdaptationThe County Council supports this policy and is pleased to see the reference to climate change adaptation and other multifunctional benefits, as well as the prioritisation of natural flood management.
2026Reg18/127	25	Question 065 Do you support or object to Policy C8? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.7.5.2 Policy criteriaNatural England particularly supports criterion 1 which requires development proposals to prioritise and seek opportunities to provide natural flood management and multifunctional benefits, linking with strategies for BNG, and green and blue infrastructure and climate change mitigation and adaptation. We advise that criteria 1 could be strengthened with the following wording:"1. Prioritise and seek opportunities to provide natural flood management and multifunctional benefits linking flood risk management to nature-based solutions and strategies for green and blue infrastructure, biodiversity net gain and ecological connectivity, improved health and wellbeing and mitigation and adaptation to climate change".
2026Reg18/19	1	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Lower Medway Int. Drainage Board			The Board is content that Policy C9 appropriately addresses sustainable drainage in planning terms. If helpful, the Council may wish to consider a brief signpost in the supporting text to the need for separate IDB consenting where development affects ordinary watercourses, to aid clarity for applicants.		

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2026Reg18/126	Neither supports nor objects to this policy, but comments: Generally content, but could go further with regards discharge rates. Local Risk Management Strategy should also be taken into account. National standards for sustainable drainage have been released and should be reflected in policy and applications. Supports point 1.	The Council agrees: Noted. Noted and agreed. Noted and agreed. Noted. KCC's comments will be reviewed alongside their comments to Policy C9 and changes made where relevant. Partial Change Agreed.
2026Reg18/127	Supports this policy for the following reasons: Particularly supports Criterion 1, but could be strengthened as follows: 'Prioritise and seek opportunities to provide natural flood management and multifunctional benefits linking flood risk management to nature-based solutions and strategies for green and blue infrastructure, biodiversity net gain and ecological connectivity, improved health and wellbeing and mitigation and adaptation to climate change'.	Agreed Change Proposed.
2026Reg18/19	Support preamble and policy but suggest signpost to separate IDB consenting for ordinary watercourses, to aid clarity for developers.	Noted and agreed in principle The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/131	9	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Environm ent Agency		.	Policy C9 - Sustainable Drainage We support the reference to the Environment Agency's Groundwater protection position statements - GOV.UK to assist in the design, maintenance and operation of sustainable drainage systems within paragraph 34.0.6. Paragraph 34.0.15 specifically mentions what the Environment Agency would support and what advice we would issue. We are in agreement with these points. However, Policy C9 does not mention that there should be no discharge into land impacted by contamination, land previously identified as being contaminated or made ground. This is supported by position C4, G10, G11, G12 and G13 of Environment Agency's Groundwater protection position statements - GOV.UK. Furthermore, for those areas where infiltration SuDS are proposed for anything other than clean roof drainage in a source protection zone 1, a hydrogeological risk assessment should be undertaken to ensure that the system does not pose an unacceptable risk to the source of supply, this is supported by position G13 and in conjunction with G10 of Environment Agency's Groundwater protection position statements - GOV.UK. Policy C10 – Water quality and water resourcesWe support the specific consideration for the protection of groundwater and source protection zones. We'd ask there to be further reference to the Environment Agency's Groundwater protection position statements - GOV.UK. This serves as a basis on how to approach and protect groundwater. There is no mention within the policy that developers should follow the drainage hierarchy when considering the disposal of foul drainage. Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:• Connection to the public sewer• Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)• Septic Tank ~~Foul drainage should be connected to the main sewer. Where this is not~~		
2026Reg18/11	6	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?					jennifer	anderson	Rainwater run-off in new developments should not be allowed to discharge into existing highway drains or sewerage drains until it can be demonstrated by the developer that there is sufficient capacity.		
2026Reg18/16	20	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Boughton under Blean Parish Council	Sarah	Muteham	§ 2f Instead of the somewhat vague-sounding 'enable sustainable maintenance', suggest something along the lines of draft NPPF policy F8 para 2b 'have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development.'§ 1g Consider replacing 'relevant Planning Guidance produced by the Council' with 'local and national guidance'.		

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2026Reg18/131	Support references to EA statements and advice as set out in paragraphs 34.0.6 and 34.0.15. Policy C9 should mention 'no discharge into land impacted by contamination, land previously identified as being contaminated or made ground' which is supported in C4, G10, G11, G12 and G13 of Environment Agency's Groundwater protection position statements - GOV.UK. Furthermore, policy C9 should mention that for those areas where infiltration SuDS are proposed for anything other than clean roof drainage in a source protection zone 1, a hydrogeological risk assessment should be undertaken to ensure that the system does not pose an unacceptable risk to the source of supply, this is supported by position G13 and in conjunction with G10 of Environment Agency's Groundwater protection position statements - GOV.UK. Support mention of SuDs as a benefit to water quality. Support mention of drainage hierarchy, but in part 2a, the drainage hierarchy should be set out, along with specific references to the parts of the 'Kent County Council Drainage and Planning Policy: A Local Flood Risk Management Strategy' the policy is referring to. We support that the policy (34.0.1) is linked with Policy C10 Water Quality and Water Resources and that the policy is looking at the benefits to water quality as well as flood risk.	Noted. Noted and agreed in principle. Noted and agreed in principle. Noted and agreed in principle. Noted. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/11	Rainwater run-off in new developments should not be allowed to discharge into existing highway drains or sewerage drains until it can be demonstrated by the developer that there is sufficient capacity.	Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/16	Suggests amending vague-sounding 'enable sustainable maintenance', with something along the lines of draft NPPF policy F8 para 2b 'have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development.' Consider replacing 'relevant Planning Guidance produced by the Council' with 'local and national guidance'.	The criteria listed in point 2 of policy C9 are a repeat of policies in a KCC document - it is not within the Council's gift to amend that document, but this reference will be reviewed. Item F1 - Appendix 2 Drainage-and-Planning-policy-statement 2019.pdf Policies need to be as specific as possible as to what is required and the phrase 'local and national guidance' might be open to interpretation. An amendment to be consistent with C8 which references compliance with NPPF, PPG, EA and CIRIA guidance, will be discussed with the LLFA. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/73	41	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council supports the overall direction of the preamble to Policy C9, particularly the strong alignment with the NPPF, Planning Practice Guidance, the Strategic Flood Risk Assessment and Kent County Council's Drainage and Planning Policy. The emphasis on multifunctional benefits, early design integration and long-term maintenance is welcomed. To make the preamble more focussed, relatable and locally grounded, the following refinements are suggested. 1. Stronger Local Context – Isle of Sheppey and Low-Lying Areas Whilst the national and policy context is well referenced, the preamble would benefit from clearer reference to: The particular vulnerability of low-level marshland and coastal areas; The increasing frequency of intense rainfall events; Surface water flooding as one of the most common forms of flooding in Swale (as identified in the SFRA); The cumulative drainage pressures on the Isle of Sheppey. Including a short paragraph highlighting the Island's drainage constraints, reliance on pumping infrastructure and flat topography would make the policy more locally relatable and evidence-based. 2. Clearer Emphasis on Maintenance and Long-Term Management The preamble rightly references maintenance arrangements, but this could be made more explicit by: Stating clearly that SuDS must have secured, funded, and enforceable long-term maintenance arrangements;		
2026Reg18/74	27	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	Yes. The preamble should take into consideration that, in Swale, "ordinary watercourses" are likely to be chalk streams flowing from the chalk aquifer of the North Downs and therefore a very high national priority for protection. Polluted surface water from roads and CSOs should not be channelled into chalk streams like the Westbrook and Cooksditch in Faversham, and where it is that should be rectified.		
2026Reg18/76	65	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Five Parishes Opposition Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). The preamble provides a very good insight into the complexity and volume of plans and bodies involved in sustainable drainage management. The policy should include a reference to C10 and protection of Water quality and Water Resources, as inappropriate SuDs in a Groundwater Protection Zone could have significant impacts on water quality and the water scarcity that has to be managed.		

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2026Reg18/73	Supports direction of preamble Suggests stronger local context (vulnerability of low lying/coastal areas, increased intensity of rainfall events, surface water flooding is the most common form of flooding, cumulative drainage pressures) Clearer emphasis on maintenance and long-term management (secured/funded/enforceable long-term maintenance arrangements, clarity on adoption (KCC/ management company/other, recognising that poorly maintained SuDs can increase flood risk rather than reduce it. Cumulative impact and capacity - reference need to consider cumulative surface water impacts across catchments/interaction between new development and existing networks and groundwater/importance of not placing additional pressure on already constrained systems - particularly in marsh/groundwater-sensitive systems. Welcome references to groundwater vulnerability zones but asks for more emphasis on high groundwater level risk in winter/re-inforce that infiltration may not be appropriate in some areas/importance of seasonal groundwater monitoring. To make the preamble more accessible add summary paragraph on why SUDS are important to Swale/ provide explanation of drainage hierarchy in plain language/add statement about climate change brining increase short-duration, high intensity rainfall events. Make stronger link to climate change and adaptation (climate resilience/role in urban cooling, key adaptation measure)	Noted. Noted. Noted. Noted. Noted. Noted. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/74	The preamble should note that ordinary watercourses in Swale are likely to be chalk streams and therefore a national priority for protection. Pollution from surface water runoff and combined sewage outfalls should not be channelled into chalk streams and where it is, the matter should be rectified.	Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/76	Supports the preamble. Policy should include reference to Policy C10 on Water Quality & Water Resources as inappropriate SuDs in a Groundwater Protection Zone can have significant impacts on water quality/scarcity that has to be managed.	Noted. Noted. The Plan should be read as a whole, and internal referencing is not a requisite, however, this point will be considered in light of the general review of the policy and preamble. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/81	27	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Borden Parish Council			There are serious concerns regarding the capacity and maintenance of existing drainage and sewer infrastructure serving the parish. There is evidence of systems operating at or beyond capacity, with incidents of overflow that appear to be linked to inadequate maintenance and insufficient network provision. Further development without confirmed and funded upgrades to drainage infrastructure will exacerbate flood risk, environmental harm, and potential public health issues. The Local Plan must require that: A full assessment of existing sewer and surface water capacity is undertaken prior to allocation or approval of development;Necessary upgrades are secured, funded, and delivered in advance of or alongside occupation of new dwellings;Ongoing maintenance responsibilities are clearly defined and enforced; andDevelopment does not proceed where there is insufficient confirmed capacity within the drainage network. Drainage infrastructure must be treated as a fundamental element of infrastructure-led development, not as an issue to be addressed retrospectively. ANSWER DUPLICATED AT Q.67		
2026Reg18/126	1	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				KCC Strategic Planning		KCC Strategic Planning	Flood & Water Management The County Council, as Lead Local Flood Authority (LLFA), notes that it is proposed for the Swale Strategic Flood Risk Assessment (SFRA) to be updated prior to the Regulation 19 submission. Swale Borough Council (SBC) should satisfy itself that the proposed updated SFRA utilises the latest surface flood maps released by the Environment Agency (EA) last year in order to comply with paragraph 172 of the National Planning Policy Framework (NPPF).The County Council would suggest that SBC may wish to include advice as detailed in National standards for sustainable drainage systems (SuDS) - GOV.UK) in regard to drainage hierarchy. This makes it clear that it is not acceptable to disregard, in permeable geologies, the use of infiltration due to the layout proposed conflicting with the required exclusion zones associated with infiltrating features; the County Council will expect the site layout to be altered in order to comply with the hierarchy. Answer below duplicated at question 66/67 Policy C9 – Sustainable Drainage Flood and Water Management Para 33.0.30 - The County Council would ask that this statement is made clearer in that the LMIDB only has jurisdiction for part of Swale, with the County Council's land drainage (consenting) authority for those areas outside the LMIDB area of jurisdiction. It is understood that this is explained elsewhere but it is felt that this sentence could be left to interpretation and it is therefore suggested that this is changed.Paragraph 34.0.9 - The County Council would advise that advice given under Policy C8 regarding DEFRA's new standards applies to all forms of development and so should also be considered alongside the requirements of the NPPF for all development proposals.Paragraph 34.0.12 - The County Council would advise that the comments made on DEFRA's new standards above applies to all forms of development and so should also be considered alongside the requirements of the NPPF for all development proposals.Paragraph 34.0.13 - The County Council would advise that DEFRA's new standards require all		

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We are aware

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2026Reg18/81	Serious concerns about capacity and maintenance of the existing drainage and sewer infrastructure serving Borden parish, with systems operating at or beyond capacity and incidents of overflow that appear to be linked to inadequate maintenance and insufficient network provision. Further development, without upgrades, could exacerbate flood risk, environmental hard and public health. Drainage infrastructure must be treated as a fundamental element of infrastructure-led development, not to be addressed retrospectively. The Local Plan must require a full assessment of existing sewer and surface water capacity prior to allocation or approval of development/that upgrades are secured, funding and delivered in advance or alongside occupation of dwellings/ongoing maintenance is defined and enforced/development does not proceed where there is insufficient capacity in the network.	Noted. Noted. As part of the evidence base for the Local Plan, Swale Borough Council undertakes a Strategic Flood Risk Assessment and works with the Lead Local Flood Authority (KCC), the Environment Agency and Southern Water on this. This looks at all sources of flooding across the borough. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/126	Notes the SFRA is to be updated and urges Council to satisfy itself that the latest surface water maps released by the EA in 2025 have been used - in order to comply with paragraph 172 of the NPPF. Suggest SBC include advice on National Standards for Sustainable Drainage in regard to the drainage hierarchy. This makes it clear that it is not acceptable to disregard, in permeable geologies, the use of infiltration due to the layout proposed conflicting with the required exclusion zones associated with infiltrating features; the County Council will expect the site layout to be altered in order to comply with the hierarchy. Clarify 33.0.30 with reference to LMIDB only having jurisdiction for part of Swale with the County Council having jurisdiction for other areas. Advise that reference to DEFRA's new standards applies to all forms of development and should be considered alongside the requirements of the NPPF for all development proposals (ref paragraphs 34.0.9 and 34.0.12) In paragraph 34.0.13 advise that DEFRA's new standards require all proposals to demonstrate interception of the first 5mm of any surface water rainfall on site as close to source as possible. Furthermore, the latest standards place emphasis on the pepper potting of SuDS features throughout any development proposals and that the use of pipe to large basin designs is no longer acceptable. The County Council ask this to be mentioned. Comments references Policy C9 directly (rather than preamble) and seeks reference (further to the climate change requirements of the Environment Agency (EA),) to the DEFRA standards which set limitations in relation to rates of runoff inclusive of climate change adjustments (see standard 3 - National standards for sustainable drainage systems (SuDS) - GOV.UK) with a 'inclusive of any required climate change allowances as set by the EA' statement.) Supports references to multi-functional benefits.	Noted. SBC can confirm that the latest Surface Water mapping has been used. Noted and agreed in principle. Noted and agreed in principle. Noted and agreed in principle. Noted and agreed in principle. Noted and agreed in principle. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/127	26	Question 066 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	2.7.6 C9 Sustainable Drainage2.7.6.1 PreambleNatural England supports with policy and the multiple benefits from SuDS identified in paragraph 34.0.1. We also support natural solutions and source control solutions as mentioned in paragraph 34.0.13. We would like to signpost the CIRIA guidance for designing SuDS to treat and reduce phosphorous and nitrogen in surface water:•Using SuDS to reduce phosphorus in surface water runoff (C808F)•Using SuDS to reduce nitrogen in surface water runoff (C815F)These guidance documents were created specifically for nutrient neutrality designated catchment areas; however, the design principles they contain are equally relevant to catchments that do not fall under nutrient neutrality requirements.		
2026Reg18/131	10	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Environm ent Agency		.		Neither	Policy C9 - Sustainable Drainage We support the reference to the Environment Agency's Groundwater protection position statements - GOV.UK to assist in the design, maintenance and operation of sustainable drainage systems within paragraph 34.0.6. Paragraph 34.0.15 specifically mentions what the Environment Agency would support and what advice we would issue. We are in agreement with these points. However, Policy C9 does not mention that there should be no discharge into land impacted by contamination, land previously identified as being contaminated or made ground. This is supported by position C4, G10, G11, G12 and G13 of Environment Agency's Groundwater protection position statements - GOV.UK. Furthermore, for those areas where infiltration SuDS are proposed for anything other than clean roof drainage in a source protection zone 1, a hydrogeological risk assessment should be undertaken to ensure that the system does not pose an unacceptable risk to the source of supply, this is supported by position G13 and in conjunction with G10 of Environment Agency's Groundwater protection position statements - GOV.UK. Policy C10 – Water quality and water resourcesWe support the specific consideration for the protection of groundwater and source protection zones. We'd ask there to be further reference to the Environment Agency's Groundwater protection position statements - GOV.UK. This serves as a basis on how to approach and protect groundwater. There is no mention within the policy that developers should follow the drainage hierarchy when considering the disposal of foul drainage. Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:• Connection to the public sewer• Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)• Septic Tank Foul drainage should be connected to the main sewer. Where this is not

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2026Reg18/127	Natural England supports the policy and preamble but want to signpost several documents, and their updates, which have been created specifically for nutrient neutrality designated catchments, although the principles can be applied elsewhere: Using SuDS to reduce phosphorus in surface water runoff C808F New guidance for Using SuDS to reduce nitrogen in surface water runoff	Noted and agreed to add reference to documents signposted by NE. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/131	Partially agrees with the Policy (and preamble) for the following reasons: Support references to EA statements and advice as set out in paragraphs 34.0.6 and 34.0.15. Policy C9 should mention 'no discharge into land impacted by contamination, land previously identified as being contaminated or made ground' which is supported in C4, G10, G11, G12 and G13 of Environment Agency's Groundwater protection position statements - GOV.UK. Furthermore, policy C9 should mention that for those areas where infiltration SuDS are proposed for anything other than clean roof drainage in a source protection zone 1, a hydrogeological risk assessment should be undertaken to ensure that the system does not pose an unacceptable risk to the source of supply, this is supported by position G13 and in conjunction with G10 of Environment Agency's Groundwater protection position statements - GOV.UK. Support mention of SuDs as a benefit to water quality. Support mention of drainage hierarchy, but in part 2a, the drainage hierarchy should be set out, along with specific references to the parts of the 'Kent County Council Drainage and Planning Policy: A Local Flood Risk Management Strategy' the policy is referring to. We support that the policy (34.0.1) is linked with Policy C10 Water Quality and Water Resources and that the policy is looking at the benefits to water quality as well as flood risk.	The Council agrees, as follows: Noted - Noted and agreed in principle. Noted and agreed in principle. Noted and agreed in principle. Noted and agreed in principle. Noted - The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/40	60	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Bredgar Parish Council	Teresa	Hudson		Support	BPC strongly support the Policy C9. New "developments" provide an opportunity to guide existing landowners to improve drainage from beyond the site of the development itself that will reduce the risk of flooding. Could such an aim be added to the policy? Such as commitments to more hedgerow restoration, woodland planting and land management for nature. BPC are particularly concerned about unacceptable risks of pollution of groundwater sources. Section 3 of the policy regarding planning applications for development sites could be improved by making sign off by the responsible water authority mandatory. For example, sign off by Southern Water for confirmation of sewage processing capability. An example of an unacceptable risk to groundwater sources was highlighted in the Highsted Park Inquiry. Whilst reading through some of the supplementary evidence that section 2 signposts we noticed the following: In 1.1.3 it is noted that "Kent County Council's Minerals and Waste Local Plan will continue to provide the policy framework for waste and minerals and all Supplementary Planning Documents (SPD) will roll forward as they will relate to the parent policy in this plan once approved." The Kent County Council's Minerals and Waste Local Plan Policy CSW 6 item 2 states that "Planning permission will be granted for proposals that do not give rise to unacceptable adverse impacts upon Local Wildlife Sites (LWS), Local Nature Reserves (LNR), Ancient Woodland, Air Quality Management Areas (AQMA)s and groundwater resources. (See Figures 7, 8, 10 & 15)". The Highsted Park application proposes the locating of a Built Waste Management Facilities where it will adversely impact Cromers Wood which, according to Kent Wildlife Trust, is "An ancient semi-natural woodland on the south-east side of a dry slope valley. Carpets of wood anemone are followed by bluebells, early purple and common spotted orchids." In addition, the policy point 5 states that "Planning permission will be granted for proposals that avoid

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/40	Supports this policy for the following reasons: New developments provide an opportunity for existing landowners to improve drainage from beyond development sites that will reduce the risk of development. Can this, and commitment to plant hedgerows, woodland planting, land management be added to the policy? Concerned about risks of pollution to groundwater. Can policy make sign off by responsible authority (eg Southern Water) mandatory? Cites example from the Highsted planning application for a Built Waste Management Facility (in SPZ1) which will be in contravention of the Minerals and Waste Local Plan Policy CSW 6.	The Council (partially) agrees for the following reasons: Policies in the Local Plan guide decisions for future development. It is difficult for the Local Plan to influence development where no planning application is needed. Other policies in the plan promote the planting of woodland, trees and hedgerows. This will be considered in the redrafting of this policy and any amendments included in the Regulation 19 Local Plan document. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

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2026Reg18/53	5	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Southern Water Services Ltd				Object	Southern Water is the wastewater service provider for the Swale district, supplying water to parts of the district. Southern Water strongly supports adherence to the National Standards for Sustainable Drainage issued by Government in June 2025 and request these be firmly embedded within this policy to ensure that it complies with the national policy presumption in favour of sustainable development. We welcome the requirement for Development to demonstrate that sustainable drainage has been considered at the earliest stages of scheme development, the National Standards for Sustainable Drainage (referred to below as 'National Standards') states under Principle 9 that Developers should also demonstrate compliance with the national standards from the conceptual stage of the application process, as per the excerpt below: Links with development planning Principle 9 Developers should demonstrate compliance with the national standards from the conceptual stage of the planning application process and that a 'SuDS Approach' has been integrated throughout the development and its landscape design. Principle 10 All appropriate planning applications should demonstrate how the national standards have been met in the site design. Principle 11 Where a development is phased, the design of the surface water drainage system should ensure that each of the standards will be delivered for each phase of the development. The proposals should consider the effects of each stage of site development, as well as the performance of the surface water drainage system. This is to ensure risks are mitigated and both short-term and long-term benefits are maximised. References to KCC sustainable drainage policy made in point 2 of the policy C9 require correction, as surface and rainwater harvesting for non-potable re-use is now at the top of the hierarchy of drainage routes in section 4.2 of the National

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/53	Southern Water supports adherence to National Standards for sustainable drainage, issued by the government in June 2025 and requests these are firmly embodied in policy. Welcomes requirement to consider sustainable drainage from the earliest stages. National Standards state that compliance should be demonstrated from the conception stage of the application (and cites national standards). References to KCC's sustainable drainage policy in point 2 needs amending - as surface and rainwater harvesting for non-potable re-use is not at the top of the drainage hierarchy in the National Standards. Water conservation (including rainwater/surface water harvesting) is essential in particularly important in light of the growth proposed in the Local Plan. Part 3 also needs correction to the National Standards eg no surface water drainage to the foul network is allowed. Southern Water will not permit any discharge of surface water from new development to a foul sewer (even if this was the point of discharge prior to the developmentof the site) and will resist surface water connections to a combined sewer. Requested wording for Part 1 of policy C9 as follows: Development proposals should, as relevant:a. Demonstrate that sustainable drainage has been considered and is compliant with the National Standards for Sustainable Drainage from the earliest stages of scheme development and that schemes seek to provide multiple benefits to the environment and communities in terms of reducing the causes and impacts of flooding, improving water quality (removing pollutants from run-off) and water resources (water reuse, recharge to groundwater), adapting to climate change and enhancing biodiversity and amenity, as appropriate; Requested wording for Part 2 of policy C9: Planning applications for major development must be accompanied by site-specific drainage strategies to be approved by Kent County Council as the Lead Local Flood Authority. Proposed drainage strategies should:a. Be in accordance with the standard run off hierarchy as set out in Paragraph 1.2 of the National Standards for Sustainable Drainage (2025).j. Minimise the risk of sewer flooding and protect water quality by providing SuDS designed to the National Standards for Sustainable Drainage (2025). Requested wording for Part 3 of policy C9: Planning applications for proposed development sites that meet with any of the following conditions:b. where the surface water currently discharges to a sewer (either surface water, combined or highway); or...shall only discharge at a rate equivalent to or below Qbar for all designed rainfall events. A staged discharge will not be acceptable. Compliance with this requirement will need to be demonstrated to the satisfaction of the Lead Local Flood Authority. Permission from the water company is required for any connection of surface water to any type of water company owned and operated sewer, early pre-planning engagement is advised.	The Council agrees, for the following reasons: Points 1.-6. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/73	11	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Eastchurc h Parish Council	Sarah	Poole		Support	The Parish Council supports Policy C9 in principle, particularly the strong requirements for sustainable drainage, biodiversity enhancement and compliance with Kent County Council's drainage standards. However, there are serious local concerns regarding: The increase in unauthorised development, including unauthorised Gypsy and Traveller sites; The absence of adequate drainage infrastructure on some illegal sites; The already poor drainage performance in parts of the local area; The cumulative strain placed on low-lying and marshland drainage systems. These issues should be more explicitly addressed within the policy framework. 1. Drainage Enforcement and Unauthorised Development Whilst Policy C9 sets high standards for new development, it does not address the real-world problem that: Unauthorised sites often proceed without approved drainage strategies; Drainage works are sometimes absent, inadequate or retrofitted poorly; This places additional strain on local ditches, culverts and pumping systems. The Parish Council supports the allocation of appropriate, well-designed and properly serviced Gypsy and Traveller sites. However, where provision is not delivered and unauthorised sites increase, there are clear drainage and environmental consequences.
2026Reg18/76	66	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Five Parishes Oppositio n Group				Support	(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG strongly support the Policy C9.FPG believe that C9 "2g) Safeguard water quality" is include discharges to the Groundwater and any downstream watercourse. During Highsted Park the Applicant planned to discharge in over 600 boreholes to the groundwater, direct road run off to a Chalk Stream via an attenuation pond and areas around KSP where no plans were provided.

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Gives qualified support for this policy for the following reasons: Gives in principle support, however has serious local concerns. Some unauthorised Gypsy and Traveller sites proceed without adequate drainage or drainage poorly fitted. Places additional strain on local ditches, culverts and pumping stations with drainage and environmental consequences. Suggests additional wording to ensure drainage standards apply to retrospective and temporary permissions: "All development, including temporary or retrospective applications, must demonstrate compliance with sustainable drainage requirements. Where development has occurred without appropriate drainage infrastructure, remediation to an acceptable standard will be required." Concerned about cumulative impacts in low-lying areas where water does not drain naturally and relies on ditches, culverts and pumping infrastructure where even small increases in impermeable areas can cause increased flooding. C9 should be clearer on cumulative impacts, sensitivity of low-lying areas, the need for drainage betterment in constrained locations. Suggests policy is strengthened with reference to hardstanding incorporating permeable surfaces unless proven unfeasible/ surface water not directed to foul systems/direct discharge to ditches requiring proper attenuation and agreement. Requests assurances that maintenance will be legally secured/responsibility will be clearly assigned/enforcement action will be taken where drainage systems fail Supports properly allocated Gypsy and Traveller Sites with adequate drainage infrastructure and early liaison with the Lead Local Flood Authority.	The Council (partially) agrees, for the following reasons: Points 1.-6. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/76	Supports this policy for the following reasons: The safeguarding of water quality is at risk through development, as demonstrated through the application at Highsted Park with discharge to groundwater and a chalk stream.	Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/81	28	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Borden Parish Council				Object	There are serious concerns regarding the capacity and maintenance of existing drainage and sewer infrastructure serving the parish. There is evidence of systems operating at or beyond capacity, with incidents of overflow that appear to be linked to inadequate maintenance and insufficient network provision. Further development without confirmed and funded upgrades to drainage infrastructure will exacerbate flood risk, environmental harm, and potential public health issues. The Local Plan must require that: A full assessment of existing sewer and surface water capacity is undertaken prior to allocation or approval of development;Necessary upgrades are secured, funded, and delivered in advance of or alongside occupation of new dwellings;Ongoing maintenance responsibilities are clearly defined and enforced; andDevelopment does not proceed where there is insufficient confirmed capacity within the drainage network. Drainage infrastructure must be treated as a fundamental element of infrastructure-led development, not as an issue to be addressed retrospectively. ANSWER DUPLICATED AT Q.66
2026Reg18/126	26	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Neither	Answer duplicated at question 66/67 Policy C9 – Sustainable Drainage Flood and Water Management Para 33.0.30 - The County Council would ask that this statement is made clearer in that the LMIDB only has jurisdiction for part of Swale, with the County Council's land drainage (consenting) authority for those areas outside the LMIDB area of jurisdiction. It is understood that this is explained elsewhere but it is felt that this sentence could be left to interpretation and it is therefore suggested that this is changed.Paragraph 34.0.9 - The County Council would advise that advice given under Policy C8 regarding DEFRA's new standards applies to all forms of development and so should also be considered alongside the requirements of the NPPF for all development proposals.Paragraph 34.0.12 - The County Council would advise that the comments made on DEFRA's new standards above applies to all forms of development and so should also be considered alongside the requirements of the NPPF for all development proposals.Paragraph 34.0.13 - The County Council would advise that DEFRA's new standards require all proposals to demonstrate interception of the first 5mm of any surface water rainfall on site as close to source as possible. Furthermore, the latest standards place emphasis on the pepper potting of SuDS features throughout any development proposals and that the use of pipe to large basin designs is no longer acceptable. The County Council would ask that this should be mentioned/reflected.In regard to Policy C9 1d - the County Council would comment that further to the climate change requirements of the Environment Agency (EA), the DEFRA standards set limitations in relation to rates of runoff inclusive of climate change adjustments. The County Council would ask that these are referenced (as set out under standard 3 - National standards for sustainable drainage systems (SuDS) - GOV.UK) with a 'inclusive of any required climate change allowances as set by the EA' statement. Climate Change and AdaptationThe County Council supports this policy, particularly in the context of adaptation and the numerous benefits provided from

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/81	Objects to this policy for the following reasons: Serious concerns about capacity and maintenance of the existing drainage and sewer infrastructure serving Borden parish, with systems operating at or beyond capacity and incidents of overflow that appear to be linked to inadequate maintenance and insufficient network provision. Further development, without upgrades, could exacerbate flood risk, environmental harm and public health. Drainage infrastructure must be treated as a fundamental element of infrastructure-led development, not to be addressed retrospectively. The Local Plan must require a full assessment of existing sewer and surface water capacity prior to allocation or approval of development/that upgrades are secured, funded and delivered in advance or alongside occupation of dwellings/ongoing maintenance is defined and enforced/development does not proceed where there is insufficient capacity in the network.	The Council (partially) agrees for the following reasons: Noted. As part of the evidence base for the Local Plan, Swale Borough Council undertakes a Strategic Flood Risk Assessment and works with the Lead Local Flood Authority (KCC), the Environment Agency and Southern Water on this. This looks at all sources of flooding across the borough. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/126	Neither supports nor objects to this policy, but comments: (See also comments to pre-ambles) Seeks reference (further to the climate change requirements of the Environment Agency (EA),) to the DEFRA standards which set limitations in relation to rates of runoff inclusive of climate change adjustments (see standard 3 - National standards for sustainable drainage systems (SuDS) - GOV.UK) with a 'inclusive of any required climate change allowances as set by the EA' statement.) Supports references to multi-functional benefits.	The Council agrees for the following reasons: Noted. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/127	27	Question 067 Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Object	2.7.6.2 Policy criteriaRegarding the policy itself, we agree with most of the wording and only suggest that under 2i. it could be strengthened with the following wording: “Conserve and enhance biodiversity” to also safeguard what already exists.We advise that criterion 2 could be strengthened by quantifying the thresholds for major residential and non-residential development within the borough. We note that a definition of major development has not been provided in the Draft Plan. To align with NPPF requirements, we recommend that a definition of “major” development is provided, either within the policy or supporting text, in line with footnote 67 of the NPPF. This will help to strengthen the policy and therefore strengthen the decision-making that it informs.
2026Reg18/131 Page 283	12	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Environment Agency		.	The Local Plan should place clearer obligations on applicants to evidence wastewater treatment capacity, storm overflow resilience, and phasing aligned with Southern Water’s DWMPs. Furthermore, while the narrative on Stodmarsh nutrient neutrality is accurate, the policy needs clearer mechanisms for nutrient budgets, long-term mitigation, and alignment with emerging strategic solutions. Paragraph 35.0.8: We support the acknowledgement of the presence and importance of protecting chalk streams; however this does not seem to carry into policy where they are not mentioned. It would be beneficial to bring chalk streams into this policy due to their sensitive nature.Paragraph 35.0.29: Consideration of the risk of the flooding of wastewater systems could also link in with the Storm Overflow Reduction Plan to explain the long-term plan to reduce storm discharges.Paragraph 35.0.30: We support that developments will be required to consider the impacts of development on water bodies and good that official guidance is being referenced. The assessment would consider ‘how the proposed development would affect a relevant water body in a river basin management plan’. It is not clear if this covers all the water bodies in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and if this should be specified in the policy.Paragraph 35.0.31: We support the requirement for a water quality assessment. It would be good to also consider the effects of drainage and making sure that the existing systems have capacity before development take place. In addition to the above comments, we have also identified 26 measures for water bodies in Swale. These are works that have been identified by the Environment Agency as being necessary for improving water bodies. Developers should work with us to confirm the details of the work that needs to be undertaken and ensure they are carried out to a good environmental standard.Please note that we are currently reviewing our water body measures therefore the list provided is provisional and subject to change, however it should give a good indication of the types of measures that are needed to improve each water body. Once created and published, alongside the fourth River Basin		
2026Reg18/3	64	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Dunkirk Parish Council			Support subject to:35.0.14 should include Sarre Penn and Whitehall Dyke - both major tributaries of the Stour.35.0.21 This is where the Sarre Penn rises. Whitehall Dyke rises in Court Wood, South BleanDunkirk. Both feed the Stour and The Stodmarsh Nature Reserve.35.0.41 This doesn't happen or villages wouldn't continually suffer water outages and sewerage collapses		

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2026Reg18/127	Gives qualified support and seeks amendments, as follows: Agree with most of wording but suggests amending to 2i to 'Conserve and enhance biodiversity' to strengthen. Strengthen policy by quantifying thresholds for development (eg major for residential and non-residential/to align with the NPPF (footnote 67))	The Council (partially) agrees, for the following reasons: The criteria listed in point 2 of policy C9 are a repeat of policies in a KCC document - it is not within the Council's gift to amend that document, but this reference will be reviewed. Definitions of large and major development will be added to the glossary, as follows: Minor development: includes between 1 and 9 dwellings/ covers up to and including 0.5 hectares/ commercial development less than 1,000 square metres. Major development: includes 10-49 dwellings/ from 0.51 hectares up to and including 2 hectares/ commercial development between, 1000 and 4,999 square metres. Large major development: includes 50-249 dwellings/ from 2.1 hectares up to and including 5 hectares/ commercial development between 5,000 to 9,999 square metres. For information, Strategic major development: includes 250+ dwellings/ covers more than 5 hectares/ commercial development of 10,000 square metres or more Partial Change Agreed
2026Reg18/131	Comments on this preamble, as follows: LP should place clearer obligations on applicant to evidence waste water treatment capacity, storm overflow resilience and phasing aligned with SW's DWMPs. Preamble/policy needs clearer mechanisms for nutrient budgets, long term mitigation and alignment with emerging strategic solutions. Support reference to chalk streams in 35.0.8 but reference to chalk streams should be included in policy as well. Paragraph 35.0.29: Consideration of the risk of the flooding of wastewater systems could also link in with the Storm Overflow Reduction Plan to explain the long-term plan to reduce storm discharges. Paragraph 35.0.30: We support that developments will be required to consider the impacts of development on water bodies and good that official guidance is being referenced. The assessment would consider 'how the proposed development would affect a relevant water body in a river basin management plan'. It is not clear if this covers all the water bodies in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and if this should be specified in the policy. Paragraph 35.0.31: We support the requirement for a water quality assessment. It would be good to also consider the effects of drainage and making sure that the existing systems have capacity before development take place. EA has identified 26 measures for water bodies in Swale. These are works that have been identified by the Environment Agency as being necessary for improving water bodies. Developers should work with us to confirm the details of the work that needs to be undertaken and ensure they are carried out to a good environmental standard. EA are currently reviewing our water body measures therefore the list provided is provisional and subject to change, however it should give a good indication of the types of measures that are needed to improve each water body. Once created and published alongside the fourth River Basin Management Plans, the Programme of Measures for each water body should be used to identify suitable Measures that could take place to improve our water environment for both people and wildlife. Draft Programmes of Measures will be published in December 2026 for consultation, with the final version due to be published in December 2027. We strongly encourage you to include reference to the Programme of Measures within your Local Plan to help secure these environmental improvements.	The Council responds as follows: Agree - preamble and policy will be reviewed in collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in collaboration with the Environment Agency. Reference to chalk streams is already included in Policy C10. Further reference will be discussed with the Environment Agency. This list has been taken from Southern Water's DWMP. Additional text will be discussed with the Environment Agency. Agree - preamble and policy will be reviewed in collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in collaboration with the Environment Agency. Change Proposed.
2026Reg18/3	Gives (qualified) support for the following reasons: 35.0.14 should include Sarre Penn and Whitehall Dyke - tributaries of the Stour/Stodmarsh Nature Reserve. The early engagement with water companies - to ensure timely capacity (as set out in 35.0.14) does not take place as evidenced by water outages and sewerage collapses.	The Council (partially) agrees for the following reasons: The Sarre Penn and Whitehall Dyke are in the Stour Management/Stodmarsh Catchment and thus not referenced in 35.0.14, which is about the North Kent Catchment. Reference to the Stour Catchment will be added to paragraph 35.0.8. Noted - Partial Change Proposed.

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2026Reg18/53	6	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Southern Water Services Ltd			The sections from 35.0.28 – 35.0.29 discuss responsibilities rather broadly, without mentioning the other organisations that have responsibility for flooding. This could be misleading to many readers who'd then assume that water companies are responsible for reducing all types of flooding – which they are not. These sections also refer to the DWMP (for which studies concluded in 2023) that informed business plans for the current water industry investment period AMP8 (2025-2030). This information is therefore now dated and does not relate to the evolving local plan, but to the growth coming forward from the adopted local plan at that time. The DWMP is now being further developed to inform investment needs for AMP9 and will be maintained into the future in line with the growth coming forward from adopted local plans. Water companies plan investment to accommodate the growth forecast in local plans. To best support our planning, we ideally need routine shares of housing trajectories in readily usable formats with geospatial data we can link to our catchments and asset service boundaries. Please note that we assess our strategic assets - for example annually for wastewater treatment works (WTWs) using growth forecast by 5-year housing land supply trajectories, adopted Local Plans and third-party analysis of growth forecasts. This feeds into asset investment planning generally, including the Drainage and Wastewater Management Plan that informs the next 5-year water industry business plan cycle, where Ofwat reviews the evidence we present to justify our investment. Tension can therefore arise where housing trajectories are not appropriately updated, or where new housing is progressed outside of Plans as 'windfall'. To assist in these scenarios then, where consulted, Southern Water also assesses capacity to serve individual development sites at planning application stage. Should our assessment identify a constraint of some kind, we will plan the work necessary to serve that development working with the developer on timings. It is the granting of planning permission and the developer applications to connect that confirms and funds our more detailed planning of local interventions that may be needed. To support this process? We continue to offer Local Planning		

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/53	Comments as follows: No mention of other organisations, apart from water companies, and responsibilities for flooding. Could be misleading. DWMPs is being updated and so this section is now dated. Sets out the process for accommodating growth forecast in local plans and planning applications. Stresses that Southern Water offers LPAs capacity checks at planning consultation stage (even though not statutory consultee) and that developers can also use the pre-app service. Requests link to Pre-App service is included in para 35.0.27. Notes that system works well in dry weather conditions, but is stressed through climate change and urban creep - a problem that needs to be tackled at source, including through working in partnership with LPAs.	The Council comments as follows: The preamble to Policy C8 on Flood Risk sets out the bodies and their responsibilities with regard flood risk. This doesn't need to be repeated in this policy. Reference to the Environment Agency's strategic oversight will be added to the preamble to C8. References to updates to DWMP and AMP9 will be included in preamble. Agree - Link to pre-application services will be added to para 35.0.27 or nearby paragraph. Noted - Partial Change Proposed.

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2026Reg18/73	85	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council supports the overall direction of the preamble, particularly its alignment with: The National Planning Policy Framework (December 2024); National Standards for Sustainable Drainage Systems; Environment Agency groundwater protection guidance; Kent County Council drainage and water management policies; The recognition that Swale is an area of serious water stress. The preamble is comprehensive and evidence-based. However, it could be made more focussed, locally relatable and clearer for communities in the following ways. 1. Stronger Local Framing at the Start The opening paragraphs are clear but could be strengthened by: Bringing the "serious water stress" designation forward earlier in the text; Clearly stating that Swale's growth must operate within environmental limits; Highlighting that water scarcity and water quality are already affecting residents (hosepipe bans, drying chalk streams, sewage discharge concerns). Making the issue more locally tangible would help communities understand why stronger standards are required. 2. Clearer Explanation of Wastewater Capacity Constraints ~~The preamble correctly references Southern Water's Drainage and Wastewater~~		
2026Reg18/74	29	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	Should this be titled Potable Water to make it distinct from other water sources and types in which case is section 8 referring to conditions for abstraction or discharge?Is section 9 clear on whether the requirement is for a maximum consumption of 100 litres per day of potable water or a discharge from a household of 100 litres per day of waste water. Note as a planning condition it is unclear how a developer can achieve this without applying water restrictive devices on a development that may be discriminatory to certain vulnerable persons.Excellent language on chalk streams. Now those principles just need to be translated into actions, in particular reduced abstraction to mitigate its disastrous effect on water flow and water quality in chalk streams.		

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Gives qualified support for the preamble: Due to alignment with national and local policy - it is comprehensive and evidence-based. Could be strengthened. Suggests stronger local framing (eg around water stress, environmental limits, effect on residents/chalk streams/climate impacts etc) Suggests clearer explanation of wastewater capacity constraints and limits on development/phasing/right to connect Suggests stronger emphasis on chalk streams (rarity, pressures, cumulative impacts) to justify stricter water efficient standards. Clearer explanation of Nutrient Neutrality and what it means for applicants. Make stronger case for water efficiency standard Make clearer link between water resources/wastewater capacity and development phasing Make it more accessible with sub-headings/key point boxes/reduced repetition	Noted and agreed in principle. Change Proposed. Preamble and policy will be reviewed in light of comments made and in collaboration with the Environment Agency.
2026Reg18/74	Neither supports nor objects to this preamble but comments: Should this be titled Potable Water to make it distinct from other water sources? Is it clear that the water efficiency standard relates to potable water not waste water? Note that water restrictive devises may be discriminatory to certain vulnerable persons. Excellent language on chalk streams - now need to reduce abstraction to mitigate harm.	The Council (partially) agrees, as follows: It is not clear what this comment is referring to but the preamble will be reviewed and extra headings will be inserted to improve clarity. Water efficiency standards are generally understood to relate to improving efficiency in water supply but a reference to 'water consumption' will be added to the policy/preamble. Noted. Customers on Water Company Priority Services Registers with medical or mobility needs, including Blue Badge holders, are exempt from Temporary Use Bans. If further exemptions are required, this should be set out through planning applications. Noted. Partial Change Proposed.

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2026Reg18/76	67	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Five Parishes Opposition Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). The preamble seems complex to the layperson, if does feel like it needs clearer internal structuring so that decision-makers and applicants can clearly distinguish potable water supply issues from water quality / environmental protection issues.Across Swale there have been number of issues with both Wastewater at both Teynham and Sittingbourne and Potable Water with both Southern Water and South East Water.Wastewater with increased pollution discharges to Milton Creek from Sittingbourne Wastewater Treatment and sewage flooding Frognal Lane Teynham.Potable Water issues with Southern Water and the Isle Sheppey water supply issues over recent summers and those experienced by South East Water over in January 2026 demonstrate the fragility of Water Supplies. Water supply and it's protection should be key to future development.The impacts on both Wastewater and Potable Water appear to have been caused by the cumulative impact of development with insufficient investment growth in the infrastructure. We schemes that are outside of the local plan should not be promoted until there is proof that the networks can cope with these additional demands.Paragraph 35.0.14 fails to mention the significant volume of chalk streams and other watercourses that originate from the North Downs and flow in the creeks, the Medway and The Swale.		
2026Reg18/82	15	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?					SARAH	MOAKES	At § 35.0.29 it is stated that 'Southern Water's analysis has identified challenges for the North KentCatchment, highlights of which include....new development in the North Kent Catchment might putadditional pressure on internationally designated habitat sites at the Medway and Swale Estuaries.Solutions will need to be found to ensure that development is nutrient neutral.' Clarification is needed. Does this mean nutrient neutrality is required in these areas or not? Despite having an existing policy in its armouryDM 21 which requires applicants to 'demonstratethat there is adequate water supply, drainage and wastewater connect ion and treatmentinfrastructure...in place before construction commences and that these details have been approved bythe appropriate water company and funded by the development where appropriate', it is simply neverenforced; planning officers invariably disregard the question of wastewater capacity by insisting itis 'not a planning matter.' True, developers have a right of connection to the foul sewer yet it wouldbe perfectly legitimate to impose a Grampian condition to ensure the necessary improvements weresecured in advance of occupation (the so called 'Wealden' condition.) To knowingly turn a blind eyeto this issue is moreover a complete breach of NPPF paragraph 187e. Paragraph 20 of the NPPF statesthat 'Strategic policies should...make sufficient provision for...infrastructure for...water supply,wastewater.' Ultimately it is the LPA's responsibility to ensure their plans for strategic growth align with the latter's Asset Management Plans, updated every five years. The PPG recommends that LPAs u ndertake a water cycle study as part of their local plan evidencebase to help 'plan for sustainable growth'. The fact that, shockingly, SBC has not carried out a watercycle study since 2010 (Scott Wilson) raises troubling questions about the soundness of its local plan.Given that Faversham's Victorian sewage was deemed to be operating at capacity back in 2010 – before the building boom of recent years got underway – it is hardly going to be able to cope with a doubling of the town's population that is now threatened. The future of its chalk streams meanwhile will be catastrophically impacted by the		

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/76	Comments on the preamble as follows: Preamble is complex - needs clearer internal structuring to distinguish between potable water supply issues and water quality/environmental issues. Wastewater issues at Teynham (sewage flooding at Frognal Lane) and Sittingbourne (discharges to Milton Creek) and potable water with SW and SEW (Isle of Sheppey (recent summers) and mainland in January 2026). Water supply is key to future development and issues have been caused by insufficient investment in infrastructure. Local Plan growth should not be promoted until proof that networks can cope. Paragraph 35.0.14 fails to mention chalk streams and other watercourses which flow from North Downs to the Medway and Swale.	The Council (partially) agrees for the following reasons: Agree the preamble is complex. This reflects the complexity of the issues and the interrelationship between water resources and water quality. The Council will insert additional headings to help make the preamble clearer. The text will be updated to reflect recent incidents and the latest evidence. Paragraph 35.0.14 covers the issues included in the Catchment Improvement Group's action plan and as such it would not be appropriate to amend as suggested. It should be noted that several of the watercourses mentioned do flow from the Downs to the Medway/Swale, as mentioned in 35.0.8. Partial Change Proposed.
2026Reg18/82	Comments on the preamble as follows: Para 35.0.29 and reference to the need to 'ensure that development is nutrient neutral' suggests nutrient neutrality is required in these areas. Clarification is needed. Existing policy DM21 which requires developers to demonstrate adequate water supply, drainage and wastewater connection is never enforced and is disregarded by planning officers as 'not a planning matter'. Agree developer have a right of connection but it would be legitimate to impose a Grampian condition (as has been done via the Wealden condition). Not to do so is in conflict with para 187e of the NPPF. Ultimately, it is the LPA's responsibility to ensure plans for strategic growth align with the Asset Management Plans of water companies. PPG recommends that LPAs undertake water cycle studies as part of evidence gathering. This was last done for Swale in 2010 when it was suggested that this was a 'living document'. Question of soundness that this hasn't been undertaken. Faversham sewage system was at capacity in 2010, before 'building boom'. Will not cope with doubling of town's population. Chalk streams threatened. 100l water efficiency standard will not help, especially as smart metering has found that water consumption in new builds were in excess of current standards. Review of Water Efficiency Standards in the Building Regulations 2010 - Defra - Citizen Space Quotes draft NPPF and inclusion of reference to Chalk Streams. Council should improve protection of these waterbodies. White Drain in Boughton has poor ecological status due to regular sewage spills from SW's combined sewer outfall at Stocker's Hill. As such,it is imperative that any housing development within the relevant catchment area Boughton/Dunkirk, Hernhill, Selling be obliged to make use of an onsite sewage treatment plant lest it overburden the network any further.	The Council responds as follows: Noted. This will be followed up with Southern Water. Noted. This will be followed up with the Development Management Team. Noted. Consultation with the water companies is an ongoing part of the development of the Local Plan. The 2025 Water Cycle Study for Swale was not progressed due to unresolved issues over methodology. However, the Council carries out ongoing dialogue with water companies, the Environment Agency, our Habitats Regulations Assessment consultants, our Viability Consultants, and other bodies to inform the development of the Local Plan. Noted. Noted. The poor ecological status of the White Drain will be addressed in the Habitats Regulations Assessment and Local Plan policies if necessary. Reference to the ecological status of the White Drain will be added to the preamble to C10. Partial Change Proposed.

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2026Reg18/126	27	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				KCC Strategic Planning		KCC Strategic Planning	Policy C10 – Water Quality and Water Resources Paragraph 35.0.23 – The County Council considers that the Stodmarsh Nutrient Neutrality Strategy.pdf has now been completed, which SBC is asked to consider the impacts of this document.Paragraph 35.0.39 – The County Council is pleased to note the aspiration for a water efficiency standard requiring a for properties to not exceed 110l/d.Energy and AdaptationThe County Council would recommend adding in the incorporation of water efficiency/saving measures such as rainwater harvesting and greywater recycling in both new and existing developments.		
2026Reg18/127	28	Question 068 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	2.7.7 C10 Water quality and Water Resources2.7.7.1 PreambleNatural England supports this policy. We note that a portion of the borough lies within the Stodmarsh catchment. We advise that as the site allocation process progresses it may be suitable to undertake a plan-level nutrient budget calculation for those sites that lie within the Stodmarsh catchment in order to understand the level of mitigation that may be required to demonstrate nutrient neutrality. Further information on nutrient neutrality can be found within Natural England's March 2022 advice.Potential mitigation could include the provision of credits from agreed strategic mitigation schemes (such as credits available from the Stour Environmental Credits Ltd trading platform), and/or provision of onsite mitigation for larger development sites where appropriate. Where onsite or offsite mitigation is considered at the next Plan stage, we support consideration as to how these sites could generate maximum gains for both people and nature. For example, consideration of the most appropriate measures in light of the Kent and Medway Local Nature Recovery Strategy (LNRS) and potential provision of Biodiversity Net Gain (BNG) units, as appropriate for individual allocations.Natural England advises that there are opportunities to 'stack' additional environmental benefits (such as BNG) with nutrient mitigation measures. Further guidance on stacking other environmental benefits with nutrient mitigation is available here. In addition, further high levels guidance on stacking can be found on the British Standards Institution website.We recognise that Kent County Council is in the process of developing a Stodmarsh catchment strategy, which will provide the latest supply and demand analysis for nutrient mitigation. This strategy is expected to be a key reference document at the Regulation 19 stage of plan preparation. Natural England wish to signpost published guidance on design principles for nutrient mitigation which are not currently referenced on your authority's nutrient mitigation webpage. These include:-NECR544 Nutrient Mitigation Tool - NECR544-Information on Nature Based Solutions as Nutrient Mitigation - NBS2024-NECR590 Edition 1 Enhanced Drainage Ditch Management: A framework approach for nutrient neutrality - NECR590-NECR591 Edition 1		

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We are aware

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2026Reg18/126	Comments on the preamble, as follows: Advise that Stodmarsh Nutrient Neutrality Strategy is complete - SBC is asked to consider impacts of this document. Pleased to note water efficiency standard of 110l/d. Recommend adding incorporation of water saving measures such as rainwater harvesting/greywater recycling in new and existing developments.	The Council responds as follows: Reference to Stodmarsh NN Strategy will be included in preamble. Target is 100/pp/day. Reference to rainwater harvesting/greywater recycling is already included in preamble at 35.0.35 Partial Change Proposed.
2026Reg18/127	Supports this policy for the following reasons: Note portion of borough in Stodmarsh catchment. May be suitable to undertake plan-level nutrient budget calculation for allocations within the Stodmarsh catchment in order to understand mitigation required to demonstrate nutrient neutrality (eg credits from Stour Environmental Credits Ltd and or onsite mitigation.) Where onsite mitigation is considered at Plan stage NE support consideration of how sites could generate maximum gains for people and nature (eg links to Kent LNRS/provision of BNG and stacking generally - links to guidance are provided.) KCC is developing a Stodmarsh Catchment Strategy (supply and demand analysis for nutrient mitigation) which will be a key reference document at the Regulation 19 stage. Signpost to new NE guidance on Nutrient Neutrality for website. Paragraph 35.0.20, note that Natural England is responsible for managing the Stodmarsh National Nature Reserve (NNR). However, the NNR forms only part of the Stodmarsh designated sites. The reserve covers 241 hectares, whereas the full designated area extends to 623 hectares, most of which is privately owned and managed.	The Council agrees for the following reasons: Preamble will be reviewed and updated in light of this information. Website will be updated with NE advice. Paragraph 35.0.20 will be reviewed and updated in light of this information. Change Proposed.

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2026Reg18/131	17	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Environm ent Agency		.		Neither	We welcome the inclusion of this policy but consider that it requires strengthening to ensure full compliance with the Water Framework Directive (WFD) and national policy. In particular, the policy must explicitly require development to demonstrate no deterioration in WFD status, support delivery of relevant River Basin Management Plan measures, and provide detailed water quality assessments where hydrological or ecological receptors may be affected, including chalk streams, groundwater Source Protection Zones, and sensitive estuarine habitats. This appears to be a good, detailed policy covering the main issues of water supply and quality issues, although it is not always clear how it is linking with some of the issues raised in the preamble.Point 4 – it is good that there is consideration for the current and future capacity of drainage for any new developments. Point 5 goes into more details as to how this will be achieved. The council should liaise with water companies to ensure that there is sufficient capacity for new developments and to ensure that there are improvements to the infrastructure if these are needed.For points 6 and 7, which deal with non-mains drainage, it is good that the site is trying to limit the discharge rate. It would be good to include wording that these methods of waste disposal should only be used where there is no other option. This is implied with the wording in point 6 but the wording could be stronger. There are no points in the policy that explicitly say that package treatment plants or other non-mains drainage should be avoided. This includes New Appointments and Variations (NAVs).Wording for point 7 could be adjusted to ‘Where onsite package treatment works are the only remaining option to deal with foul sewage after discounting connection to the main sewerage network’.Policy should make a mention of drainage hierarchy and link into Policy C9 Sustainable Drainage.The policy also mentions about limiting the amount of discharge but has no restrictions on where the waste is being discharged to. Discharge into dry ditches should be avoided and there should be consideration of the effects of discharge on vulnerable water bodies, particularly chalk streams.
2026Reg18/3	65	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Dunkirk Parish Council				Support	Support subject to C10.8 'In areas within the catchment of Stodmarsh Nature Reserve.....'. Thiswould exclude Winterbourne Fields.In areas within the catchment of Stodmarsh Nature Reserve, development will only be permitted where it can be demonstrated that it will achieve nutrient neutrality through appropriate mitigation measures.Sarre Penn and Whitehall Dyke both rise at Winterbourne and Court Wood.CHALK STREAMS IN THE STOUR CATCHMENT - Kentish Stour
2026Reg18/11	7	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?					jennifer	anderson		Neither	10b should include wording:- not result in a drop in water pressure for neighbouringproperties

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/131	Gives qualified support for this policy: Good detailed policy, but not always sure how policy deals with issues in preamble. Needs strengthening to ensure full compliance with Water Framework Directive and national policy by requiring demonstration of no deterioration in WFD status, the support for delivery of River Basin Management Plan measures and provide Water Quality Assessments where hydrological or ecological receptors may be affected, including Chalk Streams, Source Protection Zones and sensitive estuarine habitats. Welcome point 4. Council should liaise with water companies to ensure there is sufficient capacity for new developments to ensure improvements to infrastructure where needed. Wording in 6 (and 7) could be stronger/clearer and make clear that package treatment plants or other non-mains drainage should be avoided. Suggests wording for point 7 as follows: 'Where onsite package treatment works are the only remaining option to deal with foul sewage after discounting connection to the main sewerage network'. Policy should mention drainage hierarchy and link to policy C9 Sustainable Drainage. Policy should explain that discharge to dry ditches should be avoided there should be consideration of the effects of discharge on vulnerable water bodies, particularly chalk streams'	The Council agrees: Noted. Preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted. Noted. Agree - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Agree - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Change Proposed.
2026Reg18/3	Supports this policy, and comments: Supports point 8 and notes presence of Sarre Penn and Whitehall Dyke.	The Council agrees, for the following reasons: Noted. Reference to Sarre Penn/Whitehall Dyke will be added to the preamble. Change Proposed.
2026Reg18/11	Neither supports nor objects to this policy: 10b should include wording to prevent loss of water pressure in neighbouring properties.	Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/12	23	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?					Carol	Jacobs		Neither	We can no longer assume that we will be able to be provided with clean water in this part of the country. On that basis any future development would be refused permission on that basis alone.
2026Reg18/16	22	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Boughton under Blean Parish Council	Sarah	Muteham		Neither	§ 5 Consider adding 'The Council reserves the right to impose Grampian conditions to this end.' Swale has no published planning guidance for non-mains drainage systems. Is this something it should address?
2026Reg18/40	73	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Bredgar Parish Council	Teresa	Hudson		Support	In light of the recent failure of South East Water to supply water to thousands of residents in Kent, including Bredgar, Policy C10, paragraph 2, should be strengthened to additionally require water companies to provide signed confirmation of their capacity to supply potable water and process foul sewage before any large development planning application is considered. The policy should also clearly define the development size at which this confirmation is required, in order to avoid ambiguity about when the requirement is mandatory. The recent experience of Kent's extreme vulnerability to loss of water supply illuminates the vital importance of protecting the existing groundwater sources that supply Swale. The picture below shows the water source protection zones. New developments over agricultural land in those zones should be avoided. If developments are considered essential they should not contain any infrastructure that might contaminate the ground water sources. I.E. Waste disposal or sewage management sites etc. See: Water source protection zones in Swale. Shown in three zones - SPZ1, SPZ2 & SPZ3. Source https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs .

Appen

We are aware

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2026Reg18/12	Neither supports nor objects to this policy, but comments: We can no longer assume that we can be provided with clean water in the south east and future development should be refused on that basis.	Noted. The Local Plan is prepared in consultation with the relevant water companies and Policy C10 has been written to help ensure that new development will not exceed the capacity of the local infrastructure. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/16	Neither supports nor objects to this policy, but comments: Consider adding requirement for Grampian condition. Should Swale publish planning guidance for non-mains drainage?	The Council (partially) agrees, for the following reasons: This point will be considered in light of a review of this policy and preamble. Guidance on non-mains drainage has been published by the Environment Agency and does not need to be replicated by the Council. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.
2026Reg18/40	Gives qualified support for this policy: Requests that additional requirement is added to point 2 to require water companies to provide signed confirmation of their capacity to supply potable water and process foul sewage before large planning applications are considered. Size threshold for this should be set out in policy. New development on agricultural land in Source Protection Zones should be avoided. If essential they should not contain any infrastructure which might contaminate groundwater.	Noted. Noted. The Council agrees to review this preamble and policy, in light of comments made and in consultation with the LLFA and the EA. Any amendments will be reflected in the Regulation 19 Local Plan document.

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2026Reg18/48	5	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Teynham Parish Council				Support	Teynham Parish Council supports the objectives of these policies but considers that Policy C10 requires strengthening to ensure effective protection of infrastructure and the environment. Water Lifecycle and Capacity as a Development Constraint In Teynham the management of wastewater operates under significant constraints. Across Kent there have been multiple examples of fresh water supply issues. Teynham Parish Council recommends that the policy clearly state that development should only proceed where: ? Sufficient Fresh Water Resource and Supply Capacity exists: Proof must be provided that the local network can deliver required volumes and maintain water pressure without detrimental impact on existing residents or the local aquifer; and? Sufficient Wastewater Infrastructure Capacity exists: Evidence must be provided that the network can accept additional flows without increasing the risk of sewer flooding or storm overflow discharges. Where capacity is lacking, necessary upgrades must be fully funded and secured. Reliance on uncertain or aspirational infrastructure improvements should be avoided. The Parish Council advocates for the use of Grampian Conditions to ensure that no dwellings are occupied until both the supply and discharge infrastructure are fully operational and verified. Cumulative Infrastructure Impact Assessment Teynham Parish Council considers that infrastructure constraints often arise from cumulative development rather than individual proposals. Policy C10 should require assessment of cumulative impacts at settlement level to ensure infrastructure capacity is not exceeded. The Parish Council advocates for the use of Grampian Conditions to ensure that no dwellings are occupied until the necessary wastewater capacity upgrades are fully operational. Catchment-Based and Nature-Based Solutions Teynham Parish Council strongly supports catchment-based approaches and

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/48	Gives qualified support for this policy: Policy requires strengthening. In Teynham the wastewater system operates under significant constraints and across Kent there have been multiple supply issues. Seek amendments to ensure development only proceeds when: Sufficient water resource supply capacity exists - proof must be provided Sufficient wastewater capacity exists - evidence must be provided that there is no risk to sewer flooding/storm overflow. Where development is lacking upgrades must be fully funded and secured. Grampian Conditions should be used to ensure no dwellings are occupied before supply and discharge are verified as operational. Policy should require cumulative assessment of impacts at settlement level. Teynham PC support catchment-based approaches and nature based solutions to improve water quality, reduce flood risk, support biodiversity, enhance environmental quality.	The Council agrees, as follows: Noted. Noted. Noted. Noted. Noted. The preamble and policy C10 will be reviewed in light of these comments and with further collaboration with the Environment Agency.

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2026Reg18/53	7	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Southern Water Services Ltd				Neither	Southern Water is the wastewater service provider for the Swale district, supplying water to parts of the district. Southern Water acknowledges the broad range of content in this policy, for which our comments are also therefore broad – covering additional concerns to protect water quality and also the processes and rules that govern the funding cycles and timing of water industry asset investment. Requested wording for Part 1 of policy C10: Please could the following wording be added to point 1 of policy C10 to acknowledge the need for delivery of watertight foul systems that are essential to areas of high groundwater the draft Plan acknowledges in places: (1e) Design and construction must also ensure a watertight foul system. Requested wording for Part 3 of policy C10: Please could the following wording be added to point 3 of policy C10: 3(a) For development within Source Protection Zones please see Southern Water's SuDS in SPZ guidance here - https://www.southernwater.co.uk/media/0oubtggs/suds-in-spzguidance.pdf 3(c) Developments will not be supported unless they contain details of the measures that will be taken in the construction phase to ensure that polluted runoff (including suspended sediment) does not leave the site. Temporary trade effluent consents can be granted by the appropriate wastewater service provider to help ensure lawful discharge from building sites. Requested wording for Part 5 of policy C10: Please could the following wording be changed to point 5 of policy C10 for alignment with water industry asset investment planning and 5-year periods, with additional content protecting existing assets: 5. Major development intending to connect to mains drainage and wastewater systems must demonstrate how the development will be phased and ensure no occupation until all necessary works relating to water and wastewater have been carried out.The utility network should be protected and development proposals that would compromise existing utilities infrastructure or approach or future

Appen

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/53	Neither supports nor objects to this policy, but comments: Notes broad range of content and therefore responds broadly. Requests wording to be added as point 1e) 'Design and construction must also ensure a watertight foul system.' (essential in areas of high groundwater). Requests addition of wording to point 3: 'For development within Source Protection Zones please see Southern Water's SuDS in SPZ guidance here -https://www.southernwater.co.uk/media/00ubtgg/suds-in-spzguidance.pdf and 'Developments will not be supported unless they contain details of the measures that will be taken in the construction phase to ensure that polluted runoff (including suspended sediment) does not leave the site. Temporary trade effluent consents can be granted by the appropriate wastewater service provider to help ensure lawful discharge from building sites.' Requests addition of wording to point 5: Major development intending to connect to mains drainage and wastewater systems must demonstrate how the development will be phased and ensure no occupation until all necessary works relating to water and wastewater have been carried out. The utility network should be protected and development proposals that would compromise existing utilities infrastructure, or encroach on future connections for utilities, will be refused. Opportunities should be sought to safeguard the provision of utilities wherever possible.' Or request a new policy on Infrastructure Safeguarding. Gives additional explanation as to need for protection of areas of high groundwater, Source Protection Zones and trade effluent (which could be added to preamble?). Repeats the comments made in the preamble. SW cannot see how the current policy could be applied in practice to water company operations and infrastructure planning. Southern Water is the statutory sewerage undertaker. There is a separate statutory regime governing the provision of sewerage and wastewater treatment under the Water Industry Act 1991 and local planning authorities should not seek to duplicate the roles and responsibilities of the statutory undertaker. Request additional wording in this policy to better safeguard the essential function of Wastewater Treatment Works, and locating development adjacent or near to an existing WTW could compromise Southern Water's ability to continue to serve growth in the district. Southern Water may have to provide additional wastewater infrastructure to serve new and existing customers and continue to meet stricter environmental standards. It is likely that there would be limited options to locate infrastructure as it needs to connect to existing networks. Planning policy should help to safeguard the strategic infrastructure necessary to sustainable development and support proposals to deliver additional infrastructure. Quotes NPPF, paras 7 and 9.	The Council (partially) agrees: Noted. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. The Council does not understand this comment and will seek clarification from Southern Water. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Noted - preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Partial Change Proposed.

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2026Reg18/73	17	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Eastchurc h Parish Council	Sarah	Poole		Support	The Parish Council supports the intent of Policy C10, particularly: The catchment-based approach; Protection of chalk streams and groundwater; The requirement for nutrient neutrality; The 100 litres per person per day water efficiency standard; Stronger wastewater infrastructure requirements before occupation. However, we have serious concerns regarding water supply resilience on the Isle of Sheppey, particularly in light of: The designation of Swale as an area of serious water stress; Recent water outages and supply interruptions affecting residents; Increasing development pressure; Climate change impacts and prolonged dry periods. The policy should go further to address long-term water security for the Island. 1. Water Supply Resilience – Isle of Sheppey The Isle of Sheppey is geographically constrained and vulnerable. Residents have experienced: Recent supply interruptions;
2026Reg18/76	68	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?				Five Parishes Oppositio n Group				Support	(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). Could use subheadings to make it easier for the layperson and developer to read.There should be proof that there is sufficient capacity with both Wastewater and Potable Water networks. Where there is insufficient capacity then the use of a Grampian condition should be made to prevent occupation of dwellings. The appropriate Potable Water supplier should be consulted by the Applicant, i.e. South East Water or Southern Water. In Highsted Park they consulted the wrong water authority and Swale didn't pick it up.It must also identify infrastructure that might contaminate the ground water sources eg waste disposal or sewage management sites etc.Figure: Water source protection zones in Swale. Shown in three zones - SPZ1, SPZ2 & SPZ3. Source https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs. Contains public sector information licensed under the Open Government Licence v3.0.

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We are aware

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2026Reg18/73	Gives qualified support for this policy and suggests amendments: Supports catchment-based approach, emphasis on chalk streams/groundwater, reference to nutrient neutrality, water efficiency standards, wastewater infrastructure before occupation. Serious concerns around water supply on Sheppey (water stress/recent shortages and low pressure/development pressures/climate impacts. Policy should go further to ensure development does not outpace water supply infrastructure and is resilient - requiring clearer evidence that water companies can demonstrate capacity before planning permission is granted. Suggests feasibility study for desalination plant on Sheppey and sets out argument. Point 5 should be strengthened - no occupation until water supply/wastewater capacity is fully operational/phasing conditions are enforceable/supply resilience is demonstrated (not simply connection rights). Suggests new wording: "Development proposals must demonstrate that sufficient and resilient water supply capacity exists, taking account of cumulative growth and climate change projections." "Where supply resilience is constrained, development will be phased to align with delivery of strategic water infrastructure." "In areas of serious water stress, strategic options including new supply infrastructure (such as desalination, water recycling or regional transfers) should be explored and evidenced through Water Resources Management Plans."	Noted Noted and will be reviewed. Noted. Southern Water/Water Resources South East could be contacted about such a study. Noted and will be reviewed. Noted and will be reviewed. Partial Change Proposed. Preamble and policy will be reviewed in light of comments made and in collaboration with the Environment Agency.
2026Reg18/76	Gives conditional support for this policy and comments: Subheadings will make reading easier. Proof of capacity for supply and waste water should be provided ahead of occupation eg by using Grampian Condition. Quotes example of Highsted Park where wrong water company was consulted. Infrastructure that might contaminate groundwater sources (Source Protection Zone) must be identified. Includes map.	The Council (partially agrees for the following reasons). Subheadings could be useful and will be considered in updates to this policy. The use of Grampian style conditions are being discussed with the Development Management team. References to the maps of SPZs are included in the preamble at 35.0.16. Preamble and policy will be reviewed in light of these comments and with further collaboration with the Environment Agency. Partial Change Proposed.

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2026Reg18/82	16	Question 069 Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?					SARAH	MOAKES		Neither	At § 35.0.29 it is stated that ‘Southern Water’s analysis has identified challenges for the North KentCatchment, highlights of which include....new development in the North Kent Catchment might putadditional pressure on internationally designated habitat sites at the Medway and Swale Estuaries.Solutions will need to be found to ensure that development is nutrient neutral.’ Clarification is needed. Does this mean nutrient neutrality is required in these areas or not? Despite having an existing policy in its armouryDM 21 which requires applicants to ‘demonstratethat there is adequate water supply, drainage and wastewater connect ion and treatmentinfrastructure...in place before construction commences and that these details have been approved bythe appropriate water company and funded by the development where appropriate’, it is simply neverenforced; planning officers invariably disregard the question of wastewater capacity by insisting itis ‘not a planning matter.’ True, developers have a right of connection to the foul sewer yet it wouldbe perfectly legitimate to impose a Grampian condition to ensure the necessary improvements weresecured in advance of occupation (the so called ‘Wealden’ condition.) To knowingly turn a blind eyeto this issue is moreover a complete breach of NPPF paragraph 187e. Paragraph 20 of the NPPF statesthat ‘Strategic policies should...make sufficient provision for...infrastructure for...water supply,wastewater.’ Ultimately it is the LPA’s responsibility to ensure their plans for strategic growth align with the latter’s Asset Management Plans, updated every five years. The PPG recommends that LPAs u ndertake a water cycle study as part of their local plan evidencibase to help ‘plan for sustainable growth’. The fact that, shockingly, SBC has not carried out a watercycle study since 2010 (Scott Wilson) raises troubling questions about the soundness of its local plan.Given that Faversham’s Victorian sewage was deemed to be operating at capacity back in 2010 – before the building boom of recent years got underway – it is hardly going to be able to cope with a doubling of the town’s population that is now threatened. Thefuture of its shellfish streams meanwhile will be catastrophically impacted by the
2026Reg18/127	41	Question 070 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	SEE Annex 5: Natural England’s Standard Advice for Air Quality Impacts for Local Plans IN ATTACHED DOCUMENT		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/82	Neither supports nor objects, but comments as follows: Para 35.0.29 and reference to the need to 'ensure that development is nutrient neutral' suggests nutrient neutrality is required in these areas. Clarification is needed. Existing policy DM21 which requires developers to demonstrate adequate water supply, drainage and wastewater connection is never enforced and is disregarded by planning officers as 'not a planning matter'. Agree developer have a right of connection but it would be legitimate to impose a Grampian condition (as has been done via the Wealden condition). Not to do so is in conflict with para 187e of the NPPF. Ultimately, it is the LPA's responsibility to ensure plans for strategic growth align with the Asset Management Plans of water companies. PPG recommends that LPAs undertake water cycle studies as part of evidence gathering. This was last done for Swale in 2010 when it was suggested that this was a 'living document'. Question of soundness that this hasn't been undertaken. Faversham sewage system was at capacity in 2010, before 'building boom'. Will not cope with doubling of town's population. Chalk streams threatened. 100l water efficiency standard will not help, especially as smart metering has found that water consumption in new builds were in excess of current standards. Review of Water Efficiency Standards in the Building Regulations 2010 - Defra - Citizen Space Quotes draft NPPF and inclusion of reference to Chalk Streams. Council should improve protection of these waterbodies. White Drain in Boughton has poor ecological status due to regular sewage spills from SW's combined sewer outfall at Stocker's Hill. As such,it is imperative that any housing development withinthe relevant catchment area Boughton/Dunkirk, Hernhill, Selling be obliged to make use of an onsite sewage treatment plant lest it overburden the network any further.	The Council responds as follows: Noted - This will be followed up with Southern Water. Noted - This will be followed up with the Development Management Team. Noted - Consultation with the water companies is an ongoing part of the development of the Local Plan. The PPG sets out that Water Cycle Studies are voluntary. The 2025 Water Cycle Study for Swale was not progressed due to unresolved issues over methodology. However, the Council carries out ongoing dialogue with water companies, the Environment Agency, our Habitats Regulations Assessment consultants, our Viability Consultants, and other bodies to inform the development of the Local Plan. Noted - Noted - The poor ecological status of the White Drain will be addressed in the Habitats Regulations Assessment and Local Plan policies if necessary. Reference to the ecological status of the White Drain will be added to the preamble to C10. Partial Change Proposed.
2026Reg18/127	Neither supports nor objects to the preamble, but comments: Include reference to Natural England's standing advice on air pollution and development. Air pollution and development: advice for local authorities - GOV.UK References the need to consider AQ in an overarching assessment of the LP's cumulative impacts. SA/HRA should consider any detrimental impacts on the natural environment from emissions and suggest appropriate avoidance or mitigation measures. Technical guidance is available but habitat sites and SSSIs as risk are those within 200m of a road with increased traffic. Caselaw should also be considered. Advice covers the following pollutants: ammonia, nitrogen oxide, nitrogen deposition, acid deposition, sulphur dioxide. The sequential approach to air quality assessments has the following stages - initial screening for risk (distance criteria, qualifying habitat) - detailed AQ modelling (Atmospheric Dispersion Modelling System) - applying screening - detailed assessment of ecological impacts - appropriate assessment for habitat sites to determined whether (including mitigation)Include an Annex which sets out that: Note: Air Quality modelling for LPs should include relevant scenarios that are clearly identified. Allowance advised for windfall development - see IAQM advice air-quality-impacts-on-nature-sites-2020.pdf	Noted. Reference to standard advice will be added to preamble. Noted. Advice will be considered as part of transport modelling / Habitats Regulation Assessment. Change Proposed.

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2026Reg18/40	61	Question 071 Do you support or object to Policy C11? What would you add, remove or amend to support it further or to remove your				Bredgar Parish Council	Teresa	Hudson		Support	BPC support Policy C11 but would prefer it to be more assertive to reflect the importance of good air quality for health. For example, in points 1 and 2 replace "should" with "must".
2026Reg18/53	8	Question 071 Do you support or object to Policy C11? What would you add, remove or amend to support it further or to remove your objection?				Southern Water Services Ltd				Neither	Southern Water is the wastewater service provider for the Swale district and we operate a number of existing wastewater treatment works (WTW) across the district. A number of these WTW are strategic sites that perform an essential function to the district and its neighbours, a function that will at times need to expand in capacity in order to support future growth. We request additional wording in this policy, as locating development adjacent or near to an existing WTW, such as housing, could have an unacceptable impact on the amenity of the site's future occupants arising from the WTW's essential operational activities. Such impacts may include odour (as well as noise and vibration). At present nowhere does the local plan sufficiently address the concerns of operators of existing wastewater treatment works in the district - although we note mention of odour in policy GD1(9) and the impact of development on its surroundings in C12, it is this air quality policy C11 that includes the developer responsibility to mitigate impacts on sensitive receptors. Requested wording: We therefore request policy C11 wording be amended to account for the 'agent of change principle' that places responsibilities on the incoming 'agent of change' in relation to odour impacts from existing businesses as below: 4. Proposals which would introduce or intensify sensitive receptors' exposure to poor air quality (including odour) should demonstrate measures that mitigate air quality impacts to ensure the ongoing viability of existing surrounding uses is not compromised. Where this wording cannot be included in policy C11 then we request an additional policy to fully account for the 'agent of change' principle in relation to odour as well as noise and vibration. Further explanation: Paragraph 200 of the National Planning Policy Framework (NPPF December 2024) seeks to ensure that 'existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established', while paragraph 198 states that development should
2026Reg18/76	70	Question 071 Do you support or object to Policy C11? What would you add, remove or amend to support it further or to remove your objection?				Five Parishes Opposition Group				Support	(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG support Policy C11 but would prefer it to be more assertive to reflect the importance of good air quality for health. For example, in points 1 and 2 replace "should" with "must".

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We are aware

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2026Reg18/40	Gives qualified support for this policy, but comments: Should be more assertive and replace 'should' with 'must'.	Agreed. Change Proposed.
2026Reg18/53	Neither supports nor objects to this policy, but seeks amendments: Southern Water is the wastewater provider for Swale and may, at times, need to expand in capacity to support future growth. Have concerns about locating new development (eg housing) adjacent or near to existing wastewater treatment works as this could have an unacceptable impact on amenity of the sites future occupants, and suggests wording: 4. Proposals which would introduce or intensify sensitive receptors' exposure to poor air quality (including odour) should demonstrate measures that mitigate air quality impacts to ensure the ongoing viability of existing surrounding uses is not compromised.	Noted. Noted and agreed. Additional wording will be added to policy C12. Change Proposed.
2026Reg18/76	Gives qualified support for this policy, but comments: Should be more assertive and replace 'should' with 'must'.	Agreed. Change Proposed.

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2026Reg18/127	29	Question 071 Do you support or object to Policy C11? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.7.8 C11 Air Quality2.7.8.1 Policy criteriaNatural England supports the inclusion of a standalone policy addressing air quality. However, we advise that additional criteria should be added to address impacts to Habitats Sites and SSSIs, and suggest the following wording:"5. Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).6. Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.7. To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider: a. the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites during the design process of the development; andb. how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure." We would also welcome reference to our standing advice for local authorities on air pollution and development, which provides guidance on how to assess planning applications that could affect air quality on a protected site. Our suggested wording is as follows: "8. Consideration will be given to Natural England's standing advice on the impacts of air pollution on protected sites. This advice will be taken into account as a material consideration when making decisions on all relevant planning applications."Further advice on addressing air quality impacts in Local Plans is provided in Annex 5.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Neither supports nor objects to this policy, but comments: Supports inclusion of standalone air quality policy, but advise that additional criteria are added to address impacts on habitats and reference to standing advice on air quality and development, as follows: "5. Proposals should not significantly delay the date for compliance with environmental thresholds for air pollutants for Habitats Sites or SSSIs that are currently in exceedance of environmental benchmarks (critical levels and loads).6. Proposals emitting air pollutants which impact Habitats Sites must rule out adverse effects on the integrity of such sites. Where this is not possible the derogations route of the Habitats Regulations should be followed.7. To avoid and minimise air pollution impacts any development requiring Habitats Regulations Assessment, Environmental Impact Assessment (EIA) or impacts to SSSIs unrelated to EIA development should consider: a. the measures included which will minimise air pollution impacts on SSSIs and Habitats Sites during the design process of the development; andb. how air quality improvements have informed the design choices made about the location of the development, its layout, and distribution of buildings, on-site activities, amenity spaces and infrastructure."" 8. Consideration will be given to Natural England's standing advice on the impacts of air pollution on protected sites. This advice will be taken into account as a material consideration when making decisions on all relevant planning applications."	Noted. Additional criteria agreed. Change Proposed.

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2026Reg18/73	96	Question 072 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council agrees with the direction and overall content of the preamble. It is comprehensive and well referenced to national policy and guidance. However, it could be strengthened by making it more locally grounded, clearer in structure, and more relatable to residents' day-to-day concerns. Below are suggested improvements. 1. Strengthen the Local Context The preamble would benefit from a clearer summary of why pollution and land instability are particularly relevant to Swale, for example: Legacy industrial land in Sittingbourne and Queenborough; Historic landfill and made ground on the Isle of Sheppey and marshland areas; Proximity to internationally designated habitats; Coastal erosion and unstable cliff or marshland environments; Distribution and logistics activity contributing to noise and vibration; Increasing lighting impacts in rural and coastal dark sky areas. A short paragraph explicitly linking national policy to local risks and lived experience would make the policy more relatable. 2. Improve Focus and Readability The preamble is thorough but lengthy. It could be made more focussed by: Grouping sections more clearly under headings (e.g. Hazardous Substances, Land Contamination, Light, Noise, Land Instability); ~~Including short summary statements at the end of each section explaining what~~		
						Environment Agency		.		Neither	Policy C12 – Pollution & land instability We are broadly in agreement with the proposed policy and its approach to the treatment of contaminated land. We support the specific reference to the requirement to protect the groundwater environment within point c and we would ask for this to also be specifically mentioned in the above point b. The policy broadly sets out the stages in which contaminated land should be managed, however, there is no mention of verification of the remedial works. This step is crucial for ensuring that any proposed and agreed remedial works have been undertaken and completed as agreed, or that deviations from agreed works is documented and either approved or rejected (i.e. that further works may still be required to meet remedial objectives). We would ask for an additional point to ensure that verification of remedial works follow once works have been completed.
						Bredgar Parish Council	Teresa	Hudson		Support	BPC support Policy C12. We would like to see an additional policy statement that sets out a requirement for the cumulative effects of new developments and in existing neighbourhoods to achieve a reduction in light pollution of dark skies. Particularly applicable in the Kent Downs National Landscape and its setting.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Supports the preamble. Seeks amendment to add Swale specific context. Seeks amendment to emphasise cumulative and coastal considerations. Seeks amendment to improve structure and clarity. Seeks amendment to highlight the protection of dark landscapes and sensitive habitats. Seeks amendment to reinforce developer responsibilities.	Comment noted. No change proposed. The preamble is just an overview of legislation, national policy and guidance on the matters pertaining to this policy. No change proposed. Cumulative impacts are considered within the preamble and coastal considerations are covered in policy C6. No change proposed. The Council disagrees because sections are headed correctly and the NPPF wording is key to helping understanding national policy and guidance. No change proposed. The Council agrees that more attention can be given to the protection of dark landscapes and sensitive habitats to align with paragraph 189 and 193 of the NPPF. Partial change proposed. Developer responsibilities are set out within the policy. No change proposed.
2026Reg18/131	Broadly agree with the policies approach to contaminated land and seeks amendment to add reference to groundwater environment to point b. The policy does not mention verification of remedial works, seeks amendment for the addition of verification of remedial works following work has been completed.	The Council agrees the groundwater environment can be specifically mentioned in the point b. Change proposed. The Council agrees to add the verification of remedial works post work. Change proposed.
2026Reg18/40	Supports the policy but seeks the amendment to add an policy statement for the cumulative effects of new developments in neighbourhoods and the Kent Downs National Landscapes.	The Council agrees that the Kent Downs National Landscape can be given more consideration. Partial change agrees.

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2026Reg18/76	72	Question 073 Do you support or object to Policy C12? What would you add, remove or amend to support it further or to remove your objection?				Five Parishes Oppositio n Group				Support	(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). FPG support Policy C12. We would like to see an additional policy statement that sets out a requirement for the cumulative effects of new developments and in existing neighbourhoods to achieve a reduction in light pollution of dark skies. Particularly applicable in the Kent Downs National Landscape, its setting, the impacts on SPA's, impact on Conservation Areas and their settings.
2026Reg18/108	9	Question 073 Do you support or object to Policy C12? What would you add, remove or amend to support it further or to remove your objection?	Savills	C	Leckie			Owners Land Old Ferry Road, Iwade		Neither	The policy requires applicants to demonstrate that a proposed development is appropriate for its location and that its layout, design and construction will not cause harm to the environment, wildlife, property, or sensitive receptors as a result of hazardous substances, land contamination, noise, vibration or light pollution. The policy should be strengthened by adding wording such as “where adverse effects arise, appropriate mitigation should be secured.” This aligns with paragraph 198 of the NPPF, which makes clear that impacts on the natural environment should be mitigated and reduced to a minimum, rather than leading to refusal without considering mitigation. Including this wording ensures the policy is proportionate, deliverable, and focused on preventing adverse effects through mitigation. PLEASE SEE ATTACHMENT

Appen

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2026Reg18/76	Supports the policy but seeks an additional policy on cumulative effects on existing neighbourhoods and in n the Kent Downs National Landscape, its setting, the impacts on SPA's, impact on Conservation Areas and their settings.	The Council agrees to specific attention on National Landscape to align with paragraphs 189 and 193 of the NPPF. Partial change proposed.
2026Reg18/108	Notes the policy seeks amendment to add "where adverse effects arise, appropriate mitigation should be secured." in line with paragraph 198 of the NPPF.	Comment noted. No change proposed. The Council agrees to add "where adverse effects arise, appropriate mitigation should be secured." to align with NPPF. Change proposed.

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2026Reg18/127	31	Question 074 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	2.8 Biodiversity and Landscapes2.8.1 B1 Biodiversity & geodiversity conservation & BNGNatural England strongly supports the inclusion of this policy.2.8.1.1 PreambleWe are pleased that the conservation and enhancement of the natural environment is at the core of the Local Plan strategy (38.0.1). We are pleased that the policy addresses both biodiversity and geodiversity within designated sites, distinguishing between the hierarchy of international, national and locally designated sites, and referencing the mitigation hierarchy. We are also pleased that the importance of conserving, enhancing and improving connectivity of biodiversity and habitats outside of designated sites (38.0.22) and on a landscape scale (38.0.25) is included. We refer you to the list of nationally and internationally designated sites provided in paragraph 1.3.1 of this letter to make minor amendments to the designated sites listed in paragraphs 38.0.6-38.0.8 and 38.0.15-38.0.17. We note that Outer Thames Estuary SPA is designated for its populations of breeding common tern and little tern as well as its populations of non-breeding red-throated diver and suggest 38.0.8 is amended to state this. We also advise that it would be useful to include examples of potential indirect impacts on designated sites in the preamble, such as impacts from noise, lighting, recreational disturbance, and loss of functionally linked land.Natural England notes that a strategic policy on Conserving and Enhancing the Natural Environment and further guidance is anticipated to be set out at the Regulation 19 stage. We would welcome the opportunity to discuss this policy and provide advice before the Regulation 19 consultation.We are pleased that the Kent and Medway Local Nature Recovery Strategy (LNRS) has been referenced in this policy's preamble (38.0.33-28.0.34). However, it is currently unclear how it is being considered in the Local Plan. The Strategy should be integrated across the Plan wherever possible, to help inform plan-making more generally, including which sites are proposed for development and environmental improvement. We recognise that the Local Nature Recovery Strategy (LNRS) has only recently been published (28th November 2025) and that this is an emerging process which will require time to establish and fully		

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Gives qualified support for this policy/pre-amble for the following reasons: the conservation and enhancement of the natural environment is at the core of the Local Plan strategy policy addresses both biodiversity and geodiversity within designated sites Useful to include potential indirect impact on designated site in preamble Offer to discuss and advise on strategic policy on Conserving and Enhancing the Natural Environment and further guidance for Reg 19 pleased that the Kent and Medway Local Nature Recovery Strategy (LNRS) has been referenced in this policy's preamble but unclear how it is considered, it should inform the plan generally. Seeks deletion/amendment of this policy/pre-amble as follows: Minor amendments to the designated sites listed in paragraphs 38.0.6-38.0.8 and 38.0.15-38.0.17. Amend for Outer Thames Estuary SPA to include populations of breeding common tern and little tern	Noted Noted Noted Noted Noted Seeks deletion/amendment of this policy/pre-amble as follows: Policy reads clearer For completeness Change Proposed

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2026Reg18/62	48	Question 074 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Maidstone Borough Council			The LNRS has now been published and although this is identified at one point, there is a lot of text about what it will be required to or should include, and this might be reviewed now it is in place (38.0.3, 38.0.33), perhaps with reference to the APIB and ACIB layers of the Habitat Map – and suggest also remove the dated information at 38.0.27 and 38.0.28 about BOAs which is now largely superseded with the LNRS. Refer to recent government guidance at 38.0.34. 38.0.40 see also national BNG register – the KCC version has different sites that need to be registered and have legal agreements before they can deliver credits and support new development so these cannot necessarily be relied upon in the planning decision making context. Having reviewed the 'Biodiversity Baseline Study' at 38.0.32, it does not appear to give much clear guidance to developers and some of it is now out of date e.g. reference to an old version of the statutory metric. It also does not directly support a 20% BNG with the only reference to this in the report being to refer to the KNP framework, so suggest this link is removed and current government guidance used instead. Review consistency in uppercase and lowercase for BNG, LWS, RNR etc. Suggest remove the lower case 's' from 'LWSs' and 'RNRs'. Re: 38.0.23, the legislation has been updated with the LURA, particularly in relation to the CROW act. Refer to amendments being made to all of this legislation. The link to the 2005 circular is now also quite dated and would suggest remove (38.0.4). Reconsider 38.0.30 as there seems to be some confusion between the ecological mitigation hierarchy and the BNG hierarchy – statutory credits are the last resort.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/62	Gives qualified support for this preamble for the following reasons: LNRS has now been published, text referencing pre-publication version should be reviewed and with reference APIB ACIB layers of the Habitat Map. Suggest removing BOAs which is now largely superseded which is now superseded with the LNRS. There different sites where legal agreement and registration have to be in place before they can deliver credit and support new development and be relied upon in planning decision making context. Biodiversity baseline study at 38.0.32 does not give clear guidance to developers with some of it out of date Review of lower and uppercase in acronyms Legislation updated LURA is now updated in relation to the CROW act.	The Council (partially) agrees for the following reasons: Noted - This will be updated. Noted to be updated Noted to be updated Noted to be updated This will be updated. Change Proposed.

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

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2026Reg18/127	32	Question 075 Do you support or object to Policy B1? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	Policy criteria2.8.1.2 Part A – For designated sitesWe welcome the inclusion of policy criteria specific to development proposals impacting designated sites. We welcome the Council's ambition to conserve and enhance designated sites, and support the reference to the hierarchy of international, national and locally designated sites in accordance with NPPF paragraph 192a. However, we suggest the policy is amended to clarify that the mitigation hierarchy must be followed in accordance with NPPF paragraph 193a.We support criterion 2 for national sites but suggest that it is amended to align more closely with NPPF paragraph 193b. We also suggest that the sites the policy applies to is stated in the criteria. For instance, to clarify if national sites refers to SSSIs, MCZs and/or NNRs, and to clarify that international sites refer to the Habitats Sites listed in NPPF paragraph 194. We advise that any development proposals that would have a direct impact on designated sites should not be selected as appropriate allocation sites in the Regulation 19 stage. We also advise that the policy could be clearer that the criteria apply to all development proposals and is not restricted to site allocations in the Local Plan.We therefore suggest the following amended wording for policy Part A:"Policy B1Biodiversity and geodiversity conservation and biodiversity net gainDevelopment proposals must follow the mitigation hierarchy. Developments must first avoid, then mitigate and only as a last resort compensate for adverse impacts on biodiversity and the natural environment. Part A – For designated sitesDevelopments proposals that have a direct or indirect effect on designated sites, which will be shown on the Proposals Map, which will be available in later stages of the Local Plan, will conserve and enhance them in a manner equal to the significance of their biodiversity and geodiversity status as follows:1. Within internationally designated sites (including candidate sites), the highest level of protection will apply. The Council will ensure that development proposals only proceed when in accordance with relevant Directives, Conventions and Regulations. Where the proposed development, either alone or in combination with other plans or projects, is likely to have an

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Gives qualified support for this policy/pre-amble for the following reasons: welcome the inclusion of policy criteria specific to development proposals impacting designated sites and ambition to conserve and enhance designated sites Sites that have a direct impact on designated sites should not be selected as appropriate allocation sites in the Regulation 19 stage. Can't comment as the strategic policy on Conserving and enhancing the natural environment is not yet provided but should include LNRS and comply with NPPF 192a brownfield sites can be important for wildlife, particularly invertebrate diversity Seeks deletion/amendment of this policy/pre-amble as follows: amended to clarify that the mitigation hierarchy must be followed in accordance with NPPF paragraph 193a. amended that sites the policy applies to is stated in the criteria Further policy A Developments proposals that have a direct or indirect effect on designated sites, which will be shown on the Proposals Map, which will be available in later stages of the Local Plan, will conserve and enhance them in a manner equal to the significance of their biodiversity and geodiversity status as follows A1 - Within internationally designated sites (including candidate sites), the highest level of protection will apply. The Council will ensure that development proposals only proceed when in accordance with relevant Directives, Conventions and Regulations. Within internationally designated sites (including candidate sites), the highest level of protection will apply. The Council will ensure that development proposals only proceed when in accordance with relevant Directives, Conventions and Regulations. Where the proposed development, either alone or in-combination with other plans or projects, is likely to have an adverse effect on the integrity of a Habitats Site (including candidate sites) that cannot be avoided or fully mitigated, the proposed development will have an adverse effects on the integrity of a European site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and where compensation for the any loss or damage is secured can be fully compensated;	Gives qualified support for this policy/pre-amble for the following reasons: Noted The HELAA assesses the suitability of sites which will be selected based on this. Noted Noted The Council (partially) agrees for the following reasons: Captured already within the preamble This is adequately stated This would be removed in next stage of plan making when map will be available. Partly accepted Partly accepted Already captured Policy wording adequate to provide sufficient flexibility This is treated in other sections of the plan This is treated in other sections of the plan This is treated in other sections of the plan Partial Change Proposed

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2026Reg18/62	49	Question 075 Do you support or object to Policy B1? What would you add, remove or amend to support it further or to remove your objection?				Maidstone Borough Council				Support	The policy is broadly supported and the requirement for 20% BNG is laudable. However, the draft NPPF reforms make it clear that a 10% BNG requirement should be standard and only allows a higher standard under exceptional circumstances. The feasibility of seeking a higher than 10% BNG target is thus at risk. The rest of the policy text repeats the BNG process and regulations and could therefore be considered unnecessary. Part B lacks reference to the Local Nature Recovery Strategy (LNRS) which should be the driving biodiversity evidence base and it is required to have regard to the LNRS in planning decisions. The following amendments are proposed: The B1(A) phrasing “where compensation can be sought for any loss or damage” could be strengthened to enable delivery of compensation wherever possible. Refine B1 part B (5) “When significant harm cannot be avoided through consideration of alternative sites or adequate mitigated mitigation provided for on-site or within the immediate locality, compensatory measures will be achieved within the relevant Biodiversity Opportunity Area, or other location as agreed by the Council;” Clarify B1 part B (6) ‘to be set’ – is the reference to ‘strategic policy on Conserving and enhancing the natural environment’ part of the LPR or a linked document? Re BNG 2 – this is a part of the national BNG hierarchy and does not need to be duplicated in the Local Plan Review. Re BNG3 – it is reasonable to check the KCC BNG Registry but these sites are not necessarily registered on the national register and the potential credits they may realise may be subject to a significant amount of administration (statutory metric, HMMP, legal s106 or Conservation Covenant agreement) to set them up on the national register to enable them to be used in a development decision making context. There are sites on the national BNG register that are set up for credits that do not appear on the KCC BNG Registry. The LNRS is also directly linked to BNG in that the LNRS provides a 45% uplift in
2026Reg18/74	33	Question 075 Do you support or object to Policy B1? What would you add, remove or amend to support it further or to remove your objection?				Faversham Society	Planning	Faversham Society		Neither	Paras B1, part A, 1-3 are misleading because of the very first word in the paragraph: “within.” In the case of internationally designated sites in particular, the excessive nutrient load being carried into the Swale SPA/Ramsar site from the Faversham WWTW must be recognised for what it is and treated in the same way as in other parts of the country such as nearby Stodmarsh and the Solent. The goal for the Swale must be the same: nutrient neutrality. Failure to do this is having real consequences, with the water of the Swale too turbid for the native oyster bed and seagrass bed restoration initiatives being carried out in less polluted parts of the Thames Estuary. Consequences too in terms of reduced recreational use of coastal waters, bathing, etc. More ambition needed!!The policy should also mention specifically the Kent LNRS completed in 2025 after broad consultation, e.g. in para B3, but implementation should not just be “where appropriate.” It should be required. On BNG: this sounds excellent.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/62	Gives qualified support for this policy/pre-amble for the following reasons: 20% BNG is laudable. However, the draft NPPF reforms make it clear that a 10% BNG requirement should be standard and only allows a higher standard under exceptional circumstances. Part B lacks reference to the Local Nature Recovery Strategy (LNRS) which should be the driving biodiversity evidence base Refine B1 (5) and B1(6), also BNG hierarchy does not need to be duplicated. The LNRS is also directly linked to BNG in that the LNRS provides a 15% uplift in credits within the statutory BNG metric.	The Council (partially) agrees for the following reasons: The NPPF is in draft form and can still change hence consideration for it is limited. Unless exempt the council's target is a minimum 20% net gain in biodiversity against a pre-development baseline. Evidence shows that this target compared to 10% has a minimal additional impact upon viability. This will be updated to include reference to LNRS Wording is adequate provides clarity to the policy. Noted Partial Change Proposed.
2026Reg18/74	Gives qualified support for this policy for the following reasons Nutrient load carried into the Swale SPA/Ramser site from Faversham WWTW must be treated the same as in other parts of the country with nutrient neutrality as the goal. Failure on this has consequences on Recreational use of coastal waters and with water of the Swale too turbid for the native oyster bed. Policy should mention the Kent LNRS completed in 2025 Excellent on BNG	The Council (partially) agrees for the following reasons: This is addressed in Policy C10 Water quality and Water Resources This will be addressed and updated at the next stage of plan making Noted Change proposed

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2026Reg18/127	33	Question 076 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Natural England	Natural	England	2.8.2 B2 Conserving & enhancing valued landscapes2.8.2.1 PreambleNatural England supports this policy which distinguishes between the hierarchy of national and local landscape designations and provides a policy to protect, enhance and manage valued landscapes. We are pleased that a range of supporting evidence has been included in the preamble, such as the Swale Landscape Sensitivity Assessment (2019), and particularly welcome the information provided about National Character Areas (NCAs).We note that information on the Kent Downs National Landscape is provided in the preamble of this policy (paragraphs 39.0.15-39.0.24). We are pleased that this information has been provided, but we advise that it would be more suitable for the preamble for policy B3 which specifically relates to development impacting the Kent Downs National Landscape.We welcome paragraph 39.0.18 which states that the Council will refuse proposals for major development within the National Landscape unless in exceptional circumstances and where it can be demonstrated that they are in the public interest and based on an assessment in accordance with NPPF paragraph 190. However, we note that the council has not provided a definition of 'major development' (paragraph 39.0.19). Natural England strongly encourages your authority to provide a definition of what constitutes 'major development' to enable informed decisions to be made regarding development proposals within the Kent Downs National Landscape.We welcome paragraph 39.0.20 which references the Kent Downs National Landscape Management Plan 2021-2026 regarding National Landscape settings. We advise that the scale and extent of development within the National Landscapes should be limited. We note that policy criteria for development in the settings of designated landscapes has been included in Part C, but this only applies to the setting of Areas of High Landscape Value. We therefore recommend that information about the setting of the Kent Downs National Landscape is moved to Policy B3.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Gives qualified support for this policy/pre-amble for the following reasons: distinguishes between the hierarchy of national and local landscape designations and provides a policy to protect, enhance and manage valued landscapes. Pleased with supporting evidence note that information on the Kent Downs National Landscape is provided in the preamble but better at Policy B3 welcome that the Council will refuse proposals for major development within the National Landscape unless in exceptional circumstances but no definition for major development. Advise that the scale and extent of development within the National Landscapes should be limited. Note that policy criteria for development in the settings of designated landscapes has been included in Part C, setting of the Kent Downs National Landscape is moved to Policy B3.	The Council (partially) disagrees for the following reasons: Noted Noted Kent Downs National Landscape preamble moved to Policy B3 and deleted in preamble of Policy B2: National landscapes - the Kent Downs National Landscape 39.0.15In 1968 a large part of the North Downs within the borough was designated as part of the Kent Downs National Landscape. The aim of this national designation was to conserve and enhance the natural beauty of the landscape. The aim of the Kent Downs National LandscapeManagement Plan (290)adopted in November 2021is to secure conservation and enhancement within the National Landscape while supporting local communities. The plan is adopted by the relevant Kent Districts and London boroughs as a material consideration in planning applications withsimilar weight to a Supplementary Planning Document. 39.0.16Accompanying the National Landscapemanagement plan are a number of supportingguidance documents(291)which should be taken into account in relevant cases. These include the National Landscape's: Guidance on the selection of and use of colour in development; Farm Diversification Toolkit; Kent Downs Farmsteads Guidance; Managing Land for Horses; Rural Streets and Lanes - A Design Handbook; Position Statement on Renewable Energy and its Companion Report as well as the Landscape DesignHandbook. The National Landscape Unit also publish guidance on specific aspects of land management, for example, chalk grassland, orchard, woodland and hedgerow management. 39.0.17The landscape of the Kent Downs is made up of 13 character areas. The character area of most relevance to Swale is the Mid Kent Downs. Key characteristics and objectives for the Mid Kent Downs have been defined by the AONB Unit and should be reflected in relevant planning applications. 39.0.18In accordance with the NPPF(292)the Council will refuse proposals for major development within the National Landscape unless in exceptional circumstances, and where it can be demonstrated that they are in the public interest and based on an assessment of: the need for the development, including national considerations, and the impact of permitting it, or refusing it, on the local economy; the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. 39.0.19In terms of what may constitute 'major development' for the purposes of this Local Plan, it will be a matter of judgement.

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2026Reg18/31	53	Question 076 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				CPRE Kent	CPRE	Kent	The preamble to the policy should make clear that the Kent Downs National Landscape is a valued landscape and/or reference made to the following policy (B3). The plan should recognise that Swale has special circumstances whereby not only the Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Development on these areas should only be a last resort. Paragraph 39.0.2 makes reference to National Parks. As there are no National Parks within Swale reference to them is confusing and should be deleted. While we welcome the reference to tranquillity (and dark skies), we would however again request that a standalone policy be drafted to specifically address dark skies in accordance with CPRE's national campaign. For example, this policy wording (policy ENV4) is included in the Ashford local plan: Proposals will be permitted provided that the lighting proposed is: the minimum appropriate for its purpose; is designed such that lighting is directed downwards, with a beam angle below 70 degrees and; that no significant adverse effects individually or cumulatively will result to the character of the area, the residential amenity of local residents, the safety of vehicle users and pedestrians or the diurnal/seasonal rhythms of the Borough's biodiversity assets. The correlated colour temperature (CCT) of outdoor lighting should not exceed 3000 Kelvins in order to limit the effects of known environmental hazards associated with short-wavelength visible light. Proposals where external lighting is required should include a full lighting scheme that provides information about layout and beam orientation, a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels. Schemes will be expected to comply with ILP technical guidance in relation to the Environmental Zone in which an application is proposed. ~~Within the area proposed to be designated as a 'dark sky zone', proposals will~~		
2026Reg18/46	8	Question 076 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Kent Downs National Landscap e	Catherine	Hughes	(See attached letter) There are a number of concerning inaccuracies in the supporting text to this policy. Most significantly, paragraph 39.0.5 is not correct. Section 85 of the CRoW Act was amended in 2023 to create a new duty on relevant authorities that they "must seek to further the purpose of conserving and enhancing the natural beauty of the area" when discharging their functions (including plan-making) in National Landscapes. The new duty replaces the previous requirement for relevant authorities to 'have regard' to the purpose of AONBs and the government is clear that it is intended as a more proactive and strengthened requirement. Guidance for relevant authorities in how to comply with this new strengthened Protected Landscapes duty was produced by Defra in 2024. The Kent Downs National Landscape team has also produced two advice notes on the duty, one specifically for local planning authorities and one providing more general advice for all relevant authorities, which can be found on our website. We are happy to work with the Council to revise the supporting text here if that would be helpful.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/31	Gives qualified support for this policy/pre-amble for the following reasons: make clear that the Kent Downs National Landscape is a valued landscape Swale has special circumstances whereby Kent Downs National Landscape and also other areas adjoining the national landscape should be protected and development there should be last resort Reference to national parks removed Tranquility and dark skies should have its own policy Lyn valley should be given protection	Status established in the plan Impact by development on Adjoining areas within the setting are required to be considered and addressed Noted - reference to National park will be removed Tranquility is sufficiently covered in the plan as it concerns the Borough. Dry valleys in proximity are usually included within the setting of the National Landscape Partial changes Proposed
2026Reg18/46	Gives qualified support for this policy/pre-amble for the following reasons: new duty on relevant authorities that they "must seek to further the purpose of conserving and enhancing the natural beauty of the area" when discharging their functions (including plan-making) in National Landscapes	The Council (partially) agrees for the following reasons: text will be amended to incorporate the new duty on the council Partial Change Proposed.

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2026Reg18/46	9	Question 077 Do you support or object to Policy B2? What would you add, remove or amend to support it further or to remove your objection?				Kent Downs National Landscap e	Catherine	Hughes		Neither	(See attached letter) There is no reference to the Kent Downs National Landscape in Policy B2 despite extensive background information on this designated landscape being included in the supporting text. This presents a rather muddled policy approach to these important Local Plan issues. Given that the following Policy (B3) addresses minor development in or affecting the National Landscape we suggest these two policies are re-examined and rewritten during the preparation of the Regulation 19 Draft, to deliver a clearer Local Plan policy approach to development in or affecting the National Landscape.
2026Reg18/62	50	Question 077 Do you support or object to Policy B2? What would you add, remove or amend to support it further or to remove your objection?				Maidstone Borough Council				Neither	The following amendments are suggested: B2 is supported and the initial phrasing 'The value, character, amenity and tranquility of the borough's landscapes will be protected, enhanced and managed' is likely to add weight to decision-making and at planning appeal. However, SBC may want to review their LCA to ensure that 'value' is clearly defined for each character area. Could reference GLVIA3 at some point as particularly relevant guidance to this policy that will be complied with. B2 Part A (1) The use of 'significant' at 'The scale, layout, build and landscape design of development that will have significant impact...' may be difficult to quantify in practice and may risk difficulties defending upon appeal. B2 Part A (3) A really useful policy as cumulative impacts can sometimes be minimised in decision making and at appeal. The recognised LVIA abbreviation might be added to the text. B2 Part B (1a) Supported. Recognises the importance of both the quality and clarity of the Statements of Significance – suggest landscape positive landscape attributes and features are made clear in these Statements and detracting features are made just as clear and accessible. Part B (1c) “ avoidance, minimisation, mitigating and compensating adverse landscape impacts as appropriate...” substantially weakens the policy. Minimisation of impacts as appropriate may result in inadequate mitigation and harmful development in the countryside. Part C (1) Suggest removal of the text 'where relevant' as it is unclear under what circumstances of the impact on the setting of Areas of High Landscape Vale would not be fully assessed?
2026Reg18/16	27	Question 078 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Boughton under Blean Parish Council	Sarah	Muteham	§ 40.0.1 'In addition, the Countryside and Rights of Way (CROW) Act 2000, seeks to further the purpose of conserving and enhancing the natural beauty of the National Landscape.' This is not quite right. Section 85 of the CROW Act requires public bodies to 'have regard' to conserving and enhancing the natural beauty of the AONB. Section 245 of the Levelling-up and Regeneration Act 2023 imposes a strengthened duty to 'seek to further' the conservation and enhancement of the natural beauty of National Landscapes.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/46	Gives qualified support for this policy/pre-amble for the following reasons: KDNL background and policy is muddled between B2 and B3	The Council (partially) agrees for the following reasons: Noted, this has been picked up and will be amended for in the Reg 19 Version Change Proposed.
2026Reg18/62	Gives qualified support for this policy for the following reasons: SBC may want to review their LCA to ensure that 'value' is clearly defined for each character area. Could reference GLVIA3 Really useful policy, the recognised LVIA abbreviation might be added to the text. Supported - it recognises the importance of both the quality and clarity of the Statements of Significance Minimisation of impacts as appropriate may result in inadequate mitigation and harmful development in the countryside.	The council partially agrees. Noted This will be considered for inclusion as part of the preamble Noted Noted Noted Partial change proposed
2026Reg18/16	Gives qualified support for this policy/pre-amble for the following reasons: Levelling-up and Regeneration Act 2023 imposes a strengthened duty to 'seek to further' the conservation and enhancement of the natural beauty of National Landscapes.	The Council agrees for the following reasons: Updates new duties on the council. Change already proposed based on previous reps Partial Change Proposed

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2026Reg18/31	22	Question 078 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				CPRE Kent	CPRE	Kent	Section 245 of the Levelling Up and Regeneration Act has amended the Countryside and Rights of Way Act to place greater emphasis on the protection of national landscapes. This provision requires public bodies to “seek to further” the statutory purposes of national landscapes, including the purpose to conserve and enhance wildlife in protected landscapes, and replaces a previous weaker duty to “have regard” to the purposes. We welcome the reference to the CROW Act at paragraph 40.01 The plan should recognise that Swale has special circumstances whereby not only the Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Development on these areas should be only as a last resort. The policy and preamble should be amended to ensure that views into and out of the designated national landscape are protected, as well as its setting. Reference should be made to the impact of renewable energy on land designated as being a national landscape (and cross-reference made to policy C5). We understand that the Kent Downs National Landscape unit is currently updating its 2011 Renewable Energy Statement. Pending its publication your attention is drawn to the position statement of the High Weald National Landscape unit (2025). Namely that, ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations. We note that reference to valued landscapes has been removed from the consultation draft of the 2025 NPPF. As such, this draft local plan policy will take on extra significance in terms of future development management decisions. We query whether the wording is sufficiently strong to secure its intended aims. Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?		
2026Reg18/46	10	Question 078 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Kent Downs National Landscap e	Catherine	Hughes	(See attached letter) As stated in our response to Policy B2 we are of the view that this part of the Plan is rather muddled. The preamble to Policy B3 is very brief and at paragraph 40.0.1 again cites an out-of-date reference to the legal duty on the Council. Much of the supporting text to this Policy has been placed against Policy B2. We feel a complete refresh would therefore be appropriate and are happy to provide informal comments on re-drafts if the Council would find this helpful.		
2026Reg18/74	34	Question 078 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	The preamble should mention that, since December 2023, public bodies must give nature recovery a higher priority than they have done previously. Managers should therefore be integrating nature recovery into the core of their operations and aiming to be exemplars of sustainable land management. It would also be useful to mention the LNRS in that respect as a common framework both for the National Landscape and for SBC.		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/31	Gives qualified support for this preamble for the following reasons: Section 245 of the Levelling Up and Regeneration Act has amended the Countryside and Rights of Way Act with a requirement for public bodies to "seek to further" greater emphasis now placed on the protection of national landscapes. Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Ensures views into and out of the designated national landscape are protected, as well as its setting. Reference should be made to the impact of renewable energy Attention is drawn to High Weald National Landscape unit (2025) that, ground mounted solar farms within the national landscape should not be considered acceptable. Query whether the wording is sufficiently strong to secure its intended aims in light of reference to valued landscapes being removed from the consultation draft of the 2025 NPPF.	The Council (partially) agrees for the following reasons: Change proposed Noted This is considered as part of the character of the landscape. Reference should be made to the impact of renewable energy Noted The wording is sufficient. Partial Change Proposed
2026Reg18/46	Gives qualified support for this policy/pre-amble for the following reasons: KDNL background and policy is muddled between B2 and B3	The Council (partially) agrees for the following reasons: Noted, this has been picked up and will be amended for in the Reg 19 Version Change Proposed.
2026Reg18/74	Gives qualified support for this policy for the following reasons: Policy should mention that public bodies must give nature recovery a higher priority than they have done previously and mention also LNRS as a framework for National Landscape and SBC.	The Council agrees for the following reasons: Provides more up to date information. Partial change proposed

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2026Reg18/127	34	Question 079 Do you support or object to Policy B3? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.8.3 B3 Kent Downs National Landscape Management PlanNatural England strongly supports the inclusion of this policy which seeks to enhance the natural beauty and special character of the Kent Downs National Landscape.As this policy sets criteria for development proposals to be compared to, rather than being specifically related to the Kent Downs National Landscape Management Plan, we advise that an amended title of “B3 Kent Downs National Landscape Management Plan” would be more appropriate. 2.8.3.2 Policy criteriaWhilst we support the requirement that “Major development within the National Landscape area will only be permitted in exceptional circumstances and where it can be demonstrated that it is in the public interest”, in line with NPPF paragraph 190, we note that a definition of major development has not been provided in the Draft Plan. To align with NPPF requirements, we recommend that a definition of “major” development is provided, either within the policy or supporting text, in line with footnote 67 of the NPPF. This will help to strengthen the policy and enable informed decisions to be made regarding development proposals within the Kent Downs National Landscape. Without this definition, it is currently difficult to provide comprehensive comments on the policy requirements for major and minor developments.We support criteria 1, 2 and 3 of this policy, but advise that these should apply to all developments within the National Landscape and its setting. We suggest that the policy should be strengthened by adding additional wording to ensure the policy aligns with both the requirements of the NPPF and the LURA duty to seek to further the purpose of conserving and enhancing the natural beauty of the area.Paragraph 189 of the NPPF states that development within a National Landscape setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. We therefore advise that any development proposals within the setting of the Kent Downs National Landscape should give consideration to the level of landscape sensitivity, risk of potential impacts on special qualities and views, and the scope for mitigation to ensure they are sensitively located and designed to avoid or minimise any adverse impacts. We advise that for

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/127	Gives qualified support for this policy for the following reasons: Supports the inclusion of policy which seeks to enhance the beauty and special character of Ken Downs National Landscape Definition for major development not provided so can't provide comprehensive comment Support policy Criteria 1, 2 and 3 but it should apply to all developments Strengthen to ensure it aligns with LURA to duty to "seek to further" the purpose of... 5. Seeks amendment of this policy as follows: "Kent Downs National Landscape Management Plan Within the National Landscape area, the goal of the plan is to ensure the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced and strengthened well beyond the plan period. Major development within the National Landscape area will only be permitted in exceptional circumstances and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment as set out in the NPPF, that considers applications for development in these areas.Minor d Development within the National Landscape and its setting will be permitted provided that:1. The location, form, scale, materials and design will conserve or enhance the character of the landscape and rural settlements;2. The development would conserve or enhance the special qualities and condition of the distinctive landscape character and including tranquillity of the National Landscape;3. The development supports the adopted National Landscape Management Plan and any associated guidance; and4. Unless allocated by the Local Plan Review, should avoid the loss of high-quality agricultural land.5. Development within the National Landscape setting should be sensitively located and designed to avoid or minimise adverse impacts on the National Landscape.6. Developments which may impact the National Landscape will be accompanied by a Landscape and Visual Impact Assessment (LVIA) at the planning application stage and have regard to the Kent Downs National Landscape Management Plan and supporting documents and guidance."	Noted Definition for major development not provided so can't provide comprehensive comment Noted Noted - policy will be amended to reflect this. Policy wording is adequate and adding to it will lead to unnecessary repetition. Partial change proposed

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2026Reg18/31	44	Question 079 Do you support or object to Policy B3? What would you add, remove or amend to support it further or to remove your objection?				CPRE Kent	CPRE	Kent		Neither	Section 245 of the Levelling Up and Regeneration Act has amended the Countryside and Rights of Way Act to place greater emphasis on the protection of national landscapes. This provision requires public bodies to “seek to further” the statutory purposes of national landscapes, including the purpose to conserve and enhance wildlife in protected landscapes, and replaces a previous weaker duty to “have regard” to the purposes. We welcome the reference to the CROW Act at paragraph 40.01 The plan should recognise that Swale has special circumstances whereby not only the Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Development on these areas should be only as a last resort. The policy and preamble should be amended to ensure that views into and out of the designated national landscape are protected, as well as its setting. Reference should be made to the impact of renewable energy on land designated as being a national landscape (and cross-reference made to policy C5). We understand that the Kent Downs National Landscape unit is currently updating its 2011 Renewable Energy Statement. Pending its publication your attention is drawn to the position statement of the High Weald National Landscape unit (2025). Namely that, ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations. We note that reference to valued landscapes has been removed from the consultation draft of the 2025 NPPF. As such, this draft local plan policy will take on extra significance in terms of future development management decisions. We query whether the wording is sufficiently strong to secure its intended aims. Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?
2026Reg18/40	64	Question 079 Do you support or object to Policy B3? What would you add, remove or amend to support it further or to remove your objection?				Bredgar Parish Council	Teresa	Hudson		Support	BPC supports Policy B3. We would prefer the second sentence to read'Major Development within the National Landscape will only be permitted in exceptional circumstances and where it can be demonstrated that it is critical to the public interest.'On Minor development, the 'setting' should be included in 2 (.....'tranquillity of the National Landscape and its setting').
2026Reg18/74	37	Question 081 Do you support or object to Policy B4? What would you add, remove or amend to support it further or to remove your objection?				Faversham Society	Planning	Faversham Society		Neither	As it stands, the final sentence of the policy makes nonsense of the entire concept of maintaining gaps between settlements. It should read: “Within these gaps planning permission will not be granted for development that would undermine one or more of their purposes.”

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/31	Gives qualified support for this preamble for the following reasons: Section 245 of the Levelling Up and Regeneration Act has amended the Countryside and Rights of Way Act with a requirement for public bodies to "seek to further" greater emphasis now placed on the protection of national landscapes. Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Ensure views into and out of the designated national landscape are protected, as well as its setting. Reference should be made to the impact of renewable energy Attention is drawn to High Weald National Landscape unit (2025) that, ground mounted solar farms within the national landscape should not be considered acceptable. Query whether the wording is sufficiently strong to secure its intended aims in light of reference to valued landscapes being removed from the consultation draft of the 2025 NPPF.	The Council (partially) agrees for the following reasons: Change proposed Noted This is considered as part of the character of the landscape. Reference should be made to the impact of renewable energy Noted The wording is sufficient. Partial Change Proposed
2026Reg18/40	Seeks deletion/amendment of this policy as follows: 'Major Development within the National Landscape will only be permitted in exceptional circumstances and where it can be demonstrated that it is in critical to the public interest.' tranquillity of the National Landscape and its setting	The Council (partially) disagrees for the following reasons: 1. Original text is clear on the intention of the policy. The Council (partially) agrees for the following reasons: 2. Closes a vacuum and provides clarity on how policy is applied in National Landscape setting. Partial Change Proposed
2026Reg18/74	That the reference to allocated sites in the gaps s removed from the last sentence in the Policy	The Council agrees for the following reasons: Whilst a suite of sites for development have not been consulted upon the HELAA findings 2025 has identified a wide range of potentially suitable sites across the borough that are both outside Important Local Countryside Gaps. Delete the words unless allocated for development by the Local Plan Change Proposed

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2026Reg18/40	65	Question 082 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Bredgar Parish Council	Teresa	Hudson	aragraph 42.0.4 – typos – line 3, replace ‘help’ with ‘will help to’. Also the letter ‘s’ is missing in several places. Paragraph 42.0.5 – could orchards be added to the list?		
2026Reg18/76	81	Question 082 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Five Parishes Opposition Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). Paragraph 42.0.4 – typos – line 3, replace ‘help’ with ‘will help to’. Also the letter ‘s’ is missing in several places. Paragraph 42.0.5 – could orchards be added to the list?		
2026Reg18/62	53	Question 083 Do you support or object to Policy B5? What would you add, remove or amend to support it further or to remove your objection?				Maidstone Borough Council				Neither	The following amendments are suggested: B5 (1c) – remove ‘preferably’ from ‘preferably native’. B5 (1i) – refer to the 15m buffer requirement at 42.0.8 if this requirement is to be delivered. B5 2 – inclusion of the requirement for Arboricultural Surveys to be to the British Standard (A British Standard compliant (BS5837) tree survey will comprise an assessment of the condition and quality of trees on the site and will include scope, survey method, details of proposed works, tree protection measures, root protection areas/zones, a hazard assessment and details of any necessary identified tree works).
2026Reg18/127	40	Question 091 Do you support or object to Policy B9? What would you add, remove or amend to support it further or to remove your objection?				Natural England	Natural	England		Neither	2.8.8 B9 The keeping & grazing of horses 2.8.8.1 Policy criteria Natural England supports this policy. We advise that the Draft Plan has overarching policies to consider developments against regarding impacts to landscapes and the environment. We refer you to our overarching comments in paragraph 2.1. It would be Natural England’s preference to rely on strong overarching policies in the Draft Plan. We advise that a link could be made to relevant overarching policies such as Policies B1, B2 and B3, and any others the Council deems relevant. We would suggest the following wording, and advise that this should be included in all other relevant policies for consistency:“Planning permission will only be granted for development involving the use of land for the keeping or grazing of horses and ponies in connection with riding or other non-agricultural purposes, if they are of high quality design and of a scale and intensity that is acceptable in landscape character biodiversity, amenity and highway terms, in accordance with Policy B1, B2 and B3.”

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/40	1. This is a duplicate representation	1. This changes proposed in the response were agreed against the duplicate response. Change proposed
2026Reg18/76	1. Seeks amendment of the preamble as follow paragraph 42.0.4 - line 3, replace 'help' with 'will help to' 2. Comments that letter S is missing in several places 3. Seeks amendment of the preamble as follows Paragraph 42.0.5 - could orchards be added to the list	1. The Council agrees for the following reasons replacing Paragraph 42.0.4 line 3, 'help' with 'will help to' would make the preamble clearer to read 2. Comment that the preamble will be subjected to further checks 3. The Council agrees for the following reasons that adding the word orchards at Paragraph 42.0.5 would provide the correct detail for the Policy matters Change proposed
2026Reg18/62	1. Seeks amendment to Policy criteria 1c to remove 'preferably' from 'preferably native'. 2. Seeks amendment to Policy criteria 1i to refer to the 15m buffer requirement 3. Seeks amendment to Policy criteria 2 inclusion of the requirement for Arboricultural Surveys to be to the British Standard (A British Standard compliant (BS5837)	1. The Council disagrees for the following reasons The term preferably is considered appropriate as it may allow for alternative species if there is need for deviation. 2. The Council disagrees for the following reasons the 15m buffer matter is set out in the preamble and the approach is set out in national guidance. 3.The Council partially agrees for the following reasons: The Policy criteria would benefit from setting out type of survey standard is required criteria worded to "2. Major development schemes shall submit an Arboriculture Survey that is BS5837 compliant Proposed change
2026Reg18/127	1. Supports this policy but seeks the inclusion of the following text; "Planning permission will only be granted for development involving the use of land for the keeping or grazing of horses and ponies in connection with riding or other non-agricultural purposes, if they are of high quality design and of a scale and intensity that is acceptable in landscape character biodiversity, amenity and highway terms, in accordance with Policy B1, B2 and B3." 2. It is Natural England's preference to rely on strong overarching policies within the plan.	1. The Council will consider the inclusion of referencing Policy B1, B2 and B3 within the Keeping and Grazing of Horses B9 policy. (Planning permission will only be granted for development involving the use of land for the keeping or grazing of horses and ponies in connection with riding or other non-agricultural purposes, if they are of high quality design and of a scale and intensity that is acceptable in landscape character biodiversity, amenity and highway terms, in accordance with Policy B1, B2 and B3.) 2. Noted. Change Proposed.

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2026Reg18/53	10	Question 091 Do you support or object to Policy B9? What would you add, remove or amend to support it further or to remove your objection?				Southern Water Services Ltd				Neither	Southern Water is the statutory wastewater undertaker for the Swale district. We request additional wording for policy B9 to help protect the quality of the water environment. Requested changes: The scale of the facility should be no more than is reasonably required for the proper functioning of the enterprise or the use of the land to which it is associated compatible with the surrounding landscape character, features, biodiversity and type/location of any sensitive groundwater zones (source protection zones in particular). Further explanation and evidence Source Protection Zones (SPZ) are created by the Environment Agency for licensed groundwater abstractions and warrant additional protection as they provide public drinking water supply. It is important to keep drinking water standards in mind when protecting SPZ. These are more stringent than the environmental standards more often referred to in guidance for the protection of groundwater. The principal rule of groundwater protection is preventing or avoiding potentially contaminating activities from occurring in the first place within groundwater catchments used for drinking water. Although groundwater is treated before feeding into supply, planned treatment processes cannot react to every change in water quality. Were an SPZ to become contaminated, this could result in loss of public water supply. It is therefore critical to protect water quality in source protection zonesto the impacts of all types of development. As stated in Environment Agency guidance here - https://www.gov.uk/government/publications/drinking-water-protected-areas-challenges-for-the-water-environment There is a long way to go in terms of land use planning in order to have sustainable and unpolluted water supplies. In the event of current mechanisms and measures not improving the water quality, the Secretary of State for the Environment can designate a water protection zone if shown to be appropriate.

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Submission Number	Comment Summary	Draft Comment Response
2026Reg18/53	1. Seeks addition to this policy to include; "The scale of the facility should be no more than is reasonably required for the proper functioning of the enterprise or the use of the land to which it is associated compatible with the surrounding landscape character, features, biodiversity and type/location of any sensitive groundwater zones (source protection zones in particular)."	1. The Council will investigate the inclusion of part of the suggested text to include any sensitive groundwater zones. (..... that is acceptable in landscape character, biodiversity, type/locations of any sensitive groundwater zones (source protection zones in particular), amenity and highway terms. Partial Change Proposed.

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2026Reg18/22	18	Question 092 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?	Finn's	Mollie	Lay	Finn's			'Listed buildings make up less than 1% of the borough's stock of buildings, and as such, it is expected that the focus on combating climate change will first and foremost be on that vast majority of buildings that can be adapted to help combat climate change, with little or no harm to their intrinsic character and associated appearance.' This assumes that those who wish to improve the efficiency of Listed Buildings would not be allowed. This may not be the case and would be subject of a listed building application on a case by case basis.		

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2026Reg18/22	'Listed buildings make up less than 1% of the borough's stock of buildings, and as such, it is expected that the focus on combating climate change will first and foremost be on that vast majority of buildings that can be adapted to help combat climate change, with little or no harm to their intrinsic character and associated appearance.'assumes that those who wish to improve the efficiency of Listed Buildings would not be allowed. This may not be the case and would be subject of a listed building application on a case by case basis.	The Council partially agrees and considers that the drafting could be refined to make the emphasis clearer, more relevant, and better aligned with the intended objectives. Climate change 47.0.8 Proposals that aim to mitigate and adapt to the effects of climate change should in the first instance explore all opportunities of enhancing energy efficiency and forms of providing renewable energy and improved adaptation to climate change without harming the significance of heritage assets. 47.0.9 Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of heritage assets, in accordance with the National Planning Policy Framework 367 (NPPF) and the development management policies and principles of this Local Plan. The more significant the heritage asset, the greater the degree of public benefit that will need to be demonstrably achievable to justify even a low level of harm to the heritage asset. Heritage assets are finite resources and with their embedded energy and in many cases, adaptability to re-use over a long period of time, they are in many cases already inherently sustainable. As such, there will be instances where proposed alteration in a particular way to help combat climate change will be firmly resisted to ensure that the significance of the heritage asset isn't compromised to an unacceptable degree. Listed buildings make up less than 1% of the borough's stock of buildings, and as such, it is expected that the focus on combating climate change will first and foremost be on that vast majority of buildings that can be adapted to help combat climate change, with little or no harm to their intrinsic character and associated appearance. Climate change 47.0.8 The borough's historic buildings are inherently sustainable. They are durable, adaptable, and constructed using materials that can be repaired and maintained, allowing their lifespan to be extended indefinitely. They also embody a significant amount of carbon from their original construction. However, as these buildings evolve, they must remain suitable for the people who live in, use, and care for them, while also contributing to a greener, more sustainable future. The Council therefore supports thoughtful and sensitive measures that both preserve heritage significance and address climate change by reducing energy demand, strengthening resilience, and mitigating climate impacts. There are many ways to improve the energy efficiency and climate resilience of historic or traditional buildings. However, the need and opportunity to do so will vary depending on the building's context. A whole-building approach is therefore recommended when considering adaptations. This approach assesses the building in its entirety to identify effective solutions that reduce energy use and

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2026Reg18/73	39	Question 092 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurc h Parish Council	Sarah	Poole	The Parish Council agrees with the preamble and supports the strong emphasis on protecting and enhancing listed buildings as irreplaceable heritage assets. General Comments The preamble clearly sets out: The statutory protection afforded to listed buildings; The importance of heritage statements and proper justification; The need for high-quality design and craftsmanship; The careful balancing of climate change objectives with heritage conservation. This is appropriate and consistent with national policy and legislation. Suggestions to Strengthen and Clarify 1. Greater Local Context The preamble could be strengthened by briefly acknowledging: The importance of Swale's historic rural villages, farmsteads and maritime heritage; The contribution listed buildings make to local identity, tourism and sense of place; The role of historic buildings in maintaining village character and tranquillity. Making the policy more locally relatable would reinforce its relevance to communities. 2. Setting and Incremental Harm It would be helpful to emphasise:		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Agrees with the preamble. Seeks amendment to preamble by acknowledging the importance of the Swale's rural villages, farmsteads and maritime heritage, the contribution listed buildings make to local identity, tourism and sense of place and the role of historic buildings in maintaining village character and tranquillity. Seeks amendment so the preamble emphasises the cumulative impact of small-scale changes to curtilage, boundaries, parking and hardstanding, the importance of traditional materials and boundary treatments and the need to protect historic gardens, orchards and associated landscape features. Seeks amendment to preamble to encourage early engagement with conservation officers when considering energy efficiency measures, promote sensitive retrofit approaches and Recognise the sustainability value of repair and reuse over demolition and replacement.	Comment noted. Comment noted although it is not necessary to amend the preamble as it refers to Listed buildings are irreplaceable heritage assets and the policy references specific contributors to significance including materials and setting. The Council partially agrees and considers that the drafting could be refined to make the sustainability emphasis clearer, more relevant, and better aligned with the intended objectives. See 47.0.3 and 47.0.8. 1. No Change Proposed. 2. No Change Proposed. 3. Partial Change Proposed; 47.0.3 - There is a presumption in favour of preserving listed buildings, and consent will only be given in very exceptional circumstances for their demolition. Poor condition is no justification for demolition, and where a building is redundant, every effort must be made to find a viable new use, which should be consistent with the character, appearance, and fabric of the building. The Council will use its statutory powers to ensure that listed buildings at risk from neglect or decay are appropriately maintained and repaired. 47.0.8 The borough's historic buildings are inherently sustainable. They are durable, adaptable, and constructed using materials that can be repaired and maintained, allowing their lifespan to be extended indefinitely. They also embody a significant amount of carbon from their original construction. However, as these buildings evolve, they must remain suitable for the people who live in, use, and care for them, while also contributing to a greener, more sustainable future. The Council therefore supports thoughtful and sensitive measures that both preserve heritage significance and address climate change by reducing energy demand, strengthening resilience, and mitigating climate impacts. There are many ways to improve the energy efficiency and climate resilience of historic or traditional buildings. However, the need and opportunity to do so will vary depending on the building's context. A whole-building approach is therefore recommended when considering adaptations. This approach assesses the building in its entirety to identify effective solutions that reduce energy use and carbon emissions, sustain heritage significance, and provide a safe and comfortable indoor environment. Further guidance is provided in Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency. Where proposed works would affect the significance of a heritage asset, a Heritage Statement should be submitted to explain the impact. The benefits of climate sensitive measures will be carefully weighed against any harm to heritage significance, in

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2026Reg18/74	43	Question 092 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	Para 47.0.3This commitment to the use of statutory powers is too weak. The Faversham Society realises that the financial unknowns and risks to any Local Authority make them reluctant to exercise their statutory powers but there are too many listed buildings, frequently on long leases, which are not being appropriately maintained. We would request Swale to create and regularly publish their own list of listed buildings at risk in order to reduce neglect and encourage appropriate maintenance and repair. Para. 47.0.05This paragraph discusses potential harm posed by a proposal to the significance of a listed building and refers to the need for convincing justification. The Faversham Society is concerned by the poor quality of some of the listed building consent applications it has reviewed in the past. It is not sufficient in report assessments simply to quote the Statutory Listing description and the Society asks that the text of the penultimate sentence in paragraph 47.0.05 be amended to read “.....its significance will not be permitted unless there is a clear and convincing justification submitted in writing as part of the initial statutory application.” Para. 47.0.05 & 47.0.07Proposals for alteration, change of use or demolition of listed buildings frequently follow periods of neglect of those buildings: sometimes that neglect is deliberate. While the Faversham Society realises that ‘condition’ is not, in Planning terms, a legitimate justification for alteration, change of use or demolition, in reality it is extremely difficult for Planning officers not to take account of poor condition. We would ask Swale to add a sentence in one of these paragraphs to the effect that where an application is made for the alteration, change of use or demolition of a listed building that is in poor condition, the accompanying heritage statement should include an explanation of the reason for that poor condition.		
2026Reg18/82	27	Question 092 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?					SARAH	MOAKES	It should be noted that the draftNPPF proposes significant changes that would offer increased protection for nondesignated heritage assets. The policy shifts from a general ‘balanced judgement’ to a requirement that any harm tothese locally listed buildings must be actively outweighed by the benefits of a proposal. A heritage impactassessment will also be required.Both these heritage policies are very poorly worded. Sections 66 and 72 of the Planning (ListedBuildings and Conservation Areas) Act 1990 amount to a statutory presumption against developmentthat would harm the significance of a listed building or a conservation area a sense which is completely lost here. Answer duplicated at question 93		

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We are aware

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2026Reg18/74	Regarding paragraph 47.0.3 the current commitment to using statutory powers is insufficient. The financial risks make local authorities hesitant, but stresses that many listed buildings often on long leases are still poorly maintained. Seeks that Swale Council create and regularly publish a building at risk list to discourage neglect and promote proper upkeep. Regarding paragraph 47.0.5 there are concerns about proposals that may harm listed buildings and the need for strong justification. Criticizes the poor quality of some past consent applications and says simply citing the statutory listing is inadequate. Seeks amendment to the wording so it reads "its significance will not be permitted unless there is a clear and convincing justification submitted in writing as part of the initial statutory application." Regarding paragraph 47.0.05 & 47.0.07, proposals to alter, change the use of, or demolish listed buildings often come after periods of neglect, which may sometimes be intentional. While acknowledging that a building's condition is not officially a valid planning justification, it notes that poor condition inevitably influences decisions. The Faversham Society recommends adding a requirement that, when such applications involve buildings in poor condition, the heritage statement must explain why the building has deteriorated.	Comment noted. Historic England manages a Heritage at Risk register that is updated annually providing a dynamic picture of the sites most at risk and most in need of safeguarding for the future. The Council disagrees as the test here aligns with the NPPF. Partially agreed and a change to paragraph 47.0.3 is proposed. 1. No Change Proposed. 2. No Change Proposed. 3. Partial Change Proposed; 47.0.3 - There is a presumption in favour of preserving listed buildings, and consent will only be given in very exceptional circumstances for their demolition. Poor condition is no justification for demolition, and where a building is redundant, every effort must be made to find a viable new use, which should be consistent with the character, appearance, and fabric of the building. The Council will use its statutory powers to ensure that listed buildings at risk from neglect or decay are appropriately maintained and repaired.
2026Reg18/82	Notes that the draft NPPF proposes changes that would offer increase protection for non-designated heritage assets. Shifts from a balanced judgment to a any harm tothese locally listed buildings must be actively outweighed by the benefits of a proposal. A heritage impact assessment will also be required. Both these heritage policies are very poorly worded. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 amount to a statutory presumption against development that would harm the significance of a listed building or a conservation area a sense which is completely lost here.	Noted, the NPPF is currently in draft form and remains subject to change. The supporting text and policy wording will be reviewed and updated, where necessary, to reflect any changes in a future iteration of the Local Plan. Also, non-designated assets are considered under separate LP policy. Noted, the Planning (Listed Buildings and Conservation Areas) Act 1990 (the "Act") imposes a mandatory statutory duty to "have special regard to the desirability of preserving" heritage assets. The NPPF provides the policy tests. Agreed and change proposed that the presumption in favour of preserving listed buildings should be included; 47.0.3 - There is a presumption in favour of preserving listed buildings, and consent will only be given in very exceptional circumstances for their demolition. Poor condition is no justification for demolition, and where a building is redundant, every effort must be made to find a viable new use, which should be consistent with the character, appearance, and fabric of the building. The Council will use its statutory powers to ensure that listed buildings at risk from neglect or decay are appropriately maintained and repaired. 1. No Change Proposed. 2. Partial Change Proposed.

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2026Reg18/120	24	Question 093 Do you support or object to Policy HE1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	L	Sinden (DHA)	Persimmo n Homes				Neither	4.21.1 It is not clear why SBC consider it necessary to include the level of detail provided as part of Policy HE1 given the prescriptive and clear requirements of the NPPF. In this regard, it is not for the Policy to set out additional burden on development over and beyond that of national guidance and other relevant statutory provisions. 4.21.2 Criterion (3) sets out that “great weight” should be given the conservation of Listed Buildings, however, the consultation NPPF (Policy HE6) sets out that ‘substantial weight’ should be given to the conservation of the asset. In the interests of effectiveness and ease of reference, SBC should review the wording to ensure consistency with the NPPF, which will allow for a more concise and clear policy framework.
2026Reg18/124	29	Question 093 Do you support or object to Policy HE1? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent					See attached document 5.27.1In response to Questions 92 and 93 of the Consultation document Fernham Homes would comment that it is not clear why SBC consider it necessary to include the level of detail provided as part of Policy HE1 given the prescriptive and clear requirements of the NPPF. In this regard, it is not for the Policy to set out an additional burden on development over and beyond that of national guidance and other relevant statutory provisions. 5.27.2Criterion (3) sets out that “great weight” should be given to the conservation of Listed Buildings: however, the consultation NPPF (Policy HE6) sets out that ‘substantial weight’ should be given to the conservation of the asset. It is therefore imperative that the Policy is revised to ensures consistency with the consultation NPPF. 5.27.3In the interests of effectiveness and ease of reference, SBC should review the wording to ensure consistency with the NPPF, which will allow for a more concise and clear policy framework. In this regard, it is not appropriate nor justified for the Policy to seek to add any further layers of restrictions that are not consistent with national policy. 5.27.4With this in mind, it is clear that elements of the Policy could readily be contained within the pre-amble to the Policy. 5.27.5Criterion (5) sets out that where substantial harm or total loss of a Listed Building is permitted “building recording will be secured”. In this regard, we would highlight that this can be readily secured via Planning Condition. In the interests of brevity and providing a clear Policy we would recommend that this requirement be relocated within the Policy pre-amble.
2026Reg18/126	30	Question 093 Do you support or object to Policy HE1? What would you add, remove or amend to support it further or to remove your objection?				KCC Strategic Planning		KCC Strategic Planning		Support	Policy HE1 – Development Involving Listed Buildings Energy and AdaptationThe County Council supports this policy and would recommend adding in wording regarding climate adaptation – adapting heritage assets to the impacts of climate change is important to prevent their deterioration and loss. Historic England has provided guidance and further information here.

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We are aware

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2026Reg18/120	Considers there to be too much detail provided as the NPPF has prescriptive and clear requirements. Therefore, the policy should not set out additional burdens on development beyond national policy and statutory provisions. Criterion 3 says that "great weight" should be given to the conservation of Listed Buildings: however, the consultation NPPF sets out that 'substantial weight' should be given to the conservation of the asset. Seeks amendment so policy ensures consistency with NPPF consultation.	The Council does not view the policy as imposing additional burdens; nevertheless, the wording can be clarified to better align with the NPPF. Partial change proposed. Comment noted. The NPPF is currently in draft form and remains subject to change. The supporting text and policy wording will be reviewed and updated, where necessary, to reflect any changes in a future iteration of the Local Plan. No change proposed.
2026Reg18/124	Considers there to be too much detail provided as the NPPF has prescriptive and clear requirements. Therefore, the policy should not set out additional burdens on development beyond national policy and statutory provisions. Criterion 3 says that "great weight" should be given to the conservation of Listed Buildings: however, the consultation NPPF sets out that 'substantial weight' should be given to the conservation of the asset. Seeks amendment so policy ensures consistency with NPPF consultation. Seeks amendment so that the policy wording is consistent with the NPPF because it is not justified to add more layers of restriction that are not consistent with the national policy. Criterion 5 sets out that were substantial harm or total loss of a listed building is permitted "building recording will be secured". This can be secured via planning condition. Seeks amendment to move this part of the policy to the preamble.	The Council does not view the policy as imposing additional burdens. No change proposed. The Council agrees that wording can be clarified to better align with the NPPF. Partial change proposed. The Council agrees that wording can be clarified to better align with the NPPF. Partial change proposed. The Council agrees that wording can be clarified to better align with the NPPF. Partial change proposed.
2026Reg18/126	Supports policy Seeks amendment to add wording regarding climate adaptation - adapting heritage assets to the impacts of climate change is important to prevent their deterioration and loss. Historic England has provided guidance and further information here.	Comments noted. No change proposed. Comment noted. The policy preamble will be updated to include energy efficiency and climate resilience to support climate change mitigation; this does not need to form part of the policy itself. Partial change proposed.

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2026Reg18/16	34	Question 094 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Boughton under Blean Parish Council	Sarah	Muteham	§ 48.0.6 'Non-listed buildings (heritage assets)' looks like it should be a heading but why add 'heritage assets' in brackets? This is confusing as the text does not appear to be referring to non-designated heritage assets.		
2026Reg18/73	60	Question 094 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurch Parish Council	Sarah	Poole	The Parish Council agrees with the preamble and considers it to be broadly comprehensive and consistent with: The Planning (Listed Buildings and Conservation Areas) Act 1990; The National Planning Policy Framework (December 2024); and National heritage guidance. General Comments The preamble clearly: Explains the purpose of Conservation Area designation; Recognises the cumulative impact of small-scale changes; Emphasises high design standards; Highlights the importance of character appraisals and management plans. This approach is supported. Suggested Improvements To make the preamble more focused and relatable, the following additions could be considered: 1. Stronger Emphasis on Local Identity The preamble could more clearly reference: The importance of Conservation Areas in maintaining village identity and historic character;		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/16	Queries why 'Non-listed buildings (heritage assets)'is mentioned in paragraph 48.0.6 as the text is not referring to non-designated heritage assets.	Comment noted. The Council agrees to delete this typo. Change proposed.
2026Reg18/73	Supports and agrees with the preamble Seeks amendment to have a stronger emphasis on local identity with reference to the importance of conservation areas in maintaining village identity and historic character and their role in supporting tourism and local pride and the contribution of historic cores to community cohesion. Seeks amendment to the preamble to strengthen the reference to cumulative harm and incremental change by giving clearer examples such as Loss of traditional windows and doors, Hard surfacing of front gardens Unsympathetic signage and lighting and Excessive traffic or parking pressure. Seeks amendment to the preamble to strengthen the setting and wider landscape regarding conservation areas by referencing The importance of countryside setting, Key views into and out of the area and The relationship between historic buildings and surrounding farmland or open space. Seeks amendment to the preamble to strengthen reference to the public realm and highways by Encouraging early engagement with Kent County Council Highways, Promoting sympathetic materials and reduced visual clutter and Supporting traditional street furniture where appropriate.	Comment noted. No change proposed. Agree that paragraph 48.0.1 can include greater linkages to local identify. Change proposed. Partially agree that setting can be emphasised further hence reference to setting in paragraph 48.0.1. Partial change agree. Comment noted. Reference to setting has been strengthened within the preamble and not all conservation areas have a countryside setting. No change proposed. Comment noted. The preamble refers to highway works, and these have also been strengthen in paragraph 48.0.9. No change proposed.

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2026Reg18/74	45	Question 094 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Faversham Society	Planning	Faversham Society	Para. 48.0.3 Although this paragraph specifically concerns neglect or decay of buildings in conservation areas, our comments above, under paragraphs 47.0.05 and 47.0.07. apply equally here. Para. 48.0.5We welcome and would wish to encourage the Council's use of Article 4 Directions. In recent decades there have been too many examples of the use in conservation areas of inappropriate materials such as uPVC doors and windows in place of timber or plastic rainwater goods in place of cast iron: these have frequently occurred in Article 4 areas. We would wish to see this paragraph strengthened by the addition of a clear commitment by Swale to the monitoring and enforcement of regulations in areas that are subject to Article 4 Directions. Para. 48.0.6The final sentence in this paragraph needs clarifying or deleting.Para. 48.0.9We would ask that the words “street furniture and surface textures” are added to the list of features in the first sentence.		
2026Reg18/120	25	Question 095 Do you support or object to Policy HE2? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	L	Sinden (DHA)	Persimmon Homes				Neither	4.22.1 As above, it is not clear why SBC consider it necessary to include the level of detail provided as part of Policy HE2 given the prescriptive and clear requirements of the NPPF. Indeed, the Policy should not seek to set out additional burdens on the delivery of development over and beyond that of national guidance and statutory provisions. 4.22.2 In the interests of brevity and providing a clear policy it is clear that elements of the Policy (i.e., Criterion (2) requirements) could be relocated within the Policy pre-amble.
2026Reg18/124	30	Question 095 Do you support or object to Policy HE2? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent					See attached documents 5.28.1In response to Questions 94 and 95 of the Consultation document Fernham Homes would comment that it is not clear why SBC consider it necessary to include the level of detail provided as part of Policy HE2 given the prescriptive and clear requirements of the NPPF. Indeed, the Policy should not seek to set out additional burdens on the delivery of development over and beyond that of national guidance and statutory provisions. 5.28.2With this in mind, it is imperative that the Policy is revised to ensure consistency with the consultation NPPF, with particular regard to Policy HE9. It is not appropriate nor justified for SBC to seek to add further layers of restrictions or requirements that are not consistent with national policy. Indeed, SBC should remain cognisant of the response to Policy HE1, insofar as the consultation NPPF's revised weighting to be given to conservation of assets. 5.28.3In the interests of brevity and providing a clear policy it is clear that elements of the Policy (i.e., Criterion (2) requirements) could be relocated within the Policy pre-amble.

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/74	this paragraph specifically concerns neglect or decay of buildings in conservation areas, our comments above, under paragraphs 47.0.05 and 47.0.07. apply equally proposals to alter, change the use of, or demolish listed buildings often come after periods of neglect, which may sometimes be intentional. While acknowledging that a building's condition is not officially a valid planning justification, it notes that poor condition inevitably influences decisions. The Faversham Society recommends adding a requirement that, when such applications involve buildings in poor condition, the heritage statement must explain why the building has deteriorated. Regarding paragraph 48.0.5, welcomes and encourages the Council's use of article 4 directions, but they have not been effectively enforced in conservation areas as inappropriate materials are still used. Wants commitment from SBC to monitor and enforce these regulations in these article 4 direction areas. Seeks amendment to the final sentence in paragraph 48.0.6 either with clarification or deletion. Seeks amendment to paragraph 48.0.9 to add "street furniture and surface textures"to the list of features in the first sentence.	Comment noted. No change proposed. Agreed that paragraph 48.0.6 requires amendment for clarity and to address typo by deletion. Change proposed. Agreed that paragraph 48.0.6 requires amendment for clarity. Change proposed. Agree that paragraph 48.0.9 can include greater scope. Change proposed.
2026Reg18/120	Unclear why SBC has given the level of detail due to the prescriptive and clear requirements of the NPPF. The policy should not seek to set out additional burdens on the delivery of development beyond national guidance. Seeks amendment to move some elements i.e criterion 2 could be moved to the preamble.	Comment noted. The Council does not consider that the policy imposes additional burdens beyond national policy. However, the wording can be reviewed to improve clarity, reduce any perception of over-prescription, and ensure it aligns with the principles of the National Planning Policy Framework regarding clear and effective decision-making policies. Partial change proposed. The Council disagrees. Criterion 2 is not descriptive it is a set of requirements that identifies what proposals will be assessed against and which directly informs whether development is acceptable. This element is consistent with the approach of the NPPF, which requires clear and effective policies that support decision-making. No change proposed.
2026Reg18/124	Unclear why SBC has given the level of detail due to the prescriptive and clear requirements of the NPPF. The policy should not seek to set out additional burdens on the delivery of development beyond national guidance. Seeks amendment so the policy is consistent with the consultation NPPF, particularly HE9. Seeks amendment to move some elements i.e criterion 2 could be moved to the preamble.	Comment noted. The Council does not consider that the policy imposes additional burdens beyond national policy. However, the wording has been reviewed to improve clarity, reduce any perception of over-prescription, and ensure it aligns with the principles of the National Planning Policy Framework regarding clear and effective decision-making policies. Partial change proposed. Comment noted. The NPPF is currently in draft form and remains subject to change. The supporting text and policy wording will be reviewed and updated, where necessary, to reflect any changes in a future iteration of the Local Plan. No change proposed. The Council disagrees. Criterion 2 is not descriptive it is a set of requirements that identifies what proposals will be assessed against and which directly informs whether development is acceptable. This element is consistent with the approach of the NPPF, which requires clear and effective policies that support decision-making. No change proposed.

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2026Reg18/73	88	Question 096 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Eastchurc h Parish Council	Sarah	Poole	The Parish Council agrees with the preamble and supports the recognition and protection of historic parks and gardens within the borough. Suggestions to Improve Focus and Relatability 1. Clearer Link to Local Identity and Public Benefit The preamble could be strengthened by briefly explaining how historic parks and gardens: Contribute to Swale's sense of place and historic identity; Provide public enjoyment, education and tourism value; Support biodiversity and landscape character; Contribute to wellbeing and access to green space. Making these links more explicit would help residents understand why their protection is important. 2. Stronger Reference to Setting While the importance of registered sites is clear, the preamble could more clearly emphasise: The importance of protecting their wider landscape setting; The impact of development on key views into and out of these parks; The need to avoid incremental erosion of their designed character. 3. Recognition of Locally Important Parks and Open Spaces The reference to undesignated parks and gardens is welcomed. This could be enhanced by:		
2026Reg18/76	95	Question 098 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?				Five Parishes Oppositio n Group			(Representation received after the 5pm deadline, 23rd Feb 2026. Also note attached document). Paragraphs 50.0.1 to 50.0.7 provide a clear description of and policy approach to Non-designated Heritage Assets. However, FPG would recommend that the preamble explicitly acknowledge the significant variation in heritage value within this category. Non-designated heritage assets range from those of modest local interest to those of considerable significance—potentially comparable to Grade II Listed Buildings—which may not have been captured during formal designation processes. Without such clarification, there is a risk that applicants and decision-makers may underestimate the planning weight that should be attached to higher-value non-designated assets.FPG recommend adding a statement to this effect, making it clear that non-designated status does not equate to minor significance.		

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We are aware

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2026Reg18/73	Supports the preamble. Seeks amendment to preamble by explaining how historic parks and gardens contribute to Swale's sense of place and historic identity, provide public enjoyment, education and tourism value, support biodiversity and landscape character and contribute to wellbeing and access to green space. Seek amendment to preamble to emphasise the importance of protecting their wider landscape setting, the impact of development on key views into and out of these parks and the need to avoid incremental erosion of their designed character. Seeks amendment to the preamble by emphasising that smaller or locally valued historic landscapes also contribute significantly to community character and linking to Swale's Heritage Strategy and Conservation Area Appraisals where relevant.	Comment noted. No change proposed. Comment noted. The Council recognises these wider benefits; however, the preamble is intended to describe the designation rather than list associated social and environmental benefits. However, minor edits are required to correct wording, improve clarity and consistency with policy terminology and the NPPF. Partial change proposed. The issues raised are already addressed in Policy HE3, particularly in relation to setting and key views, so no further amendment to the preamble is necessary. No change proposed. The preamble already refers to locally important historic landscapes and directs these to Policy HE4, so no further change is required. No change proposed.
2026Reg18/76	Paragraphs 50.0.1 to 50.0.7 provides a clear description of the approach to non-designated heritage assets. Seeks amendment so that the preamble to acknowledge the significant variation in heritage value. Non designated can be compared to grade II listed buildings in some cases, with no clarification, there is a risk that they may be underestimated in planning weight.	Comment noted. Comment noted. This amendment is not necessary as the supporting text already explains that non-designated heritage assets vary in type and significance, and this is further addressed through the policy's case-by-case assessment approach. No change proposed. The Council disagrees as it is not appropriate to equate non-designated heritage assets with listed buildings, which are subject to a separate statutory and policy regime. The policy already allows for appropriate weight to be given to significance in individual cases, consistent with the NPPF. However, for clarity and to correct grammatical errors two paragraphs require slight revision. Partial change proposed.

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2026Reg18/124	31	Question 099 Do you support or object to Policy HE4? What would you add, remove or amend to support it further or to remove your objection?	DHA Planning	G	Filmer	Fernham Homes c/o Agent				Support	See attached documents 5.29.1Fernham Homes broadly support the inclusion of Policy HE4 which reflects that of national policy guidance and the consultation NPPF, we would however comment on the Policy wording in response to Questions 98 and 99 of the Consultation document. 5.29.2Criterion (1) highlights the use of SBC’s Local Heritage List and its use for seeking to retain and conserve Non-Designated Heritage Assets (NDHAs), this inclusion is supported by Policy HE1 of the consultation NPPF which highlights the importance of Development Plans being supported by local lists to identify NDHAs. However, to ensure a justified Policy, it is imperative that the Plan is supported by an up-to-date list of NDHAs, the current SBC Heritage Strategy for Swale is dated March 2020. 5.29.3The Policy sets out a requirement that “Prior to any approved demolition, alteration, extension or restoration of non-designated heritage assets, the Council may require appropriate building or archaeological recording, relevant to the asset’s significance and the scope of works”. In the interests of brevity and providing a clear Policy, this element should be reviewed and moved within the Policy pre-amble as this can be secured sufficiently as part of a Planning Condition as required.
2026Reg18/19	2	Question 103 Do you have any further comments to make on any aspect of the consultation that you haven’t yet made?				Lower Medway Int. Drainage Board			Overall, we consider the Plan to be very strong, particularly in its treatment of flood risk, drainage, and strategic coastal defence. The approach to the Medway Estuary and Swale (MEAS) strategy is especially well articulated and clearly justified against national policy, including the tests for planning obligations set out in the National Planning Policy Framework. The clarity around benefit areas, proportionality, and the relationship between development and strategic flood risk infrastructure is welcome and provides a robust policy basis for future decision-making. We have only three minor points to note. First, references to the Internal Drainage Boards should be updated to reflect that, from 1 April, the Boards will operate under the name North Kent Marshes Water Level Management Board, following the forthcoming amalgamation. We would be grateful if this updated name could be reflected in the final version of the Plan where relevant. Second, we note and welcome the policy references to drainage and flood risk management (including the sections attached). We would be very happy to continue to support the Council in the interpretation and application of these policies as the Plan progresses, specifically in relation to the planned Planning Guidance to assist in the interpretation and application of climate and water related policies. Third, the Board is content that Policy C9 appropriately addresses sustainable drainage in planning terms. If helpful, the Council may wish to consider a brief signpost in the supporting text to the need for separate IDB consenting where development affects ordinary watercourses, to aid clarity for applicants. Development proposals that introduce water to, or affect flows or volumes within, ordinary watercourses may also require separate consent from the relevant Internal Drainage Board, in addition to any planning permission. Applicants are encouraged to engage with the Board at an early stage. Thank you again for producing such a well-considered Local Plan. We look forward to continuing to work constructively with the Council as it moves towards		

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We are aware

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2026Reg18/124	Supports the policy criterion 1's SBC's Local Heritage List and the conservation of non-designated heritage assets is supported by Policy HE1 and the drat NPPF, but the plan should be supported by an up-to-date list. SBC's is dated March 2020. Seeks amendment by moving the sentence "Prior to any approved demolition, alteration, extension or restoration of non-designated heritage assets, the Council may require appropriate building or archaeological recording, relevant to the asset's significance and the scope of works" to preamble.	Comment noted. The Council's Local Heritage List was adopted in 2024, updated in 2026, and is available here: https://swale.gov.uk/planning-and-regeneration/heritage-and-landscape/local-heritage-list The Council disagrees, as supporting text does not carry decision-making weight. Its inclusion within the policy provides a clear hook for securing recording by condition and is necessary to ensure the policy is effective. However, the policy should be updated to improve clarity, consistency with the NPPF, and its effectiveness in decision-making. Partial change proposed.
2026Reg18/19	Overall, consider the Plan to be very strong, particularly in its treatment of flood risk, drainage, and strategic coastal defence. The approach to the Medway Estuary and Swale (MEAS) strategy is especially well articulated and clearly justified against national policy, including the tests for planning obligations set out in the National Planning Policy Framework. The clarity around benefit areas, proportionality, and the relationship between development and strategic flood risk infrastructure is welcome and provides a robust policy basis for future decision-making. References to the Internal Drainage Boards should be updated to reflect that, from 1 April, the Boards will operate under the nameNorth Kent Marshes Water Level Management Board. Note and welcome the policy references to drainage and flood risk management. Would be happy to continue to support the Council in the interpretation and application of these policies as the Plan progresses. Is content that Policy C9 appropriately addresses sustainable drainage in planning terms. It may be helpful to add a brief signpost in the supporting text to the need for separate IDB consenting where development affects ordinary watercourses, to aid clarity for applicants. Suggests text: Development proposals that introduce water to, or affect flows or volumes within, ordinary watercourses may also require separate consent from the relevant Internal Drainage Board, in addition to any planning permission. Applicants are encouraged to engage with the Board at an early stage. Thanks the Council for producing such a well-considered Local Plan.	Noted. All references to the Internal Drainage Boards will be updated to theNorth Kent Marshes Water Level Management Board. Change Proposed. Noted. The Council agrees to this suggested addition to the pre-amble. Change Proposed. Noted.

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2026Reg18/64	8	Question 104 Have we missed any terms from the glossary or anything from the list of acronyms?	Laister Planning Ltd	David	Hancock	Country and Coastal Parks 3 Ltd			Introduction 1.1. The question requests feedback on any terms from the glossary that would be useful to include. Response 1.2. Within the Glossary section the following definitions of 'brownfield land' and a 'caravan' are stated as: "Brownfield Land: land that has been previously developed but is not currently in use, and may be potentially contaminated due to its former industrial or commercial use." "Caravan: Mobile living vehicle used by Gypsies and Travellers; sometimes referred to as trailers. Also used for holiday accommodation." Definition of Brownfield Land 1.3. For the definition of brownfield land we recommend the council aligns with the NPPF definition which is the same as previously developed land "Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape." Definition of Caravan 1.4. The House of Lords decision in 'Wyre Forest 1990' (Wyre Forest District Council and CoS and Others 1990 19 A.C. 257) dealt with a permission		

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We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/64	Seeks amendment to the glossary to the term brownfield land. Seeks amendment to the glossary to the term caravan.	The Council agrees to change the definition of brownfield land because this definition should be inline with the NPPF.Changes proposed. The Council agrees to change the definition of brownfield land because this definition should be inline Caravan Sites and Control of Development Act 1960. Change proposed.

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2026Reg18/71	3	Question 104 Have we missed any terms from the glossary or anything from the list of acronyms?		Rhian	Casey	Kent Holdco LTD			Introduction Question 104 on page 191 requests feedback on any terms from the glossary that would be useful to include. Response Within the Glossary section the following definitions of 'brownfield land' and a 'caravan' state: "Brownfield Land: land that has been previously developed but is not currently in use, and may be potentially contaminated due to its former industrial or commercial use." "Caravan: Mobile living vehicle used by Gypsies and Travellers; sometimes referred to as trailers. Also used for holiday accommodation." Definition of Brownfield Land There is no requirement for brownfield land or previously development land to not be in use and therefore vacant to be defined as such. For the definition of brownfield land, we recommend the Council aligns with the NPPF Annex 2 Glossary definition for previously developed land. "Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape." Definition of Caravan		

Appen

We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/71	Seeks amendment to the glossary to the term brownfield land. Seeks amendment to the glossary to the term caravan.	The Council agrees to change the definition of brownfield land because this definition should be inline with the NPPF. Changes proposed. The Council disagrees with changing the definition of caravan to the one suggested because that is defining twin unit caravans. The Council believes that the Caravan Sites and Control of Development Act 1960 has a more appropriate definition. Partial change proposed.

Appendix I: Schedule of representations, summaries and proposed changes to the regulation 18 Local Plan consultation

We are aware that in some of the cells of the original rep the text disappears/is not always clear. However, for the full original rep, please see it online at Objective. Instructions on how to do so re in Appendix II.

Submission Number	Com ment Num ber	Consultation Point Name	Agent/org anisation	Agent - first name	Agent - Surname	Submissio n - Consultee Organisati on	Consultee - First Name	Consultee - Surname	Original Response	Vote	Vote - Comment
2026Reg18/73	69	Question 104 Have we missed any terms from the glossary or anything from the list of acronyms?				Eastchurc h Parish Council	Sarah	Poole	The Parish Council considers the glossary and acronym list to be comprehensive and helpful. However, the following additions and clarifications may improve clarity and completeness: 1. Terms That May Be Worth Adding to the Glossary 1. Coastal Change Management Area (CCMA)This term appears in policy but is not clearly defined in the glossary. A short definition explaining that it identifies areas at risk of coastal erosion where development is restricted would be helpful. 2. TranquillityThe term is used throughout landscape policies but is not defined. A definition could reference the NPPF description of areas relatively undisturbed by noise and visual intrusion and valued for amenity and wellbeing. 3. Setting (of a heritage asset or landscape designation)Frequently referenced but not clearly defined in the glossary. A definition aligned with the NPPF would be useful. 4. Irreplaceable HabitatUsed in biodiversity and woodland policies. Although referenced in national guidance, it would assist clarity to define it locally (e.g. ancient woodland, veteran trees, etc.). 5. Best and Most Versatile (BMV) Agricultural LandWhile referred to in policy, a short glossary definition would assist non-technical readers. 6. National LandscapeThe term replaces AONB in national policy. It may be helpful to clarify in the glossary that “National Landscape” refers to Areas of Outstanding Natural Beauty. 7. Coastal SqueezeAlthough defined, it may be helpful to cross-reference this term clearly to coastal and biodiversity policies. 8. Public Benefit (heritage context)Used repeatedly in heritage policies. A short explanatory definition referencing the NPPF approach to balancing harm and benefit could assist understanding. 9. Net ZeroThe term is referenced indirectly in climate-related policies but is not clearly defined. 10. Landscape Sensitivity Assessment (LSA)This is referenced in landscape policy but is not clearly defined in the glossary.		
2026Reg18/126	31	Question 104 Have we missed any terms from the glossary or anything from the list of acronyms?				KCC Strategic Planning		KCC Strategic Planning	Glossary Public Rights of WayThe County Council considers that the definitions of 'active travel' and 'green infrastructure' are both welcomed. The addition of Public Right of Way (PROW) – 'A way over which the public has a right to pass and repass, including public footpaths, public bridleways, restricted byways and byways open to All Traffic' is recommended to assist understanding for all readers of the Plan, and all references within the Plan to PROW should then be standardised for consistent understanding.		

Appen

We are aware

Submission Number	Comment Summary	Draft Comment Response
2026Reg18/73	Seeks amendment to add Coastal Change Management Area, tranquillity, setting, irreplaceable habitat, best and most versatile (BMV) agriculture land, national landscape, coastal squeeze, public benefit, net zero and landscape sensitivity assessment to glossary. Seeks amendment to add BMV and MEASS to the acronyms Seeks amendment to add LSA and EIA to the acronyms Seeks amendment to remove SME from the acronyms as there is a duplication Seeks amendment to add reference to the Environment Act to the LNRS acronym Seeks amendment to clearly state National Coastal Erosion Risk Map for NCERM	The Council agrees to add these terms to provide a clearer understanding for readers. Changes proposed. The Council agrees to add these acronyms to provide a clearer understanding for readers. Changes proposed. The Council disagrees to the addition these acronyms as they are not used the document, but if they are used in the future then they will be added. No changes proposed. The Council agrees to remove SME because it is a duplicate. Changes proposed. The Council disagrees because the list of acronyms is not the place for this. No changes proposed. The full name is in the list. No changes proposed.
2026Reg18/126	Seeks amendment to add Public Rights of Way to the glossary and PROW to acronyms.	The Council agrees for the following reason, this will assist the readers with a better understanding of the Plan. Change proposed.

Appendix II: A guide to viewing representations, summaries and draft responses on Objective portal

Guide to viewing ‘What People Said’ in Objective Keyplan

The link to the Customer facing portal for the Reg 18 is: <https://swale-consult.objective.co.uk/kpse/event/FE1E2176-C2C5-494B-AD9F-DA27D697D235>

On the landing page, select “What People Said”

Page 359



Swale
BOROUGH COUNCIL

Swale Borough Council Consultation Portal



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Local Plan Review (Regulation 18), January 2026

Swale Borough Council is inviting comments on the Regulation 18 stage of the Local Plan. This consultation seeks feedback from stakeholders and the community on a series of questions about the Local Plan's vision, objectives and Development Management

ABOUT THIS CONSULTATION

PROPOSAL

WHAT PEOPLE SAID

More Information

Planning Policy

Swale Borough Council

01795 417850

lpcomments@swale.gov.uk

Swale House East Street Sittingbourne ME10 3HT

Supporting Files

[SBLP \(Regulation 18\) January 2026 PDF.pdf](#)

[2025 Statement of Community Involvement December25.pdf](#)

[2025 Draft Sustainability Appraisal Scoping](#)

PRIVACY STATEMENT

As data controller we ensure that processing is carried out in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation. The information provided on this form will be used solely in connection with Local Plan Review and will only be shared where it is necessary in order for your request to be resolved or where there is a legal requirement to do so. The lawful basis which enables the Council to process your data for this purpose is Public Interest Article 6, paragraph (e) of the UK GDPR. The information will be stored and destroyed in line with the Council's Retention and Deletion Schedule. Please visit the Privacy pages for further information: <https://swale.gov.uk/planning-and-regeneration/local-plans/local-plan-review/local-plans-privacy-notice>

GO TO EVENT

This consultation seeks feedback from stakeholders and the community to a series of questions about the Local Plan's vision, objectives and Development Management policies.

The Regulation 18 is the initial consultation stage of the local planning process in the UK, where local authorities consult with the community to gather input on the development of local plans.

Please read through the whole document first and identify specific areas where you may wish to comment. You do not have to answer every question in the document and we recommend preparing your comments in Word first, before copying them into the appropriate question

This page can be sorted by either each question/consultation point or by submission (person or organisation that have sent in comments.)

1

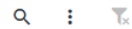
Local Plan Review (Regulation 18), January 2026

Swale Borough Council is inviting comments on the Regulation 18 stage of the Local Plan. This consultation seeks feedback from objectives and Development Management

[ABOUT THIS CONSULTATION](#)
[PROPOSAL](#)
[WHAT PEOPLE SAID](#)

Processed Items

List By: ☒ Consultation Point ☐ Submission



Consultation Point	Responses
Question 1 Do you have any comments on section 1 of the draft Local Plan which will inform t	38
Question 2 Do you have any comments on section 2 of the draft Local Plan which will inform t	44
Question 3 Have all the key issues and challenges been taken into consideration?	48
Question 4 Is the vision positive, clear, realistic and ambitious and does it identify the right pri	40
Question 5 Do you agree with the proposed vision for the area? If not, how should it be change	39
Question 6 Are the objectives broad enough to address the issues and challenges set out abo	46

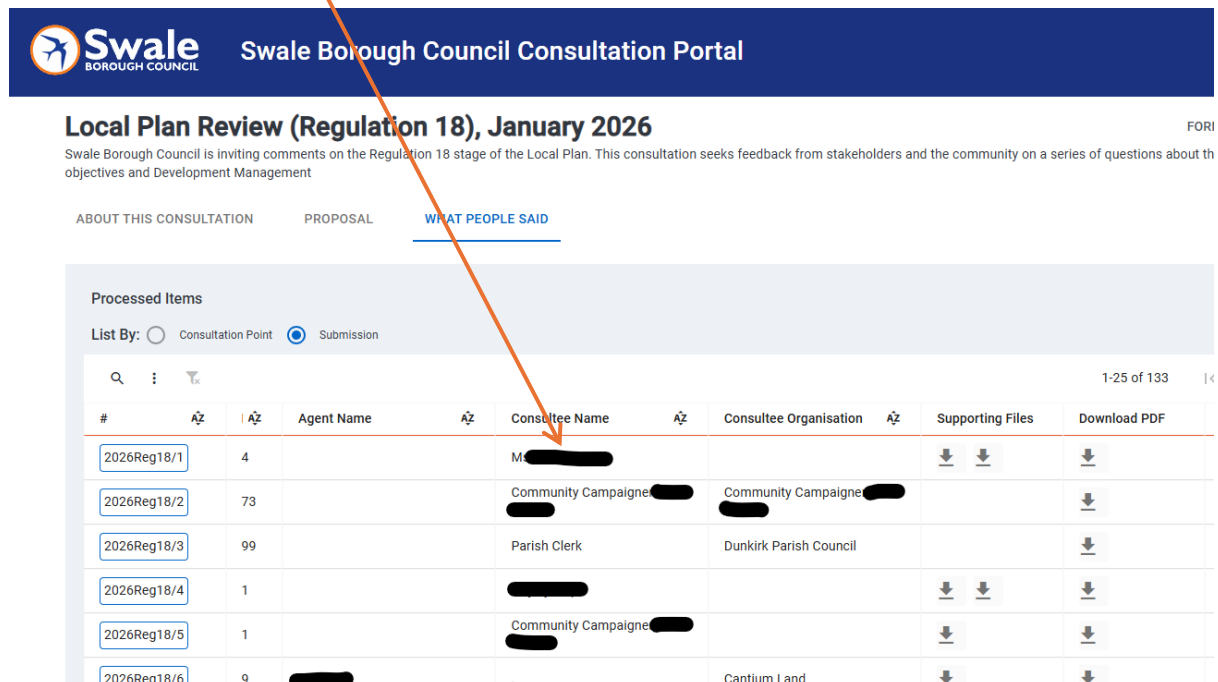
Page 360

Click on the yellow text to view the responses and click on the 'eye' symbol to view the comments:

2026Reg18/81-36	Parish Clerk	Borden Parish Council	X	25-Feb-2026



Alternatively, click on the consultee / organisation to view the whole response from each submitter.



Swale BOROUGH COUNCIL Swale Borough Council Consultation Portal

Local Plan Review (Regulation 18), January 2026

FORI

Swale Borough Council is inviting comments on the Regulation 18 stage of the Local Plan. This consultation seeks feedback from stakeholders and the community on a series of questions about the objectives and Development Management

ABOUT THIS CONSULTATION PROPOSAL WHAT PEOPLE SAID

Processed Items

List By: ☐ Consultation Point ☒ Submission

1-25 of 133

#	Agent Name	Consultee Name	Consultee Organisation	Supporting Files	Download PDF
2026Reg18/1	4	M. [REDACTED]		Download Download	Download
2026Reg18/2	73	Community Campaigner [REDACTED]	Community Campaigner [REDACTED]		Download
2026Reg18/3	99	Parish Clerk	Dunkirk Parish Council		Download
2026Reg18/4	1	[REDACTED]		Download Download	Download
2026Reg18/5	1	Community Campaigner [REDACTED]		Download	Download
2026Reg18/6	9	[REDACTED]	Cantium Land	Download	Download

There is also an option in this screen to:

- Download Supporting Files – these are the files submitted with the representation and may contain text, images, tables, charts and photographs to support the submission.
- Download a PDF which is a system-generated PDF of the submission each stakeholder has made.

If you have any questions, please email LPCComments@Swale.gov.uk

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Planning and Transportation Policy Working Group	
Meeting Date	27 th May 2026
Report Title	Local Plan Review - Draft Strategic Policies and Draft Houses in Multiple Occupation Development Management Policy
EMT Lead	Emma Wiggins – Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson – Head of Place
Lead Officer	Natalie Earl – Planning Manager (Policy)
Classification	Open
Recommendations	That members provide comment on and note the draft strategic policies and the Houses in Multiple Occupation development management policy.

1 Purpose of Report and Executive Summary

- 1.1 This report presents the draft Strategic Policies which will be consulted on as part of the Regulation 19 Local Plan. Members of the Planning and Transportation Policy Working Group (PTPWG) requested that the draft strategic policies were brought to a meeting ahead of agreeing the Regulation 19 Local Plan for consultation to give an opportunity to provide early feedback. It also includes a draft Houses in Multiple Occupation (HMO) Development Management (DM) policy.
- 1.2 The draft policies will be consulted on as part of the Regulation 19 version of the emerging Local Plan this summer after which it will be submitted for examination in public.

2 Background, Context and Proposals

- 2.1 Strategic planning policies in local plans are high-level, overarching policies that set out the scale, pattern, and quality of development across a local authority's area. They provide the high-level, long-term planning principles that guide development, setting out the key principles for growth, infrastructure and the protection of areas. They sit above the development management (DM) policies (which were consulted on in the recent [Regulation 18 Local Plan](#))
- 2.2 Strategic policies were included within the [Regulation 19 Local Plan](#) that was consulted on in Spring 2021 and these have been updated using feedback received from members at a workshop in Summer 2024, updates to national policy and guidance and new and emerging evidence base documents.

2.3 The strategic policy titles are:

- 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

2.4 The policies, in Appendix I, are a work in progress and will be further refined in light of comments received by PTPWG members and using feedback received as part of the recent Regulation 18 consultation where there were a number of comments on what should be included in strategic/overarching policies. Officers have focused on updating the policies themselves so there is still work to do around these, especially to the pre-ambles text.

2.5 Also included in this report (Appendix II) is a draft Houses in Multiple Occupation (HMO) Development Management (DM) policy which members raised as an aspiration at Policy and Resources Committee on 14th March 2026. It would sit alongside the emerging HMO Supplementary Planning Document (SPD) and Article 4. The policy has been drafted using examples from other adopted Local Plans and to ensure compatibility with the Council's emerging HMO SPD and Article 4.

Next Steps

2.6 Officers will continue to work on the policies, incorporating feedback, and the finished drafts will be presented to members as part of the Regulation 19 Local Plan this Summer.

3 Recommendations

3.1 That members provide comment on and note the draft strategic policies and the houses in multiple occupation development management policy.

4 Alternative Options Considered and Rejected

4.1 An alternative option is for members not to provide comments at this stage and wait until the draft Regulation 19 Local Plan is brought to committee. This is not

recommended as comments now can be given adequate time to be researched and considered by officers ahead of drafting the Regulation 19 document.

5 Consultation Undertaken or Proposed

- 5.1 The draft policies will be part of the Regulation 19 Local Plan consultation where there will be an opportunity for all stakeholders to provide comments.
- 5.2 Earlier iterations of the strategic policies were consulted on as part of the Regulation 19 Local Plan in Spring 2021 and comments received to the consultation have been considered whilst redrafting the policies.
- 5.3 A workshop was held with PTPWG members in Summer 2024 for members to comment on the Strategic Policies that were included in the Regulation 19 Local Plan in April 2021.

6 Implications

Issue	Implications
Corporate Plan	The Local Plan supports the delivery of the Corporate Plan, aligning with the following priorities: • Environment - To provide a cleaner, healthier, more sustainable and enjoyable environment, and to prepare our borough for the challenges ahead. • Community - To enable our residents to live, work and enjoy their leisure time safely in our borough and to support community resilience. • Economy – Working with our businesses and community organisations to work towards a sustainable economy which delivers for local people. • Health and Housing - To aspire to be a borough where everyone has access to a decent home and improved health and wellbeing. The Corporate Plan contains a specific objective to ‘progress a Local Plan with local needs and capacity at its heart.’
Financial, Resource and Property	The Local Plan work programme is fully funded across a combination of base budget, committed reserves and a contribution from the government’s Local Plans Delivery Fund.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	There are no direct crime and disorder impacts arising from this decision.

Environment and Climate/Ecological Emergency	As part of the Local Plan, there will be a Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making and these assess the environmental impact of the Local Plan as a whole.
Health and Wellbeing	There is a draft Health and Wellbeing strategic policy and it is considered a cross cutting theme which is reflected in all of the strategic policies.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.
Local Government Reorganisation	The current Local Plan timetable expects the Local Plan to be submitted for its Examination in Public and to be adopted before local government reorganisation is expected to be complete.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Draft Strategic Policies
- Appendix II: Draft Houses in Multiple Occupation Development Management Policy

8 Background Papers

8.1 [Regulation 19 Local Plan 2021](#)

Appendix I: Draft Strategic Policies

This appendix contains early drafts of the Strategic Policies which will be included in the Regulation 19 Local Plan:

- 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

Strategic Policy ST1 Delivering sustainable development in Swale

Delivering sustainable development in Swale

1. The purpose of the Development Plan is to facilitate and manage sustainable development. There are three dimensions to sustainable development:
 - economic;
 - social; and
 - environmental.
2. Sustainable development means meeting present needs - specifically for homes, jobs, and infrastructure - without compromising the ability of future generations to meet theirs. It is the core purpose of planning, balancing economic, social, and environmental objectives to create, beautiful, safe, and healthy communities, underpinned by a "presumption in favour of sustainable development."
3. The policies in the Local Plan seek opportunities to make a positive contribution to these dimensions.
4. In essence, the presumption in favour of sustainable development lies at the heart of the Local Plan and should be seen as a golden thread running through it. The strategy for Swale has been shaped by a desire to deliver sustainable growth that brings benefits for all sectors of the community – for existing residents, businesses and organisations as much as for new ones. In order to deliver these benefits, it is necessary to take a bold approach to addressing the impacts of climate change, to embracing opportunities to enhance health and wellbeing through improving our environment and ensuring communities are supported with the opportunities and infrastructure needed to enjoy a good quality of life, including jobs and homes.

5. This policy provides the basis for action and the means to locally determine whether development proposals merit the national presumption in favour of sustainable development. It emphasises the importance of joint working, placing the requirement on all to demonstrate their commitment through specifications.

Policy

To deliver sustainable development in Swale that provides both mitigation and adaptation to climate change, all development proposals will contribute to:

1. Build a strong competitive and green economy by meeting identified needs for inward investment and indigenous growth on allocated and suitable sites, including meeting the needs of under-represented sectors;
2. Ensure the vitality of town centres by: strengthening the principal centre role of Sittingbourne; improving the role of Sheerness as the Island's main centre; or consolidating, proportionate to its scale and character, Faversham's role as a centre for the town itself and its local catchment;
3. Support a prosperous rural economy, especially for sustainable farming and tourism, or where enabling communities to meet local needs or benefiting countryside management;
4. Accord with the Local Plan settlement strategy;
5. Offer the potential to reduce levels of out-commuting and support the aims of the Swale Local Transport Strategy, including the promotion of zero carbon and active transport;
6. Support high quality communications infrastructure;
7. Deliver a wide choice of high quality, low carbon homes by:
 - a. meeting the full, objectively assessed need for housing in the housing market area;
 - b. providing housing opportunity, choice and independence with types of housing for local needs; and
 - c. keeping vitality within rural communities with identified housing needs, proportionate to their character, scale and role;
 - d. promoting energy efficiency, renewable energy and district heat networks on new developments;
 - e. promoting the use of recognised certification schemes to demonstrate the environmental quality of new housing.
8. Achieve good design through reflecting the best of an area's defining characteristics;
9. Promote healthy communities through:
 - a. location of development to achieve safe, mixed uses and shared spaces;
 - b. rejuvenation of deprived communities;
 - c. the Local Plan implementation and delivery plan and schedule;
 - d. safeguarding services and facilities that do or could support communities;

- e. maintaining the individual character, integrity, identities and settings of settlements;
- f. protecting, managing, providing and enhancing open spaces and facilities for sport and recreation;
- g. implementing the Swale natural assets green infrastructure strategy; and
- h. enabling and fostering the conditions for cultural enterprises to establish and flourish within Swale.

10. Meet the challenge of climate change, flooding and coastal change through:

- a. promotion of sustainable, low carbon and resilient design and construction, the installation and use of renewable energy, the efficient use of natural resources and the management of emissions;
- b. the management and expansion of green infrastructure; and
- c. applying planning policies to manage flood risk and coastal change;

11. Protect and enhance the natural environment by:

- a. applying international, national and local planning policy for:
 - (i) areas designated for their biodiversity (inc. Nature Improvement Areas), geological or landscape importance; and/or
 - (ii) priority habitats and populations of protected and notable species;
- b. using landscape character assessments to protect, and where possible, enhance, the intrinsic character, beauty and tranquillity of the countryside, with emphasis on the estuarine, woodland, dry valley, down-land and horticultural landscapes that define the landscape character of Swale;
- c. integrating the benefits of ecosystems to society across all policy areas;
- d. achieving plentiful native landscaping of local provenance in and around developments;
- e. achieving net gains in biodiversity within and around developments by use of such measures as natural/semi-natural greenspace and the creation of coherent ecological networks;
- f. avoiding significant harm to biodiversity or, when not possible, adequately mitigating it, or, as a last resort, compensating for it with off-site action at identified Biodiversity Opportunity Areas or other appropriate locations;
- g. using areas of lower quality agricultural land for significant levels of development (singly or cumulatively) where compatible with other criteria; and;
- h. applying national planning policy in respect of pollution, despoiled, degraded, derelict, contaminated, unstable and previously developed land;

i. having regard to the Local Nature Recovery Strategy.

12. Conserve and enhance the historic environment by applying national and local planning policy through the identification, assessment and integration of development with the importance, form and character of heritage assets (inc. historic landscapes).

Strategic Policy ST2 Swale's Settlement Hierarchy

1. There are a wide range of towns, villages, hamlets and isolated settlements across Swale. The development strategy presents the approach to development to these locations and examines their role within the overall strategy for the broad distribution of growth and decisions about other development.
2. In consideration of the options for our development strategy, we have looked closely at what is set out in Bearing Fruits and seek to complement that strategy with this Local Plan Review.
3. Other key drivers that shape this strategy include delivering sustainable growth, addressing climate change and enhancing health and wellbeing.
4. The Borough of Swale has significant constraints in terms of landscape designations, land at risk of flooding, coastal change and ecological designations. Approximately 60% of the Borough is covered by such constraints. Of the remaining 40%, there are areas that are locally important for their landscape value or high quality agricultural land, for example. To meet the borough's development needs, difficult choices must be made.
5. In the first instance, the availability of brownfield sites are considered. The council has followed an approach of Focussing development on brownfield sites for a while.
6. There are limited opportunities now and within this context, Sittingbourne town centre has been identified as providing considerable redevelopment potential that will yield a minimum of 988 dwellings.
7. Other brownfield sites in Faversham included in the Neighbourhood Plan and in Sheerness that could come forward outside of the Local Plan or through a master plan document that could be prepared.
8. Nevertheless, there are insufficient brownfield sites to deliver the quantum of development needed and the Local Plan Review must look elsewhere to deliver sustainable growth. The process was completed through the HELAA where potential sites have been assessed with the most suitable allocated to meet the borough's housing need.
9. Defining and implementing a settlement strategy is assisted by the identification of settlement tiers that guide the location of development and services. The means that the urban centres and the larger well-connected villages occupy the higher settlement tiers whilst those with strong environmental character, poorer access to services and/or limited capacity for change generally occupy the lower. Settlements are assigned to the tiers as shown in the table below.

Tier	Settlement	Role
Tier1 Principal town	Sittingbourne	Sittingbourne remains at the top of the hierarchy, justified by it being the largest town in the Borough with the greatest range of services and facilities. These include all key and higher-order services and facilities including secondary schools, a college, a minor injuries unit and the Borough's main library. It holds the largest share of the Borough's population and economy with over 2000 employment units. There is a retail centre in the high street,

		Sittingbourne retail park and Princes Street retail park. It is also the location of the Eurolink industrial estate and Trinity trading estate. The ongoing town centre regeneration has and is expanding the leisure and retail offer further with a cinema, hotel and restaurants. Sittingbourne is served by a train station and bus hub with the greatest and most frequent variety of destinations. It is the most sustainable settlement within the Borough.
Tier 2 – Secondary towns	Faversham and Sheerness	Faversham and Sheerness, smaller than Sittingbourne, are unique in their identity and offer all of the key services and facilities and most of the higher-order ones too. Sheerness falls short of having its own hospital but benefits from that nearby at Minster. These towns also offer a wide range of employment, retail and leisure facilities. Faversham, the Borough's smaller market town, acts as a focal point for trade and services for the wider rural area here and has around 780 employment units. For the Isle of Sheppey, Sheerness is its main centre with an employment base in its high street and industry linked to the Port of Sheerness. There are around 430 employment units here. Public transport provision is good at Faversham, and fair at Sheerness but with connections to Sittingbourne. Away from Sittingbourne, these are the Borough's most sustainable locations.
Tier 3 – Urban service centres	Minster & Halfway and Queenborough & Rushenden.	Individually, the settlements within this tier are more limited in their range of services and facilities, although still having many of the key ones but at a lower frequency. However, due to their proximity to each other, Minster and Halfway and Queenborough and Rushenden combined create larger urban service centres which are able to support and be supported by their proximity to Sheerness and each other. There is an employment focus to the West of Minster, at Neatscourt retail park and around Queenborough Creek. Minster and Halfway have around 410 employment units and Queenborough and Rushenden have some 225. Public transport is more limited, although still fair with connections in and amongst each other and Sheerness
Tier 4 – Village service centres	Boughton, Eastchurch, Iwade, Leysdown, Newington and Teynham.	The villages in this tier provide the majority of the following key services and facilities: GP surgeries, primary schools, recreational grounds, convenience stores, public houses, post offices and places of worship. Newington and Teynham have the highest level of services and facilities serving their communities as well as having train stations, but overall, public transport provision is fair or limited. They are more isolated from the strategic road network but generally closest to the main link roads in between (the A249 and the A2). Those on the eastern end of the island have less services and facilities but

		given the distance to the nearest town at Sheerness, act as local centres for their communities. Leysdown and the surround have a unique tourism offer but otherwise would benefit from more diverse employment opportunities, public transport improvements and support for local services. As a whole, the eastern end of the island has around 295 employment units. All of these villages are likely to serve their and the surrounding rural populations' day to day needs with some sharing of services with nearby smaller settlements. They will need to travel to other centres for a wider range of retail, leisure and employment needs.
Tier 5 – Small villages	Bapchild, Bayview, Borden, Bredgar, Conyer, Doddington, Dunkirk, Eastling, Hartlip, Kingsborough Manor, Lewson Street, Lower Halstow, Lynsted, Neames Forstal, Newnham, Oare, Painters Forstal, Rodmersham Green, Selling, Sheldwich Lees, Upchurch and Warden.	These smaller villages vary in size and offer. The more sustainable provide primary schools, recreation grounds, convenience stores and have fair public transport provision. These include the likes of Upchurch, Bredgar and Bapchild. The less sustainable are without a few or most of the key services and facilities with limited or no public transport offer. A common theme for these villages, however, is their isolation from the nearest urban service centres and towns, as well as the main transport corridors to access these locations (the A249 and the A2). Even by foot, there are not always suitable, lit footpaths for use. Single or occasional clusters of villages may contain enough services to meet the day to day needs for their own communities, whilst others would require investment to provide or improve them. Travel to the urban service centres and towns is necessary for many or most needs.
Tier 6 – The open countryside	Baddlesmere, Bobbing, Bobbing Hill, Chestnut Street, Danaway, Dargate, Goodnestone, Graveney, Hernhill, Milstead, Staplestreet, Throwley Forstal and Tunstall.	The remainder of the Borough's settlements are without defined boundaries and form very small villages, hamlets, ribbon development, clusters of houses and isolated houses. Services and facilities here are extremely limited with public transport provision generally limited or non-existent. They are usually well away from the Borough's main transport corridors with poor foot links in and amongst them. Occasionally, a small range of day to day needs can be met but on the whole, there is no immediate access to a wider range of services, facilities and employment opportunities.

10. In combination with the development still being completed from Bearing Fruits, Sittingbourne, as the Borough's principal town remains the main focus for sustainable growth. With the largest share of the Borough's population and economy, it is tightly constrained by environmental designations. The regeneration of the town centre needs to continue to capture the benefits of a growth in population:

- Faversham
- Isle of Sheppey
- Rural local service centres
- Other villages with built up area boundaries
- Outside the built up area boundaries

Policy ST 2

Swale Settlement Strategy

By use of previously developed land within defined built up area boundaries and on sites allocated by the Local Plan, development proposals will be permitted in accordance with the following settlement strategy:

1. The principal town and main Borough urban centre of Sittingbourne will provide the primary urban focus for growth where development will support town centre regeneration and make the best use of previously developed and vacant or underused land;
2. Faversham, as one of the Borough's secondary towns, will provide a key focus for growth where development includes a sustainable urban extension and will deliver significant infrastructure improvements;
3. Redevelopment at Rushenden as an expansion to the Regeneration Area of Queenborough & Rushenden to provide landscape led regeneration that will provide new homes, jobs, infrastructure, open space and community facilities;
4. Village service centres provide the tertiary focus for growth.
5. Small villages with built-up area boundaries that can provide some services and offer more sustainable travel options than private car travel on infill and redevelopment sites within the built up areas boundaries where compatible with the settlement's character, amenity, landscape setting, heritage or biodiversity value; and
6. At locations in the open countryside, outside the built-up area boundaries shown on the Proposals Map, development will not be permitted unless supported by national planning policy and able to demonstrate that it would contribute to protecting and, where appropriate, enhancing the intrinsic value, landscape setting, tranquillity and beauty of the countryside, its buildings and the vitality of rural communities.

Policy ST3 Climate Change

1. As a coastal borough in the south of England, Swale's population and environment is particularly vulnerable to the local impacts of climate change including:
 - drought and water shortages
 - overheating
 - flooding, including from surface water, sewage and tidal sources
 - sea-level rise and coastal squeeze
 - erosion
 - increased storms
2. Effects are already being felt, particularly by communities and businesses and by local ecosystems and landscapes. Generally, the most deprived communities and most depleted ecosystems will be impacted most.
3. In response to the threats of climate change, in June 2019 the Council declared a Climate and Ecological Emergency. This included a commitment to facilitate the action required to make Swale carbon neutral, with an agreed target of 2045 (updated in 2025 from a former target of 2030). Following on from this the Council has developed, and updated, an Action Plan with actions for departments across the Council.
4. The Council's approach to addressing climate change must be seen within the international context. The UK is a signatory to the international Paris Agreement 2015, brokered via the United Nations. This commits signatories to ensure global average temperatures rise is limited to 2°Celsius above pre-industrial levels, and to pursue a limit of 1.5°C. This commitment requires fast and drastic cuts to global carbon emissions.
5. In 2019 the UK Government also declared a climate emergency and updated the legally binding carbon reduction goal for 2050 enshrined in the Climate Change Act 2008. The Act comes with 5-yearly carbon budgets that are devised by the independent Committee on Climate Change (CCC) and passed into law by Parliament.
6. The CCC's, Seventh Carbon Budget (2025), explains:
 - in nearly all scenarios considered by the Intergovernmental Panel on Climate Change (IPCC), long-term warming exceeds 1.5°C; under current policies, the global carbon budget for 1.5°C would be exhausted by 2030;
 - it is still possible to limit long-term warming with deep and immediate emissions cuts;
 - long-term warming above 1.5°C, even temporarily, will bring impacts that need to be adapted to. The greater the overshoot, the larger the climate risks;
 - a greater overshoot implies a larger need for CO2 removal measures many of which are not yet proven.
7. The urgency of the situation is clear and local plans (and thereby planning applications) have a duty and a mandate to respond, as follows:
 - i. The Planning & Compulsory Purchase Act 2004 125 establishes that local plans are obliged to include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change;
 - ii. The Climate Change Act 2008 sets the UK's 2050 net zero carbon goal, and also interim 'carbon budgets', that reduce every 5 years;
 - iii. The Planning & Energy Act 2008 grants local planning authorities the power to set reasonable requirements for:

- Energy efficiency standards higher than those set by Building Regulations; and
 - Renewable or low carbon sources 'in the locality of the development' to supply a proportion of energy used at the development.
- iv. National Planning Policy Framework (NPPF) states that:
- The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (para 161);
 - Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures, in line with the objectives and provisions of the Climate Change Act 2008 (para 162);
 - The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts (para 163);
 - New development should be planned for in ways that help to reduce greenhouse gas emissions, such as through its location, orientation and design (para 164);
 - To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources (para 165).
- v. The Planning Practice Guidance chapter on Climate Change explains why it is important for planning to consider climate change and the legal mandate for such. It highlights opportunities to mitigate and adapt to climate change including:
- Reducing the need for travel and providing sustainable transport;
 - Providing opportunities for renewable and low carbon energy and decentralised energy; and
 - Promoting low-carbon design approaches to reduce energy consumption in new buildings
8. A positive response to the mitigation and adaptation of climate change is fundamental to all new development in Swale and ST3 Climate Change seeks to achieve this. This response cuts across other objectives and policies of the Local Plan including ST1 Delivering sustainable development in Swale, ST4 Development needs for the borough, ST5 Building a strong, competitive economy, ST6 Delivering a wide choice of high-quality homes, ST7 Good design, ST8 Health & Wellbeing, ST9 Planning for Infrastructure and ST10 Promoting Sustainable transport and active travel. When done well, development can bring benefits to Swale's communities, their health and wellbeing, their businesses and the natural environment. If done poorly, the risks are existential.

Policy application

9. Applicants for planning permission are expected to set out how policy ST 11, as well as the Development Management Policies, C1-C5, have been considered and responded to

in a Climate, Energy and Waste Statement, to accompany planning applications. This statement should be proportionate to the scale of the application and the impacts of the development.

Policy

1. All new development must demonstrate how it will mitigate and adapt to climate change and create places which respond to the local and national Climate Emergency by demonstrating that:
 - a. the location and choice of sites, linkages to other sites, layout and land-uses of development have been chosen to mitigate and adapt to climate change;
 - b. new development uses nature-based solutions to provide connected, accessible and multi-functional green spaces, which prioritise climate mitigation and adaption, biodiversity enhancement, health and wellbeing, flood risk mitigation, sustainable drainage and pollution prevention, in accordance with policies ST7 Good design, ST 8 Health and Wellbeing, ST10 Promoting sustainable transport and active travel; ST11 Conserving and enhancing the natural environment and the corresponding development management policies;
 - c. the principles of sustainable design and adaptation, including addressing overheating and creating places that are comfortable to live in and are adapted to climate change, as set out in Policy C1 Sustainable design and construction principles, are considered from the very start of the site selection and design process and integrated into the development;
 - d. new development is net zero carbon in operation, in line with Policies C2 Net zero operational in new build residential development and C3 Net zero operational in new build non-residential development.
 - e. embodied carbon and waste is minimized in line with Policy C4 Embodied carbon and waste;
 - f. renewable energy is enabled where it is appropriate for its site, in line with Policy C5 Renewable energy development and infrastructure;
 - g. existing and new development will be safe from the impacts of climate change, including coastal change and flood risk and contributes to necessary infrastructure where appropriate, in line with policies C6 Coastal Change Management, C7 Implementing the Medway Estuary and Swale Coastal Risk Management Strategy, C8 Flood Risk and C9 Sustainable drainage. Where existing areas are at risk, positive approaches to adaptation and relocation are sought, in accordance with policy C6 Coastal Change Management;
 - h. new development will seek to protect the ecosystem services on which we rely (including our water, air and soil) from all types of pollution and land instability in line with policies C10 Water quality and water resources, C11 Air quality and C12 Pollution and land instability.

Policy ST4 Development Needs for the Borough

Quantum of new housing land

1. The Borough's Local Housing Need for 2027 to 2042 (the timeframe for this plan) has been informed by a local housing needs assessment, conducted using the Governments standard method in national guidance. The need of 1,064¹ dwellings per annum represents an increase of 38% compared with the current local plan, Bearing Fruits that has an objectively assessed need of 776 dwellings per annum for 2014 – 2031. The Local Plan is therefore seeking to allocate sites to accommodate the uplift in numbers for the period 2026 to 2042. The figure for the dwellings needed for this period is calculated by multiplying the number of years in the Local Plan plan period by the Local Housing Need figure calculated using the standard method, i.e. $16 \times 1,064 = 17,024$
2. The supply of all types of sites that have been consented and not built out for the Plan period totals 7,167 and this leaves a residual requirement to accommodate 9,857 dwellings. In identifying supply to meet this residual requirement windfall delivery rates since the monitoring year 2014/15 (period of 12 years) has been considered, and an allowance for windfall is made for small sites (1 to 4 dwellings) for 1,014 dwellings over the last 13 years of the plan period. In addition a large sites (5 or more dwellings) windfall allowance is made of 1,395 dwellings over the last 9 years of the Plan. There have also been two Neighbourhood Plans recently made that combined allocate land for 231 dwellings. These sources of supply result in the need to allocate enough land to accommodate 7,217 additional dwellings through this Local Plan Review. Whilst their remains approximately 1,703 dwellings allocated from the Local Plan Bearing Fruits without planning consent, due to the time past since that Plan was adopted all remaining allocations have been reassessed and where they remain suitable have been included as allocations within this Plan.

New employment land

3. Our strategy focuses on creating a strong supply of employment land to meet the identified need, and improving the quality of our economic offer to create a better business image and a more diverse economic base. It will enable the borough to branch out into under-represented sectors, increase the number of higher growth/value businesses and ensure that it retains and develops existing strengths and foster indigenous growth. In order to meet new floorspace needs, we will provide a range and choice of sites in areas of demand to meet the needs of differing sectors. We will be flexible, and plan positively to accommodate unexpected opportunities and allowing for the upgrading and renewal of our existing, older sites.
4. Our strategy has seen some growth in the out of town retail sector and we remain confident over the delivery of emerging retail schemes in central Sittingbourne. Manufacturing has declined, but relative to Kent and the UK, the sector is strong and our strategy will seek to stabilise this sector and support the emergence of more niche and advanced manufacturing activities. In recent years, the Borough has attracted new distribution and logistics businesses and jobs.

¹ All housing land supply figures and assumptions are based on 1 April 2025 monitoring position including use of the Local housing Need at this base date. The housing land supply will be updated to 1 April 2026 as part of the Local Plans submission.

5. We will continue to promote our strengths in industrial employment, helped by maintaining and enhancing a supply of well-located land and buildings, including those suitable for larger scale distribution. We will be focusing on continued growth from our indigenous (economic land uses) base and have identified sites to capitalise on this potential. Overall, our land bank will be flexible and has sufficient margin to grasp unexpected opportunities, such as those that reinforce the Borough's role as a recognised distribution hub.
6. The needs of the office sector cannot be met easily within the existing land supply. Our strategy for office is supportive of its expansion, especially for central Sittingbourne, around the A249 and at Faversham. Some 55% of the Borough's workforce commute for jobs outside Swale, and while generally the distances travelled are modest we will also encourage employment sectors attractive to those commuting, including those in key sectors such as finance, information and communications and science based activities.
7. Tourism is a major contributor to the local economy and we will capitalise on reduced travel and spending abroad to bring in greater local spending. There will be an emphasis on proposals that successfully integrate land based industries with the Borough's heritage offers and the landscapes of the North Kent marshes, the Blean, the Kent Downs and the horticultural belt. Specifically, given its location and proximity to other tourist centres at Canterbury, Whitstable and Herne Bay, Faversham has strong potential to diversify its economy around tourism, especially its food and drink based offer. On Sheppey we need to address declines in its traditional seaside tourism offer through modernisation and improvements in quality.
8. Although the number of jobs in agriculture and horticulture is relatively small, our strategy anticipates forecast growth in this sector. For this and the wider rural economy, we will respond positively to the new opportunities for diversification and improved resilience for food production, as well as activities in other rural sectors, including growth in community based jobs and services, where these can be successfully integrated within the locality.
9. We are also keen to continue to grow Swale's burgeoning creative industry offer, however this is often a sector that likes to grow organically and outside of the traditional planning allocations route. The DM employment policies give flexibility to allow these businesses to grow and flourish.
10. Improving education provision performance will bring needed improved skills into the local workforce, but this more mobile workforce will need to be able to work and/or set up businesses locally. We will provide flexible planning policies that support a greater choice of opportunity in such areas as the 'sharing economy'. It also remains important to tackle entrenched skill deficiencies so that all can benefit from growth. We will support a better range of opportunities for local people to improve their education and skills, endeavour to secure a further education facility within Sittingbourne town centre, and promote closer links between learning and employment opportunities, including the use of local labour and learning opportunities.

11. How will this strategy be visible in terms of physical development? We will be largely maintaining our current portfolio of sites, with the renewal and intensification of existing sites in and around Sittingbourne, in particular, the growth of its key economic product – the Eurolink business park. Close to the urban areas, the A249 is also likely to remain the focus for meeting any potential for larger scale distribution or industrial uses. On the Isle of Sheppey, the existing large pool of employment sites will be developed for industrial purposes so that the economic benefits of infrastructure investment already made can be accomplished. At Faversham, the approach is to improve the quality and availability of sites on account of the town's good location and the loss of existing sites to other uses.
12. Regeneration policies are also provided for two of the Borough's major strategic employment locations - the Port of Sheerness and the Kent Science Park. These will guide both their immediate needs for growth, and indicate the possibility of longer-term aspirations. Some port related activity will continue to be met as part of the general industrial supply, beyond the port's own portfolio, and the Science Park could attract science, technology and knowledge-based jobs that would help meet the socio-economic objectives of the Plan.

Ensuring the vitality of town centres

13. Our town centres are facing considerable challenges at present and it is the Council's approach that there should be flexibility in the range of uses that are provided in these shopping areas, especially to encourage unexpected opportunities that occur on the fringes of the Primary Shopping Areas. This flexibility will help to enhance the vitality and viability of the Borough's town centres and maximise their contribution to the local economy. A wide range of uses can potentially have a key role in maintaining a diverse and commercially prosperous centre without undermining their primary retail function.

Supporting a prosperous rural economy

14. Our rural areas support a wide range of businesses and the strategy is to support their expansion. However, this will not be by micro-management through the allocation of sites, as innovation comes from locations and sectors that we cannot hope to identify and write into the plan. Flexible planning policies will therefore be supportive of the right business at the right scale and in the right place. Our strategy will also maintain and enhance vibrant and viable rural services, particularly when we are shown innovative new ways of delivering them. A factor affecting the development of the rural economy is the limited availability of land and buildings and we will look to their use for employment before considering other uses such as housing.
15. We intend to further encourage tourism and other businesses that are linked by and harmonised with our landscapes and communities. Across the rural area, business proposals, tourism related or otherwise, able to support the active and sustainable management of the countryside will be supported. See policy E2 The Rural Economy.
16. The strategy does not overlook the importance of the agricultural sector and there are likely to be changes in the way land is used which will present challenges. We will harness the confidence that has re-emerged within fruit production and will encourage

sustainable initiatives that respond to global challenges, including the realignment of the marketplace, climate change and the decline in pollinators, whilst encouraging more local food production and sales.

Swale's Jobs and Housing ratio

17. It is an aspiration of the Council that for our strategic, mixed use sites, for every house that is built a new job is provided. Mixed use was identified in the Employment Land Review 2018 as a practical means of delivering jobs, and a one: one ratio would help to reduce our out-commuting rate, thus reducing congestion and air pollution and help to foster and grow our own economy.

Employment Need

18. The [Employment Land Review update October 2023](#) (ELR) evidences the scale and quality of new land needed to support the Borough's growth over the period of 2022 – 2040. This document provides an update to the [ELR 2018](#) to address recent macro-economic 'shocks' that have led to major structural changes in employment and business habits and significant changes to the planning system and guidance as they relate to the economy and employment.
19. The ELR update 2023 concludes the demand for, and take-up of industrial land has been stronger and faster than was anticipated in the 2018 ELR, led by the strategic distribution market (particularly for retail and 3PLs, but also manufacturing and freight and wholesalers). This has produced a higher need figure at 73 ha – with demand of 48 ha, plus a margin of 25 ha.
20. The ELR update 2023 goes on to set out that the requirement for offices has shifted significantly since the 2018 assessment. Both the demand and the availability of office space remain low and broadly in balance, with the market serving essentially local businesses. Rents are insufficient to stimulate viable development and the long-standing weak performance of the office market, coupled with the shock of Covid and its aftermath has pulled the assessment substantially downwards. The latest assessments of office demand broadly align, suggesting the market is at equilibrium at best, but could equally see contraction. This means that the unmet need for new office floorspace is just 1.1 ha; virtually no requirement.

Policy ST 4

Development needs for the Borough

1. The Council seeks to meet its development needs through the implementation of existing consented sites and by and by allocating sites for development as set out in this Local Plan.

Swale's development needs for jobs and homes 2027 – 2042

2. Land is identified by the Local Plan Review to meet the following development targets:
 - B Class Employment floorspace provision (ha): 73ha
 - Housing provision: 17,024 (1,064 dwellings per annum)

3. The Council will monitor and review the Local Plan as required by national policy. Infrastructure requirements to support housing and employment will be delivered as set out in the Infrastructure Delivery Plan.

Policy ST5 Building a Strong, Competitive Economy

1. The requirement in the PPG and NPPF to plan for business uses - office and industrial/warehousing allocations remains. Use class E does not affect this, for the time being at least. The Employment Land Review (ELR) gave a need figure for Swale so we will allocate for use class B and the parts of use E class that are relevant – office and R&D (E(g)i & ii) and light industrial (E(g)iii). We will refer to them as ‘economic land uses’ through the LPR. This may need to be revised before submission/examination if Government legislation changes.

Building a strong, competitive economy

2. The Council will encourage and support sustainable economic development in Swale and ensure that local residents will benefit from a thriving, healthy and more diverse local economy. The Local Plan will support the local economy by protecting the existing stock of property where it has a reasonable prospect for ongoing employment use and allocating new sites to meet our economic needs.
3. The Council aims to meet the needs of our residents and provide employment opportunities that match their skills and ambitions, whilst attracting inward investment into the borough and supporting our own home-grown businesses to further grow and expand. We will create the conditions to support start-up businesses, especially in our future growth sectors and in the creative, science related and high tech industries.
4. The economic objective of achieving sustainable development through the National Planning Policy Framework (NPPF) is “to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.” (NPPF, paragraph 8a.)
5. Policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. (NPPF, paragraph 85.)
6. The creation of the South East Local Enterprise Partnership (SELEP) in April 2011 included Government, Councils, businesses and education providers from Kent, Greater Essex and East Sussex. Their vision was “a more productive and prosperous economy in which everyone has the opportunity to succeed.” Since April 2024, their activities to support local growth have been undertaken by Local Authorities.
7. Prior to Covid-19 Swale’s economy was growing, dominated by manufacturing and a number of small niche sectors. Post Covid-19, the economy remains similar, we are still a net exporter of labour mainly to London and adjoining areas of Kent, with some weaknesses in the local labour market, including relatively high unemployment levels, below average skills and lower earnings. Our rates of new business formation are also currently lower than the county averages. Most of our stock of employment space comprises industrial uses, with comparatively modest amounts of office accommodation, although this has grown in recent years.

8. This policy, along with ST1 and ST4, supports the vision and objectives of Local Plan Strategy to strengthen economic development in the Borough and addresses the issues highlighted by the Swale Employment Land Review (2018) and its Update (2024), the Strategic Market Housing Assessment (2020), the Local Housing Needs Assessment (2020) and the Retail and Leisure Needs Assessment (2019) and Update (2023) to produce a strategy to meet employment needs over the Plan period.
9. In line with the evidence on need this policy supports our future potential growth sectors (see Statement below) and the needs of:
 - the manufacturing sub-sectors and their underlying strengths in certain specialist sectors;
 - the retail sector;
 - the visitor economy (recreation, accommodation and food services);
 - growth focused on the natural environment and heritage offer;
 - our burgeoning creative industry sector; and
 - expansion proposals in the pharmaceutical sector.
10. This policy confirms and encourages the appropriate development of the 'Strategic Employment Locations', as set out in the proposed allocations chapter and within Regeneration and town centre policies as appropriate, at:
 - Sittingbourne, Sheerness and Faversham town centres;
 - Ridham, Kemsley, Eurolink and the Kent Science Park in the Sittingbourne area; and
 - Neatscourt and the Port of Sheerness on the Isle of Sheppey.
 - An objective of the Council is to promote port related activities in and around the Sheerness Port estate Policy Regen 1 (whilst recognising that the port land is outside of the scope of normal planning control) and to promote high tech industries at the Kent Science Park Policy Regen 4.

Statement Box

Swale's Future Potential Growth Sectors

- General and advanced manufacturing and engineering
- Logistics and distribution
- Agriculture/ forestry/woodland
- Financial/business services
- Environmental technologies (low carbon sector)
- Healthcare/biotechnology
- ICT, media/telecommunications
- Construction
- Creative industries
- Retail/leisure, cultural activities, tourism, hotels and catering and boat repair

11. Future growth depends on attracting inward investment, developing the sectors where there are already established strengths and stimulating growth of smaller scale home-grown firms (inc. creating a positive climate to encourage school and higher education leavers to base new businesses in Swale). We also need to diversify into higher value manufacturing, logistics and distribution and the environmental sectors, all of which offer potential that can build on the area's strengths.
12. Agriculture is also an important economic sector and the industry needs to keep pace with the changing context brought about by climate change, food security, global markets, major food retailers and changing legislation/guidance.

The Importance of Swale's Agricultural Sector

- Swale has 37,000 ha of land; of which 24,000 ha is farmed and approximately 60% is classified as best and most versatile (BMV).
- The best and most versatile land (ALC Grades 1, 2 and 3a) farmed in Swale is worth approximately £360 million at the current average market price for good quality arable land in England. It is estimated to support £105m– £255m of agricultural output each year.
- Swale is within the top 20% of local authorities in England with the highest numbers of agricultural workers - Swale had 2,494 workers in 2016. In Swale, the agricultural workforce has increased in recent years.

13. Policy E2 aims to support the agriculture sector adapt to the challenges it faces and continue to be a key feature of Swale's economy.
14. As a Borough with a woodland resource, there is also potential employment through its better management, both for woodland products and as a renewable energy source.
15. This policy safeguards for future use the employment potential of existing land or buildings, but acknowledges the desirability of releasing older, poorer performing industrial sites to other uses. The Employment Land Review 2018 and the Update (2024) assessed the existing stock of premises and land, and identified just six existing sites and no allocations that were suitable for managed release. This safeguarding includes both land or buildings in current employment use or allocation, land where planning permission has expired or other vacant land and premises where their potential for employment remains relevant. For sites not considered suitable or viable, the Council must be convinced that evidence points to wider, fundamental and deep seated structural problems with the site, rather than shorter term difficulties caused by a particular economic context. This is important where allocations and committed employment sites have been made on the basis of a particular economic and/or locational need to serve the plan period. Policy E1 gives more detailed guidance on the evidence that the Council requires.
16. Given the outstanding environment in Swale, this policy seeks to expand our potential for sustainable rural tourism to benefit local communities and raise awareness and support for conservation of the environment. There is an important link between the quality of the environment (both historic and new) and economic development, in particular the area's ability to attract investment, jobs and population. Swale's historic environment has the potential to play a significant role in supporting enterprise, especially in helping under-performing parts of Swale to transform themselves, such

as at Sittingbourne town centre and Sheerness. Also important is our current portfolio of principal tourism assets (see Statement Box 3), with this policy supporting their growth and, if necessary, their protection from inappropriate development proposals.

Swale's Principal Tourism Assets and Potential

- Coast - beaches, cliffs, lively seaside resorts including holiday parks and amusements, wild landscapes and marshes, Saxon Shore Way, King Charles III England Coast Path, Church Marshes, bird life and quiet sailing waters. The Isle of Sheppey is unique within Kent.
- Countryside - down land, valleys, woodlands, orchards, parkland, narrow lanes, picturesque villages and houses and a network of foot and cycle paths (including a National Cycle Route) and bridleways.
- Built heritage - a great range of heritage assets reflecting its Roman and Medieval legacy, its naval and maritime history and its industrial and agricultural past.
- Fruit Heritage - the National Fruit Collection, and 'fruit' celebrations.
- Festivals – such as the Faversham International Hop Festival, Faversham Literary Festival, Brogdale Collections Seasonal Fruit Festivals, Festival of Sheppey
- Market Town of Faversham. A small historic Cinque Port town, lively town centre, unexploited creek and marshland, a multi-faceted town with links to the countryside.
- Unspoilt rural villages.
- Industrial heritage - gunpowder, naval, brewing, aviation, 'defence of the realm', sailing barges, brick and paper-making.
- Naval and aviation history, sustainable rural tourism e.g. walking/cycling, other outdoor activities and sustainable accommodation at Faversham and Sheerness
- Food and drink - high quality restaurants, pubs, brewers and local food suppliers
- Accommodation - small number of hotels, pubs with rooms, guest houses and bed and breakfast establishments, holiday parks and glamping sites

17. For our town centres and the retail and leisure sectors, our Local Plan Strategy indicates that there is a need for further comparison (non-food) floorspace support general growth and to help claw back expenditure lost to other centres and a diversification into the 'experience' sector rather than traditional retail. The creative sectors and arts and culture are an important part of the economy, which benefit from the availability of accessible flexible studio and workspace.
18. We cannot anticipate every business opportunity. This policy indicates a series of 'Priority Locations' where, when demonstrated that an existing employment location or allocation is unsuitable or unavailable for the development in question, appropriate sites will be considered. For such proposals, the Local Plan Strategy and environmental quality should not be compromised. The 'Priority Locations' are:

- the extension of our existing employment sites;
 - where benefits to deprived communities can be achieved;
 - well related to either the A249, A2, the built out section of the Sittingbourne Northern Relief Road or A299 Thanet Way; and
 - the re-use of heritage assets or where they could deliver significant benefits to the conservation of landscape and/or biodiversity.
19. Some of our businesses will be at the front line of climate change, either by being affected by future natural processes or by offering potential for the Borough to be a focus for low carbon technologies. This policy supports improved resilience and new business opportunities within this sector.
20. Swale is a net exporter of labour, with a net outflow of 10,394 working commuters, and aside from commuting to London, almost all commuting is very short distance into one of the immediately adjoining local authorities. (Swale ELR, 2018.) Whilst reducing the level of out-commuting will be challenging, this policy is supportive of proposals able to realistically deliver a reduction in commuting out of the Borough, especially for those sectors currently the focus of out-commuting.
21. In May 2024, Swale's employment rate was 80.7% (ages 16 to 64) which was higher than across the South East as a whole and economic inactivity was 18.7% (ages 16 to 64.) ([Swale's employment, unemployment and economic inactivity - ONS](#))
22. Unemployment levels in Swale in 2025 were 4.4%, above the Kent's 4%. (KCC Economic Indicators, www.kcc.gov.uk) Improving the skills performance of the local labour supply is needed.
23. Swale performs above the national median in 3 indicators: median gross weekly resident earnings; employment rate; and 5-year percentage change in employees. Swale performs below the national median in 9 indicators: job density; unemployment rate; median gross weekly workplace earnings; percentage qualified to RQF level 4 and above; percentage qualified to RQF level 2 and above; stock of businesses; 3-year business survival rate; GVA per head; and percentage of employees in the knowledge economy.
24. High speed internet connectivity is important to encourage economic growth, especially in the rural areas. All new development will be required to provide for access to this technology regardless of location.

Policy ST 4

Building a strong, competitive economy

Actions by public, private and voluntary sectors will work towards the delivery of the Local Plan economic strategy.

1. Development proposals for current employment sites that re-provide the same employment land uses will be supported.
2. Development proposals for employment use on sites used for non-employment purposes will be encouraged where they meet the needs identified in the Council's Employment Land Review and/or where other considerations weigh in their favour.

Development proposals will be encouraged where they:

3. Stabilise losses of jobs within the manufacturing sector or exploit competitive strengths in the Swale economy including uplifting sectors related to the visitor economy and expansion of the pharmaceutical and science sectors;
4. Bring forward an increase in homegrown business creation and inward investment, including those able to encourage younger people to retain and use their skills within Swale;
5. Encourage educational facilities or an expansion of vocational learning, developing links between institutions and the private sector or work-based learning at key locations;
6. Grow opportunities for the creative and cultural sector through opportunities in underused properties or new developments for creative start-up space, skills hub, and flexible public facing creative exhibitions and events;
7. Contribute to the delivery of a comprehensive land portfolio for the Borough by:
 - a. safeguarding and maximising the potential of identified 'Strategic Employment Sites';
 - b. bringing forward the stock of existing committed employment sites for industrial use;
 - c. addressing qualitative issues with new provision at Local Plan allocations to support established industrial markets, additional office space, the release of poorer quality locations and the broader upgrade of the supply; or
 - d. managing existing and future employment potential by upgrading older industrial areas.
8. Include sectors that are under-represented in Swale, and/or that may potentially enable a reduction in commuting out of the Borough;
9. Avoid proposals that would harm existing employment locations and allocations where appropriately located and suitable, viable for users under normally functioning economic conditions or required to meet the identified needs for the plan period;
10. Address future challenges to the agricultural and woodland/forestry industries with sustainable and appropriate proposals to create new markets and greater resilience;
11. Safeguard or enhance Swale's 'Principal Tourism Assets' and consolidate or widen the Borough's tourism potential, particularly where embracing principles of sustainable tourism;
12. Focus larger scale development where they utilise the strategic and primary road networks;
13. Support sectors attractive to the local population who would otherwise out-commute for work;
14. Facilitate the delivery of digital infrastructure, including access to high speed Internet connectivity from all new developments;
15. Create improved resilience for existing businesses by measures to address flood risk, climate change and natural processes and lead to an expansion of businesses in the low carbon sectors; or
16. Provided the Local Plan strategy is not significantly compromised, and sites cannot be found within criterion 7, meet unanticipated needs on appropriate sites within one or more of the following 'Priority Locations':
 - a. the extension of an existing employment site;
 - b. where benefits to deprived communities can be achieved;

c. sites well related to the A249, A2, Sittingbourne Northern Relief Road or A299 Thanet Way; or

d.re-use of heritage assets or where delivering significant benefits to the conservation of landscape or biodiversity.

Policy ST6 Delivering a wide Choice of High-quality Homes

Delivering a wide choice of high-quality homes

1. The National Planning Policy Framework (NPPF) is clear that local plans should make sufficient provision to meet housing needs and that the needs of groups with specific housing requirements are addressed. Councils are expected to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
2. The Council is committed to delivering housing through the Local Plan that reflects the needs and preferences of local people and that the adverse effects of development on communities is offset by properly funded infrastructure. The Swale Borough Council Corporate Plan (2023– 2027) sets out that the Council will Progress a Local Plan with local needs and capacity at its heart. This will be achieved through this Local Plan by ensuring that future housing delivery is more closely aligned to the Borough's ability and capacity to provide for genuine sustainable housing needs, in terms of location, type and tenure and that the impact of housing growth is offset through improved physical, environmental, social and health infrastructure.
3. The strategic priorities of the Swale Borough Housing, Homelessness & Rough Sleeping Strategy 2023-2027 are to deliver affordable homes; to prevent homelessness; to develop a more efficient housing options service; and to improve conditions in existing homes. Delivering a range of choice of quality homes through the policies and proposals in this Local Plan Review will assist in delivering these priorities.
4. Provision is made in this Local Plan for at least 8,068² dwellings (from non-consented allocated sites) to address the identified local housing need using the standard method set out in the national planning practice guidance. Major new development will be delivered at the strategic sites identified in this plan.
5. In addition to the strategic and non strategic site allocations, new housing development for park homes, older person accommodation and Gypsy, Traveller and Travelling Show people accommodation will be delivered in accordance with the specific policies in this Local Plan.
6. The Boughton and Dunkirk Neighbourhood Plan was made in February 2023 and The Faversham Neighbourhood Plan in December 2024. is already adopted and Faversham Town Council is in the process of preparing their Neighbourhood Plan, The two Plans combined have allocated sites for 263 dwelling over the life of the plan. There are other areas that have been designated Neighbourhood Planning Areas with work commenced but no draft plans prepared to date.
7. The Swale Housing Market Assessment (HMA) update 2026³, provides the evidence needed to identify the mix of housing needed for the Borough during the plan period. It sets out detailed information about the size profile and the tenure split for the period 2026 to 2042 for new dwellings. It also sets out the number of specialist dwellings for older persons needed and the need for new adapted housing to meet the needs of people with disabilities.
8. The government's standard method local housing need calculation for Swale of 1,064 is disaggregated using the Long Term Balancing Housing Markets model (LTBHM) to identify the tenure and size of housing that should be sought over the plan period to best accommodate the future population. The outputs of this model determine the size and

^{2 2} All housing land supply figures and assumptions are based on 1 April 2025 monitoring position including use of the Local housing Need at this base date. The housing land supply will be updated to 1 April 2026 as part of the Local Plans submission.

³ Link to be inserted once published

tenure of the new housing required as a guide, acknowledging that it may be appropriate to divert away from this profile in particular instances.

9. The HMA concluded that affordable rent demand is highest for 3 bed properties, then 1 bed properties, and then followed by demand for 2 bed properties. Given that the HMA is a snapshot in time, the latest information available from the Council's Housing Register should be used as the starting point for identifying and agreeing the sizes of properties need for affordable rent in development proposals.
10. The HMA also sets out in terms of size profile, the greatest demand in market housing is for 4 bed properties (23.8%), followed closely by 2 bed properties (23.1%), with the lowest demand being for 1 bed properties (11%). The tenure split for the new dwellings in the Borough is for 76.8% market housing; 3.3% First Homes, 4.0% Shared ownership, 4.1% affordable rent; and 11.8% Social rent.
11. For specialist dwellings for older persons has a need for 928 additional units of Sheltered housing for older people/ retirement housing and 267 additional Extra care units/ supported living housing over the Plan period. It is also identified that an additional 360 Registered Care spaces (nursing and residential care homes) will be required. The HMA concludes that the need for new adapted housing is required for an additional 5,376 households (and therefore should meet M4(2) space standards) and of those, 1,123 dwellings should be M4(3) Category 3 homes, i.e. dwellings suitable for wheelchair users.
12. The most effective approach to ensuring the housing stock has the flexibility to meet the requirements of the future population is for the Council to implement a policy of universal Category 2 standards in all new build housing. The Viability evidence confirms this can be achieved and that 5% of new dwellings can also achieve the higher standard of M4(3.)

Policy

Development proposals will, as appropriate:

1. Provide affordable housing in accordance with Policy H1;
2. Be steered to locations in accordance with Policy ST 2 (Swale's Settlement strategy), including:
 - i). at local plan and neighbourhood plans allocations and Community Right to Build initiatives;
 - ii). Windfall sites where, its design, layout and landscaping would support and enhance the character of the area and can demonstrate that development of the site within its local context, would benefit the existing community and support sustainable development.
 - iii). town centres when contributing to their vitality and viability; or
 - iv). Deprived communities when improving local housing markets and supporting communities.
3. Use densities determined by the context and the defining character of the area;
4. Provide 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;
5. Achieve the mix of housing types needed as reflected in the findings of the latest Housing Market Assessment or similar needs assessment, and for affordable homes

to use the information from the Council's Housing Register to ascertain specific needs at that time;

6. Meet the housing requirements of specific groups including families, older persons or disabled and other vulnerable persons;
7. Bring vacant homes back into use and up to the relevant standards; and
8. Achieve sustainable, healthy and high quality designed homes in accordance with Policy ST 7 Good Design, ST8 Health and Wellbeing and policies GD1 Local Design Principles and C1 Sustainable design and adaption principles.

Policy ST7 Good Design and Placemaking

1. Swale Borough Council considers that high quality urban design, landscape design and building design is required to enable healthy and happy lifestyles within sustainable communities for its residents and businesses. We must plan and build differently, carefully, beautifully and with a greater conscience for what we are creating for those that come after us.
2. Local distinctiveness and culture are important for placemaking in Swale. A new development may successfully be able to create a sense of place by addressing the following:
 - I. Discover the unique qualities of the physical and natural environment then identify how to both conserve what is special, learn from the findings and apply to new development to create distinctive character.
 - II. Understand how people move around, connect with their social and physical environment, interact and integrate to create walkable communities whilst considering how technology could change this.
 - III. Make places better for people by understanding who will live and work in them and appreciating their needs coupled with regard for the environment by ensuring the right mix of uses whilst allowing for flexibility and agility to adapt to change in the future.
3. There is renewed appreciation of the value of good design as set out in updated national policy, the release of new guidance and the promise of more to come:
 - The National Planning Policy Framework (NPPF) stresses that good design is a key aspect of sustainable development and together the two achieve healthy, inclusive and safe places.
 - The National Design Guide (NDG) illustrates how a well-designed place that is beautiful, enduring and successful can be achieved in practice. The Council expects a high level of engagement with this guidance by applicants.
 - The Building Better, Building Beautiful Commission advise how to promote and increase the use of high-quality design for new neighbourhoods in the report 'Living with Beauty' which identifies a number of far ranging priorities and policy recommendations to enhance the quality and design of buildings and spaces, including the need for a greater use of form-based codes.
 - Ministry of Housing, Communities and Local Government (MHCLG) is advancing the preparation of a National Model Design Code, that will set the basis for a consistent approach to Design Codes across England, with an emphasis on the preparation of Codes by Local Authorities and Community Forums as part of local plans. The Council will engage with this process in the future.
4. The Council encourages developers to consider using the Council's design panel, or similar and respond positively to the provisions of the previously stated documents and the following (and successor) publications:
 - I. The Healthy Homes Principles: The Town and Country Planning Association's twelve Healthy Homes Principles.

- II. Building for a Healthy Life: Homes England, NHS England and NHS Improvement. A widely used design tool for creating places that are better for people and nature. Cited by NPPF as a tool helpful for assessing and improving design quality.
- III. Putting Health in Place: NHS England: The Healthy New Towns programme informed ten healthy new town principles which demonstrate to housebuilding, local government, healthcare and local communities how to create new places that offer people improved choices and chances for a healthier life.
- IV. The Manual for Streets: Department for Transport. Emphasises that streets should be places in which people want to live and spend time in, and are not just transport corridors. Aims to reduce the impact of vehicles on residential streets by planning street design intelligently and pro-actively, giving a high priority to the needs of pedestrians, cyclists and users of public transport.
- V. Kent Design Guide (and appendices): Prepared by the Kent Design Group, it provides the criteria necessary for assessing planning applications. Helps building designers, engineers, planners and developers achieve high standards of design and construction.
- VI. Secured by Design: An initiative that focuses on crime prevention of homes, commercial premises and schools by promoting the use of security standards for a wide range of applications and products. Now supported locally by Design for Crime Prevention, part of the Kent Design Guide.
- VII. Design guidance from Kent Downs National Landscapes unit: Includes its Landscape Design Handbook and Rural Streets and Lanes Design Handbook.
- VIII. Active Design Guidance: Sport England. A set of design guidelines to promote opportunities for sport and physical activity in the design and layout of development. Promotes sport and activity through three key Active Design principles of - improving accessibility, enhancing amenity and increasing awareness.
- IX. Swale Borough Council Supplementary Guidance and Documents: These include guidance on house extensions, shop fronts and advertisements, landscaping, and converting rural buildings, together with a Supplementary Planning Document on Landscape Character and Biodiversity Assessment and Guidelines 2010 and the Urban Extension Landscape studies, Parking SPD, Town Centre SPD.

Policy

All development will be required to achieve high-quality design that delivers sustainable, resilient and locally distinctive places. Development proposals must demonstrate how they respond to the following principles:

1. **Character and Identity** - Reinforce and enhance the distinctive qualities of Swale's coastal, creek, estuarine and rural landscapes, its historic towns, villages and settlements, and its built and archaeological heritage. Development must contribute positively to local identity and sense of place, responding positively to local character and context while allowing for high-quality and innovative design.
2. **Inclusion and Safety** - Create inclusive environments that promote health, wellbeing and social interaction. Development must ensure that spaces are safe, accessible, easy to navigate and reduce opportunities for crime.
3. **Connectivity and Permeability** - Provide a clear, legible and well-connected network of streets, routes and spaces that are attractive and permeable. Development should prioritise walking, cycling and public transport, and provide strong and integrated

connections within sites and to the surrounding urban and natural environment, including links to the coast, countryside, green spaces and heritage assets where appropriate.

4. **Sustainability and Climate Resilience** - Maximise resource efficiency and minimise carbon emissions, while integrating multifunctional green and blue infrastructure that supports amenity, biodiversity net gain, water management and climate adaptation. Given Swale's particular vulnerability to flood risk, climate change and sea level rise, development must demonstrate resilience to current and future climate impacts.
5. **Well-managed and Built to Last** - Ensure buildings and spaces are durable, adaptable, and designed for longevity, delivering a high standard of amenity. Development must support clear arrangements for long-term stewardship, management, and maintenance, and contribute positively to Swale's built and natural environment.
6. **Context** - Ensure that the use, scale, height, massing, density, and appearance of development are appropriate to their location, responding positively to both the immediate context and the wider area. In smaller settlements, rural areas, and sensitive coastal, creekside, and historic environments, development should take account of the established character, grain, and setting.
7. **Public Spaces** - Deliver high-quality, well-designed public spaces and public realm that support social interaction, community cohesion and opportunities for recreation and cultural activity. Public spaces should respond to and celebrate Swale's distinctive character, including its maritime, industrial and landscape heritage.
8. Development should comply with the detailed requirements of Policy GD1 (Local Design Principles), relevant design codes and masterplans, which provide more specific guidance on achieving these principles.
9. Major and sensitive development proposals will be required to engage with the Council's Design Review Panel at an early stage, in accordance with the Council's Design Review Protocol.

Policy ST8 Health and Wellbeing

1. The Council aim to 'reduce health inequality by developing more productive relationships with local health partners and making health and wellbeing a central consideration in all relevant council decision-making, recognising especially the link between housing and health'.
2. The National Planning Policy Framework (NPPF) (paragraph 96) stresses the importance of healthy, inclusive and safe places that encourage social interaction, provide good accessibility and support healthy lifestyles. The importance of positive planning for the provision of social infrastructure including schools, health facilities, sports facilities, open spaces, local shops, allotments and community centres. Planning for and protecting existing services and open space are also recognised by the NPPF as important elements of creating healthy communities.
3. The Healthy Places programme was set up in 2013 by Public Health England (PHE) in recognition that where people live, their homes and their communities' connections have a big impact on health and wellbeing and need to be integrated with high-quality health services. The learning from the Healthy New Towns programme has since been distilled into 'Putting Health into Place' 2019 which sets out the role councils, developers and the NHS can play as well as outlining the ten principles for healthy place-making:
 1. Plan ahead collectively
 2. Assess local health and care needs and assets
 3. Connect, involve and empower people and communities
 4. Create compact neighbourhoods
 5. Maximise active travel
 6. Inspire and enable healthy eating
 7. Foster health in homes and buildings
 8. Enable healthy play and leisure
 9. Develop health services that help people stay well
 10. Create integrated health and wellbeing centres
4. The Department of Health and Social Care have published guidance regarding the mutual relationship between wellbeing and health. Healthier lifestyles and good health status are both associated with higher levels of wellbeing and wellbeing is important to health. Therefore, focusing policies on wellbeing could lead to improved wellbeing and also improved health outcomes. The five ways to wellbeing are listed as, connectivity in terms of relationships and community, physical activity, engagement in life, continuous learning and giving back. In addition, there is clear evidence that good work improves health and wellbeing across people's lives.
5. Community programmes to improve diet should address the needs, concerns and interests of local people and can be delivered in formal or informal ways. Increasing knowledge and skills in healthier eating and cooking is assisted with Public Health England's Eatwell Guide which sets out recommendations on eating healthily and achieving a balanced diet.
6. The Marmot Review: Implications for Spatial Planning (2011) identified the role planning can play in affecting health through: the design of developments, ensuring that services are joined up and easier to access, community participation, accessible transport, well located services and by the pursuit of healthy lifestyles through active travel and use of green space.

7. Health Equity in England: The Marmot Review 10 Years On (2020) highlights that: people can expect to spend more of their lives in poor health; improvements to life expectancy have stalled and declined for the poorest 10% of women; the health gap has grown between wealthy and deprived areas and irrespective of wealth or deprivation where you live negatively impacts on life expectancy by nearly five years. The Council is committed to addressing these health inequities.
8. Kent and Medway Councils have set up a joint Health and Wellbeing Board as an advisory joint sub-committee to tackle system-wide health challenges and health inequalities with a focus on adult social care and health integration (local care) and on prevention. The Kent Joint Health and Wellbeing Strategy recognises that shaping the physical environment of the community so that it can better promote healthier lifestyles is central to the health improvement role of local authorities. Key health facts for Swale:

Key health facts for Swale box:

- The health of people in Swale is mixed when compared with the average for England. The Public Health England publication Swale Health Profile reveals levels of health/deprivation significantly worse than the England average in the following areas: mortality rate at birth for males; suicide rates; smoking during pregnancy; teenage pregnancies; and prevalence of smoking in adults.
 - The Public Health England publication Swale Health Profile show that obesity levels in children was higher in Swale than in Kent in both reception (11.1%) and year 6 (23.9%).
 - There are significant health inequalities depending on where people live within the Borough. Life expectancy is about 8.3 years lower for men and 6.4 years lower for women in the most deprived areas of Swale than those in the least deprived areas.
9. There are significant health and wellbeing issues in Swale, especially in its deprived communities. To address these issues, it is important that community needs are supported through appropriate physical and social infrastructure and by other facilities and key services which contribute to improving wellbeing and the overall quality of life experienced by residents. The Local Plan, therefore, makes provision for improved access to local services, healthy transport choices such as cycling and walking, access to green infrastructure, open space and active recreation, good design in the built environment and recognises the role that mixed use developments can play in providing healthy communities. Specifically, to encourage healthy eating the negative impact of access to hot food takeaways (use class order sui generis) in close proximity to schools is addressed. In 2020 the PHE and partners provided practical support for local authorities that wish to use the planning system to achieve these important public health outcomes regarding obesity.
 10. On 19th November 2025, the Council declared a mental health crisis which is committed to ending the stigma around men's mental health and promote the support services available to residents such as Mind, MenTalk Health Swale Group, the Samaritans and CALM.
 11. The Council has undertaken an audit of open space and determined standards to be applied to new developments. These can be found in policy INF3 open space, sport and recreation provision. Existing provision, whether of open space, health or other community facilities should also be safeguarded against development proposals that would result in their loss.

12. This policy brings together all the relevant matters affecting health to provide an integrated approach. If fully implemented, an integrated approach toward health should potentially reduce costs to health services in the long term. Health impact assessments will be used to ensure these issues are properly considered and integrated at the planning application stage. The use of such assessments will be appropriate as identified by Local Plan allocations, or when statutory
13. Environmental Impact Assessments are required, or for larger developments within Swale's most deprived wards.
14. In May 2024, the Council signed the Town and Country Planning Association's Healthy Home Pledge. This pledge:
 - Ensures the provision of high-quality homes and places that will protect and promote all residents' physical, mental and social wellbeing, as well as to support planetary health. This is a commitment to ensure all homes meet the Healthy Homes Principles.
 - Is to not knowingly engage in any form of development, activity or decision making likely to create harm to human health.
 - Supports the provision of genuinely affordable homes, based upon people's ability to pay.
 - Ensures all residents have defined legal protections against poor build quality, management or maintenance and landlord harassment.
15. Culture also plays a role in supporting health and wellbeing and should be viewed as fundamental part of living well. Participation in creative and cultural activity can help people feel happier, healthier, more connected and more resilient while also strengthening communities and reducing inequalities. This is highlighted by the Arts Council England (<https://www.artscouncil.org.uk/developing-creativity-and-culture/health-and-wellbeing/creative-health-wellbeing>). The Council is preparing a cultural statement and more details will follow once it is completed.

Policy

The Council, working in conjunction with relevant organisations, communities and developers, will undertake targeted interventions to identify Swale's most disadvantaged families and communities, improve our understanding of the issues they face, and develop new ways of working to reduce social exclusion and enhance opportunities and quality of life to reduce health inequalities.

Development proposals will, as appropriate:

1. Bring forward accessible new community services and facilities, including sufficient health facilities with developers contributing towards the provision of built facilities and other improvements to healthcare services, as set out in the Infrastructure Delivery Plan;
2. Safeguard existing community services and facilities where they are viable or can be made so, or where replacement facilities can be provided without leading to any shortfall in provision: access to open space to facilitate physical activity, cultural activity, activities which strengthen social bonds, healthy eating learning, childcare and youth provision;
3. Safeguard or provide multifunctional open space, sport and recreation in accordance with INF3 Open space, sport and recreation provision, additionally enabling access to

nature in accordance with the green infrastructure strategy in ST11 Conserving and enhancing the natural environment;

4. Promote healthier options for transport, including cycling and walking by ensuring that the site chosen for the new place is suitable for sustainable transport links with other places, where appropriate is designed to be mixed use, compact and provided with safe pedestrian and cycle routes to make active travel easier in accordance with ST10 Promoting sustainable transport and active travel;
5. Improve or increase access to a healthy food supply such as allotments, markets and farm shops;
6. Limit new hot food takeaways within 400m of a school perimeters;
7. Create social interaction and safe environments through mixed uses and in the design and layout of new development in accordance with ST6 Delivering a wide choice of high-quality homes ST7 Good design;
8. Create a healthy environment that regulates local climate by providing open space and greenery to achieve shading and cooling, particularly within existing urban environments in accordance with B5 Woodland, orchards, trees and hedgerows;
9. Address air quality in accordance with C11 Air quality;
10. Ensure mitigation and adaptation to climate change through sustainable design and construction in accordance with C1 Sustainable design and adaptation principles; and
11. Undertake and implement a Health Impact Assessment for relevant proposals that are:
 - a. Required to undertake Environmental Impact Assessments; or
 - b. Within Swale's most deprived wards; or
 - c. Identified as required by the Local Plan.

Policy ST9 Planning for Infrastructure

1. The new housing, employment and other development proposed in the Local Plan will increase demands on infrastructure in the Borough. These demands need to be managed and may involve protecting existing infrastructure, identifying where there is capacity and/or securing the timely provision of new infrastructure, which in itself may require land allocations to be made to accommodate it.
2. Identifying and making sufficient provision for infrastructure is an important thread running throughout the National Planning Policy Framework (NPPF). The NPPF highlights the role the planning system can play in identifying and co-ordinating the provision of infrastructure⁴ and the need for engagement with infrastructure providers to determine where additional infrastructure is necessary⁵.
3. Infrastructure can include roads and other transport facilities, public transport, utilities, flood defences, schools and other educational facilities, health facilities, cultural services, sports and recreational facilities and open spaces. This is not an exhaustive list and there may be other infrastructure facilities and services, which will be required to deliver the Local Plan.
4. The council, in consultation with partners and service providers, has prepared an Infrastructure Delivery Plan (IDP), setting out the key infrastructure and service needs required to support the level of planned growth across the Borough and the individual site allocations. The IDP identifies, where known, how and when this infrastructure might be delivered, who will lead on delivery and a broad indication of timing, costs and funding mechanisms. The key on-site infrastructure needed to support implementation of a particular site allocation has also been identified in the relevant allocation policy. It should be noted that the IDP principally identifies key infrastructure projects and does not include all site-specific infrastructure requirements, which will be dealt with through individual planning applications.
5. The IDP has been published separately and can be viewed on the council's website. The IDP is a 'living' document, which will be reviewed and updated on a regular basis. The council will continue to engage with service providers to ensure that the IDP provides the most up-to-date picture of the infrastructure needs of the Borough, particularly regarding infrastructure needed to support development later in the plan period, and to monitor progress in the delivery of infrastructure projects, their costs and funding.
6. It is critical that sufficient infrastructure is available to serve new development and that it is delivered in a timely manner to ensure the needs of the occupiers of new development can be met without placing undue burdens on existing infrastructure facilities and services. The policy seeks to ensure that new infrastructure and services are delivered either in advance or alongside the development they are intended to support. Where appropriate, applicants will be expected to collaborate on the provision of infrastructure needed to serve more than one site.
7. In some circumstances, due to the timing of critical infrastructure projects such as off-site highway improvements, it may be necessary for development of a site to be phased to ensure it does not proceed until the provision of this infrastructure. Should this be the

⁴ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf Para 8a

⁵ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf Para 26

case, the council may grant permission with conditions or planning obligations restricting full or partial occupation until the completion of critical infrastructure projects or phases of projects. Where site allocations coming forward are dependent on the delivery of infrastructure projects this has been reflected in the phasing of the allocation in the housing trajectory.

8. In the event issues arise with the delivery of strategic infrastructure required to enable growth, the council will seek to work actively with developers, infrastructure providers and other partner organisations to resolve the issue.
9. The Local Plan is based on a whole plan viability approach. The Whole Plan Viability Assessment has tested whether the Local Plan strategy, taken as a whole, is realistic and able to be delivered and has considered the impact of the Local Plan policies and other requirements on the viability of development likely to come forward over the plan period in the borough. The assessment has found that the policy requirements in this plan are viable across most site typologies.
10. As a starting point, therefore, it is assumed that all development proposals will be viable unless exceptional circumstances are demonstrated, and it should not normally be necessary for viability assessments to be submitted with individual planning applications. It will be for an applicant to justify, in line with paragraph 59 of the NPPF, the need for a viability assessment at the planning application stage. Where the applicant can justify that the particular circumstances warrant the need for a viability assessment the council will follow national guidance, as set out in the Planning Practice Guidance⁶, in determining the weight to be given to the assessment. Any viability assessment should reflect the government's recommended approach to viability assessment and be prepared at the applicant's expense.
11. Where a viability assessment demonstrates to the satisfaction of the council that a reduced level of developer contribution would be appropriate in order to enable the development to be delivered, the council will take a pragmatic approach to seeking developer contributions. In doing so, the council will generally apply the following priority to developer contributions, having regard to the latest IDP:
 - Those that are required to unlock growth, such as strategic highway improvements or ensure the
 - safety of the development, such as flood risk mitigation; then
 - Contributions to local infrastructure delivery to mitigate the impact arising from the development, such
 - as education or health provision; then
 - Affordable housing provision; then
 - Other developer contributions that would not fall into the above.
12. Any changes to this priority will be set out in the council's annual Infrastructure Funding Statement.
13. In recognition that the viability of development may change overtime, particularly for larger development proposals which may take many years to build out, any subsequent planning obligation will need to allow for a review of viability during the lifetime of the development at appropriate trigger points agreed between the council and the applicant.

⁶ [Planning practice guidance - GOV.UK](https://www.gov.uk/guidance/planning-practice-guidance)

14. All new development should contribute towards the cost of new infrastructure. Infrastructure funding by developers is most often secured through planning obligations⁷. On-site infrastructure will be secured based on the needs of each proposal and delivered directly by the developer or through financial contributions and/or the provision of land. Off-site infrastructure will be secured through developer contributions.

Policy ST 9

Planning for Infrastructure

The Council will work with Kent County Council, infrastructure providers, applicants and other key stakeholders to ensure that growth over the plan period is supported by necessary infrastructure, facilities and services in a timely manner to meet the needs of communities.

1. The Council will resist the loss or change of use of existing social and community facilities unless it can be demonstrated that:
 - a. The facility is no longer needed for its existing purpose, and the site or building is not needed for an alternative social or community use;
 - b. The current or alternative community uses are not viable; or
 - c. The services can be re-provided in a facility of better quality on the same site or in an alternative location that is equally accessible to the community served.
2. Development proposals, including those allocated in this plan, which give rise to the need for infrastructure improvements will be expected to mitigate their impact either individually or cumulatively and at a rate and scale to meet the needs that arise from that development or a phase of that development. As such development may require to be phased to ensure the co-ordination with delivery of necessary infrastructure. Where appropriate, developers will be expected to collaborate on the provision of infrastructure needed to serve more than one site.
3. The council will regularly update the Infrastructure Delivery Plan to determine the scope, cost and range of infrastructure improvement required to continue supporting the delivery of the Local Plan.

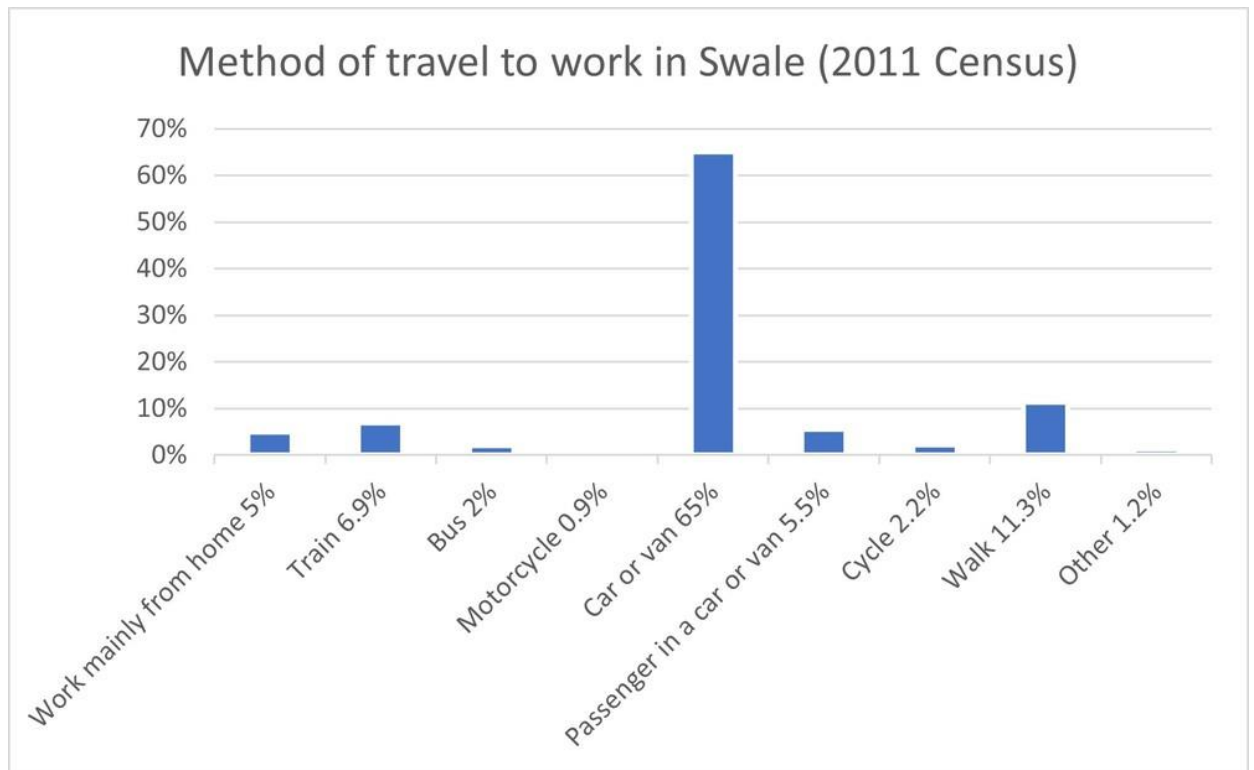
⁷ Either through a Section106 agreement or Section 278 Highway agreement (with Kent County Council)

Policy ST10 Promoting Sustainable Transport and Active Travel

1. One of the objectives of the Local Plan is to enable communities across Swale to become more sustainable. Creating safe and attractive neighbourhoods which promote walking and reduce the dominance of motor vehicles in particular have been found to be associated with increased social interactions and a sense of community. It can also help to create a sense of place and give an area identity. This section provides policies on sustainable and active travel in the borough with an aim of creating modal shift towards sustainable and active modes and less reliance on the private car in the borough.
2. Transportation plays a key role in the delivery of the Local Plan strategy, especially sustainable transport and active travel options. An efficient transport network which has good connectivity with the regional and national network is vital in helping Swale to realise its economic potential. To promote sustainable transport choices and active travel development should firstly, prioritise the needs of pedestrians and cyclists and then assess the role that public transport can contribute towards meeting the travel demands it will generate. Only once those options have been fully explored should further highway improvements be considered in the context of the capacity of the existing highway network. Picture **** Development Transport Hierarchy for Swale is set out within Policy INF 1 on Managing Transport Demand and Impact.
3. The Council declared a Swale Climate and Ecological Emergency in 2019 and a 'living' Action Plan in 2020 which was updated in 2025 Climate and Ecological Emergency Action Plan. This has a list of actions under Air Quality and Sustainable Transport to promote a wide modal shift towards public transportation and active travel within Swale and its communities.

Travel Patterns

4. The need for an uptake in sustainable transport is more apparent than ever. The population of Swale is increasing with its major towns and villages experiencing growth. Swale has the third largest population in Kent, and in the last 10 years more employment floorspace has been built than anywhere else in the county and Swale has the fourth highest level of dwelling completions over the 10 years to 2014. Swale has high levels of road and fuel use, a below UK average use of public transport, an underdeveloped public transport network and higher than average proportion with no access to a car. Although the increase is modest (1.5% given the increase in workforce between these years), an extra 3,900 persons were commuting between 2001 and 2011, mostly to the nearest larger towns beyond Swale.
5. The way in which people access work shows an increased reliance on car travel, with an increase from 60% to 70% using the car to get to work in Kent. The exception appears to be London commuting, where the proportion driving has remained fairly constant at 38%, train at 46% and bus at 11%. Method of travel to work for Swale residents largely reflects the Kent data, with 70.5% of residents travelling to work by car (drive or passenger in a car or van). The second most popular method is walking with just over and 11% share. Figure **** below shows the travel to work mode share.
6. These results also reflect the 2011 Census results for car ownership in Swale. The proportion of households with one or more cars available has increased to just under 80%, which is an increase on 2001 figures and now makes Swale identical to the Kent average. Kent car ownership as a whole is higher than the national average (80% of households compared with 74% nationally). The rate of increase in car ownership in Swale has been twice the national rate of increase over this period.



7. The commuting data therefore suggests that there has been an increase in out commuting, particularly by car, to other Kent districts, with Medway, Maidstone and Canterbury being the most popular destinations. London commuting has risen only slightly, and whilst car commuting has also increased in absolute terms on this route, train and bus use have maintained their proportionate share of commuters. These figures therefore suggest increasing pressure on the strategic and interurban road network.
8. The UK has seen traffic levels and commuting patterns turned on their heads during 2020. Commuting patterns in Swale are considered to be largely back to normal, other than rail travel into larger hubs such as London. However, Covid travel behaviours and commuting are likely to have been affected and the longer-term impacts of that on Swale are unknown. This presents an opportunity to enable more sustainable travel to be embedded in policy, development and any schemes taken forward within the borough.

Rural Lanes

9. Whilst the development strategy of the Plan and supporting Transport Strategy is focused on locating development where the supporting transport can be provided in the most sustainable way, the Borough also has a rich heritage of rural lanes which contribute greatly to amenity. These may come under pressure with inappropriate development proposals. The issues are considered in the context of Policy B8.

Health and Air Quality

10. Accessible transport links are vital for providing Swale's residents with access to facilities and services across the borough, county and beyond. This includes connecting businesses and communities, as well as reducing social isolation. However, there are negative impacts associated with transport too. Road transport contributes to 32% of Swale's CO2 emissions and pollutants have a negative impact on air quality, human health and the natural environment, as well as transport increasing noise pollution.

Sustainable transport choices and 'active travel' (travel requiring a person to exercise - such as walking and cycling) in particular are able to provide an opportunity for people to build activity into their daily lives. Currently 60.5% of primary school children, and 33.7% of secondary school children actively travel to school, whilst 13.5% of adults actively travel to work. [Kent's Active Travel Strategy](#) aims to make active travel an attractive and realistic choice for short journeys in Swale.

Swale Transport Model

11. A multi modal strategic transport model has been undertaken during the drafting of the Local Plan Review to reflect the development strategy and proposals of this plan. A total of four scenarios have been tested in the AM (8-9) and PM (17-18) peaks in the year 2037.

* A table will be included showing the Local Plan Review Modelling Scenarios.*

12. The following transport network schemes are seen as necessary to support growth and the full implementation of the Local Plan strategy: (To be filled in before Reg 19.)
13. The Council will work with Kent Highways, as the Highways Authority, on an A2 mitigation strategy to manage the flows of traffic on the A2 and the roads that feed on to it, especially where there are air quality, traffic congestion and road safety issues. This will cost an estimated £1-2m (depending on land values and land availability.)
14. Furthermore, the modelling report has recommended a number of mitigations for the borough which includes schemes relating to the allocated development sites. This is encompassed within the Infrastructure Delivery Plan.
15. Regional and National transport policies have an important role to play in tackling poor air quality, facilitating development and wider environmental and health objectives within Swale.
16. The National Planning Policy Framework (NPPF) continues the core principle of sustainable development, through means such as using technology to reduce the need to travel, using planning policies and decisions to actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focusing significant developments in areas which are or can be made sustainable.
17. Transport policies have an important role to play in facilitating development and also in contributing to wider sustainability and health objectives. It is nevertheless recognised that different policies and measures will be needed in different communities and that sustainable transport solutions will vary between urban and rural areas.
18. Key national objectives for transport policy include:
 - Working with relevant transport providers and neighbouring authorities to develop strategies for viable infrastructure necessary (including for the growth of ports) to support sustainable development;
 - Ensuring that opportunities for sustainable and active travel have been taken up to minimise the need for major new transport infrastructure to support reductions in greenhouse gas emissions and to reduce congestion;

- Ensuring that the necessary improvements can be undertaken as far as possible within the transport network and are cost effective at mitigating the significant impacts of development;
 - Achieving safe and suitable access to sites for all people and goods; and
 - Designing developments to prioritise pedestrian and cycle access and give access to high quality public transport facilities.
19. The Department for Transport Circular 01/2022: Strategic Road Network and the delivery of sustainable development relates specifically to the impact of proposed development on the strategic road network (SRN) which is operated, maintained and improved by Highways England on behalf of the Department for Transport. The SRN play an important part in enabling and sustaining economic prosperity as part of wider sustainable development objectives, with Highways England ensuring the continued safe operation of the network.
20. For the SRN, development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (or link or key junction) of the relevant part of the network; or they do not increase the demand for use of that section which is already operating over capacity, taking account of any mitigation and/ or capacity enhancement measures which may be proposed. Generally, development should only be prevented or refused where the residual cumulative impacts of development are severe. Safety of the SRN is the key consideration for judging impact of proposed development.
21. The key issues for the Local Plan are to promote development patterns which minimise the need to travel; encourages the use of sustainable means of transport and minimises journey lengths for everyday activities such as work, education, shopping and leisure. Capacity on the SRN is limited, and additions are difficult, costly and time consuming, so these measures are integral to the local plan approach to reducing the potential for congestion on the SRN.
22. The Circular states that capacity enhancements and infrastructure necessary to deliver strategic growth should be identified through the Local Plan. Where this is identified as necessary, Highways England will work with delivery agencies to assess the suitability, viability and deliverability of such proposals (including funding arrangements). If the need and deliverability is confirmed when balanced against other environmental and practical considerations, it may be considered for inclusion in the Highways England forward programme of works.
23. The objectives of the Circular are reflected throughout the Local Plan in terms of its overall development strategy, land allocations and general policies for guiding design, layout and access, they are supported by and influence complementary plans, projects and funding programmes of the transport providers, highway authorities and the Local Economic Partnership (for Kent, Essex and East Sussex).

Car Parking

24. The NPPF also gives the option for local planning authorities to develop their own vehicle parking standards. Swale Borough Council has set out their [Swale Parking Standards 2020](#) These must be referred to for all residential and non-residential developments within the borough. Further detail on this can be found in Policy DM 11.

Promoting Sustainable Transport and Active Travel

25. Projects to provide new and improved transport infrastructure will play a central role in supporting growth and promoting sustainable transport within the borough as well as creating a shift towards sustainable modes. As major development will largely be concentrated in locations that are, or will be, subject to significant transport improvements, land and facilities will therefore need to be safeguarded in order to ensure delivery of these projects.
26. All transport improvement schemes which are assessed and taken forward by the council should be focused on the promotion of sustainable transport and active travel.
Figure ** Transport Hierarchy** (in Policy INF 1) should be adhered to when appraising all transport schemes within the borough.

Policy ST 10

New development will be located in accordance with Policies ST 1 and Policy ST 2, Local Plan allocations and approved Neighbourhood Plans, which minimise the need to travel for employment and services and facilitate sustainable transport. The Council will promote an uptake of sustainable transport and active travel through the prioritisation of walking, wheeling and cycling, in line with the hierarchy of road users, and the Council's adopted Swale wide Local Cycling and Walking Infrastructure Plan (LCWIP) and Faversham's LCWIP, along with public transport within all new developments.

The Council will:

1. Promote walking within the borough by ensuring that developments improve the pedestrian environments by supporting public realm improvements including the provision of high-quality safe road crossings, seating, signage and landscaping that are safe and easy to walk through;
2. Promote cycling in the borough by ensuring that developments provide and make a contribution towards high quality and safe cycle routes, provide for accessible, secure cycle parking taking into account the size and location of the development, and make provision for high quality facilities that promote cycle usage including showers, lockers and dryers;
3. Ensure walking and cycling routes are linked to new and existing communities with services and facilities, public transport and the Green Grid network and are accessible for all users;
4. Safeguard and promote the provision of public transport in the borough by ensuring that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate;
5. Where appropriate, be required to provide for the interchange between different modes of transport including the provision of facilities to make interchange easy and convenient for all users – as set out in Policy INF1;

6. Facilitate the greater use of waterways for commercial traffic, where this would not have an unacceptable adverse environmental impact, through working with the Port of Sheerness and other bodies;
7. Contribute to transport network improvements, where capacity is exceeded and or safety standards are unacceptably compromised with particular emphasis on those identified in the Infrastructure Delivery Schedule and in paragraph 4.2.112 above;
8. Make best use of capacity in the network by working together with transport providers to improve the transport network in the most sustainable way, and extending it where necessary, as demonstrated by Transport Assessments and Travel Plans in support of development proposals – as discussed in INF1;
9. Support the provision of major new transport infrastructure in accordance with national and local transport strategies; and
10. Maintain and improve the highway network at key points to improve traffic flows and respond to the impact of new development and regeneration, as set out in the existing Local Transport Strategy.

Policy ST11 Protecting and Enhancing the Natural Environment

1. Swale's diverse and outstanding natural environment is a defining characteristic of the borough. ADD SOMETHING ABOUT ECOSYSTEM SERVICES This policy sets out how our natural environment will be conserved, enhanced, and managed and through this how habitats, species, landscapes, natural resources, the economy and quality of life can recover.

Natural Environment in Swale

2. Details of Swale's natural environment are set out elsewhere in the Local Plan (see table 3.1.3 and the preambles to policies B1 and B2), and include a swathe of designations:
 - Internationally designated wetlands across the Medway and Swale Estuaries and Marshes (Ramsar sites, Special Areas of Conservation and Special Protection Areas, see Policy B1)
 - Nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves and Marine Conservation Zones)
 - Locally designated sites for wildlife (see Policy B1)
 - The Kent Downs National Landscape (see Policy B3)
 - Areas of High Landscape Value (see Policy B2)
 - Coastal Change Management Area (see Policy C6)
 - Important Local Countryside Gaps (see Policy B2)

Swale Biodiversity Baseline Study

3. All of Swale's environments – urban or rural, designated or not - are integral to the quality of our natural environment and are valued by the residents and visitors to the borough. The Council uses its [Swale Landscape Character and Biodiversity Appraisal](#) (2011) Supplementary Planning Document to ensure the protection and enhancement of the Borough's landscapes and habitats (see Policy B2). ADD REF TO URBAN ENVIRONMENTS – G&B Inf Strategy/LNRS

Pressures and impacts

4. Pressures on the natural environment, the landscapes, habitats and species of Swale come from a variety of sources:
 - **Pressures on land from competing interests** – development, infrastructure, renewable energy, agriculture, nature recovery - ref Land Use Framework
 - **Population growth and urban creep** – loss of countryside, water demand/ - water quality etc
 - **Water and soil pollution** including nutrient pollution of rivers, streams (including globally rare chalk streams) and groundwater. Pollution comes from many sources including agriculture and where the capacity of the wastewater network is stretched, particularly during storm overflow events, as well as from fuel combustion, industrial chemicals and metals, pesticides, pharmaceuticals, plastics and silt, many of which do

not break down naturally (eg forever chemicals). Poor land management can exacerbate these issues.

- **Air pollution** from the combustion of fuel and agricultural activity (eg particulates, atmospheric nitrogen and ammonia) can damage both human health and the natural environment.
- **Water demand** from an increasing population is impacting natural habitats through over abstraction and drought (eg disappearing chalk streams, drying of wetlands). At the same time, surface water, sewage and tidal flooding are impacting Swale's habitats, species and human communities.
- **Recreational disturbance** of sensitive wildlife (especially coastal) sites from people visiting, often with their dogs, and straying off designated paths. This can put strain on birds' ability to feed, rest and survive the winter and subsequent spring migration.
- **Fragmentation of habitats** caused by increased land take for development, reduces the space available for connectivity between habitats. Climate change may also mean some species need to move north, but fragmentation makes this harder to achieve.
- **Climate Change** - the risks to Swale's natural environment from Climate Change are widespread and compound the issues outlined above. The Kent and Medway Local Nature Recovery Strategy⁸ and the UK Climate Change Risk Assessment⁹ sets these out, including:
 - rising temperatures, including rising freshwater and sea temperatures and acidification
 - temperature and water disruption (impacts pollinating species, migratory patterns and life cycles)
 - new pests and diseases
 - flooding, sea-level rise, coastal squeeze and coastal erosion
 - drought and extreme rainfall/storms
 - soil erosion, soil aridity and waterlogging
 - wildfires, soil erosion, poor air quality

all of which impacts Swale's habitats (eg chalk streams, seagrass beds, intertidal mudflats) and species (such as the critically endangered European Eel).

5. As well as impacting our natural environment, these impacts also risk our economy (in particular farming), well-being and quality of life.
6. In recognition of the risks to the natural environment caused by the climate crisis, in 2019, Swale Borough Council declared a Climate and Ecological Emergency and developed an Action Plan.
7. Whilst other policies in this plan (most significantly ST 3 Climate Change and the Development Management Climate Change Policies C1 to C5) address mitigation and adaptation to climate change in detail, ST 11 recognises the interrelationship between the changing climate and impacts on the natural environment and how these issues need to be considered and addressed together so that we can deliver places that can adapt to a changing climate and provide opportunities for people and biodiversity to thrive and for nature to recover.

⁸ 5.1 [Kent and Medway Local Nature Recovery Strategy 2025 - Part 2](#)

⁹ [UK Climate Change Risk Assessment 2022](#)

8. The State of Nature – State of Nature Report '23 – struggling chalk streams, nutrient pollution.
9. Pressure on Mental health and link to policy on Health and Wellbeing.
10. Economic impact on agriculture and tourism.
11. Opportunities too – eg new crops and species, (viniculture), more visitors.

Policy background

12. The National Planning Policy Framework (para 187 onward) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by (in summary):
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
 - recognising the intrinsic character and beauty of the countryside and the wider benefits of natural capital and ecosystem services
 - maintaining the character of the undeveloped coast and improving appropriate public access
 - minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks and supports species such as swifts, bats and hedgehogs
 - preventing development being at risk from, or adversely affected by pollution
 - remediating contaminated land and improving environmental conditions

13. Planning Practice Guidance

- **Environment Act**– about provision to address nature recovery, with targets [The Environment Act - Nature Recovery Laws](#)
- **Planning and Infrastructure Act**– about environmental delivery plans and the nature restoration levy
- **LURA** — about furthering purpose of Protected Landscapes and strengthening legislative framework for nature recovery and ensure support for the conservation of landscapes - LNRS one of 48 strategies to be produced across England, with the aim of joining up national efforts to reverse the decline of biodiversity.
- **NERC ACT**

14. As the overarching policy on the natural environment ST11 both sets out the Council's strategic policy on the natural environment and is the umbrella policy for the Development Management environment policies – most specifically those which relate to climate change, pollution, water, flood risk, biodiversity, landscapes, the coast and agricultural land.

15. **HRA of the Local Plan** - Is being undertaken alongside the preparation of the Local Plan.

Strategic policy areas on the natural environment which ST 11 addresses include:

The Green and Blue Infrastructure (GBI) Strategy

16. In 2020 the Council published [The Green and Blue Infrastructure Strategy for Swale](#) with the following vision:
- a. *to develop a resilient, biodiverse and multi-functional GBI network to contribute to ensuring Swale a great place to live, work and invest, and respond to the climate and ecological emergency.*
17. The Strategy seeks to identify and guide opportunities for a greener, healthier, more biodiverse and prosperous Swale. It sets out Swale's GBI resource and where deficits exist, it explains the priorities for GBI and its multifunctionality. It also looks at the opportunities for GBI in existing development (eg our established towns) as well as in new development – seeking to create a network of green and blue infrastructure across the borough and beyond.
18. The GBI plan identifies four opportunity areas:
- A green and diverse borough
 - A healthy blue environment
 - A connected, active and healthy Swale
 - A beacon for the visitor economy

under which it provides practical advice for the optimisation of Swale's GBI resources. For instance, for our main urban areas it promotes elements such as:

- Town and commercial centre greening
- Urban tree planting
- Provision of sustainable urban drainage
- Optimising green spaces and parks
- Promoting access to waterways
- Promotion of active travel routes, which are green and shaded and stretch across towns and into the countryside
- Promoting wildlife corridors and increasing opportunities for movement and dispersion of species
- Open space and greening provision in new development
- Encouraging community participation and engagement
- Promoting healthy play and leisure
- Enabling access to affordable healthy food and food growing

and always advocating a multi-functional approach where issues and solutions are layered for maximum benefit.

19. New development in Swale will be expected to address and further the opportunities promoted in the Green and Blue Infrastructure Strategy.

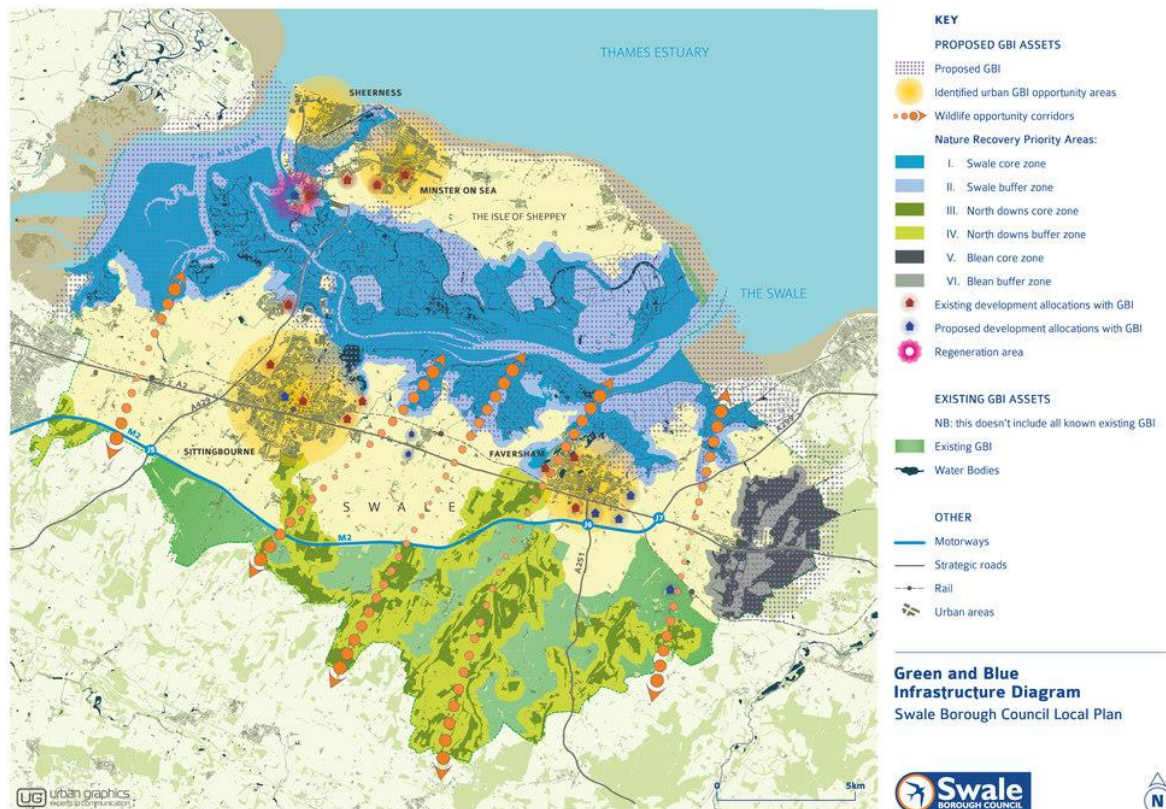


Image: Green and Blue Infrastructure Network

Natural England's Green Infrastructure Framework Standards

20. Natural England (NE) have published Green Infrastructure (GI) Framework's standards to help development deliver against the NPPF's requirements for green infrastructure, taking a strategic approach, deliver solutions to climate change and the nature crisis and make positive contributions to placemaking and urban renewal.
21. NE define the benefits of GI as creating:
 - Nature-rich beautiful places
 - Active and healthy places
 - Thriving and prosperous communities
 - Improved water management
 - Resilient and climate positive places
 - through:
 - working in partnership to deliver a vision
 - using evidence and good land use practice
 - planning strategically
 - understanding a place to create well-designed, beautiful and distinctive places
 - properly managing, monitoring and evaluating GI
22. NE has produced the following standards:

- Green Infrastructure Strategy Standard
- Accessible Greenspace Standard
- Urban Nature Recovery Standard
- Urban Greening Factor Standard
- Urban Tree Canopy Standard

which define what good green infrastructure looks like for local planners, developers, parks and greenspace managers and communities, and how to plan it strategically to deliver multiple benefits for people and nature. When used together, these standards help stakeholders to deliver the Green Infrastructure Framework's principles and enable everyone to benefit from good green infrastructure provision.

ADD REF TO [Green Infrastructure Map](#) AND [Environmental Benefits for Nature Tool](#) AND HOW THIS WILL BE USED IN SWALE

The Kent and Medway Local Nature Recovery Strategy

23. The Kent and Medway Local Nature Recovery Strategy (LNRS) was published in November 2025. The strategy has been designed to assist Local Authorities/RESPONSIBLE AUTHORITIES /OTHERS in understanding the locations important for conserving and enhancing biodiversity and help meet the challenges that the natural environment is facing.
24. The principles for nature recovery set out in the Kent and Medway LNRS are as follows):
- **Better** – improve the quality of our existing habitats and ensure they are in a healthy and functioning state by applying and resourcing better and appropriate management of them. We also need to better conserve and safeguard what we already have.
 - **Bigger** – increase the size of our most valuable and important habitat sites, not only extending but buffering them, to protect them from the pressures of human influences.
 - **More** – through habitat restoration and creation, establish new, nature-rich sites that not only provide more space for nature but also provide connectivity between existing core sites.
 - **Joined up** – enhance connections between, and join up, sites, by improving the quality of the land between them, creating new physical corridors and establishing stepping stones.
 - **Nature-based solutions** – work with nature and use natural processes to tackle some of the socio-economic challenges our county faces, maximising the benefits of nature recovery.
 - **Land management and land use** – increase the number of landowners, land managers and farmers using nature-friendly and habitat-sensitive land management and land-use practices, recognising the crucial role they play in helping to deliver a better, more coherent and resilient wildlife network across the county.

The LNRS also has range of Ambitions for the county:

- **Connectivity** – to address fragmentation
- **Nature-based solutions** – to increase carbon sequestration and ecosystem services and soil health

- **Land management and land use** – to increase nature friendly farming which responds to climate change and prevents pollution which managing publicly accessible open spaces better for wildlife
- **Grasslands**
- **Successional habitats**
- **Woodlands trees and hedgerows**
- **Freshwater habitat**
- **Urban habitat**
- **Coastal habitat**
- **Species habitat**

under which a series of priorities sit.

25. Under the requirements of the Environment Act 2021, LNRS are required to produce a biodiversity statement and map, which should:
 - Describe, identify and map biodiversity features within the Local Authority Boundary, including nationally designated sites, other nature reserves and wider areas of important for biodiversity; and
 - Describe, identify and map priorities and opportunities for promoting nature recovery and enhancement.
26. The details of the work undertaken for Kent and Medway, along with advice, guidance (eg a [Developer's Toolkit](#)) and case studies are set out on the [Homepage | Kent and Medway Local Nature Recovery Strategy](#)
27. The Kent And Medway LNRS contains a mapping portal which maps:
 - APIBS - Areas of Particular Importance for Biodiversity – including existing designated sites and irreplaceable habitats
 - Potential Measures - the proposed actions to deliver the priority.
 - ACIBS - Areas that Could Become of Particular Importance for Biodiversity - comprise the extent of the potential measures, with areas of particular importance for biodiversity excluded. These are the areas where the Strategy proposes effort should be concentrated to recover nature.

Habitats Regulations Assessments

28. If a development proposal is considered likely to have a significant effect on a protected habitats site (either individually or cumulatively) then an Appropriate Assessment (AA) of the implications for the site will be required under the Conservation of Habitats and Species Regulations 2017/255. If the Council, further to the AA and in consultation with other bodies, is unable to conclude that the proposal will not adversely affect the integrity of the site, then it will have to be refused.
29. Applicants will therefore need to provide sufficient information as may be required to undertake the assessment, including implementation of the mitigation hierarchy.

30. More generally, the Council will take a precautionary approach in requiring Habitats Regulations Assessments to be prepared for individual development proposals until a strategic solution has been prepared or where effects of a proposal are deemed to be uncertain. The Council will consider the need for Habitats Regulations Assessments to be undertaken at the reserved matters stage for sites where outline planning permission has already been granted. AGAIN?

Strategic Access Management and Monitoring Strategy (SAMMS) for North Kent

31. In 2011, Local Authorities and conservation organisations across north Kent joined together within the North Kent Environment Planning Group to identify the impacts of recreational disturbance on wintering birds within the Special Protection Areas. Following a Visitor and Bird Disturbance Survey, a Strategic Access Management and Monitoring Strategy (SAMMS) is now in place, which sets out a range of measures to mitigate any disturbance to birds caused by increasing numbers of recreational visitors.
32. These strategic measures (such as habitat creation, management and wardening) are funded by developer contributions, and are applied to all residential development within 6km of the SPAs (the area mostly likely to result in increased recreational pressure on them). These contributions are collected via Section 106 agreements, or, if implemented in the future, a Community Infrastructure Levy. Some larger developments beyond the 6km radius, or those particularly close to the SPA, may require additional mitigation.
33. Alternatively, developers can gather their own evidence and complete a Habitats Regulations Assessment and implement bespoke mitigation measures. Such an assessment would have to consider the impact of the proposal in combination with other proposed developments, the cost of which is likely to be higher than making a contribution to the implementation of the SAMMS. In most cases, it will not be viable for a development to provide its own bespoke mitigation package.
34. An integral part of the SAMMS will be the monitoring of the effectiveness of the measures put in place through the tariff payments. If this monitoring highlights areas where changes to the mitigation measures are required, these will be implemented by the Partnership.

35. Please see the Partnership's website for more detailed information [Bird Wise](#)

Environment Delivery Plans/Levy - [Environmental Delivery Plans | Local Government Association](#) TO DO

Kent Nature Partnership [About Us | Kent Nature](#)

Biodiversity Opportunity Areas

Water - River basin management plans etc

Nutrient Neutrality

36. Due to raised nitrogen and phosphorous levels at the Stodmarsh National Nature Reserve, in 2020 Natural England issued nutrient neutrality advice for the catchment that feeds that reserve. A small area of Swale is within the Stodmarsh Catchment. As a result of the advice, Local Planning Authorities can only approve development if they are

certain it will not have an adverse effect on the Stodmarsh Nature Reserve ie that schemes are 'nutrient neutral'.

37. Policy C10 Water quality and water resources and its preamble explains the detail on nutrient neutrality and the response to it, including recently developed environmental credits and enhancement schemes.

Biodiversity Net Gain – gov guidance, threshold, need for net gain plan.

Natural Capital/Ecosystem Services/Nature Based Solutions/Biodiversity and Geodiversity – define what these are – here or in B1.

Policy Application

38. All non-householder applications are required to submit a Natural Environment Statement, with any planning application. This should be proportionate to the scale of the development, but should seek to set out the application's response to the Council's declaration of an Ecological Emergency. Where relevant this should include an Ecological Assessment, a Green Infrastructure Plan, a Local Nature Recovery Strategy Response, a Biodiversity Net Gain Plan and a Landscape and Visual Impact Assessment.

Policy

1. Actions by public, private and voluntary sectors will:
 - a. use nature-based solutions to safeguard, restore and enhance the size, quality, diversity and interconnectedness of the natural environment in Swale and reverse the decline in nature, including furthering the delivery of Swale's Green and Blue Infrastructure Network and Strategy and the Kent and Medway Local Nature Recovery Strategy;
 - b. recognise and value natural capital and ecosystems for the wider services they provide, such as for food, water, flood mitigation, disease control, recreation, health and well-being, climate change mitigation;
 - c. provide a focus and opportunities for social inclusion, community development and lifelong learning(?);
2. All non-householder development proposals will, as appropriate, demonstrate via a Natural Environment Statement how the development:
 - a. is appropriate to its location, steered to land of least environmental value and avoids: internationally, nationally and locally designated sites of importance for nature; nationally and locally designated landscapes; best and most versatile agricultural land, in accordance with policies B1 Biodiversity and geodiversity conservation and Biodiversity Net Gain and B2 Conserving and enhancing valued landscapes and B6 Agricultural Land;
 - b. follows the mitigation hierarchy by avoiding, then mitigating, and only as a last resort, compensating for adverse impacts on biodiversity and the natural environment;
 - c. provides protection, enhancement and recovery to the most valuable existing habitats and species (Habitats and Species of principle importance under s.41 of the NERC Act), and the creation of new habitats;

- d. contributes to the recovery and expansion of Swale's natural environment, by fully responding to the Council's Biodiversity Baseline Study, the Green and Blue Infrastructure Strategy, Natural England's Green Infrastructure Strategy and contributes to the targets of identified Biodiversity Opportunity Areas and of the Kent and Medway Local Nature Recovery Strategy.
 - e. protects and enhances the intrinsic character and natural beauty of the countryside and the borough's urban natural environment;
- 3. All applications will accord with Policy B1 Biodiversity, geodiversity and biodiversity net gain with regard the hierarchy of biodiversity and geological designations as well as for land that is not specifically designated, but contains features of biodiversity and geodiversity value.
- 4. All relevant development will set out, via a Biodiversity Gain Plan, how development will achieve a measurable, by a recognised metric, net gain of 20% in biodiversity, in accordance with Policy B1 Biodiversity, geodiversity and biodiversity net gain;
- 5. All relevant development will require the completion of project specific Habitats Regulations Assessment (HRA), to ensure there are no likely significant effects upon any European designated site. For residential sites within 6km of an access point to any of the North Kent Marshes, development must contribute to its Strategic Access Management and Monitoring Strategy or undertake their own HRA;
- 6. All development will:
 - a. increase opportunities for nature, 'green' the borough and assist with adaptation to the changing climate in existing and proposed development by contributing to the planting of a strategically significant network of street trees, trees in and around formal open spaces and in new gardens, green roofs and green walls, and contribute to approaches to improve the network of habitats at scale and locally (eg though the inclusion of swift and bat boxes and hedgehog highways);
 - b. deliver a high standard of design quality and promote nature-based solutions to protect the intrinsic natural beauty and character of our natural environment in accordance with policies ST7 Good design, GD1 Local Design Principles, B4 The Separation of Settlements – Important Local Countryside Gaps, B8 Rural Lanes and B9 The keeping and grazing of horses and maximise the social, economic, health and environmental benefits of green and blue infrastructure.
 - c. provide new recreational facilities in accordance with Policy INF3 Open space, sport and recreation provision , exploiting opportunities to increase green infrastructure whilst linking urban and countryside areas and to create new 'green' footpath and cycle links between new and existing developments and services and facilities for both recreation and commuting, in accordance with ST 10 Promoting Sustainable Transport and Active Travel and INF1 Managing transport demand and impact;
 - d. create natural environments that promote health and wellbeing and protect Local Green Spaces in accordance with policies ST8 Health and Wellbeing and INF4 Local Green Spaces.
 - e. ensure mitigation and adaptation to climate change is a defining element of any proposals, in accordance with ST 3 Climate Change and the

Development Management Climate Change Policies C1 to C5, prioritising nature-based approaches.

- f. take account of and integrate with natural processes, such as natural flood management, utilising sustainable urban drainage in accordance with Policies C8 Flood Risk and C9 Sustainable Drainage;
- g. ensure development is safe from the risks of flooding and coastal change and does not increase flood risk elsewhere, in accordance with C6 Coastal Change Management, C7 Implementing the Medway Estuary and Swale Risk Management Strategy and C8 Flood Risk;
- h. demonstrate how pollution will be prevented and local environmental conditions, including air, soil and water quality are to be improved by development and how contaminated or unstable land will be remediated
- i. demonstrate how natural resources will be protected and ecosystem services supported, in accordance with C10 Water quality and water resources, C11 Air Quality and C12 Pollution and Land Instability.
- j. protect, enhance and manage the value, character, amenity and tranquillity of the Borough's landscapes, in accordance with Policies B2 Conserving and enhancing valued landscapes and B3 The Kent Downs National Landscape and B7 The Coast.
- k. Demonstrate the protection, enhancement and management, as appropriate, of seascape and coastal processes in accordance with C6 Coastal Change Management, B7 The Coast and C7 Implementing the Medway Estuary and Swale Coastal Risk Management Strategy.

Policy ST12: Conserving and Enhancing the Historic Environment

1. Swale's built heritage is one of its greatest assets. The Borough has a wealth of historic areas, buildings, and features reflecting its Roman and medieval legacy, its naval and maritime history, and its industrial and agricultural past can still be seen in its principal landscapes of the central North Downs, The Blean, the northern fruit belt, the northern coast and marsh and the Isle of Sheppey. Other important historic landscapes shaped by human intervention are the Borough's grand-scale parklands and more formal gardens and landscape features focussed around imposing country houses such as Doddington Place.
2. Whilst the NPPF and development management policies are likely to be sufficient to deal with detailed proposals affecting heritage assets, this section sets out the significance of our assets at the strategic level and how our Local Plan strategy for heritage is integrated across a range of issues.
3. Heritage assets are defined by the NPPF as a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets and assets identified by the local planning authority during the process of decision making or through the plan-making process (including local listing).
4. One of the NPPF's core planning principles is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of current and future generations. It requires local plans to provide a positive strategy for the conservation and enjoyment of the historic environment and to recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
 - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place.
5. Swale Borough Council adopted a Heritage Strategy in March 2020; the key deliverables have been divided over a period of 12 years through a series of 4 consecutive 3-year actions plans. In addition to the projects centred around conservation and management of existing building stock and identifying non-designated heritage assets, the Council is also committed to developing, disseminating and encouraging further understanding of the heritage diversity within the borough by producing the following heritage theme papers during the 12-year period of the adopted Heritage Strategy as follows:
 - i. Archaeology
 - ii. Aviation and defence heritage
 - iii. Industrial Heritage

- iv. Maritime and defence heritage
- v. Agricultural, horticultural and rural heritage
- vi. Towns and high streets
- vii. Villages and hamlets
- viii. Churches, chapels and memorials
- ix. Historic Landscapes
- x. Museums, collections & Archives (digital/traditional)
- xi. Portable/moveable heritage

6. These themes have been chosen due to the particular vulnerability and typically poor level of understanding of these heritage types.
7. When considering the impact of a proposed development on a designated heritage asset, the NPPF states that considerable importance and weight should be given to its conservation. The more important the asset, the greater the weight should be. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification and substantial harm to or loss of a grade II listed building, park or garden should be exceptional.
8. The Local Plan strategy ensures that consideration of the historic environment is central to decision-making. Within each strategic policy, allocation or development management policy, there will rarely be a situation where there is not a relationship with heritage in some form, whether from green infrastructure, landscape, regeneration, economic development, transport, infrastructure planning, tourism, town centres and climate change. This policy recognises this interrelationship.
9. The Borough's rich legacy of heritage assets, both designated and non-designated, allows a broad strategic overview of their significance to be outlined in terms of their importance to the character and distinctiveness of the Borough. This is illustrated by Statement box **. Such assets act as drivers for regeneration and tourism within the Borough and can give developments an identity and character specific to the area. Heritage assets may offer opportunities for potential partnership working with the Council, with amenity groups, building preservation trusts and/or civic societies.

Statement Box **

Strategic overview of Swale's heritage assets

1. Swale's diverse range of heritage assets make a substantial positive contribution to the borough's local character and distinctiveness. They are an irreplaceable resource which justifies conservation and enhancement in a manner appropriate to their significance. Listed buildings, conservation areas, registered parks & gardens and scheduled monuments are all designated heritage assets. However, the term heritage asset includes any valued component of the historic environment, be it a building, monument, site, place, area or landscape, which is positively identified as having a degree of significance meriting consideration in planning decisions.

2. Both designated and non-designated assets are identified by the council during the plan-making process and through the planning application process. Their identification is a response to the recognition that they hold meaning to society and this justifies a degree of protection in planning decisions.
3. A study undertaken by Historic England about how the COVID-19 pandemic has impacted our social lives includes our access to and engagement with our precious heritage and it has found that 'historic places convey a sense of uniqueness and awe and are strong emotional pillars connecting communities... heritage can also improve personal wellbeing, by helping us understand our past, our individual and communal identity and help us connect with the places where we live'.
4. The heritage sector therefore has an important role to play in our individual mental wellbeing in the future, and visiting heritage can ease the challenges associated with dementia and Alzheimer's disease.
5. The Royal Society of Arts, in partnership with the British Council, recently conducted a study in light of the Black Lives Matter movement. The RSA identified six domains of heritage: historical built environment; museums, archives and artefacts; industrial heritage; parks and open space; landscape and natural heritage; and culture and memories. Heritage is therefore both tangible and intangible. The study concluded that:
6. We all have 'heritage' and it belongs to everyone but heritage narratives can reinforce power inequalities. Some heritage is privileged over others. Narratives around heritage, identity, place and belonging can be controversial. They can exclude the heritage of minorities and they can sometimes be hijacked by far right, nationalist agendas about national identity and who belongs. In reality, there are multiple heritages: 'established' heritage, working class heritage, Black heritage, South Asian heritage, place-based heritage. Harnessed positively, the authors believe heritage can help bring diverse communities together and bridge the increasingly polarised public discourse in the UK.'
7. Swale currently has: 1,439 listed building entries, comprising nearly 2000 buildings, 22 Scheduled Monuments and 4,818 sites on the Kent Historic Environment Record. There are also 50 designated conservation areas and 4 Registered Historic Parks and Gardens in the borough.
8. Broadly, our assets comprise:
 - historic landscapes - the central North Downs, The Blean, the northern fruit belt, the northern coast and marsh and the Isle of Sheppey; early settlements around Roman Watling Street and coastal creeks;
 - Saxon and Norman settlements evidenced by e.g. defensive sites and churches;
 - former monastic establishments at Faversham and Minster;
 - medieval farmsteads with attendant barns, oast houses and outbuildings;
 - time-span (of buildings present) and urban form/morphology of Faversham;
 - rural lanes and droving tracks;
 - the array of coaching inns along the ancient Watling Street route (now the A2), particularly focused at Sittingbourne, together with other features e.g. milestones, associated with its travelling past;
 - the legacy of historic and ongoing industries in the borough's landscapes and townscapes, including gunpowder production, milling, brewing, brick making, barge building, paper production and maritime trading;

- structures and features relating to pioneer aviators and the establishment of Great War and WW2 airfields at Leysdown and Eastchurch, at Sheppey;
 - centuries of Naval history at the former Royal Naval Dockyard at Sheerness;
 - Great War defences to the west of Sittingbourne and along the Sheppey coast;
 - World War II defensive structures, including those of strategic importance in the Battle of Britain;
 - remnants of prehistoric activity in Swale, particularly across Sheppey and at Milton Creek, Sittingbourne.
 - numerous villages, hamlets and parkland estates; and
 - Swale's currently unknown archaeological sites.
9. The overview in Statement ** is not intended to be a replacement for establishing the presence and value of heritage assets when considering new development. However, given the importance of many such assets, full weight to their preservation and enhancement will be given. In order to further assist the identification of heritage assets, the council has embarked on producing a list of Swale's non-designated local heritage assets.
 10. Parts of Swale's heritage are at risk. Historically, this has typically been from neglect, but more recently, it has been from changing needs and requirements. This is especially true for our high streets, where a growing demand for online shopping and housing has put the future of some buildings, and in some cases a number of our high streets as a whole at risk. For its part, the Council will aim to remove or reduce this risk over time, but will be especially supportive of sustainable proposals that bring the buildings in these areas back into viable and appropriate use, especially where they can contribute to our regeneration aspirations and make a positive contribution to the local character and distinctiveness of the area, based upon an understanding and evaluation of its defining characteristics.
 11. Within historic landscapes, historic patterns of land use define the 'grain' of existing patterns of settlement and landscape. As with urban development, new development is more likely to be successfully integrated into the Borough if it respects and responds to its context and provides for a sustainable low carbon future. Its layout should take account of the historic landscape of the area. Existing patterns of roads, lanes, paths, hedgerow networks and field boundaries should help to shape new development, allowing the older landscape to show through the modern development. Historic landscape analysis will enable judgements to be made about the relative importance of different components of the landscape so that priorities can be set for conservation and enhancement.
 12. Overall, development proposals will be informed by the integrity, form and character of settlements and historic landscapes within our settlement strategy, using these assets as a strong starting place for planning change. They will also consider the broad heritage issues identified by the settlement strategy (Policy ST2), and within development management policies. When bringing forward development proposals, a continuous assessment of considering designated and non-designated heritage assets should be demonstrated from site and desk-based heritage assessment, master planning and development briefs through to design and access statements, as appropriate. The fruits of this important and necessary work will be apparent in the design, layout and detail of the proposals.
 13. Understanding the significance of heritage assets is vital to the sustainable evolution of managing change, and maintenance of the historic environment. The idea of 'significance'

lies at the core of these principles. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape. Applicants must include an assessment of significance of any heritage asset affected, including any contribution made by their setting, based on Historic England's guidance on the subject outlined in 'Conservation Principles' and in Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England Advice Note 12). The level of detail to be provided in any assessment should be proportionate to the heritage asset's significance and no more than is sufficient to understand the potential impact of the proposal on that significance.

Policy

1. Heritage assets within the Borough are an irreplaceable resource that contribute to its character, identity, economy, and quality of life. Development affecting heritage assets will be required to conserve and, where appropriate, enhance their significance, including their setting, in a manner proportionate to their importance.
2. Designated heritage assets will be given great weight in decision-making. Any harm to, or loss of, their significance, including their setting, must be clearly justified and will be weighed against the public benefits of the proposal. Substantial harm or total loss will be exceptional and will only be permitted where substantial public benefits outweigh that harm or loss.
3. Applications affecting non-designated heritage assets, directly or indirectly, will be assessed through a balanced judgement, having regard to the significance of the asset and the scale of any harm or loss.
4. Development proposals must respond, where applicable, to the following principles:
5. Conserve and respond positively to the significance, form and character of settlements, historic landscapes and heritage assets;
6. Support the sensitive and sustainable use of heritage assets, including those identified as being at risk on national or local registers;
7. Promote the understanding, appreciation and enjoyment of heritage assets through interpretation, education and, where appropriate, public access;
8. Ensure that measures to address climate change and sustainable development are sensitively designed and implemented to avoid unacceptable harm to the significance of heritage assets;
9. Recognise the importance of archaeological remains, historic landscapes and the broader setting of heritage assets; and
10. Recognise and account for cumulative or incremental impacts on heritage assets and their settings.
11. Where appropriate, conservation and enhancement measures will be secured through planning conditions or obligations.

Appendix II: Draft Houses in Multiple Occupation (HMOs) Development Management Policy

- 1 HMOs, as defined by the Town and Country Planning (Use Classes) Order 1987, provide an important component of the Borough's housing supply. They can meet the needs of a range of households, including single persons, people unable to access market housing, and other groups requiring flexible rented accommodation. The council's evidence indicates that the amount of HMOs has increased, with an emerging HMO SPD that is due to be adopted in June 2026, identifying a 68% increase in HMOs between 2021 and 2026.
- 2 HMOs can have different impacts from single household dwellings. The emerging HMO SPD identifies potential impacts through increased parking demand, refuse generation, pressure on infrastructure and public services, changes to housing balance and residential character, reduction in the supply of family homes, and poor living conditions for occupiers.
- 3 The council is considering the introduction of an Article 4 Direction to remove permitted development rights for changes of use from dwellinghouses to small HMOs, where justified by evidence. This would require planning permission for such changes and allow proposals to be assessed against this policy, the HMO SPD and other relevant development plan policies.
- 4 The policy below applies to development requiring planning permission for the creation, extension, intensification or alteration of HMOs, including small HMOs within Use Class C4 where planning permission is required and larger sui generis HMOs. It should be read alongside the council's HMO SPD, relevant neighbourhood plan policies, and the National Planning Policy Framework.

Draft Policy DM: Houses in Multiple Occupation

Proposals for the creation, conversion, extension, intensification or alteration of HMOs will be supported where they provide good quality accommodation, maintain an appropriate housing mix, safeguard local character, and avoid unacceptable impacts on residential amenity, highway safety and parking conditions.

Proposals will be permitted where:

1. The proposal would not result in an over-concentration of HMOs or undermine the housing mix and character of the area, having regard to:
 - (a) No more than 10% HMO concentration within 100 metres of the application property, measured from the front door, unless the site is in a commercial or mixed-use area with fewer than 10 residential properties, where a 30% threshold applies;
 - (b) No non-HMO dwelling should be sandwiched between HMOs, including horizontally or vertically within buildings containing flats.
2. The proposal would provide safe and suitable access and would not result in parking stress or severe highway impacts, having regard to any parking standards for HMOs that have been adopted by the Council.

3. The proposal would provide adequate, discreet and accessible storage for refuse and recycling, together with appropriate management arrangements where required. These provisions should accord with any supplementary guidance adopted by the Council;
4. Applications for HMOs must demonstrate that room sizes comply with the most generous applicable standard, including the National Standards, any replacement standards, or any local standards adopted by the Council's Private Sector Housing team.