

Bredgar Parish Council

Swale Local Plan Regulation 18 Response

Submitted on the Swale Consultation Portal and by email on 22nd February 2026

Section 1 - Plan Progression

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

BPC consider this section 1 to be a reasonable historical record and explanation about the Local Plan.

Section 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?

BPC consider this section 2 provides a good description of what has influenced the development of the Local Plan.

Section 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?

BPC commend this section and particularly we value the heritage, ecological and Kent Downs National Landscape designations. These are all characteristics of the borough that must be preserved and enhanced by the Local Plan. The key issues and challenges are well summarised in section 3.2.2.

The government is proposing many changes in the current consultation on the NPPF that will weaken the protection of nature, the countryside and biodiversity. The Local Plan is built upon and must comply with the NPPF, but wherever possible the proposed NPPF changes should not be allowed to reduce the protection of nature, the countryside and biodiversity.

BPC strongly support the planning system securing infrastructure funding from developers through Section 106 and Section 278 agreements. The Local Plan needs to include control mechanisms that ensure the funding and infrastructure agreed is delivered. That mechanism must make sure that the Council has sufficient resources to properly supervise and enforce the delivery of agreements.

Section 4 - Vision and Objectives

Question 4 - Do you agree with the proposed vision for Swale? If not, how should it be changed??

BPC support the Statement 1 - The Vision for Swale. It is a positive, clear, realistic and ambitious vision, but we suggest additional priorities and changes to include restoration of our valued countryside as described in Question 5.

Questions 5 - Is the vision positive, clear, realistic and ambitious and does it identify the right priorities for Swale?

BPC suggest additional priorities and changes to the Statement 1 - The Vision for Swale as detailed as follows:

BPC suggest a new paragraph in the vision statement about health care improvements:

"Developers contributions have been rigorously secured, obtained and re-invested in the borough's health services. Existing and new GP surgeries have been re-established in Rural Local Service Centres (Policy E3) and in any new large developments. The Sittingbourne Memorial Hospital has a fully functional Urgent Treatment Centre and Medway Hospital has fully funded Acute Care services to meet Swale's population growth need."

BPC suggest a new paragraph in the vision statement about water services (see answer to question 69):

"Water Authorities have signed up to support all large developments and delivered the needed infrastructure ahead of site delivery. Drinking water supply infrastructure has been significantly improved, drainage systems now limit the potential for flooding and new sewage capacity has eliminated spills into the environment."

BPC suggest a change to include restoration of our valued countryside as follows:

"Our rural and maritime communities have seen enabling development maintain and improve local services. The local needs of residents are well catered for, supporting vibrant communities whilst maintaining the quality and special qualities of the countryside setting."

Is changed to:

"Our rural and maritime communities have seen enabling development maintain and improve local services, **with important countryside gaps, national designations and agricultural land protected**. The local needs of residents are well catered for, supporting vibrant communities whilst ~~maintaining~~ the quality and special qualities of the countryside setting **have been enhanced and restored, including the tranquillity and dark skies of the Kent Downs National Landscape**."

BPC suggest a change to the paragraph below in the vision statement about housing design - responding to the climate change and affordable dwellings emergencies that have been declared by the council.

"Across the borough development has improved health and air quality, and increased opportunities for local employment, active travel and affordable housing. Development has supported a vibrant sense of community, within and across the borough. There are thriving built and outdoor sports and leisure facilities, and everyone has access to a decent home. Swale is a place residents, businesses and visitors recognise as sustainable and forward-looking – a place to live, work and enjoy."

Is changed to:

"Across the borough development has improved health and air quality, and increased opportunities for local employment, active travel and affordable housing. Development has supported a vibrant sense of community, within and across the borough. There are thriving built and outdoor sports and leisure facilities, and everyone has access to a decent home. **All new homes built in large developments under this plan's lifetime are ultra-energy efficient**. Swale is a place residents,

businesses and visitors recognise as sustainable and forward-looking – a place to live, work and enjoy."

Question 6 - Are the objectives broad enough to address the issues and challenges set out above? Would you remove, add or amend any?

Statement 2 - The Objectives for Swale

The objectives for Swale in Statement 2 do not recognise the unacceptably poor state of our existing infrastructure and aspire improvement. For example, water supply and sewage infrastructure.

BPC suggest objective 2 is amended from:

"To support and sustain communities across the borough, big and small, by planning to meet identified needs, including needs for community facilities and infrastructure;"

to:

To support and sustain communities across the borough, big and small, by planning to meet identified needs, including needs for **the existing and future** community facilities and infrastructure;

There is nothing about enhancing the rural environment.

BPC propose objective 3 is amended from:

"To protect and manage our resources to address climate change through delivering sustainable growth that supports urban and rural economies and makes the best use of infrastructure;"

to:

"To protect and manage our resources to address climate change through delivering sustainable growth that supports urban and rural economies and makes the best use of infrastructure, **whilst enhancing the rural environment and safeguarding agricultural land for future generations;**"

Section 5 - Policy G1 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?

BPC support the preamble and strongly agree with paragraph 5.0.3 which states that "All of the policies and proposals in the Development Plan must be read 'as a whole'." This is an important principle that should guide both plan-making and decision-taking and aligns with the objectives of the National Planning Policy Framework.

However, the preamble would be strengthened if the following additional principles or considerations were more explicitly reflected within the text:

- a) Carbon reduction and energy efficiency
Greater emphasis should be given to the reduction of carbon emissions and the delivery of ultra-energy-efficient homes, particularly within larger developments. This would support climate resilience and reduce long-term living costs for residents.
- b) Protection of landscape character and countryside gaps
The importance of maintaining settlement separation through recognised village countryside gaps and protecting the setting of the Kent Downs National Landscape should be clearly

referenced. This would help ensure that development respects valued landscapes and avoids coalescence of settlements.

c) Adequate infrastructure and services

The preamble would benefit from clearer reference to the need for development to be supported by adequate infrastructure and services, including utilities, education, public transport, healthcare, and sports and recreation provision. This is essential to achieving sustainable and healthy communities.

d) Countryside restoration and enhancement

Stronger emphasis should be placed on opportunities for development to restore and enhance the countryside through measures such as new hedgerow planting, woodland creation, and biodiversity enhancement.

e) Provision for older persons' housing

The inclusion of a principle supporting delivery of appropriate older persons' housing on larger sites would help address demographic change and promote mixed, balanced communities.

f) Protection of best and most versatile agricultural land

A clearer commitment should be made to protecting "best and most versatile" agricultural land from irreversible development, including large-scale solar installations where these would result in the loss of high-grade farmland.

g) Protection of dark skies and tranquillity

Recognition should be given to the value of dark skies and tranquillity, particularly in rural areas, and the need to minimise light and noise pollution.

h) Valued land and environmental constraints

Swale's objectives paragraph 4.2.2 acknowledges the challenges in identifying sufficient land for development. This should be reflected into the development criteria which would be improved by including a broader definition of land that should be recognised as having particular value and therefore requiring strong protection. This could be achieved by adding wording such as:

"Protecting land with higher value, such as National Landscapes, higher-grade agricultural farmland, water source protection zones, local environmental designations, and locally valued landscape areas (as defined in relevant landscape character and biodiversity assessments)."

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?

BPC support Policy G1 General Development Criteria but suggest the following amendments or additions:

- Suggest 'protect and enhance' be added to Policy G1 8 after 'Reflect'.
- Must respect designations such as the National Landscape and its setting, valued Swale Landscape Areas and countryside gaps.

Section 6 - Policy GD1 Local Design Principles

Question 9 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC support the preamble for Policy GD1 Local Design Principles and strongly agree with the statement point 6.0.3 which states that "The policy should not be considered in isolation but read in conjunction with all the other policies in the Plan and relevant and associated national, regional and local design guidance, relevant Design Codes, development briefs and Masterplans."

Question 10 - Do you support or object to Policy GD1? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy GD1 Local Design Principles.

Section 7 - Policy GD2 Alterations & Extensions

Question 11 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC support the preamble. Would it be more complete if it included a link to heritage policies that will apply in some cases? In addition, guidance about 'changes of use' applications is not covered (for example, from large agricultural to light industrial).

Question 12 - Do you support or object to Policy GD2? What would you add, remove or amend to support it further or to remove your objection?

BPC support the policy.

Section 8 - Policy GD3 Shop fronts, signs & advertisements

Question 13 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC agree that the design of shop front signs and advertisements have a major influence on an areas appearance, in particular in conservation areas or on listed business.

Some businesses erect large advertising boards and signs away from shop fronts. For example, in the countryside, along the roadside and even on land adjacent and visible to the M2 motorway. Does the preamble need to be updated to make clear that such signs will not be approved?

Question 14 - Do you support or object to Policy GD3? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy GD3. It may be improved by an additional clarifying restriction on signs in the countryside away from the shop front.

Section 9 - 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?

BPC support the preamble and recognise the urgent need for affordable housing for a balanced community and sustainable local services. The 30% target for affordable houses on greenfield sites and 10% on brown field seem reasonable. Bredgar has a very successful development of affordable housing in Smiths Orchard.

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?

BPC support Policy H1.

Section 10 - 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?

Whilst land for Small and Medium Enterprise (SME) house builders small scale sites may come forward on an ad-hoc basis and be less likely to be promoted through the Local Plan process it must still be subject to all the protections that may be applicable. For example, National Landscape, Countryside Gaps, local designations, etc.

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?

BPC support Policy H2 but suggest the following amendment:

4. The proposals are of an appropriate scale, layout and design to its location and is designed in a way that preserves residential amenity, designated heritage assets, is landscape-led where appropriate, ~~and~~ environmental assets, *and respects national and local land protections;*

Section 11 - Policy H3 Rural exception and community-led housing development

Question 19 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC recognise the needs described in the preamble and support the aspiration to provide community led rural housing. Bredgar already has Smiths Orchard, which was a successful community led development that included provisions for 'local persons' as shown in paragraph 11.0.4. With that exception, we are unaware of further evidence in the borough of developers being interested in this type of development.

Question 20 - Do you support or object to Policy H3? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy H3.

Section 12 - Policy H4 Self-build and custom build

Question 21 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC have no specific comments on the preamble. Could it be more complete by explaining how such sites are monitored and managed after approval? Is there a higher risk of failure to complete all developments on a self build site with multiple owners?

Question 22 - Do you support or object to Policy H4? What would you add, remove or amend to support it further or to remove your objection?

BPC consider the Policy H4 to be reasonable.

Section 13 - Policy H5 Park Homes

Question 23 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC reviewed the preamble but have no specific comments or suggestions.

Question 24 - Do you support or object to Policy H5? What would you add, remove or amend to support it further or to remove your objection?

BPC accept Policy H5 as written.

Section 14 - Policy H6 Gypsy, Traveller & Travelling Showpeople Accommodation

Question 25 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC asks that the Borough Council identifies specific sites proactively rather than relying on windfall. Windfall site proposals generate conflict and significant anxiety in settled communities, and a reactive approach places the burden of objection on those communities rather than the Council taking responsibility for planned, considered site identification.”

Question 26 - Do you support or object to Policy H6? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy H6 because the detail is required. However, we observe that satisfying all of the 12 policy requirements for new or expanding sites will be extremely difficult to achieve and unlikely to be enforced. This is based on actual experience in our parish in regard to sites in Blind Mary's Lane, where despite Swale completing a successful appeal process with the Planning Inspectorate, it has not enforced the decisions. BPC requests that the Borough Council sets out clearly how and by whom each requirement will be monitored and enforced, and what consequences will follow non-compliance.

Section 15 - Policy H7 Dwellings for rural workers

Question 27 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

Seems to lack a definition of a 'Rural Worker'.

Question 28 - Do you support or object to Policy H7? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy H7 subject to adding a definition of a 'Rural Worker'.

Section 16 - Policy H8 Extensions to, & the replacement of, dwellings in the countryside

Question 29 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

The preamble may be more complete if it included guidance on energy efficiency as that does not seem to be covered in the Supplementary Planning Guidance entitled Designing an Extension: A Guide for Householders.

Question 30 - Do you support or object to Policy H8? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy H8 but suggest additional text on item 1 that supports the councils objectives to tackle the climate emergency.

1. Extensions to dwellings in the countryside will be permitted, considering any previous additions, where they are of an appropriate scale, mass and appearance in relation to the original dwelling, ~~and~~ location and significantly improve the energy efficiency performance of the overall property.

Section 17 - Policy H9 Extending the garden of a dwelling in the countryside

Question 31 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

No comments.

Question 32 - Do you support or object to Policy H9? What would you add, remove or amend to support it further or to remove your objection?

BPC support the Policy H9.

Section 18 - Policy E1 Loss of employment floorspace & land

Question 33 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC support the preamble for Policy E1 Loss of employment floorspace & land.

Question 34 - Do you support or object to Policy E1? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy E1 Loss of employment floorspace & land.

Section 19 - Policy E2 The Rural Economy

Question 35 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC strongly support the preamble for Policy E2 The Rural Economy.

Question 36 - Do you support or object to Policy E2? What would you add, remove or amend to support it further or to remove your objection?

BPC strongly support Policy E2 - The Rural Economy. It would be improved further if additional requirements for agricultural/forestry sectors development proposal were added as below:

- g. enhance soil structure for future food security; or
- h. deliver enhanced biodiversity and landscape outcomes in line with Policies B1 to B6.

Section 20 - Policy E3 Proposals for Main Town Centre Uses

Question 37 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC support the preamble for Policy E3 Proposals for Main Town Centre Uses.

Question 38 - Do you support or object to Policy E3? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy E3 Proposals for Main Town Centre Uses.

Section 21 - Policy E4 New Holiday Parks or extensions to existing parks & the occupancy of holiday parks

Question 39 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC support the preamble. Could it be enhanced with further references to SSI and Ramsar protections etc.?

Question 40 - Do you support or object to Policy E4? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy E4 New Holiday Parks or extensions to existing parks & the occupancy of holiday parks.

22 Policy INF1 Managing transport demand & impact

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

BPC commend the preamble, which clearly describes the local plan principles for managing transport demand and impact. We particularly support paragraph 22.0.24 which indicates the Council's intent for the local plan's policies to accommodate new adaptations to the way we travel, work and shop. Perhaps through the use of new technologies the recently withdrawn bus services to

rural villages can be replaced by new flexible low cost services in the not too distant future. Such a service may be more appealing to passengers of all ages, increasing demand and success in Promoting Sustainable Transport and Active Travel, with all the environmental benefits that will accrue. For example, reductions in congestion, emissions and pollution, harm from cars used for short journeys, (such as to Doctors, or Supermarkets, Libraries, etc.).

BPC strongly support paragraph 22.0.25 and the clear statement that "*New direct access to the strategic road network will only be considered in cases of strategic development, proposed through a local plan review, and only where appropriate access arrangements can be achieved without detriment to network capacity or safety.*".

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?

BPC support Policy INF1 but suggest the following amendment and addition:

Point 4d, All trip generating development proposals must consider highway impacts by:

Currently - "*Avoid the formation of a new direct access onto the strategic or primary distributor route network where possible, or unless identified by the Local Plan. Other proposals for new access onto the networks will need to demonstrate that they can be created in a location acceptable to the Council and appropriate Highway Authority.*"

should be strengthened to:

Proposed - "*Avoid the formation of a new direct access onto the strategic or primary distributor route network ~~where possible, or unless~~ identified by the Local Plan. All proposals for new access onto the networks **must** demonstrate that they can be created in a location acceptable to the Council and appropriate Highway Authority.*"

Add a new point 4f:

Proposals for new roads should avoid locations on sensitive or protected land. For example, Countryside Gaps, SANG (Suitable Alternative Natural Greenspace) and areas covered by national protections such as Special Protection Areas, Ramsar sites and National Landscapes.

23 Policy INF2 Vehicle parking

Question 43 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC agree sufficient parking must be provided in new developments to ensure that residents can live safely. Recent developments where parking has proven difficult (Iwade) should be assessed for lessons learned. Derelict land within Sittingbourne could be repurposed to alleviate car parking issues near to GP surgeries.

Question 44 - Do you support or object to Policy INF2? What would you add, remove or amend to support it further or to remove your objection?

BPC consider Policy INF2 Vehicle parking is reasonable and suggest no changes.

24 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?

BPC agree with the aims of the preamble.

Councillors note that existing facilities that we have need to be protected too. For example, the now defunct pavilion in Gore Court Road(Appleyard) included a once viable Tennis Facility. Whilst some of the land due to be built on by houses in Swanstree Avenue,could be devoted to a football, hockey, basket ball facility like that at London Road Rainham.

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?

BPC consider Policy INF3 Open space, sport and recreation provision is reasonable and suggest no changes.

25 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?

BPC consider that the preamble is informative and concise. No changes proposed.

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?

BPC support Policy INF4 Local Green Spaces.

Section 26 - Policy C1 Sustainable design and adaptation principles

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

BPC share the concerns raised in the preamble about climate change and the urgency in responding to them through carbon targets. The Local Plan must utilise every power within its remit to address the situation and achieve net zero. SBC must adopt policies that will ensure new development is zero carbon and truly mitigates and adapt to climate change - we support the "Key Principals for net zero development" that feed into policies C1 to C5.

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?

BPC support Policy C1. The wording of the two opening paragraphs would be stronger if the word "should" is replaced with "must" and it was indicated that such documentation will be assessed for all applications. We do not have the expertise to question the rating or assessment systems identified for large/major developments but our brief investigation of them leads us to support their use. It would be helpful to define what are large/major developments (reading ahead it seems to be developments of 50 units or more?), and where these systems are required to be used or is it best left to planning officers to decide (with decision scrutiny)? Will the proposed Planning Guidance set out more detail about what constitutes a large development and the systems applicable?

Section 27 - 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?

BPC support the Policy C2 preamble. We particularly commend and strongly support paragraphs 27.0.8 and 27.0.9, where enforcement of policy C2 adherence by large developments will be particularly important and deliver the most benefit. It is our opinion that large scale developers are not delivering houses of a sufficiently high enough standard of energy efficiency and they need to take a longer term view when designing their homes (e.g. 'ultra-energy efficient' as mentioned previously). What scrutiny will be given to the Planning Guidance that the council aim to produce before adoption of the Policy, as this could have a significant impact on its interpretation?

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?

BPC support Policy C2. Enforcement of Policy C2 paragraphs 5 and 7 is essential to ensure design stage predications are delivered. How will adherence be monitored and enforced - will it be transparent and published, holding developers to account? The climate change evidence base recommends that Third Party verification is essential. How will this verification and subsequent enforcement be guaranteed to be fully funded and resourced?

Section 28 - 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?

The approach seems reasonable. We commend and strongly support paragraphs 28.0.9 and 27.0.10, where enforcement of policy C3 adherence will be particularly important and deliver the most benefit.

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?

BPC support Policy C3. Enforcement of Policy C3 paragraph 5 is essential to ensure design stage predications are delivered. BPC would like to see more detail or commitment requirement from developers and the council for proving that design targets are delivered during and after build. How will adherence or recompense be enforced if the post occupancy evaluation proves to be deficient?

Section 29 - 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?

The preamble justification for this policy is supported by BPC. Once again the content of the Planning Guidance that the Council aim to produce will be extremely important for plan interpretation and require appropriate scrutiny by qualified technical experts.

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?

BPC support the existence of Policy C4. We are not qualified to validate the targets but assume they are challenging? How will adherence be ensured?

Section 30 - 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?

No changes proposed to the preamble.

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?

BPC support Policy C5. We agree that siting of large scale developments need to be mindful and well supported for grid connections; that higher resilience through safe storage systems will be needed; with early engagement with local communities and offer of 5% community ownership. Conditions for the return of renewable energy sites to an improved state following end-of-life are very important - particularly if sited on countryside/farmland as they are essential for future food security.

Section 31 - Policy C6 Coastal Change Management

Question 59 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC recognise the importance of understanding coastal change, its management and the need for a policy. No changes proposed to the preamble.

Question 60 - Do you support or object to Policy C6? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy C6.

Section 32 - Policy C7 Implementing the Medway Estuary & Swale Coastal Risk Management Strategy

Question 61 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

Support the preamble it sets out the issues, risks and opportunities for needed funding streams well. Reference paragraph 30.0.6 BPC are concerned that Partnership Funding under MEAS strategy may not be realised and increased flooding and erosion to up to 14000 properties are at risk. We agree that prioritising the use of government funding is sensible.

BPC strongly support the levy on developments that benefit from MEAS related infrastructure.

Question 62 - Do you support or object to Policy C7? What would you add, remove or amend to support it further or to remove your objection?

BPC support the policy. It is very brief and direct compared to the preamble - maybe a good thing. How will it be enforced?

Section 33 - Policy C8 Flood risk

Question 63 - Do you have any comments on the change in designation of Flood Zone 3a(i) in Faversham Creek? Please supply evidence as appropriate.

BPC support the preamble and SWMP. Bredgar is vulnerable to overland flooding as experienced in recent years. BPC are pleased to see that recognised in the SWMP (15). This could be mitigated with restoration of hedgerows and woodland planting by landowners - could that be added in to the policy?

Question 64 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

No changes proposed to the preamble.

Question 65 - Do you support or object to Policy C8? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy C8. Due to climate change this will be a growing future risk and an extremely important risk to be managed, whilst safeguarding and retaining our important coastal environment. An additional policy aim could be added to mitigate flooding risks on the Kent Downs dip slope by restoration of hedgerows and woodland planting.

Section 34 - Policy C9 Sustainable Drainage

Question 66 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

Preamble supported.

Question 67 - Do you support or object to Policy C9? What would you add, remove or amend to support it further or to remove your objection?

BPC strongly support the Policy C9. New "developments" provide an opportunity to guide existing landowners to improve drainage from beyond the site of the development itself that will reduce the

risk of flooding. Could such an aim be added to the policy? Such as commitments to more hedgerow restoration, woodland planting and land management for nature.

BPC are particularly concerned about unacceptable risks of pollution of groundwater sources. Section 3 of the policy regarding planning applications for development sites could be improved by making sign off by the responsible water authority mandatory. For example, sign off by Southern Water for confirmation of sewage processing capability.

An example of an unacceptable risk to groundwater sources was highlighted in the Highsted Park Inquiry. Whilst reading through some of the supplementary evidence that section 2 signposts we noticed the following:

In 1.1.3 it is noted that "Kent County Council's Minerals and Waste Local Plan will continue to provide the policy framework for waste and minerals and all Supplementary Planning Documents (SPD) will roll forward as they will relate to the parent policy in this plan once approved." The Kent County Council's Minerals and Waste Local Plan Policy CSW 6 item 2 states that "Planning permission will be granted for proposals that do not give rise to unacceptable adverse impacts upon Local Wildlife Sites (LWS), Local Nature Reserves (LNR), Ancient Woodland, Air Quality Management Areas (AQMAs) and groundwater resources. (See Figures 7, 8, 10 & 15)".

The Highsted Park application proposes the locating of a Built Waste Management Facilities where it will adversely impact Cromers Wood which, according to Kent Wildlife Trust, is "An ancient semi-natural woodland on the south-east side of a dry slope valley. Carpets of wood anemone are followed by bluebells, early purple and common spotted orchids." In addition, the policy point 5 states that "planning permission will be granted for proposals that avoid Groundwater Source Protection Zone". The proposed location for the proposed Highsted Park waste site is above the aquifer within the SPZ1 inner water extraction area. BPC would like to highlight that should the Highsted Park application ever be approved and the waste site located as proposed it will be in contravention of the Minerals and Waste Local Plan Policy CSW 6. This is extremely concerning and highlights the importance of having and enforcing Policy C9 "2 g) Safeguard water quality"!

Section 35 - Policy C10 Water Quality and Water Resources

Question 68 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

The preamble provides a very good insight into the complexity and volume of plans and bodies involved in water management. The detail within it is very important to provide the background to the policy. Stronger wording about the importance of developers having engagement with water companies, the council, the Environment Agency and other bodies would improve the preamble - emphasising the critical importance of 'getting water right' in any new developments.

Question 69 - Do you support or object to Policy C10? What would you add, remove or amend to support it further or to remove your objection?

In light of the recent failure of South East Water to supply water to thousands of residents in Kent, including Bredgar, Policy C10, paragraph 2, should be strengthened to additionally require water companies to provide signed confirmation of their capacity to supply potable water and process foul sewage before any large development planning application is considered. The policy should also clearly define the development size at which this confirmation is required, in order to avoid ambiguity about when the requirement is mandatory.

The recent experience of Kent's extreme vulnerability to loss of water supply illuminates the vital importance of protecting the existing groundwater sources that supply Swale. The picture below shows the water source protection zones. New developments over agricultural land in those zones

should be avoided. If developments are considered essential they should not contain any infrastructure that might contaminate the ground water sources. I.E. Waste disposal or sewage management sites etc.

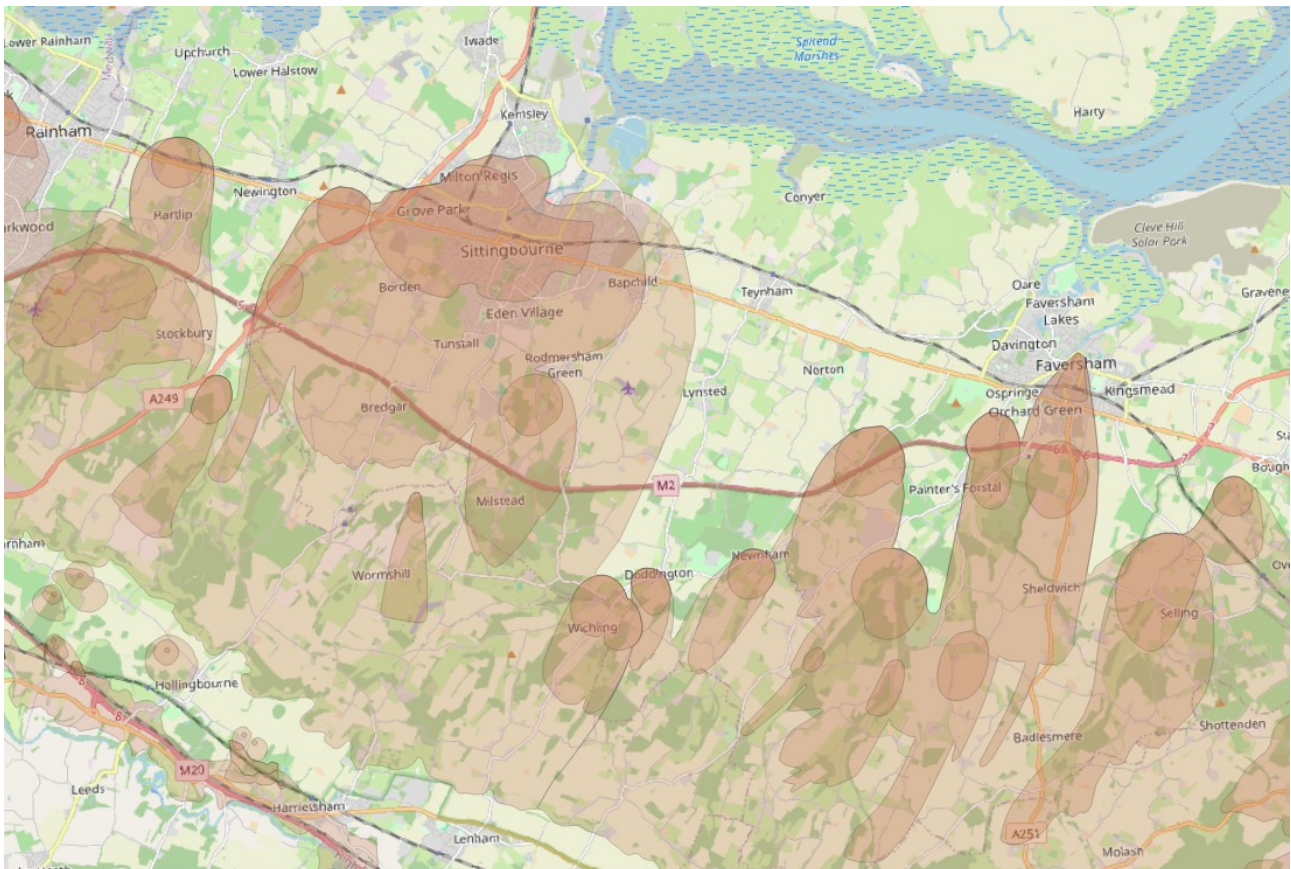


Figure 1: Water source protection zones in Swale. Shown in three zones - SPZ1, SPZ2 & SPZ3. Source <https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>. Contains public sector information licensed under the Open Government Licence v3.0.

Section 36 - Policy C11 Air Quality

Question 70 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC have no comments about the preamble, which seems reasonable. However, the M2 motorway cuts through Bredgar parish, and despite not registering highly on Swale's modelling of air quality, we can report that it causes a noticeable and significant impact on air quality and noise pollution in some weather conditions. For this reason we strongly support paragraph 36.0.33. Wherever there are large developments in the borough that will increase traffic volume on the M2 we would like to see Section 106 conditions applied that enable mitigation to minimise the resultant emissions and noise increases. For example, funding for strips of woodland planting along both sides of the route of the M2. This would help improve air quality and reduce noise pollution.

Question 71 - Do you support or object to Policy C11? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy C11 but would prefer it to be more assertive to reflect the importance of good air quality for health. For example, in points 1 and 2 replace "should" with "must".

37 Policy C12 Pollution & Land Instability

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

BPC commend the preamble. It describes well important issues like light pollution and noise and their impact on tranquillity.

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?

BPC support Policy C12. We would like to see an additional policy statement that sets out a requirement for the cumulative effects of new developments and in existing neighbourhoods to achieve a reduction in light pollution of dark skies. Particularly applicable in the Kent Downs National Landscape and its setting.

Section 38 - Policy B1 Biodiversity & geodiversity conservation & BNG

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

In general, BPC supports the intentions set out in section 38 and considers biodiversity to be of great importance in the development of a local plan. The preamble sets out clearly the application of the applicable regulations in respect of the designated sites and otherwise.

We support the Council's statements in relation to developments in 38.0.13.

38.0.18 clearly sets out the restrictions in relation to developments, but, in relation to Locally Designated sites, it is not clear what safeguards will be put in place.

We support the proposals in 38.0.22, but would like the inclusion of a requirement for surveys to be carried out where there is a possibility of destruction of habitats.

In Statement 3, there is no mention of Chalk Streams, or indeed Ancient Woodlands, which we would expect to form part of the selected habitats in Swale.

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?

BPC strongly supports Policy B1.

In Part A, sections 2 and 3, it should be the case that 'compensation' takes the form of measures relevant to the damage concerned and as local as practicable to the site of the damage – maybe by adding the word 'appropriate'.

Part B provides a useful 'road map' for the stated intention of protecting biodiversity.

BNG – BPC supports the target of 20% BNG and also the important aspect of ongoing management.

Section 39 - 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?

The preamble sets out very clearly the Council's understanding of the requirements to protect and enhance valued landscapes with reference to the applicable designations.

Concerning Bredgar – (39.0.12) the Swale Landscape Sensitivity Assessment 2019 (A1 189)

indicates a medium/high sensitivity. In using this as a reference resource, the planning process should take into account the newly adopted Bexon Conservation Area and in particular its setting, towards the village, and to the South and East.

Further, (39.0 20 to 23) – BPC supports the use of the Setting Position Statement and would suggest that the adoption of Bexon Conservation Area makes its application in relation the surrounding area doubly important.

(39.0.19) – the DMPO 2015 definition of a major development reads:

“major development” means development involving any one or more of the following—

- (a) the mining and working of minerals or the use of land for mineral-working deposits;
- (b) waste development;
- (c) the provision of dwelling houses where—
 - (i) the number of dwelling houses to be provided is 10 or more; or
 - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- (e) development carried out on a site having an area of 1 hectare or more;

We would prefer not to dismiss this as a benchmark, but retain it by amending the wording of 39.0.19 to be

‘In terms of determining what may constitute a ‘major development’ for the purposes of this Local Plan reference may be made to the definition of major development in the Development Management Procedure Order or may (at the Council’s discretion) be a matter of judgement based on the relevant circumstances and to take into account the creation of any large scale infrastructure.’

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?

BPC supports Policy B2. The only suggested amendment is the removal of the words ‘where relevant’ from part C.

Section 40 - Policy B3 Kent Downs National Landscape Management Plan

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

A search online seems to indicate that the Kent Downs National Landscape Management Plan 2021 to 2026 has been adopted, rather than being under review.

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?

BPC supports Policy B3. We would prefer the second sentence to read

‘Major Development within the National Landscape will only be permitted in exceptional

circumstances and where it can be demonstrated that it is critical to the public interest.’

On Minor development, the ‘setting’ should be included in 2 (.....’tranquillity of the National Landscape and its setting’).

Section 41 - 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?

In addition to those gaps identified and named in the preamble, BPC believes that the separation of villages South of the A2 is important and would like to add the area between Tunstall and Bredgar - the North-South boundaries being the area between Tunstall Village Hall and the entrance to Bredgar Village (Bredgar Road), and also from the Woodstock Road area up Ruins Barn Road to Bexon Conservation Area.

This would also have the effect of protecting the setting of the National Landscape and Bexon Conservation Area, and protecting dark skies and tranquillity in both areas.

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?

BPC is fully supportive of the retention and protection of important Countryside Gaps and of Policy B4, but to be amended to include a gap between Tunstall (Rural and Urban) and Bredgar as identified in our response to Q80.

Section 42 - 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?

Paragraph 42.0.4 – typos – line 3, replace ‘help’ with ‘will help to’. Also the letter ‘s’ is missing in several places.

Paragraph 42.0.5 – could orchards be added to the list?

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?

BPC supports policy B5.

However, the second sentence should be changed to read “Development proposals will not be rejected in relation to their plans for woodland, trees, orchards and hedgerows where: “ As it stands it appears that, if the criteria are observed, a development will be supported (regardless of other factors...).

Section 43 - 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?

Paragraph 43.0.3 does not read correctly and we question the use of the words “shows it is” – and would prefer them replaced with “indicates that it may be”.

Question 85 - Do you support or object to Policy B6? What would you add, remove or amend to support it further or to remove your objection?

BPC supports Policy B6. However, as this is a policy which will form part of the basis of the Local Plan, numbered point '1' should be deleted.

Further, the following sentence from paragraph 6.3 of Swale's Agricultural Land Report – Stage 1 Baseline information reads:

Opportunities to minimise the loss of BMV land will need to be taken where possible, by maximising development on brownfield land, and on lower grade agricultural land.

This should be incorporated in Policy B6

Section 44 - Policy B7 The Coast

Question 86 - Do you have any specific comments on the preamble above? What would help make it more focused, relatable or complete?

BPC has no comments.

Question 87 - Do you support or object to Policy B7? What would you add, remove or amend to support it further or to remove your objection?

BPC supports Policy B9.

Section 45 - Policy B8 Rural Lanes

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

The overall content of the preamble is supported but there should be mention of the fact the many rural lanes are already overused and struggling to cope with the existing traffic levels. It would also be beneficial to understand what the effect of the designation of rural lanes as 'quiet lanes' is in the context of planning policy.

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?

BPC supports Policy B8, but It is difficult to comment meaningfully without access to the 'Proposals Map' – our views in that respect are reserved until that is brought forward for consultation.

The words 'and the effects of increased traffic levels' should be added at the end.

There is no mention of 'Quiet Lanes' the intention to create them should form part of the Policy.

Section 46 - Policy B9 The keeping & grazing of horses

Question 90 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC has no comments to add.

Question 91- Do you support or object to Policy B9? What would you add, remove or amend to support it further or to remove your objection?

BPC supports Policy B9.

Section 47 - 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?

BPC support paragraphs 47.0.1 to 47.0.6 of the preamble, which provide a clear and well-reasoned statement of policy on development involving Listed Buildings.

Regarding paragraphs 47.0.8 and 47.0.9 on climate change, we would recommend that the same cautious approach be applied to all proposals—however fashionable or urgent they may appear—that may end up only being applied over the short to medium term.

Related to this point, when assessing significance under paragraph 47.0.9, appropriate weight should be given to an asset's longevity and potential lifespan. Even relatively modest heritage assets accumulate historical and cultural significance over time, and this compounding value should be properly considered in the planning process.

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?

BPC support Policy HE1.

Regarding paragraph 1d, we would recommend clarifying the term "important" as it relates to views of Listed Buildings. While some Listed Buildings contribute significantly to landscape or village character through their prominent or attractive appearance, more modest heritage assets can also serve as important local landmarks—for example, in wayfinding and local orientation—and thus form an integral part of the community fabric. The policy should recognize that significance of views is not solely dependent on architectural grandeur.

With respect to paragraph 4, we recommend adding that where a decision is finely balanced, the benefit of the doubt should favour conservation of the heritage asset.

Section 48 - Policy HE2 Development affecting a Conservation Area

Question 94 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC support the points made in the preamble.

Question 95 - Do you support or object to Policy HE2? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy HE2.

Section 49 - Policy HE3 Parks & gardens

Question 96 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

None of the sites fall within Bredgar. However, BPC support the points made.

Question 97 - Do you support or object to Policy HE3? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy HE3

Section 50 - Policy HE4 Non-designated Heritage Assets

Question 98 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

Paragraphs 50.0.1 to 50.0.7 provide a clear description of and policy approach to Non-designated Heritage Assets. However, BPC would recommend that the preamble explicitly acknowledge the significant variation in heritage value within this category.

Non-designated heritage assets range from those of modest local interest to those of considerable significance—potentially comparable to Grade II Listed Buildings—which may not have been captured during formal designation processes. Without such clarification, there is a risk that applicants and decision-makers may underestimate the planning weight that should be attached to higher-value non-designated assets.

BPC recommend adding a statement to this effect, making it clear that non-designated status does not equate to minor significance.

Question 99 - Do you support or object to Policy HE4? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy HE4

Section 51 - Policy HE5 Archaeology

Question 100 - Do you have any specific comments on the preamble above? What would help make it more focussed, relatable or complete?

BPC feel the medieval period is passed over rather quickly, in a paragraph – 51.0.7 – that seems to be about to discuss maritime archaeology. Perhaps it could have its own paragraph.

Question 101 - Do you support or object to Policy HE5? What would you add, remove or amend to support it further or to remove your objection?

BPC support Policy HE5.

Section 52 - Implementation and Monitoring

Question 102 - Do you have any comments on the monitoring and delivery section of the Local Plan?

Local Plans are monitored through regular reporting, housing delivery tests, and plan reviews, and enforced indirectly via planning decisions, conditions, legal agreements, and enforcement action by the local planning authority.

BPC want the council to ensure it is capable of monitoring and enforcing the Local Plan - particularly in the case of large developments. To do this there must be sufficient resources and full exercise of powers.

We suggest that there should be a clear mechanism documented in the plan that explains how the usage of resources and powers will be monitored and corrected in a timely manner to achieve the enforcement of the Local Plan objectives.

Question 103 - Do you have any further comments to make on any aspect of the consultation that you haven't yet made?

Whilst reading through some of the supplementary information "Kent Nature Partnership Biodiversity Strategy 2020 to 2045", that it signposts, we particularly noticed and support the plan to restore 2250 km and plant 2250 km new species-rich hedgerow that is championed by the

Medway Valley Countryside Partnership. BPC would like to see Swale's Local Plan championing, with targets, the restoration and new planting of hedgerows in the borough.