Draft Swale Borough Local Plan (Regulation 19)

Representations to Public Consultation on Infrastructure Delivery Plan, Sustainability Appraisal and Habitat Regulation Assessment

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INFRASTRUCTURE DELIVERY PLAN

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SHEERNESS TOWN COUNCIL	2. INFRASTRUCTURE & EVIDENCE BASE 2.1 The Infrastructure Development Plan is incomplete. The transport model is a key piece of evidence needed to understand the impact of development on transport, housing, employment, education and the environment. The Council is concerned that this information will not be available until after the consultation has closed. The Plan should not progress without the transport model being published and an opportunity being given for it to be properly considered. 2.2 There is no specific Neighbourhood Plan framework or allocation for Sheppey. The Council is particularly concerned about the level of social housing proposed. The provision outlined does not appear to reflect the level of housing need within Sheerness and the wider Island. Sheerness has some of the highest levels of deprivation and housing need within the Borough, yet the Council feels that greater focus continues to be placed on Sittingbourne and Faversham. A lack of social housing means local residents can be forced to look outside their own communities for suitable housing. The private rental sector is also unaffordable for many local families. The Plan needs to provide sufficient social and affordable housing to meet the needs of existing residents and allow people to remain within their local communities. There also needs to be greater transparency around infrastructure funding and Section 106 contributions. The Council has not been provided with sufficient information to demonstrate how Section 106 contributions from development on Sheppey have been, or will be, spent for the benefit of the Island. There are also concerns that educational contributions have been directed towards schools in Sittingbourne while Sheppey continues to experience its own pressures. Local bus services remain inadequate for residents who rely on them for employment, education, healthcare and other essential journeys. There is also no clear funding or delivery plan for the replacement of Sheppey's swimming pool, which is an important community facility for the Island. 2.4 Paragraph 10.1 refers to a GP facility which is not currently confirmed as sustainable or operational in the near future. The Council believes this should be reviewed so that the Plan reflects confirmed healthcare provision rather than facilities which may not be available. 2.5 Paragraph 10.1.10 refers to community care processes which the Council does not believe reflect what is happening locally.

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	There is no clarity on where additional community care capacity will be provided. Provision at Minster is being reduced and no replacement has been identified. Where development results in the loss or reduction of important community infrastructure, replacement provision should be identified and secured. The Council is also concerned that thresholds can be exceeded without any clear enforcement or remedy. If these measures are to form part of the Plan, there needs to be clarity about how they will work in practice. 2.6 Education provision also needs further consideration. There is no reference to SEN nursery provision. The lack of suitable local provision can leave families having to travel, relocate or go without the support they need. This particularly affects families on lower incomes or those without access to a car. Primary school numbers are falling, while there remain concerns about secondary school capacity. Some children have been out of mainstream education for extended periods, which risks further disengagement and young people becoming NEET. There are also concerns about access to selective education for children living on Sheppey. Where a child lives should not create an additional disadvantage in accessing educational opportunities. 2.7 The Council is concerned that parts of the Plan rely too heavily on what is hoped will happen rather than what can realistically be delivered. This is particularly relevant to water infrastructure. Swale Borough Council does not have direct control over the delivery and performance of utility providers. Where the Plan relies on other organisations to deliver essential infrastructure, there needs to be clear evidence showing how and when that infrastructure will be provided.
NHSPS - NHS Property Services Ltd	Infrastructure Delivery Parts 2 and 3 of Draft Policy ST9 requires development to contribute to and be coordinated with the timely provision of necessary infrastructure, and sets out that the Council will continually monitor and update infrastructure requirements through the Infrastructure Delivery Plan (IDP). Supporting paragraph 3.2.15 identifies healthcare as a form of social infrastructure. In addition, supporting paragraph 6.10.11 confirms that, where a viability assessment demonstrates that that a reduced level of developer contributions would be appropriate; the Council will prioritise developer contributions in accordance with the IDP. Part (ii) of supporting paragraph 6.10.11 specifically identifies contributions towards local infrastructure provision, including health provision. NHSPS supports the Council's expectation for development to make provision for the delivery of necessary infrastructure. The IDP also clearly demonstrates engagement with the NHS (specifically NHS Kent and Medway ICB) is required to reflect NHS/ICB strategies. NHSPS encourage the Council to continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the IDP, prior to submission. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare

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	infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures. As the local health commissioners, the ICB are responsible for the strategic planning of the delivery of healthcare infrastructure, including the identification of appropriate health facilities required for continued healthcare service provision. Further comments on IDP are provided in the relevant section below. The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that both planning obligations and the capital allocation process for the Community Infrastructure Levy (CIL) effectively support and result in capital funding towards delivery of the required infrastructure. The IDP demonstrates clear engagement with NHS Kent and Medway ICB and includes healthcare infrastructure in its project schedule. We welcome this engagement and recommend that the Council continues to work with the ICB to identify the healthcare infrastructure required to support new development and to ensure that the IDP clearly identifies the appropriate mechanism and form of developer contribution required to secure Its dellvery. As the local health commissioners, the ICB are responsible for the strategic planning of the delivery of healthcare infrastructure, including the identification of appropriate health facilities required for continued healthcare service provision.
Rodmersham Parish Council	Infrastructure is uncertain, late or described as aspirational. Contributions are not the same as operational facilities.
Maidstone Borough Council	There appears to be a lack of highways mitigation/improvement schemes or the identified KCWIP project active travel route 14 Maidstone to Sittingbourne. Yes, please add references to appropriate highways schemes and the KCWIP active travel route proposed between Maidstone and Swale LPAs.
SW (Savills / Wates Dev)	The Council has published an IDP (June 2026) to support the preparation of the Local Plan, which identifies the infrastructure and services necessary to support the growth across the borough over the Plan Period. The IDP acknowledges at paragraph 5.0.5 that additional transport modelling is currently being undertaken to assess the impacts of the proposed growth strategy and identify any necessary mitigation measures. It is understood that the Transport Model is being developed to support the Regulation 19 Local Plan and the evidence is emerging. In this context, it is important that the Council fully considers the transport and infrastructure implications of the existing allocation strategy before concluding that the proposed

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	distribution of growth represents the most appropriate and sustainable option. Until the transport modelling is complete and its findings have been taken into account, the Council has not demonstrated that the selected spatial strategy is justified by proportionate evidence or that it will be effective over the Plan period. The IDP identifies a number of aspirational projects which could improve connectivity and accessibility across the Borough, including a potential car park at Swale Station and its expansion to a “Swale Parkway Station”. This recognises the potential for such improvements to encourage a modal shift from private car use to rail travel, particularly for residents travelling from the rural areas of Sheppey and Iwade. In this context, the Site's proximity to Swale Station, together with its relationship to the existing built-up area of Iwade, demonstrates its ability to support the Council's wider objectives of encouraging sustainable travel patterns and improving access to public transport. These aspirational projects have not been mentioned in the emerging Transport Model, however, and therefore there is a disconnect between the two documents. In terms of healthcare developer contributions, the IDP sets out that the ICB (Integrated Care Board) is currently trying to seek developer contributions that would cover not only GP Primary Care, but also Acute and Community Care. When taken together, the contributions would amount to £2,400 per unit on anything over 20 homes, and £7,200 per unit for anything over 300 dwellings. The concern with this is that this could well undermine project viability and healthy urban design features intended to prevent, reduce and delay the need for health and social care. Furthermore, we do not consider that this approach is Regulation 122 compliant because the actual demand is not directly attributable to the proposed development. The Infrastructure Delivery Plan contains uncosted or inadequately costed infrastructure projects and does not identify realistic delivery mechanisms. Consequently, there is insufficient evidence that the Plan can be implemented effectively.
Kent County Council	Infrastructure Delivery Plan Highways and Transportation The County Council welcomes the preparation of the Infrastructure Delivery Plan (IDP) and supports the recognition that transport infrastructure is fundamental to the successful delivery of the Local Plan growth strategy. The IDP appropriately acknowledges the role of transport infrastructure, public transport, active travel and wider infrastructure investment in supporting sustainable growth across the borough. However, the IDP repeatedly identifies that: • further transport modelling is still underway; • highway hotspots have been identified but require further assessment; • mitigation measures have not yet been fully established; and • the IDP will be updated once additional modelling outputs become available.

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	The County Council considers that the submission version of the Local Plan should be supported by an updated IDP which clearly demonstrates that the cumulative impacts of planned growth have been assessed and that the necessary transport mitigation measures have been identified, costed, phased and are capable of delivery. **Section 11.1 Roads** **Transport Evidence and Modelling** The County Council welcomes the acknowledgement that transport capacity constraints represent one of the principal infrastructure challenges facing the borough and supports the continued transport modelling work. However, the IDP currently relies upon future modelling outputs to identify transport mitigation requirements. Whilst the County Council accepts that modelling is iterative, the Local Plan should be accompanied by sufficient evidence to demonstrate: • the cumulative impacts of growth; • the infrastructure required to mitigate those impacts; • delivery responsibilities; • indicative costs; and • implementation triggers. The Council recommends that the transport sections of the IDP are updated prior to submission to reflect the findings of the latest modelling work. **Vision and Validate** The County Council supports the inclusion of the Vision and Validate approach and notes that it aligns with Kent County Council's adopted Transport Assessment and Travel Plan Guidance and wider transport planning objectives. However, the County Council considers that Vision and Validate should complement, rather than replace, the identification of known transport infrastructure requirements. The need for future monitoring should not create uncertainty regarding mitigation measures already demonstrated to be necessary through transport evidence or planning applications. The IDP should continue to identify the strategic and local transport interventions required to support growth whilst recognising the role of monitoring and adaptive management during implementation. **Strategic Highways** ***M2 Junction 5*** The County Council supports the recognition that despite the recently completed improvements, M2 Junction 5 remains a strategically important junction that will continue to require monitoring as growth comes forward across the borough. However, the IDP should provide greater clarity regarding:

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	• future capacity assessments; • growth assumptions; • relationships with strategic allocations; and • any future intervention requirements arising from the ongoing transport modelling work. ***M2 Junction 7 (Brenley Corner)*** The County Council strongly supports the recognition of Brenley Corner as a strategic constraint affecting both Swale and the wider north Kent transport network. The IDP correctly identifies the strategic importance of the junction and its relationship with growth planned in both Swale and neighbouring authorities. However, the IDP currently lacks sufficient certainty regarding: • the scope of future improvements; • delivery mechanisms; • funding; • cumulative growth assumptions; and • implementation timescales. Given the importance of Brenley Corner to the delivery of growth within Faversham and the wider corridor, the County Council recommends that future versions of the IDP provide greater clarity on scheme development and delivery. **A249 Corridor:** ***Bobbing Junction*** The County Council supports inclusion of Bobbing Junction improvements within the IDP and notes that mitigation is already being progressed through current planning applications and associated transport assessments. The IDP should clearly distinguish between: • mitigation secured through planning permissions; • improvements associated with strategic allocations; and • any additional mitigation required as a consequence of the wider Local Plan growth strategy. This will reduce the risk of double counting infrastructure requirements and improve transparency in infrastructure planning. ***Key Street and Grovehurst*** The County Council notes the completion of the Key Street and Grovehurst schemes and supports the recognition that future growth may require continued monitoring of these junctions. The IDP should provide greater clarity regarding the circumstances in which further intervention may be required and how future monitoring will inform decision making.

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	Local Highway Schemes: ***A2 Mitigation Strategy*** The County Council strongly supports retention of the A2 Mitigation Strategy project. The A2 corridor remains one of the borough's most sensitive transport corridors and has repeatedly been identified through previous modelling work as experiencing capacity pressures. The County Council recommends that: • the strategy be further developed; • links with Teynham growth be clarified; and • future interventions be informed by updated modelling. ***Teynham Junction Improvements*** The County Council supports inclusion of junction improvements at: • Station Road; • Lynsted Lane; • Claxfield Road; • The Crescent; and • Conyer Road. However, there is currently limited information regarding scheme scope, costs and delivery arrangements. Greater certainty would strengthen the soundness of the IDP. **Walking, Cycling and Public Transport:** ***LCWIP Delivery*** The County Council strongly supports inclusion of both the Swale LCWIP and Kent CWIP projects within the IDP. The links between growth locations and active travel infrastructure are welcome and align with KCC's wider objectives. The County Council recommends that future versions of the IDP identify: • priority delivery corridors; • anticipated funding mechanisms; • relationships with specific allocations; and • indicative delivery programmes. **Bus Infrastructure** The County Council supports the requirement for major developments to provide bus infrastructure and support services from an early stage. The IDP should place greater emphasis on:

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	• early delivery of bus services; • safeguarding bus routes through master planning; • bus priority measures; and • long-term service viability. **Swale Parkway Station** The County Council supports retention of this project within the IDP as an aspirational scheme. Whilst not committed infrastructure, it represents a potentially significant opportunity to support modal shift and reduce pressure on Sittingbourne and Sheppey town centre parking demand. The County Council considers it appropriate that the project remains identified for future consideration. **IDP Overall Conclusion** The County Council welcomes the Infrastructure Delivery Plan and supports its identification of transport infrastructure as a critical component of the Local Plan growth strategy. However, the transport chapters and Infrastructure Delivery Schedule should be updated prior to submission to reflect the latest transport modelling outputs, identify the full package of required transport mitigation, and provide greater certainty regarding scheme scope, costs, funding responsibilities, delivery mechanisms and implementation triggers. The County Council particularly supports the continued safeguarding and identification of strategic transport interventions including Brenley Corner improvements, the A249 corridor schemes, the A2 Mitigation Strategy, LCWIP projects and public transport enhancements. The Council considers that these measures will play an important role in supporting the delivery of sustainable growth across the borough. Overall, the County Council's position at this stage is one of broad support for the transport strategy and direction of travel within the Plan. However, the Local Highway Authority considers that further certainty is required regarding strategic transport mitigation, infrastructure delivery, funding responsibilities and implementation triggers before the Plan can demonstrate that the cumulative impacts of its proposed growth strategy can be satisfactorily accommodated on the transport network.
Faversham Town Council	Planning and Compulsory Purchase Act 2004 Town and Country Planning (Local Planning) Regulations 2012 Swale Borough Council Local Plan Regulation 19 Pre-submission draft Faversham Town Council have given careful consideration to the Regulation-19 Local Plan and its supporting evidence base. This representation should help inform the emerging Local Plan in respect of relevant planning matters that are important to our community in Faversham. The Town Council supports the emerging Local Plan, providing certainty and informing the wider growth strategy across the borough. Under national transitional arrangements set out in Annex A of the August 2026 NPPF, emerging local plans (and their accompanying evidence base) submitted for examination prior to the statutory deadline are examined against the National Planning Policy Framework (NPPF, December 2024. Because Swale Borough Council prepared its Regulation 19 Local Plan policies, housing requirements and site allocations under the December 2024 NPPF, all policy and paragraph references in this representation cite the December 2024 NPPF to ensure direct policy alignment.

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	Paragraph 36 of the NPPF states that local plans must be positively prepared, justified, effective and consistent with national policy (tests for soundness). The Town Council considers that overall, the Plan meets these tests for the reasons set out in this representation, subject to the suggested modifications. This representation is based upon: the Council's own evidence base and Sustainability Appraisal; the National Planning Policy Framework, December 2024 ("NPPF"); the Environmental Assessment of Plans and Programmes Regulations 2004 ("SEA Regulations"); and relevant case law concerning lawful plan-making and environmental assessment. Growth Strategy The Local Plan acknowledges the following extant planning permissions that support the delivery of the growth strategy across the borough including the following in Faversham: Land at Preston Fields, Salters Lane, Faversham Land at Lady Dane Farm, Faversham; and Land at Ham Road, Faversham. Whilst the Town Council recognises these extant permissions, 'Land at Ham Road, Faversham' is not extant as the 'Land Allocations for Development, Summer 2026' document suggests. This is an error and the site should be removed from the list of extant permissions. The site only received the outcome of a High Court legal challenge by Faversham Town Council this summer (2026) and there have been no relevant applications (reserved matters or discharge of pre-commencement conditions) to indicate the permission is extant. Furthermore, the site has been discounted again through Swale Borough Council's SHELAA assessment, updated 5th May 2026, concluding the site is 'unsuitable' noting that: "Due to the exposed and sensitive nature of the landscape in this area north of Faversham potential development of the site would have significant impacts on the landscape to the north. " The removal of the site would not have an adverse effect on the overall growth strategy for the borough as this is delivered together with the site allocations in the Faversham Neighbourhood Plan (FNP). The FNP far exceeds its housing requirement and therefore the removal of 'Land at Ham Road' would not have a material impact on the housing number and would correct the error. To include this incorrect allocation in the growth strategy could make the Plan unsound. FTC also notes the proposed strategic site allocation relevant to Faversham is STRAT2 South East Faversham, together with the small and medium site allocations of: HOAI Land at Graveney Road, Faversham, SHELAA/III; HOA2 Land at Lion Field, Faversham, SHELAA/393; HOA16a Lady Dane Farm Building's, Love Lane, Faversham, SHELAA/081; and HOA16b Syndale Park, London Road, Faversham (Ospringe), SHELAA/391. We also note the relevant employment site allocation relevant to Faversham is: EMA5 Land East of A2/M2 This allocation should have demonstrable evidence that the proposed employment site allocation would not have a detrimental or severe impact on the highway and surrounding road network, taking account of the cumulative impacts of other strategic site allocations in proximity including STRAT2.

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	Natural Environment FTC notes 'Policy BI, Traditional Orchards', supports local food growing opportunities and is consistent with policies FAV7 and FAVIO of the FNP. We also support 'Policy B4, Important Local Countryside Gaps', particularly as they protect the sensitive edges of Faversham and Ospringe. We note 'Policy INF4, Additional Local Green Space' includes a number, of further Local Green Space designations in and around Faversham. The designation of additional Local Green Space designations is strongly supported. However, there is an error with proposed LGS/078 'Footpath parallel to Brent Road'. The area shown in the proposed LGS map conflicts with the site allocation reference FAV24 in the FNP that is currently subject to a hybrid outline application for development. The Town Council understands the sentiment of the proposed LGS to protect the footpath parallel to Brent Road. However, the Faversham Neighbourhood Plan already deals with PRoW in policies FAV4, FAVIO and FAV15. Furthermore, policy FAV24 explicitly deals with PRoW ZF40 and supports the creation of new public access to the waterfront. Any redevelopment of this site should protect the right way and see improvements to the surface whilst ensuring that the green character of the footpath is protected. The Town Council requests that the greens at Beech Close and Stonebridge Way are designated as Local Green Spaces. We also understand the rationale to de-designate Faversham Cricket Ground LGS as a replacement facility is to be created. The Town Council through a revised Neighbourhood Plan or a future Local Plan could make the replacement facility a new Local Green Space in whichever Plan is updated first following it's development. The Town Council strongly support the joined and linked landscape areas with 'Policy B2, Swale Area of High Landscape Value' adjoining the designated 'Policy B3, Kent Downs National Landscape area'. This connectivity will support the natural environment and its habitats as well as protecting the rural landscape character that surrounds Faversham. The Town Council also strongly supports the connectivity of the 'International Sites of Biodiversity and/or Geological Value' and the 'National Sites of Biodiversity and/or Geological Value' with the 'Local Sites of Biodiversity and/or Geological Value' and Country Park. Again, this policy direction recognises the diverse and rich role of our biodiversity in Faversham and surrounding rural area. We also note that the proposed site allocation 'HOA16b Syndale Park' is surrounded by Local Sites of Biodiversity and/or Geological Value'. The Town Council request that Vicarage Lane and Tin Shop Hill are included as Green Lanes. Active Travel 'Policy B8, Rural Lanes' identifies a number of rural lanes in Faversham. The King Charles Ill Coastal Path is also defined on the interactive planning map. Faversham Town Council strongly supports active travel (walking, wheeling and cycling) and welcomes opportunities to connect to existing networks of national routes, traffic free routes, and other Public Rights of Way to support strong active travel connectivity across the town and reduce the need for private car journeys. Settlement Boundary It is noted that the 'Draft Built up Area Boundary' proposed takes account of extant planning permissions. However, to include the area of 'Land at Ham Road' is clearly an error as this permission is not extant as clearly set out earlier in this representation.

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	FTC strongly object to the extension of the boundary in this location. Equally to allow and support the development of this site, knowing the substantial flood risk would be irresponsible. Faversham Town Council remains clear in its position, strongly opposing any development of this site and believe that to include this site could make the Plan unsound as it is contrary to it's own evidence base (SHELAA) and not consistent with National Policy. It is noted that the proposed 'Town Centre Boundary' is different to the area in the FNP. The proposed boundary includes revisions to incorporate the large retail area off West Street and removes an area off Church Road. It was agreed that the retail unit on West Street should be included in Town Centre Boundary, but that the residential street should not be. West Street: It was agreed that the residential area on Church Road should be removed from the Town Centre Boundary. Soundness Test — Justified Paragraph 32 of the NPPF requires plans to be supported by relevant and proportionate evidence. Paragraph 36 requires the strategy to represent an appropriate strategy taking account of reasonable alternatives. FTC consider that currently the Plan is supported by sufficient evidence to demonstrate that it represents the most appropriate strategy, providing that the site 'Land at Ham Road' is removed. Soundness Test — Effective Paragraphs 20 and 35 of the NPPF require strategic policies to make appropriate provision for infrastructure and set out clearly the contributions expected from development. FTC would request that the infrastructure necessary to support the proposed allocations is delivered in a co-ordinated, timely or adequately evidenced manner. The allocations are dependent upon significant supporting infrastructure and mitigation measures. FTC support the delivery of additional infrastructure to support the wider town including: • Traffic free, Active Travel routes to support reduced car journeys; New healthcare facilities including a Neighbourhood Hub; o Please see Infrastructure Delivery Projects, Activities and Outcomes Report (Appendix A) Soundness Test — Consistent with National Policy As set out earlier in this representation the proposed site allocation 'Land at Ham Road' must be removed from the Local Plan. It is contrary to the evidence base that underpins the proposed allocation. The site is not extant as the (Land Allocations for Development, Summer 2026' document suggests. This is an error and the site should be removed from the list of extant permissions. The site only received the outcome of a High Court legal challenge by Faversham Town Council this summer (2026) and there have been no relevant applications (reserved matters or discharge of pre-commencement conditions) to indicate the permission is extant. The proposed allocation has been discounted again through Swale Borough Council's SHELAA assessment, updated 5th May 2026, concluding the site is 'unsuitable' noting that: "Due to the exposed and sensitive nature of the landscape in this area north of Faversham potential development of the site would have significant impacts on the landscape to the north."

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	The removal of the site would not have an adverse effect on the overall growth strategy for the borough as this is delivered together with the site allocations in the Faversham Neighbourhood Plan (FNP). The FNP far exceeds its housing requirement and therefore the removal of 'Land at Ham Road' would not have a material impact on the housing number and would correct the error. To include this incorrect allocation in the growth strategy could make the Plan unsound. Other Material Matters In parallel to any growth strategy, it is imperative that the associated infrastructure is also delivered. This includes delivering a range and type of homes to meet local housing need, access to healthcare and education, employment opportunities and providing safe and convenient access to services and facilities, reducing the need for private car travel. Other factors that are also important to our community and should be taken account of include ensuring new development incorporates climate resilient design, taking account of 7 local resources, particularly as Faversham is a water stressed area and planning positively for the impact from rising sea levels and flood risk to existing and new communities. Faversham Town is nestled on an internationally significant coastline, including rare chalk streams, surrounded by best and most versatile agricultural land, renowned for local food production. The range of natural habitats is unique and should be protected and enhanced where possible. Faversham also includes a diverse range of heritage assets above and below ground with a rich history linked to its coastal location. The Plan must balance all these elements and take account of the needs now and in the future for our communities to ensure we thrive, rather than blight our environment. Conclusion and Requested Modifications On balance the Plan is considered to meet the soundness tests as set out in this representation. Faversham Town Council welcomes the Regulation-19 Local Plan, providing certainty. Together with the Faversham Neighbourhood Plan these Plans positively meet the growth agenda and set clear policy tests for new development. Taking account of this representation Faversham Town Council respectfully requests the following modifications to the Plan: The 'Draft Built up Area Boundary' is amended to remove 'Land at Ham Road' as this is not an extant permission. We suggest proposed LGS/078 'Footpath parallel to Brent Road' is removed as the area shown in the LGS is an allocated site in the Faversham Neighbourhood Plan and the proposed LGS conflicts with the brownfield site allocation. Amendments to the Town Centre Boundary FTC hope this representation is constructive and helpful in shaping the modifications of the Regulation-19 Plan prior to examination. 8 Draft Infrastructure Delivery Projects, Activities and Outcomes Active Travel Faversham LCWIP detailed all the interventions sought. Car share scheme (larger developments). Access routes whether old or new to be brought up to KCC adoptable standard. Bus stops.

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	Community Improve & develop community spaces, which in particular are currently limited in the East of the town and we would like to see that solved Improve & develop play spaces — including free play space with natural materials Accessible new play spaces Football pitch provision Environment Flood deviation/flood response Well insulated and ventilated buildings Provision of street trees Shade installation at play areas (e.g. sail shades) Provision of shade areas using solar panels in open spaces (e.g. Solar pergola) Chalk Streams should be protected in planning provision. Financial contribution to Siltex application. Water butts on new properties Benches (suitably spaced so less able bodied people can rest while walking between destinations) Green roof bus shelters Bee bricks Signage to be placed on bee posts instead of regular posts August 2026 Representations on Applications: File Note: Some of these are things that may not be directly covered by developer contributions but could be referenced in pre-application advice and representations to planning applications. Provision of bird boxes for colony birds, to be placed appropriately (cluster rather than spaced out) Old Town Warehouse The Old Pumphouse The Creek (Buildings, bridge dredgings and public access) Chalk Streams should be protected in planning provision. Financial contributions to Siltex application. Signal Box and Engine Sheds Railway History Oare Gunpowder Works Where applications would have an impact on these buildings or their setting representations should be made. No Suggestions Potential Developer Contributions: (S106 and Unilateral Undertaking) File Note: Some of these are projects that a development may not directly deliver, but the commuted sums could collectively be used to deliver. Relevant contributions should be sought in the planning representations to applications. Active Travel Faversham LCWIP detailed all the interventions sought. Contributions for the expansion of the Faversham Hopper including funding for additional bus(es), paid drivers, commuter services. New primary school in the east of town. Car share scheme (larger developments).

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	Gaps in pedestrian pavements such as on Love Lane. Access routes whether old or new to be brought up to KCC adoptable standard. Bus stops - Construction and Improvement of bus stops within the adopted highway, potentially including kerbs, boarding areas, shelters, road markings, signs, lighting and drainage. Community To develop the Skate park Improve & develop community spaces, which in particular are currently limited in the East of the town and we would like to see that solved Improve & develop play spaces — including free play space with natural materials Disabled accessibility improvements to existing play spaces Football pitch provision Environment Flood deviation/flood response Home insulation programme Energy efficiency programme (EPCC) Provision of street trees Shade installation at play areas (e.g. sail shades) Provision of shade areas using solar panels in open spaces (e.g. Solar pergola) Green roof bus shelters Signage to be placed on bee posts instead of regular posts Provision of bird boxes for colony birds, to be placed appropriately (cluster rather than spaced out) Heritage, Buildings Old Town Warehouse The Old Pumphouse The Creek (Buildings, bridge dredgings and public access) Chalk Streams Signal Box and Engine Sheds Railway History Oare Gunpowder Works Supported by relevant capital costings for each project. Policy and Resources Committee No Suggestions Potential Section 278 matters Active Travel Faversham LCWIP detailed all the interventions sought. Contributions for the expansion of the Faversham Hopper including funding for additional bus(es), paid drivers, commuter services. Gaps in pedestrian pavements such as on Love Lane. Street-tree planting within the adopted highway, subject to highway authority approval and maintenance arrangements. Access routes whether old or new to be brought up to KCC adoptable standard.

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	Bus stops - Construction and Improvement of bus stops within the adopted highway, potentially including kerbs, boarding areas, shelters, road markings, signs, lighting and drainage. Junction, crossing, footway, cycleway, traffic-calming or other highway works required to mitigate development impacts. Community Environment Heritage, Buildings and Creek Committee Policy and Resources Committee Potential planning conditions to be suggested in representations Active Travel Faversham LCWIP detailed all the interventions sought. Street trees on new developments, as part of landscaping plan. New primary school in the east of town. Access routes whether old or new to be brought up to KCC adoptable standard, as a highways condition. Community Improve & develop play spaces — including free play space with natural materials, where shown in an application. Football pitch provision, where shown in an application. Environment Provision of street trees, as part of the Landscape Plan. Shade installation at play areas (e.g. sail shades) as part of the Landscape Plan. Provision of shade areas using solar panels in open spaces (e.g. Solar pergola) as part of the Landscape Plan. Water butts on new properties Benches (suitably spaced so less able bodied people can rest while walking between destinations) details as part of the Landscape Plan. Green roof bus shelters Bee bricks Signage to be placed on bee posts instead of regular posts Provision of bird boxes for colony birds, to be placed appropriately (cluster rather than spaced out), as part of the Landscape Plan. Heritage, Buildings and Creek Committee Policy and Resources Committee
Alison Burchell Strategic Estates Team INTEGRATED CARE BOARD	Thank you for the opportunity to comment on the Regulation 19 Local Plan consultation. NHS Kent and Medway Integrated Care Board (ICB) has reviewed the Regulation 19 Local Plan and supporting Infrastructure Delivery Plan (IDP) from a healthcare infrastructure perspective. The ICB notes that the South East Faversham and Land West of Bobbing strategic developments have already progressed through separate planning application processes. Healthcare infrastructure requirements arising from these developments have been considered through those processes and the ICB will continue to engage through the implementation of the relevant planning permissions and associated Section 106 agreements. The ICB notes that the Infrastructure Delivery Plan is a live document. The IDP will continue to be reviewed and updated as new information emerges and development proposals progress.

RESPONDENT	REPRESENTATION
	The ICB has reviewed the healthcare-related sections of the Infrastructure Delivery Plan and suggests a small number of factual amendments to ensure they accurately reflect current NHS structures and terminology. • Paragraph 4.0.9 should be updated as follows, noting that the way in which organisations are working together is detailed under an update for paragraph 10.1.2. *NHS Kent and Medway ICB was created on the 1st of July 2022 under the health and Social Care Act 2022 which abolished the Clinical Commissioning Group that preceded the organisation.* • Paragraph 10.0.2 should be updated to reflect the scope of the healthcare infrastructure that is considered within the IDP *For the purposes of the IDP health care includes general practice, community healthcare services and hospitals. It does not take into account the specific infrastructure requirements for dentists, pharmacies, opticians, these are currently considered by the relevant organisations.* • Paragraph 10.1.2 should be updated to reflect current partnership arrangements. *NHS Kent and Medway ICB is a statutory consultee on Local Plans. The ICB is strengthening how organisations across Kent and Medway work together through a Kent and Medway Provider Alliance.* *This is not a new organisation. It is a more joined-up way of working where NHS providers share responsibility for improving services and delivering system priorities.* *The alliance builds on the work already developed through local health and care partnerships, but with a stronger focus on delivering change at scale across the whole of Kent and Medway.* *Alongside this, two provider collaboratives are leading delivery:* • *The Neighbourhood Provider Collaborative, comprising the community trust, mental health trust and primary care.* • *The Acute Provider Collaborative, bringing together Kent and Medway's hospital providers.* *Together, these arrangements will help organisations work more effectively across traditional boundaries while keeping their own governance and responsibilities.* • Paragraph 10.1.3 should be amended to more accurately describe the role of Primary Care Networks (PCNs). *Primary Care Networks (PCNs) are groups of neighbouring GP practices working together, and in partnership with community, mental health, social care, pharmacy, hospital and voluntary services, to provide more coordinated and personalised care for their local populations. PCNs help ensure that local needs, opportunities and challenges are reflected in the planning and delivery of healthcare services.* • Paragraph 10.1.4 final sentence should be updated with the following. *The list size variation is influenced by a combination of PCN changes which includes practice configuration changes and redistribution of registrations between practices.*

RESPONDENT	REPRESENTATION
	Paragraph 10.1.10 should be updated to remove the proposed/planned health provision list from this section as not related to the paragraph. The ICB will continue to work with Swale Borough Council on the ongoing assessment of healthcare infrastructure requirements arising from growth through the Local Plan, including consideration of appropriate healthcare infrastructure mitigation and developer contributions where appropriate.
Five Parishes Group	The Highsted Park waste-infrastructure contradiction must be resolved. The IDP says Sittingbourne's existing waste facilities are already at operational capacity. It identifies relocation of the Sittingbourne HWRC as "critical", but then says: "The allocation of the relocated Sittingbourne HWRC has been included in the Highsted Park development. However, this is dependent on the development gaining planning permission." Highsted Park is not allocated in Regulation 19. Swale is therefore relying upon an unallocated and undecided development to provide critical infrastructure needed to support the growth proposed by its own Plan. Under the new NPPF's effectiveness and infrastructure tests, Swale should identify: • an alternative site; • the land-acquisition arrangements; • cost and funding; • a delivery timetable; and • what happens if Highsted Park is refused. Without that, an important part of the Plan's waste strategy is not demonstrably deliverable. Duty to cooperate and cross-boundary infrastructure The effectiveness of the strategy depends on bodies outside the Council's control, including KCC, National Highways, NHS Kent and Medway ICB, South East Water, Southern Water and neighbouring authorities. Network Rail, especially as the railway effectively cuts Sittingbourne in North and South. The evidence must show outcomes, not merely meetings. This is particularly important for water transfers and resilience, wastewater treatment, acute and primary healthcare, the A2 and M2 network, secondary education and cumulative growth beyond Swale. Required modification: Publish a concise schedule of unresolved strategic matters, each body's position, agreed action, delivery date, funding status and contingency. Any material disagreement must be clearly identified for the Inspector.

RESPONDENT	REPRESENTATION
	Revise the IDP so every critical and necessary item states a quantified cost, funding gap, delivery body, site dependencies, latest operational date and contingency. For health, distinguish relocation or refurbishment from net additional service capacity and quantify GP workforce, appointments, urgent-treatment capability, diagnostics, travel times and opening hours. For education, identify baseline deficits separately from development-generated need and show the school site, forms of entry, funding, promoter, opening date and occupation trigger. Where this cannot be demonstrated, the related allocation or housing trajectory must be rephased. It is really important the section 106 agreements are submitted with the planning applications. A head of terms is insufficient and leaving the drafting until after a decision by planning committee or officers has been made, is too late Swale must insist fully formed and drafted section 106 agreements are submitted at the time an application is made.

SUSTAINABILITY APPRAISAL

RESPONDENT	REPRESENTATION
Quad Quinn Estates	The Sustainability Appraisal of the Swale Local Plan (SA Report) (July 2026) underpinning the Regulation 19 Plan considers choices for the STRAT1 and STRAT2 allocations in a flawed way. The SA Report explains (page i) that the proposed two large strategic allocations are held "constant" because they have "recently gained planning permission", albeit that the Council has only resolved to grant permission for land at South East of Faversham4 and land at West of Bobbing5. The SA Report therefore asserts that it is reasonable to assume that the two developments are committed (and will come forward) for the purposes of defining growth scenarios (paragraph 5.2.21). At the time of writing these representations, neither had secured planning permission and both applications, following the publication of the replacement August 2026 NPPF, will need to be reported back to committee. Appendix II (Superseded growth scenarios) of the SA Report appraised six growth scenarios from June 2026, three of which included Highsted Park providing 2,000 homes. Although this appraisal concluded that 'Scenario 1' (which omitted Highsted Park) and 'Scenario 4' (which included Highsted Park) were ranked first, it subsequently states the "topic specific appraisal conclusions are open for debate" since no account has been taken of significant effects and no weighting was applied in relation to the importance of each topic. This fundamentally undermines the entire appraisal.
Environment Agency	Box 5.1: *The Queenborough/Rushenden regeneration area* mentions the consideration of flood risk. We would agree that site specific flood risk assessments would be required for the sites discussed. It is implied that as the sites are defended, they will be suitable for development. However, any proposed development would still need to ensure that it can be made safe for the lifetime of the development, taking into consideration to any flood defence improvements that may need to be made. Please note we have made site specific comments to those in Queenborough and Rushenden when responding to Appendix A of the Strategic Flood Risk Assessment Scoping report.
CPRE	The Council has not clearly shown how the appraisal informed the evolving strategy, that the alternatives remained genuinely open to consideration, and that new evidence and cumulative effects have been addressed. We therefore seek a clear decision and appraisal audit trail, with further assessment and consultation where required.
SW (Savills / Wates Dev)	Sustainability Appraisal (SA) The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) requires a comprehensive assessment of Environmental Impact to determine likely significant effect in the process of plan making. Section 19 of the Planning and Compulsory Purchase Act 2004 also legally requires that a full sustainability appraisal is carried out on the proposed plan.

RESPONDENT	REPRESENTATION
	The Council has prepared and published the SA (July 2026), which sets out the proposed methodology for the Sustainability Appraisal, and establishes the framework for assessing the sustainability impacts of the LPR. As set out in Planning Policy Guidance - Strategic environmental assessment and sustainability appraisal1, a Sustainability Appraisal provides the opportunity “to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives.” The SA identifies four reasonable alternatives which differ principally in the balance between strategic and non-strategic growth and the overall provision of housing: ▪ Scenario 1 – a lower growth strategy comprising the Council’s preferred approach but excluding 11 less accessible non-strategic allocations, delivering approximately 16,806 dwellings; ▪ Scenario 2 – (the Council’s preferred approach) within the draft Plan, comprising the committed strategic allocations at South East Faversham and West of Bobbing, regeneration sites and some non-strategic allocations, delivering approximately 17,705 dwellings; Scenario 3 – an alternative strategy which removes the 11 less accessible allocations included with the preferred approach and instead allocates a new strategic urban extension at East of Faversham, delivering approximately 18,269 dwellings; and ▪ Scenario 4 – a higher growth strategy which retains all elements of the Council’s preferred approach whilst also allocating the additional strategic urban extension at East of Faversham, delivering approximately 19,168 dwellings. 2.8 Importantly, the SA does not adequately assess a reasonable alternative growth strategy comprising a balanced mixture of strategic, medium-sized and smaller deliverable sites distributed across sustainable settlements within the Borough. Whilst the assessment considers broad alternatives based on the inclusion or exclusion of an additional strategic allocation and a mixture of less accessible sites, it does not explore whether sustainable omission sites could provide a preferably alternative to some proposed allocations. As a result, the assessment largely compares differing growth distributions at a strategic level rather than a detailed examination of whether alternative sites could better support the Plan’s objectives in terms of accessibility, deliverability, housing supply and sustainable growth patterns. In this regard, sustainable and deliverable opportunities adjoining larger rural settlements, such as Iwade, have not been robustly assessed through the reasonable alternatives process. Furthermore, the Site would represent a suitable and deliverable opportunity capable of contributing to housing delivery from the outset of the Plan Period. The Sustainability Appraisal provides only limited consideration of omission sites at Iwade, concluding that there is "limited strategic case" for their allocation on the basis that significant growth is already proposed nearby and that A249 capacity is a factor. However, this assessment does not adequately consider the individual merits of the omission sites, including their sustainability credentials, deliverability, relationship to existing services and facilities, and potential contribution towards maintaining housing supply. Nor does the SA provide any detailed evidence demonstrating that the Site would give rise to unacceptable transport impacts. As such, it is not clear that omission sites at Iwade have been assessed with the same level of scrutiny as alternative growth options elsewhere in the Borough.

RESPONDENT	REPRESENTATION
	Whilst the Council's commitment to regeneration and previously identified development opportunities is supported in principle, the SA should give greater consideration to the risks associated with relying on complex regeneration schemes to deliver a large proportion of the Borough's housing requirement. In this regard, the evidence base acknowledges that housing capacity within the Queenborough and Rushenden Regeneration Area has reduced over successive plan-making exercises, from around 2,000 dwellings originally envisaged through the Masterplan to approximately 871 dwellings currently identified, with a strong element of delivery risk remaining and Homes England suggesting delivery may be closer to 500 dwellings on viability grounds. This highlights the importance of maintaining a flexible and diverse housing land supply. The SA should therefore give further consideration to the role that sustainable and deliverable greenfield sites adjoining existing settlements could play in diversifying supply, reducing delivery risk, increasing flexibility within the housing trajectory and supporting earlier housing delivery. In this context, greater weight should be afforded to sustainable and deliverable sites capable of contributing to housing supply in the short term, such as the Site. Sites located adjacent to existing settlements, with access to services, facilities and public transport, can play an important role in ensuring that housing needs are met throughout the plan period and reducing reliance on more complex or longer-term development opportunities. If the Site at Iwade became an allocation in the Plan, it would be delivered within the first five years of the plan and this is a strong reason for its inclusion, providing greater certainty on the immediate pipeline of housing sites. For these reasons, the spatial strategy has not been demonstrated to be justified. The reasonable alternatives have not been assessed on a sufficiently consistent basis, and the evidence does not demonstrate that the selected strategy represents the most appropriate approach when considered against reasonable alternatives. The reliance on complex and longer-term development opportunities also raises concerns regarding whether the strategy will be effective in maintaining housing delivery throughout the Plan period.
Five Parishes Group	However, the Plan is not yet sound. Its spatial strategy and Sustainability Appraisal remain materially affected by the unresolved Highsted Park applications, but the answer is not to delay the Local Plan or wait for the Secretary of State. The Plan must proceed now on a strategy that is sound and deliverable without Highsted Park, and protect the established Stones Farm Countryside Park and SANG. The Government's formula-derived housing target is excessive when applied without proper regard to Swale's infrastructure, environmental constraints and realistic market delivery; permissions and allocations must not be treated as completions. The Plan must tackle stalled sites and land-banking rather than penalise Swale by releasing more countryside. It must also provide explicit protection for curlew and functionally linked land, the North Downs dip slope and the character and safety of rural lanes. It must address the healthcare deficit: relocated or consolidated GP services must not be counted as net new capacity without evidence, and Sittingbourne needs full urgent-treatment provision proportionate to its existing and planned population. Before any additional greenfield land is allocated, the Plan must require delivery of the existing Queenborough and Rushenden allocation and fully test restoration of the original 2,000-home brownfield regeneration ambition. These changes are needed to make the Plan justified, effective and consistent with national policy.

RESPONDENT	REPRESENTATION
	The SA treats Highsted Park as a reasonable alternative while acknowledging that there was no practical way for it to account for the detailed evidence examined during the 54-day inquiry and thousands of inquiry documents. It nevertheless repeats claimed economic benefits associated with a new motorway junction and Kent Science Park. That is not a consistent evidential basis for comparing alternatives. The assessment must not selectively carry forward the promoter's asserted benefits while being unable to evaluate the scheme's substantial landscape, heritage, biodiversity, agricultural land, water, transport, viability and delivery effects. FPG agrees that the Council should not wait for the Secretary of State before progressing the Local Plan. Delay would prolong uncertainty, weaken plan-led decision-making and leave the borough exposed to speculative development. The correct response is to submit a Plan whose housing and employment strategy is demonstrably sound without Highsted Park. The Plan should not contain a fallback, reserve or review mechanism that allows Highsted Park to re-enter the strategy merely because the applications remain undecided or because another site delivers more slowly than forecast. Proceed with and submit the Local Plan without waiting for the Highsted Park decision. Remove any reliance on Highsted Park from the housing trajectory, employment strategy, transport case, infrastructure programme and contingency planning. Revise the SA now so that it records the full range of harms and delivery risks established through the inquiry evidence, applies consistent assumptions to every reasonable alternative, and explains why the preferred strategy remains sound whether Highsted Park is approved or refused.
Mr David Meredith @ resident	I am writing to object to the Council plan in Upchurch. I believe the scale of this proposal would cause significant harm to the character of the village and place unacceptable pressure on local infrastructure and services. 1. Scale of Development & Village Character Over the past year we have had Coudance planning application for 120 houses in forge lane where residents have shown their disapproval on the planning portal along a petition https://www.change.org/p/halt-the-construction-of-100-homes-in-upchurch?recruiter=1121138269&recruited_by_id=65083d70-b16a-11ea-9c75-3552d5de45ca&utm_source=share_petition&utm_campaign=psf_combo_share_initial&utm_term=share_petition&utm_medium=copylink&utm_content=cl_sharecopy_490480143_en-GB%3A&fbclid=IwY2xjawULkNlwZG9mAWV4dG4DYWVtAjExAHNydGMGYXBwX2lkEDIyMjAzOTE3ODgyMDA4OTIAAR7VNJ66go72kqbgrN1PYaAJJO37hG8TOBAe6W7dbumj3YE-mlYTfbiJKqMazQ_aem_xqpaMAvvtFvLBzrfwcIEzwwith Plans for another 20 houses next to school in forge lane this was turn down my Swale based on the area could not handle the increase in traffic for the school It should be noted that this land is now in this proposal (how is this possible if its been turned down already?) Any further proposed development would be excessive for a village of this size of this, fundamentally changing the character of the village, eroding its rural identity and sense of community. 2. Traffic & Road Safety

RESPONDENT	REPRESENTATION
	Local roads are geared for a village i.e small narrow these are already heavily congested, particularly at peak times. Any additional homes where possibly two or three cars per family this would significantly increase traffic, worsening congestion and raising serious road safety concerns for residents, pedestrians, and cyclists.schools,nursery, horses. The roads were designed for a small village where horses and cyclists, school children and nursery children,use daily nothing has changed. They struggle to handle the traffic at present especially at school times adding more cars is ludicrous and frankly dangerous. 3. Pressure on Schools, Healthcare & Services Local schools, GP surgeries, and healthcare services are already over subscribed. There is no clear evidence that existing or proposed infrastructure can accommodate the increased demand created by a new development. 4 Loss of Countryside & Green Space The development would result in the permanent loss of valuable countryside and green space surrounding the village. This land contributes to the rural setting of Upchurch and provides environmental for wildlife and wellbeing benefits to residents. 5. Cumulative Impact of Multiple Developments When considered alongside other developments in and around Upchurch the cumulative impact is unacceptable. The combined scale of growth has not been adequately assessed and would overwhelm local infrastructure. 6.Upchurch has a history of surface water and drainage issues. Large-scale development on surrounding land raises serious concerns about increased flood risk and the long-term effectiveness of proposed drainage solutions. For the reasons outlined above, I respectfully request that this land is taken out of the plan. I believe the proposal is unsustainable and not in the best long-term interests of Upchurch or its residents
Daniel Mattocks	6.9. Historic environment 6.9.4. Finally, with regards to allocations that are a constant across the scenarios: • Upchurch – the conservation area contains only one listed building (a Grade II* listed church), and the proposed allocation likely gives rise to limited concern. **I would like to point out that the Church of St. Mary the Virgin has been mis-quoted as a Grade II listed building. It is Grade I listed and of considerable significance.** **This should be corrected before proceeding to examination.**

HABITAT REGULATION ASSESMENT

RESPONDENT	REPRESENTATION
Natural England	Natural England agrees with the conclusions and recommendations of the HRA, but provide additional advice relating to nutrient neutrality. We recommend that the suggestions outlined in the HRA are incorporated into the Plan to ensure that there will be no adverse effects on the integrity of the Habitats sites as a result of the Plan. **Nutrient Neutrality** We agree with those sites screened in to the Appropriate Assessment but advise that Stodmarsh Special Area of Conservation (SAC) and Ramsar site should also be screened in for water quality impacts. We advise that part of the borough lies within the catchment of Stodmarsh SAC and Ramsar (as explained in Policy C10 Water Quality and Water Resources) so should be screened in to the assessment. Provided that the commitments outlined in overarching policies including C10 and B1 are adhered to (and provided amendments are made to ensure Policy B1 is sound), we would be satisfied that adverse effects on the integrity of the Stodmarsh designated sites can be ruled out.
CPRE	CPRE Kent is concerned that the conclusions of the August 2026 Habitats Regulations Assessment depend upon recommendations relating to recreational pressure, functionally linked habitat and construction disturbance in sections 6.2–6.6. Before submission, the Council should identify where every necessary safeguard is secured through the Plan and demonstrate, taking account of Natural England's advice, that the mitigation is sufficiently certain, effective and deliverable. Regulation 105 of the Conservation of Habitats and Species Regulations 2017 requires the necessary assessment and integrity conclusion before the Plan is given effect. Although every project level survey need not be completed at allocation stage, necessary safeguards cannot be deferred. Where established copses and hedgerows within the proposed Faversham allocations provide functionally linked habitat, ecological connectivity or disturbance buffers, their retention and protection should be expressly secured through the relevant allocation policies.
SHEERNESS TOWN COUNCIL	3.1 The Council supports the baseline information within the Habitats Regulations Assessment but believes some important local issues are missing. These include: • Crown Estate land management responsibilities and how organisations will work together to protect habitats. • Ongoing fly-tipping and other environmental damage. • The recent incident involving a digger falling from the cliff adjacent to a Site of Special Scientific Interest. • Whether sufficient on-site assessment has taken place to reflect what is actually happening in these areas. •Shoreline Management Plan information and projections for future habitat loss. 7 These issues should be considered as part of the environmental evidence supporting the Plan.

RESPONDENT	REPRESENTATION
Maidstone Borough Council	Reference is made to the Maidstone Local Plan 2011-2031 rather than the Maidstone Local Plan Review 2021-2038. This is odd as the reference refers to the Lidsing Garden Community which was not in the Local Plan 2011-2031, but the Local Plan Review 2021-2038 Yes, please change reference from Local Plan 2011-2031 to Local Plan Review 2021-2038.
Five Parishes Group	FPG supports the HRA's recognition of recreational pressure, water quantity and quality, functionally linked land, air pollution and construction disturbance. However, the HRA records that recent non-breeding bird surveys are unavailable for potentially functionally linked land and recommends allocation-specific survey wording. Reliance on later assessment is only sound if the Plan contains an enforceable protective framework and does not assume that mitigation will always be available. Curlew require explicit protection. The HRA records that curlew were the species most likely to make a major flight response to disturbance in the cited bird-disturbance study and refers to flight responses at substantial distances. That evidence is incompatible with relying on generic biodiversity wording or assuming that small buffers, later surveys or displaced habitat will always be adequate. Target Policies: Policy ST11 (Natural Environment), Policy B1 (Biodiversity), and Policy B2 (Valued Landscapes)
MR ROGER HARRIS @ RESIDENT	I FEEL VERY STRONGLY AGAINST THE URBANISATION OF THE RURAL AREA OF SWALE. FOR EXAMPLE UPCHURCH IS THREATENED WITH 2 HUGE DEVELOPEMENTS AT THE CENTRE OF THE VILLAGE. THE SIZE OF THE PROPOSED ESTATES ARE EACH BIGGER THAN THE VILLAGE CENTRE AND WILL COMPLETELY RUIN THE VILLAGE AMBIENCE. THERE IS INSUFFICIENT INFRASTRUCTURE TO COPE ANY WHERE IN SWALE . FACT SOUTHERN ATER CEO HAS STATEDTHEY CAN NOT PROVIDE SERVICES FOR FURTHER DEVELOPEMENTS IN THE AREAS THEY ARE RESPONSIBLE FOR.CURRENTLY ROADS SCHOOLS DOCTORS HOSPITALS ETC. ARE AT THEIR LIMITS .SBCSHOULD ACTIVELY OPPOSE NEW REGULATIONS BEING FORCED UPON THEM. THANKYOU.
Mr Simon Poulter	I protest this assessment even take place. The heritage of the village is unique and does not Lend itself to such a massive extension to its footprint. It also struggles with electrical and water supply with it's current size. This proposed estate will drain these further as well as add traffic to an already overcrowded road network
Mrs Wendy Pitts	I would like to comment on the proposed development of land east of Chaffes Lane, Upchurch but some of my concerns apply to many of the proposed developments: 1. There is a history of very poor drainage in Upchurch and especially this end of Chaffes Lane. Works have to be done regularly to maintain the Holywell school system. 2. There are not infrequent power cuts and the general infrastructure is not sound.

RESPONDENT	REPRESENTATION
	3. Traffic would increase significantly through the village which already has many problem bottlenecks, not just from development in Upchu4ch but from surrounding villages as many people now use Upchurch as a ‘rat run’ to get to the Medway towns. 4. It has been widely reported that Medway hospital has insufficient capacity for more people. 5. There is no capacity already at the local doctors and school. 6. Small infill development would be much preferred and acceptable to the village than large housing estates.
Mr David Newham	Dear Sir/Madam, My name is David Newham, and I live in Oast Lane, Upchurch. I wish to comment on the Swale Borough Council Local Plan Review-Regulation 19 and in particular Policy HOA14 concerning the land around Forge Lane and Chaffes Lane Upchurch. It would appear from the plan that Swale Council is suggesting that the land is suitable for building a minimum of 168 houses and I wish to highlight the reasons why I believe this suggested policy for this area is unsound and should be removed from the plan. Firstly, part of this site was recently the subject of an appeal by the Planning Inspectorate. The application reference is 24/504410/OUT, and the appeal reference is 6002253. The planning inspector dismissed the appeal on 14 July 2026, because “the proposal would harm the character and appearance of the area and would conflict with the Council’s spatial strategy”. The same comments would apply even more to this larger site proposed for the new plan. This site contravenes Chapter 19. Conserving and enhancing the natural environment. It is located outside the defined built-up area boundary of a small rural village, and is surrounded by open countryside, and this major development would result, in an urbanizing impact on the surrounding open countryside. I believe that policy HOA14 is unsound because primarily it is not consistent with The National Planning Policy Framework (NPPF). In fact, I believe that the HOA14 policy concerning the Upchurch Site should be removed from the plan for the following reasons: The location and sheer scale of this proposed site relative to the size of the village, compounded by severe infrastructure deficits, means the site allocation directly contravenes several core policies of the August 2026 NPPF.

RESPONDENT	REPRESENTATION
	This site, which is located outside the defined built-up area boundary, does not meet any of the requirements set by Policy S5: Principle of development outside settlements, which seeks to prevent unsustainable patterns of growth and conserve rural character. The rural character of Upchurch would in my opinion be adversely impacted and start a process of urban sprawl within a rural village setting. This site is not “within reasonable walking distance of a well-connected station” under Policy S5(1)(h), because the nearest station is way over 2 miles away in Rainham. This site is not “physically well-related to the existing settlement” or “of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.” under Policy S5(1)(j). The village itself has only 506 dwellings as per the 2021 Census, so an extra 168 houses represent a disproportionate 33% expansion, failing the test of being scale-appropriate or well-related to a small rural settlement. The local primary school is at capacity, and the GP surgery is closed to new patients, meaning that this proposed site is fundamentally incompatible with local infrastructure. With no train station and highly restricted bus services (5 on weekdays, 3 on Saturdays, none on Sundays), this site fails to offer genuine, sustainable transport choices. It forces a significant and almost exclusive reliance on private vehicles. The minimal bus frequencies completely undermine any claim to a high level of connectivity required to justify rural expansion. In this modern age, 168 new dwellings would likely mean at a minimum an extra 300 to 400 cars and the road network through the village would not cope with such an influx of additional vehicles. The congestion in the village would increase exponentially and parking spaces, currently at a premium would prove to be non-existent. Of particular note concerning increased traffic in a rural setting, the junction between The Street after leaving Upchurch Village, Halstow Lane and Holywell Lane is a blind corner with an accident waiting to happen and the additional vehicles could prove to be the tipping point. This site contravenes Policy DP3: Key Principles for Well-Designed Places. Policy DP3(1) explicitly mandates that development proposals must respond directly to their context, history, character, and setting. This proposed site would encroach into the open countryside with a high-density housing estate, fundamentally conflicting with the character of this small village surrounded by open landscape, and ignoring the established village form, thereby violating Policy DP3's requirements for context-driven scale and design. In summary, I believe this site does not meet the requirements of Policy S5(4) because the benefits of the proposal do not substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement. As well as the seven points made above, I would contend that generally, this site does not meet the requirements of Policy TR3: Locating development in sustainable locations. I would repeat my introduction that Swale Borough Council’s attempt to include this site in the plan is unsound and I request that the planning inspector insists that it is removed from the plan. 2. Do you have any comments on the Regulation 19 draft Local Plan Sustainability Appraisal Report? To help us process your comments effectively please reference which section of the Sustainability Appraisal you are commenting about

RESPONDENT	REPRESENTATION
	Dear Sir/Madam, My name is David Newham, and I live in Oast Lane, Upchurch. I wish to comment on the Swale Borough Council Local Plan Review-Regulation 19 and in particular Policy HOA14 concerning the land around Forge Lane and Chaffes Lane Upchurch. It would appear from the plan that Swale Council is suggesting that the land is suitable for building a minimum of 168 houses and I wish to highlight the reasons why I believe this suggested policy for this area is unsound and should be removed from the plan. Firstly, part of this site was recently the subject of an appeal by the Planning Inspectorate. The application reference is 24/504410/OUT, and the appeal reference is 6002253. The planning inspector dismissed the appeal on 14 July 2026, because “the proposal would harm the character and appearance of the area and would conflict with the Council’s spatial strategy”. The same comments would apply even more to this larger site proposed for the new plan. This site contravenes Chapter 19. Conserving and enhancing the natural environment. It is located outside the defined built-up area boundary of a small rural village, and is surrounded by open countryside, and this major development would result, in an urbanizing impact on the surrounding open countryside. I believe that policy HOA14 is unsound because primarily it is not consistent with The National Planning Policy Framework (NPPF). In fact, I believe that the HOA14 policy concerning the Upchurch Site should be removed from the plan for the following reasons: The location and sheer scale of this proposed site relative to the size of the village, compounded by severe infrastructure deficits, means the site allocation directly contravenes several core policies of the August 2026 NPPF. This site, which is located outside the defined built-up area boundary, does not meet any of the requirements set by Policy S5: Principle of development outside settlements, which seeks to prevent unsustainable patterns of growth and conserve rural character. The rural character of Upchurch would in my opinion be adversely impacted and start a process of urban sprawl within a rural village setting. This site is not “within reasonable walking distance of a well-connected station” under Policy S5(1)(h), because the nearest station is way over 2 miles away in Rainham. This site is not “physically well-related to the existing settlement” or “of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.” under Policy S5(1)(j). The village itself has only 506 dwellings as per the 2021 Census, so an extra 168 houses represent a disproportionate 33% expansion, failing the test of being scale-appropriate or well-related to a small

RESPONDENT	REPRESENTATION
	rural settlement. The local primary school is at capacity, and the GP surgery is closed to new patients, meaning that this proposed site is fundamentally incompatible with local infrastructure. With no train station and highly restricted bus services (5 on weekdays, 3 on Saturdays, none on Sundays), this site fails to offer genuine, sustainable transport choices. It forces a significant and almost exclusive reliance on private vehicles. The minimal bus frequencies completely undermine any claim to a high level of connectivity required to justify rural expansion. In this modern age, 168 new dwellings would likely mean at a minimum an extra 300 to 400 cars and the road network through the village would not cope with such an influx of additional vehicles. The congestion in the village would increase exponentially and parking spaces, currently at a premium would prove to be non-existent. Of particular note concerning increased traffic in a rural setting, the junction between The Street after leaving Upchurch Village, Halstow Lane and Holywell Lane is a blind corner with an accident waiting to happen and the additional vehicles could prove to be the tipping point. This site contravenes Policy DP3: Key Principles for Well-Designed Places. Policy DP3(1) explicitly mandates that development proposals must respond directly to their context, history, character, and setting. This proposed site would encroach into the open countryside with a high-density housing estate, fundamentally conflicting with the character of this small village surrounded by open landscape, and ignoring the established village form, thereby violating Policy DP3's requirements for context-driven scale and design. In summary, I believe this site does not meet the requirements of Policy S5(4) because the benefits of the proposal do not substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement. As well as the seven points made above, I would contend that generally, this site does not meet the requirements of Policy TR3: Locating development in sustainable locations. I would repeat my introduction that Swale Borough Council’s attempt to include this site in the plan is unsound and I request that the planning inspector insists that it is removed from the plan.