

Comments from CPRE Kent on the Regulation 18 consultation on the Swale local plan, February 2026

## 1. Introduction

### **Q1 - Do you have any comments on section 1 of the draft Local Plan which will inform the Plan's progression?**

CPRE Kent is extremely disappointed that the Council's local plan hasn't been progressed in an open and transparent manner; and that as a consequence to the delays in recent years it has allowed itself to be 'held hostage' to a third party (Highsted Park).

You will recall that we felt it necessary to intervene on several previous occasions when we wrote individually to members about proposed amendments to the Council's Local Development Scheme.

Letters were sent and copied to the Local Plan policy team on 4 December 2024, 21 July 2025 and 29 July 2025.

In these letters we set out in the strongest of terms our view that delaying local plan production until after a decision on the Call-In Highsted Park development was foolhardy.

We made reference to another Call-In scheme in the County and how this took five years from submission to decision (via Judicial Review). Waiting for the Secretary of State to decide whether planning permission should be granted (and hence taking the spatial strategy decision out of the hands of the Council) was at best naïve, in terms of placing the Council in local plan limbo.

Our view was that local plan making should proceed in accordance with the previous Local Development Scheme and that an emerging local plan without Highsted Park would then be given the appropriate planning weight by the Planning Inspectorate/Secretary of State.

In any event, the Council now seems to have concluded that the delay to local plan production because of the Highsted Park issue has been to no avail because it now accepts that early delivery of the scheme will not be possible due to unresolved infrastructure deliverability issues (see paragraph 2.57 of the Planning and Transportation Policy working group report, 22 January 2026).

Consequently, now, as then, we remain bemused as to why – when so many of the Council's decisions are being overturned at appeal (because of the Council's lack of a

5-year housing land supply and out of date local plan) – that Swale is apparently so willing to continue to operate in a policy vacuum, pending due process.

Our local members and volunteers are left being further confused as to why a spatial strategy isn't being outlined in the current Regulation 18 consultation (which relates to DM policies only), especially when mid-way through the consultation, draft allocations and spatial strategy were reported to (and agreed) by the Council's Planning & Transportation Policy Working Group (22 January 2026).

To further add to the confusion, consultation on the Council's proposed DM policies is taking place alongside consultation on the revised NPPF (December 2025), which sets out changes to the framework, including proposed national decision-making policies.

The Council will need to take into account the direction of policy travel of the proposed decision making policies as these will be a material consideration alongside the local plan.

Page layout (page numbers and header titles) should be set to appear on the outer edges of the page. As presented (on the inside edge) they cannot be readily found, which makes navigating a printed version of the document difficult.

## 2. What has influenced the development of the Local Plan

### **Question 2 - Do you have any comments on section 2 of the draft Local Plan which will inform the Plan's progression?**

In response to Question 1 CPRE Kent has set out its long-standing concern about how the delay in local plan preparation and the impact that the Council's decision making on this has had in relation to stalling consideration of the Council's spatial strategy going forward (the Highsted Park issue).

The need for development to be Plan-led is clearly set out at paragraph 2.1.1 of the draft local plan. Consulting on DM policies without detail on the accompanying allocations/spatial strategy prolongs the length of time the Council will be susceptible to speculative development and decisions being overturned at appeal due to the lack of a 5-year housing land supply and out of date local plan.

Falling to set out early options (and preferred options) in relation to its spatial strategy and the Council's associated strategic and non-strategic allocations alongside the current Regulation 18 consultation, means pushing these important decisions further down the line (until July 2026).

The current Local Development Scheme confirms that there will be just one phase of Regulation 18 consultation. Leaving the important matters of spatial strategy and site allocations until Regulation 19 (after which the plan will immediately be submitted to the Secretary of State), effectively cuts local residents and interested parties out of an

important consultation stage. This again calls into question the Council's transparency with regard to important decisions that will affect residents for years to come.

It is noted that despite Regulation 18 consultation starting on 12 January 2026, no mention is made of the consultation on the draft NPPF which was published on 16 December 2025 and the relationship between the national decision-making policies and the draft DM policies in the local plan.

### 3. Characteristics of the borough and the key challenges to be addressed

#### **Question 3 - Have all the key issues and challenges been taken into consideration?**

CPRE campaigns from Parish to Parliament on a range of issues including:

- prioritising genuinely affordable home
- giving the principle of 'brownfield-first' development some teeth
- protecting best and most versatile agricultural land (food security); and
- protecting our landscapes as we transition to (rooftop) renewables.

Accordingly, we recognise and support in principle the identification of the key issues and challenges facing the Council.

In terms of infrastructure delivery our members and supporters consistently ask that infrastructure be provided up-front, in order that existing communities are not prejudiced in terms of the demands placed on existing services and facilities by new residents.

With regard to affordable housing, we would like to see every effort made to hold developers to account in securing the provision of affordable housing in accordance with policy H1. It often seems to be the case that once planning permission has been granted developers seek to renegotiate what they've previously committed to.

In addition to the issues and challenges identified, we would like to see details with regard to delivery rates (from nationwide and SME builders) to enable a better understanding of the rate at which allocated (and windfall) sites are being built out.

We would like to see paragraph 3.2.19 amended to make reference to the use of Community Infrastructure Levy payments, and if not, an explanation given as to the reasons why reliance is placed instead on Section 106 Agreements. Having a non-negotiable standardised levy would avoid the issue of developers seeking to renegotiate S.106 Agreements.

Reference is made at paragraph 3.2.51 to the cost implications of CIL and the impact this would have on the whole plan viability, when the Council doesn't actually have a current CIL scheme. This needs to be corrected.

#### 4 Vision and Objectives

**Question 4 - Is the vision positive, clear, realistic and ambitious and does it identify the right priorities for Swale?**

**Question 5 - Do you agree with the proposed vision for Swale? If not, how should it be changed?**

With regard to Faversham, the vision for sympathetic and symbiotic growth is acknowledged. However, in the absence of details of the Council's spatial strategy and geographic spread of strategic and non-strategic allocations, it is not clear that will be the case.

Based on the report to the Council's Planning and Transportation Policy working group (22 January 2026) it would appear that thousands of new homes are in the pipeline around Faversham, which is clearly at odds with the existing character of Faversham as a market town and nationally known heritage destination.

Again, we call into question why the current Regulation 18 consultation doesn't include details of the Council's spatial strategy and proposed allocations.

#### **Development Management Policies**

##### Policy GD1 - General Development Criteria

**Question 7 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 8 Do you support or object to Policy G1? What would you add, remove or amend to support it further or to remove your objection?**

Specific reference should be made for the need for bungalows to allow elderly residents to downsize and free up their homes for growing families.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

##### Policy H1 – affordable housing

**Question 15 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 16 Do you support or object to Policy H1? What would you add, remove or amend to support it further or to remove your objection?**

The current affordable housing requirement (0% in Sheppey, 10% Sittingbourne, 35% Faversham, 40% the rural areas) is being replaced by a rate of 10% on previously developed land and 30% on greenfield sites.

This undercuts the 35% target set out in the Faversham Neighbourhood Plan. The relationship between local plan policy and policy within neighbourhood plans should be clearly set out in the policy preamble.

We question what has changed in terms of viability issues (which resulted in the existing adopted affordable housing policy of zero provision in Sheppey and 10% in Sittingbourne, compared to higher rates in Faversham and the rural area) such that targets are now presented as across the board figures, with varying rates for previously developed land and greenfield sites.

The lack of transparency in the drafting of this policy appears to look like a backdoor attempt to ensure that the majority of future development will be at Faversham, as development in Sittingbourne and Sheppey is likely to continue to be unviable with the proposed affordable housing target.

The decision to amend the tenure split from a 90% affordable/social rent:10% intermediate products ratio to one of 60%:40% is also disappointing in view of the Council's declared Affordable Housing Emergency. It should be noted that affordable rent – a 20% discount on the market rate – is a very different proposition to social rent and it is misleading to lump them together – see paragraph 9.0.7.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

#### Policy H2 – small and medium sites for housing development

**Question 17 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 18 Do you support or object to Policy H2? What would you add, remove or amend to support it further or to remove your objection?**

Seek confirmation that the policy preamble (see paragraph 10.0.2) is in line with draft NPPF plan-making policy HO6

Paragraph 10.0.4(2) refers to the publication of an up-to-date Brownfield Land Register. CPRE Kent is of the firm view that this should be accompanied by the Council's own site survey work (including an urban capacity review) to ensure that all potential brownfield sites are known to it.

While we welcome the Council's targeted call for brownfield sites (November 2024), we are yet to be convinced that a sufficiently robust and proactive approach is in-hand to ensure all brownfield opportunities are being maximised. We would like to see a full, detailed and up-to-date urban capacity review which robustly identifies where further development opportunities are within urban areas across the borough.

CPRE campaigns tirelessly for a brownfield first approach to development. However, as the Council knows, sites in the brownfield register are simply a list of sites already known to it, either as a consequence of a planning application or an existing local plan allocation. These add nothing in terms of identifying future additional supply.

It is always the case that very few brownfield sites come forward as part of a call for sites exercise as these are usually in locations where the principle of development is already acceptable, meaning there is very little point in a landowner going through the unnecessary expense of promoting sites through the local plan process. Instead, the real profits are to be made from the promotion of green field sites where the principle of development has not been agreed, hence why this type of site naturally dominates any call for sites exercise.

Welcome reference to 20% BNG – see also our comments at policy B1.

Policy INF1 – managing transport design & impact

**Question 41 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 42 Do you support or object to Policy INF1? What would you add, remove or amend to support it further or to remove your objection?**

CPRE Kent welcomes the Council's recognition of the need to prioritise sustainable transport and active travel. However, we are disappointed to see there is no such commitment to prioritising sustainable freight.

We would like to see the policy framed in such a way that residents can be assured that responses on planning applications from KCC highways are not watered down the closer it gets to decision making. In addition, the preamble to policy INF1 should clearly explain the remit under which KCC highways operates, in terms of a monitor and manage regime (and what this means in layperson terms), as opposed to the previous system of predict and provide.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy INF3 – open space, sport and recreation provision

**Question 45 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 46 Do you support or object to Policy INF3? What would you add, remove or amend to support it further or to remove your objection?**

CPRE Kent welcomes the Council’s continued commitment to provide, protect and enhance areas of open space across the borough. This aligns with the CPRE initiative around members of the public being able to access their “countryside next door”.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy INF4 – Local Green Spaces

**Question 47 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 48 Do you support or object to Policy INF4? What would you add, remove or amend to support it further or to remove your objection?**

CPRE Kent welcome the Council’s continued commitment to Local Green Space designations. This aligns with the CPRE initiative around members of the public being able to access their “countryside next door”.

It is important for the preamble and the policy to make clear that such designations relate to the contribution the space currently makes to the community, rather than retrofitting by provision of cricket pitches etc, for instance, on proposed developments - which is what the Duchy of Cornwall is seeking to do at South East Faversham.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy C1 – sustainable design and adaption principles

**Question 49 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 50 Do you support or object to Policy C1? What would you add, remove or amend to support it further or to remove your objection?**

CPRE campaigns for rooftop renewables and has been one of the driving forces behind the government announcing plans for all new-build homes to be fitted with solar panels from 2027 under the Future Homes Standard.

We would like to see the Council actively championing this as a way of responding to climate change through design and as a means of protection the countryside (including generational loss of best and most versatile agricultural land). Solar panels should also be placed on commercial buildings.

Under water conservation, specific reference should be made of the use of “grey water” systems which would enable the use of captured rainwater, in preference to mains supply. This should be stored on site and used for non-potable uses such as washing, watering, toilet-flushing and pond-filling.

This would use a large part of the 600mm of annual rainfall in Swale that currently runs to waste. Such a dual system of water supply would conserve the critically limited ground water reserves that have been shown to be inadequate by long hose pipe bans.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

#### Policy C2 – net zero operational carbon in new build residential development

**Question 51 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 52 Do you support or object to Policy C2? What would you add, remove or amend to support it further or to remove your objection?**

CPRE campaigns for rooftop renewables and has been one of the driving forces behind the government announcing plans for all new-build homes to be fitted with solar panels from 2027 under the Future Homes Standard.

We would like to see the Council actively championing this as a way of responding to net zero operational carbon in new build residential development.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

#### Policy C3 – net zero operational carbon in new build non-domestic development

**Question 53 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 54 Do you support or object to Policy C3? What would you add, remove or amend to support it further or to remove your objection?**

CPRE campaigns for rooftop renewables and has been one of the driving forces behind the government announcing plans for all new-build homes to be fitted with solar panels from 2027 under the Future Homes Standard.

We would like to see the Council actively championing this as a way of responding to net zero operational carbon in new build non-domestic development.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy C4 – embodied carbon and waste

**Question 55 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 56 Do you support or object to Policy C4? What would you add, remove or amend to support it further or to remove your objection?**

CPRE Kent welcomes the principle of addressing the issue of embodied waste and carbon.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy C5 – renewable energy development and infrastructure

**Question 57 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 58 Do you support or object to Policy C5? What would you add, remove or amend to support it further or to remove your objection?**

CPRE campaigns for rooftop renewables and has been one of the driving forces behind the government announcing plans for all new-build homes to be fitted with solar panels from 2027 under the Future Homes Standard.

However, we remain concerned about the loss of countryside (including generational loss of best and most versatile agricultural land) in relation to ground-mounted solar farms, as well as the impact this has on the landscape.

The plan provides no guidelines as to the siting of such development, which should as a minimum be steered away from environmentally or ecologically sensitive areas.

Specific reference should be made to the impact of renewable energy on land designated as being a national landscape (cross-referenced to policy B2), rather than referring to only valued landscapes at C5(b)(iv).

Reference should be made to the impact of renewable energy on land designated as being a national landscape (and cross-reference made to policy B3). We understand that the Kent Downs National Landscape unit is currently updating its 2011 Renewable Energy Statement.

Pending its publication your attention is drawn to the position statement of the High Weald National Landscape unit (2025). Namely that, ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations.

Ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations.

Solar farms (and other energy schemes) should not be approved unless there is evidence that the grid has capacity to connect them.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy C12 – pollution & land stability

**Question 72 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 73 Do you support or object to Policy C12? What would you add, remove or amend to support it further or to remove your objection?**

CPRE Kent welcomes reference to the charity at paragraph 37.0.13 and its dark skies mapping. However, referring to dark skies under the generic terms of pollution and light pollution doesn't particularly highlight how sensitive the urban fringe and rural areas are

in terms of the impact on tranquillity and dark night skies for both human beings and wildlife.

While we welcome the reference to tranquillity (and dark skies), we would however again request that a standalone policy be drafted to specifically address dark skies in accordance with CPRE's national campaign.

For example, this policy wording (policy ENV4) is included in the Ashford local plan:

*Proposals will be permitted provided that the lighting proposed is: the minimum appropriate for its purpose; is designed such that lighting is directed downwards, with a beam angle below 70 degrees and; that no significant adverse effects individually or cumulatively will result to the character of the area, the residential amenity of local residents, the safety of vehicle users and pedestrians or the diurnal/seasonal rhythms of the Borough's biodiversity assets.*

*The correlated colour temperature (CCT) of outdoor lighting should not exceed 3000 Kelvins in order to limit the effects of known environmental hazards associated with short-wavelength visible light.*

*Proposals where external lighting is required should include a full lighting scheme that provides information about layout and beam orientation, a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels. Schemes will be expected to comply with ILP technical guidance in relation to the Environmental Zone in which an application is proposed.*

*Within the area proposed to be designated as a 'dark sky zone', proposals will only be permitted where they adhere to the above requirements and where they can demonstrate that there will be no significant adverse effects on the visibility of the night sky or its intrinsically dark landscapes.*

*All proposals will be expected to demonstrate clear regard to the guidance and requirements set out in the Council's Dark Skies SPD (2014).*

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy B1 – biodiversity & geodiversity & BNG

**Question 74 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 75 Do you support or object to Policy B1? What would you add, remove or amend to support it further or to remove your objection?**

CPRE Kent welcomes the commitment to seek a minimum 20% biodiversity net gain.

We note that the Maidstone Local Plan (adopted 20 March 2024) contains a policy requiring 20% BNG (policy LPRSP14(A)), successfully demonstrating to the Local Plan Inspector that being ambitious in terms of BNG has been proven to not have a negative impact on viability.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

#### Policy B2 – conserving & enhancing valued landscapes

**Question 76 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 77 Do you support or object to Policy B2? What would you add, remove or amend to support it further or to remove your objection?**

The preamble to the policy should make clear that the Kent Downs National Landscape is a valued landscape and/or reference made to the following policy (B3).

The plan should recognise that Swale has special circumstances whereby not only the Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Development on these areas should only be a last resort.

Paragraph 39.0.2 makes reference to National Parks. As there are no National Parks within Swale reference to them is confusing and should be deleted.

While we welcome the reference to tranquillity (and dark skies), we would however again request that a standalone policy be drafted to specifically address dark skies in accordance with CPRE's national campaign.

For example, this policy wording (policy ENV4) is included in the Ashford local plan:

*Proposals will be permitted provided that the lighting proposed is: the minimum appropriate for its purpose; is designed such that lighting is directed downwards, with a beam angle below 70 degrees and; that no significant adverse effects individually or cumulatively will result to the character of the area, the residential amenity of local residents, the safety of vehicle users and pedestrians or the diurnal/seasonal rhythms of the Borough's biodiversity assets.*

*The correlated colour temperature (CCT) of outdoor lighting should not exceed 3000 Kelvins in order to limit the effects of known environmental hazards associated with short-wavelength visible light.*

*Proposals where external lighting is required should include a full lighting scheme that provides information about layout and beam orientation, a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels. Schemes will be expected to comply with ILP technical guidance in relation to the Environmental Zone in which an application is proposed.*

*Within the area proposed to be designated as a 'dark sky zone', proposals will only be permitted where they adhere to the above requirements and where they can demonstrate that there will be no significant adverse effects on the visibility of the night sky or its intrinsically dark landscapes.*

*All proposals will be expected to demonstrate clear regard to the guidance and requirements set out in the Council's Dark Skies SPD (2014).*

Paragraph 39.0.23 refers to dry valleys. One special area should be given particular protection. This is the Lyn valley, a largely dry valley in chalk downland, which stretches from Dadman's near Lynsted village to the Swale at Teynham Levels. This tranquil vale is largely undeveloped and features a charming stream in the valley bottom north of the railway.

#### Policy B3 – Kent Downs National Landscape

**Question 78 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 79 Do you support or object to Policy B3? What would you add, remove or amend to support it further or to remove your objection?**

Section 245 of the Levelling Up and Regeneration Act has amended the Countryside and Rights of Way Act to place greater emphasis on the protection of national landscapes. This provision requires public bodies to "seek to further" the statutory purposes of national landscapes, including the purpose to conserve and enhance wildlife in protected landscapes, and replaces a previous weaker duty to "have regard" to the purposes. We welcome the reference to the CROW Act at paragraph 40.01

The plan should recognise that Swale has special circumstances whereby not only the Kent Downs National Landscape should be protected, but also other areas adjoining the national landscape which are of an exceptional quality in terms of landscaping. Development on these areas should be only as a last resort.

The policy and preamble should be amended to ensure that views into and out of the designated national landscape are protected, as well as its setting.

Reference should be made to the impact of renewable energy on land designated as being a national landscape (and cross-reference made to policy C5). We understand

that the Kent Downs National Landscape unit is currently updating its 2011 Renewable Energy Statement.

Pending its publication your attention is drawn to the position statement of the High Weald National Landscape unit (2025). Namely that, ground mounted solar farms within the national landscape should not be considered acceptable. Greater commitment should be given to roof top solar ahead of the change in Building Regulations.

We note that reference to valued landscapes has been removed from the consultation draft of the 2025 NPPF. As such, this draft local plan policy will take on extra significance in terms of future development management decisions. We query whether the wording is sufficiently strong to secure its intended aims.

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy B4 – the separation of settlements – Important Local Countryside Gaps

**Question 80 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 81 Do you support or object to Policy B4? What would you add, remove or amend to support it further or to remove your objection?**

At paragraph 41.0.5 the Important Local Countryside Gaps should be expressed as being between Teynham and Lynsted etc, rather than Teynham to Lynsted – see also section vii and viii of policy B4.

The Important Countryside Gap around Faversham should be increased to include all sides and not just be in the direction of Goodnestone.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan (DM25) successfully achieved its envisaged aims – especially in light of the weight the Inspector placed on this policy in dismissing a recent appeal on land off Riddles Road, Borden (24/503677)?

Policy B5 – woodland, orchards, trees and hedgerows

**Question 82 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 83 Do you support or object to Policy B5? What would you add, remove or amend to support it further or to remove your objection?**

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy B6 – agricultural land

**Question 84 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 85 Do you support or object to Policy B5? What would you add, remove or amend to support it further or to remove your objection?**

More detail needs to be provided in the preamble to this policy. For instance, how many hectares of land makes up the 80% figure quoted at paragraph 43.0.4?

To get a clearer sense of the loss of best and most versatile agricultural land it would be helpful to understand how much was lost to allocations in the adopted 2017 local plan, and how much has been lost to subsequent windfall (unallocated sites), even in just the last five years.

Loss of best and most versatile agricultural land is a national issue and is a key campaigning point for CPRE - nearly 14,500 ha of England's BMV land was lost to development between 2010 and 2022.

It is noted that the role of the agricultural sector on the local economy is recognised in the preamble to this policy recognised in the draft local plan, but no mention is made of the importance of BMV with regard to food security. This should be addressed as a matter of urgency. Farmland plays an important role in feeding the nation and should not be considered an unused resource, ripe for development.

How does this policy relate to a corresponding decision-making policy in the draft NPPF (N2)?

Has the corresponding policy (DM31) in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy B8 – rural lanes

**Question 88 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 89 Do you support or object to Policy B8? What would you add, remove or amend to support it further or to remove your objection?**

Pursuant to paragraph 45.0.5 and the Council's wish to designate Quiet Lanes we would like to put forward Cellar Hill, in Lynsted with Kingsdown parish as a prime candidate.

We would support a policy that recognises quiet lanes as routes that are currently tranquil and popular with walkers, dog-walkers, cyclists and horse riders, whose value is degraded by motor vehicle activity; which are often connected to footpaths and bridleways. These resources are of particular community value for active transport and should be protected.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?

Policy HE1 – development involving listed buildings

**Question 92 Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?**

**Question 93 Do you support or object to Policy HE1? What would you add, remove or amend to support it further or to remove your objection?**

Swale has some exceptional buildings of national importance, this policy should ensure that nothing should happen to damage the setting of them.

How does this policy relate to a corresponding decision-making policy in the draft NPPF?

Has the corresponding policy in the 2017 adopted Local Plan successfully achieved its envisaged aims?