

Planning and Transportation Policy Working Group	
Meeting Date	12 th March 2026
Report Title	High Level Early Feedback on the Regulation 18 Local Plan consultation
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officer	Natalie Earl, Planning Manager (Policy)
Classification	Open
Recommendations	1. To note the number of representations received to the Regulation 18 Local Plan consultation and the high level early feedback.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to provide members with an early picture of how many representations were received to the recent Local Plan Regulation 18 consultation and to provide some high level feedback on the comments made.

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 agreed at Full Council (FC) on 10th December 2025.

The Consultation

- 2.2 The document was out for consultation between Monday 12th January 2026 and Monday 23rd February 2026 at 5pm. The consultation could be viewed and responded to via the Council's consultation portal: <https://swale-consult.objective.co.uk/kse/>
- 2.3 1361 individual comments were received to the consultation via the Objective consultation portal from 73 different individuals and organisations. Four Parish and Town Councils, 11 developers and 58 members of the community responded (via the portal).
- 2.4 The most responded to questions on the portal were question 18 which was the small and medium sites for housing development policy and question 103 which was the catch all question for any other comments.

- 2.5 At the time of drafting this report, the 100 representations from 100 different respondents received by email were just starting to be uploaded to the Objective portal to prepare for publishing (for interested parties to view.) Therefore, a breakdown in who they were from and their content is not available. No representations were received by post.
- 2.6 Disappointingly, only 26% of representations were submitted using the Council's consultation portal. The team has been trying to increase this recently by providing step by step guides and offering to assist people with submitting using this method. Councils elsewhere get much higher usage, e.g. Wiltshire Borough Council increased their portal uptake by 60% by removing the requirement to log in to Objective and discouraging emails/letter submissions. Portal submissions reduce officer time in uploading email comments to Objective and allows respondents to ensure their comment is registered to the correct question and to know that their comment has been processed (as they get automatic emails from Objective). It also allows the team to publish all of the representations received much more quickly, allowing stakeholders to view all of the representations received in a timelier manner. The team will continue to try and increase the use of Objective in future consultations. One option would be to follow Wiltshire's example and remove the need to log in to the portal whilst also actively discouraging or even refusing to accept email representations. Dover District Council also do not accept email representations. The team will also discuss with the relevant Officers the recent Community Governance Review consultation, which received almost 90% of representations online, to see what lessons they can share.

Common Themes in the Representations

This is a very high level, early summary of the most prevalent issues raised. It is by no means an exhaustive list.

Vision and Objectives

- There were a number of comments feeling that a more positive vision is required for Swale;
- There was a request for greater clarity around the target housing numbers and how these are set;
- There was a specific comment requesting reference 'to protecting, conserving and enhancing biodiversity and the natural environment' as a key objective, alongside delivering development and growth;
- There were a number of comments about health and health facilities needing more prominence in both the vision and objectives; and
- A number of stakeholders felt that heritage needs to be more strongly recognised in the vision, objectives and the issues and challenges for Swale.

Development Management (DM) Policies

- There were questions around whether the DM policies should have regard to the emerging National Planning Policy Framework (NPPF); (*Officers will of course review all of the Local Plan when the NPPF final version is agreed, to avoid inconsistencies or unnecessary repetition.*)
- Praise for the Biodiversity Net Gain policy going beyond the Government's 10% target;
- General support for the DM employment policies; and
- Concerns were raised about the recent water supply issues in Swale, the capacity issues at the wastewater processing plants and water supply and wastewater provision.

General Comments

- Praise for the consultation approach and the availability of documents in Swale's libraries, and
- There was some concern that the lack of strategic policies and site allocations limited the opportunity for engagement and consultation on the Council's preferred development approach.

Submitted Sites

- 2.7 A number of potential development sites were submitted as part of the consultation. However, from an initial sift, many are sites that have previously been submitted and have already been assessed as part of the Housing and Economic Land Availability Assessment (HELAA). Any new sites submitted will be assessed as part of the HELAA. At committee, officers will update Members on the exact number of new sites submitted.

Sustainability Appraisal Scoping Report

- 2.8 The Scoping Report for the Sustainability Appraisal was also consulted on and at the time of preparing this report six responses have been processed on this consultation. The three statutory bodies who the Council are required to consult (Environment Agency, Natural England and Historic England) did not raise any substantial objections and were broadly supportive of the approach. They highlighted issues around:

- Water quality and water resources;
- Effects of proposed development sites on heritage assets;
- Consideration of ecological receptors alongside human receptors;
- Biodiversity - inclusion of Marine Conservation Zones, delivery of Biodiversity Net Gain and Regard for Local Nature Recovery Strategies;
- Delivery of nature based solutions to mitigate and adapt to climate change;
- Delivery of high quality green infrastructure for community and health;
- Distinction between the nationally designated Kent Downs National Landscape and locally designated Areas of High Landscape Values;

- Contribution to the green and blue infrastructure strategy; and
- Clarification on prioritisation of Best and Most Versatile agricultural land.

2.9 Other respondents raised issues around:

- Consideration of the 2021 Swale Important Local Countryside Gaps (alongside the 2025 review); and
- Consideration of reasonable alternatives in the sustainability appraisal for the Regulation 19 Local Plan.

Next Steps

2.10 Representations will be made live in one batch once all letters and emails have been uploaded to Objective. The team intend to do this by the end of March.

2.11 A report of all the representations, which will be summarised and responded to by officers, will be brought to PTPWG in April/May 2026. (Dates are still being confirmed with Democratic Services.)

3 Recommendations

3.1 To note the number of representations received to the Regulation 18 Local Plan consultation and the high level early feedback.

4 Alternative Options Considered and Rejected

4.1 This report is for noting, so Members could choose to not note the information provided and wait for the detailed analysis of representations received at a later PTPWG meeting.

5 Consultation Undertaken or Proposed

5.1 A consultation strategy, in line with the recently adopted [Statement of Community Involvement](#), was implemented including:

- Emails sent out setting out the relevant 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 start 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. So far, this has had 120 views and we have received positive feedback on it;
- 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 \(PDF 454KB\)](#) 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 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	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. However, some policies within the Local Plan will positively affect crime and disorder within Swale.

Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own 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	Draft policies within the Regulation 18 Local Plan will 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	None identified at this stage.
Equality and Diversity	None identified at this stage, although the Local Plan Review itself will be subject to equality impact assessments at key stages as advised by the policy team.
Privacy and Data Protection	All representations and personal data are being dealt with in line with the Council's GDPR Policy .
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 None.

8 Background Papers

[Swale Borough Local Plan Regulation 18 consultation document](#)