

**Appendix II - Table of comments from PTPWG, 16<sup>th</sup> September 2025, with responses from Planning Policy Team**

	<b>Comments from PTPWG, 16<sup>th</sup> September 2025</b> (Minutes - Planning and Transportation Policy Working Group Minutes: <a href="#">Minutes Template</a> )	<b>Response from Planning Policy team</b>
1	Glossary needs to be added	Change agreed. Glossary now included in the SCI version for P&R Committee.
2	Important to include sustainable drainage as a material planning consideration.	Change agreed. 7.7 vii Flood risk, water quality and water resources supplemented with the phrase: <u>(including sustainable drainage)</u>
3	Include comprehensive list of the statutory authorities/ consultees.	Change agreed. List of statutory consultees added to the glossary. A reference will be added to 4.5, 1 and 7.22, v.
4	Important to highlight how the Council engages with neighbouring local authorities as well as hard to reach groups and residents.	Partial change agreed. 4.5 explains how neighbouring local authorities are engaged in the preparation of the Local Plan. For clarity, 7.23 iv 'Consult with other organisations such as the Environment Agency, Natural England, Historic England etc, where applicable' has been moved to 7.22 under 'The Council will'. The SCI principles of engaging with hard to reach groups, as well as individuals/residents, is established in the document, including in sections 2.5 and 4.5. The detail of how this will be done for local plans, SPDs and neighbourhood plans with vary with each consultation. Local Plan consultation processes will be reported in a Consultation Statement to accompany the Regulation 19.
5	Needs to be more explicit about how the Council was transparent in its reporting, as required by the National Planning Policy Framework (NPPF).	Change agreed At the end of 4.8 and 4.12 bullet 'Report all comments received though the consultation to the relevant committees along with a summary of key issues highlighted and the Council's response to these issues' added.
6	SCI should include some wording on the Council's commitment to review the document within the next five years.	No change agreed Already explicit in 3.7.

7	Explanation of how representations to local plans are used and what feedback is given.	Partial change agreed. Approach to this is already set out in 2.5 viii. Furthermore, amendments listed in item 5, above, add clarity on this point.
8	Referred to paragraphs 7.13 and 7.14 of the draft SCI and stated that not all applicants engaged with the local community including Ward Councillors	Partial change agreed. Comment noted. Chapter 7 sets out the approach to applications and the encouragement the Council gives to pre-application engagement, in line with the NPPF. Reference to Ward Councillors added to 7.12.
9	With regard 7.17 of the draft SCI, asked that the word 'must' replaced the word 'should' in the second sentence	No change agreed. As explained at the PTP meeting on 16 <sup>th</sup> September, not reporting engagement can't be made a requirement (as it can't be a reason for refusal) and so the word 'must' is not appropriate.
10	There should be an obligation on officers to inform Ward Members and Parish Councils when a major application was coming forward	No change agreed. Notifying ward members is not a matter for the SCI. Established practice is that ward members receive the weekly list of planning applications. Para 7.23 ii sets out that 'The Council may...notify Town or Parish Councils of relevant planning applications in proximity to their area, inviting comments'.
11	Referred to paragraph 7.22 of the draft SCI and requested that the wording "Notify ward councillors...." be added to point (iii);	As 10 above.
12	Referred to paragraph 7.25 of appendix II and said it should be made clear that for public speaking at Planning Committee there was only one slot for each category. The current wording gave the impression that anyone could register.	Change agreed. 7.25 iii amended as follows: 'If the application is considered at Planning Committee, provide applicants, Town and Parish Council representatives of the parish in which the application is situated, and those who have commented on a planning application, an opportunity to register to speak at Planning Committee, noting that one Parish Council representative, one supporter, one objector and the applicant or their agent can speak, each for no longer than three minutes.'
13	Paragraph 7.32 of the draft SCI, 'Appealing a Planning Decision', should also include details of procedures for legal challenges to applications which had been granted permission by the Council.	Change agreed. New para at 7.32 'Those opposed to a grant of planning approval by a public body such as the Council or the Planning Inspectorate have the right to apply for Judicial Review.

		There are strict criteria for this, and set timeframes. Legal advice should be sought.'
14	Concerned that not all the relevant planning documents for Kent County Council (KCC) planning applications were published on Swale's 'Find or comment on a planning application' website, this needed to be addressed. Also need confirmation that comments made on Swale's planning public access are seen by KCC.	Change agreed. This issue highlighted in 7.20 with the inclusion of the additional sentence: 'Details of applications made to Kent County Council can be found on the following website: <a href="#">Planning applications - Kent County Council</a> . Please note this Statement of Community Involvement only relates to the procedures of Swale Borough Council'
15	Should be made clear that Regulations 18 and 19 were for a 'minimum' six-week consultation period, but the relevant committee had discretion to extend.	Partial change agreed. Added to end of 4.8 iv. 'for a minimum of six weeks'. For Regulation 19, the phrase 'for a minimum' in 4.12 already implies that the consultation period can be extended if the Council wishes.
16	The SCI should note that it was a legal requirement to publish S106 Agreements ahead of Planning Committee meetings.	No change agreed. This matter has been discussed with the DM manager who advised this was a procedural matter and not a matter for the SCI.
17	Planning (Application) reports should include whether or not applicants had engaged with the local community prior to submitting their application.	No change agreed. This matter has been discussed with the DM manager who advised this was a procedural matter and not a matter for the SCI.
18	Three minutes to speak at planning committee was not sufficient if you were speaking on a major application.	No change agreed. This is not a matter for the SCI. (At the meeting on 16/9/25 the Chair of PTPWG advised this was a matter for the Constitution Working Group and he would contact the Chair of that group.)