

**Appendix V: Table of Comments Made and Changes Requested at P&R 18<sup>th</sup> November 2025**

Comments from Members at PTPWG	Officer Response
<b>General</b>	
Thanks and praise for all of the hard work put in by both current and past members of the planning team on drafting the Reg 18 Local Plan.	Noted.
All policies within the Reg 18 are draft until the Local Plan is adopted.	Noted.
How will this interact with Local Government Reorganisation (LGR)?	The Government has been clear that Local Authorities need to continue to make progress with their Local Plans whilst LGR is progressing. A shadow authority will not have any say on any sovereign decisions, and once adopted by Swale, this would remain the Local Plan until a new Council develops their own.
Highsted set out that deliverability and viability do not need to be taken into account when permission is granted. Can we consider adding into G1 that proposals/planning applications must demonstrate that they are viable and deliverable? It would prevent approved developments not being delivered.	<p>A Local Plan has to be deliverable and viable, unlike in the past. This is why the Whole Plan Viability Assessment is carried out.</p> <p>Deliverability can be a material consideration, particularly if a Local Planning Authority is giving weight to a benefit that requires the development to be delivered in a certain time. However, it is for the decision maker to decide whether it is material or not – meaning this would be an unreasonable request to make of all applicants; but it can be made when appropriate. An applicant always needs to submit viability evidence if they are not meeting all the planning obligations that the Council would expect.</p> <p>In short, viability evidence could not be insisted on if the planning application is policy compliant.</p> <p>A concern raised was that a developer could build out half a scheme and then not be able to build out the benefits of that scheme. However, that is prevented by the Section106 linked to a planning permission.</p> <p>Therefore, adding a clause into G1 that proposals/planning applications must</p>

	demonstrate that they are viable and deliverable is not recommended.
In terms of process, as consultation responses come back what then happens?	All the comments received are read, compiled and reported to members and policies are altered as a result of comments made if members agree. The Local Plan then goes out to consultation again, as a Reg 19 Local Plan. Comments received during this consultation are submitted to the Examiner, along with the submission version of the Local Plan.
In terms of the accessibility of consultation – when members of public go on-line, do they have to fill in all the questions?	No, you only have to fill in those questions that are of interest to you.
<b>Environment</b>	
SANGS (Suitable Alternative Natural Greenspaces) should have their own policy (or be clear within the Natural Environment Strategic Policy). The aims of and criteria for a SANGS should be set out within the policy. It was raised at PTPWG and officers agreed to add it at Reg 19, however, it should be in now to allow it to be tested.	As officers advised at PTPWG, this will be addressed at the Reg 19 stage of the Local Plan, as it will be a strategic policy which are not being consulted on at this stage.
Policy wording should be added around the preservation of chalk streams. This is mentioned in the pre-amble, however, there is no specific policy.	<p>The policy direction supports this comment and therefore reference to chalk streams will be added to the policy.</p> <p>New wording agreed with the relevant member, as requested, as: <i>'protect the management catchments, the operational catchments and the water bodies across the borough as well as all groundwater and surface water, including chalk streams;'</i></p>
There is no policy on groundwater protection zones (SPZs.)	They are covered by Policy C10 Water Quality and Water Resources.
Recommend a policy excluding solar farms on Best and Most Versatile (BMV) Agricultural land.	P&R voted that officers look into the feasibility of undertaking a piece of evidence base around this topic and reporting back to PTPWG. If it is deemed feasible, it would fed into the Reg 19, not the Reg 18 LP.
Policy B1 – clarification was requested as to the status of the Local Nature Recovery Strategy (LRNS) publication date and making sure the position in the Reg 18 is correct in its references.	Noted. At the printing cut-off date officers will ensure the most up to date information is included within the document.
Policy B7 The Coast, paragraph 44.0.9 'open to the public' needs clarifying as	Noted. The status was taken from the official Coastal Path website. A new sentence has

some of the public can't access all of Swale's coast.	been included at paragraph 44.0.9 for additional clarification on accessibility: <i>"Additional accessibility information on the sections with the status "Open to the public" and updates on the status of other sections in the table are available on the England Coast Path website."</i>
<b>Housing</b>	
Rural exceptions sites shouldn't be linked to the settlement hierarchy.	<p>Whilst it is important to offer local communities the opportunity to bring forward affordable housing in their own areas where there are no alternatives, it is still important that development is sustainably located.</p> <p>Retaining the phrase 'settlement hierarchy' makes clear that proposed development should seek to be located near a level of services appropriate to the scale of development being proposed.</p> <p>It is felt appropriate to keep 'settlement hierarchy' in to give steer to sustainability and ensure appropriateness of scale.</p>
Policy H1 – why the change to the affordable housing percentages?	The Council has recently published the Whole Plan Viability Assessment (WPVA) which tested policy aspirations for the Local Plan including the affordable housing need identified within the Council's housing market assessment 2020. The WPVA provides the evidence base for what affordable housing contributions can be achieved across the borough. <a href="#">Local Plan Review Evidence - Viability</a>
Policy H5 - needs consistent language as there are a couple of different phrases used 'over 55s' and 'older persons'..	<p>Noted.</p> <p>The terminology references used are those taken from the Housing Market Assessment (SHMA 2020) paragraphs 6.10 to 6.17. For consistency with the supporting text Policy H5 criteria 4 uses of the term "older people" and this has been amended "older persons". The use of the term over 55 years olds in the supporting text is referring to SHMA 2020 that discusses persons of 55 years or older who may not need specialist older persons housing but general housing of a smaller scale. To make this general need for over 55 years old homes clearer paragraph 13.0.7 has been amended to: <i>For Park Home proposals that are for general accommodation needs for</i></p>

	<p><i>the over 55 year olds as set out in the SHMA 2020 at paragraph 6.17...</i></p>
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