

Maidstone Borough Council

Maidstone House,
King Street ME15 6JQ

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Jill Peet
Planning Policy Manager
Swale Borough Council
Swale House
East Street
Sittingbourne
ME10 3HT

Date:

Dear Jill,

RE: SWALE BOROUGH LOCAL PLAN REVIEW REGULATION 19 CONSULTATION

Thank you for consulting Maidstone Borough Council (MBC) on the Regulation 19 pre submission Swale Local Plan Review. The responses below are officer-level comments, submitted ahead of the extended consultation deadline of 30 April 2021.

As you now, we have had regular meetings under the Duty to Co-operate and, as set out in those meetings, we have no significant concerns with this latest version of your Local Plan. Our main point is around clarity with regard to Gypsies and Travellers.

The Localism Act 2011 places a legal duty on planning authorities to engage constructively, actively, and on an ongoing basis, to ensure the effectiveness of Local Plan preparation in relation to strategic, cross-boundary issues. Effective and on-going joint working between strategic policy-making authorities is integral to the production of a positively prepared and justified strategy. MBC formally responded to the previous Swale Borough Council consultation on its Regulation 18 Issues and Options.

The plan and supporting evidence identifies that the objectively assessed housing need for Swale is 16,608. We welcome the Plan's commitment to meet the full OAN for housing within the borough boundaries as expressed in Policy ST1.

The plan is supported by a gypsy and traveller accommodation assessment ,however, the plan is not clear what the assessed need for gypsy and traveller site is over the plan period, nor does it address whether there is a need for a transit site/s. MBC feels that the plan could be clearer on what the overall need for gypsy and traveller sites is. The plan does not seek to allocate gypsy and traveller pitches, instead adopting a flexible approach to pitch provision by allowing sites to come forward under Policy DM19.

MBC welcomes that the plan intends to meet its employment need through policy ST1, which states that a need for 56ha of employment land, of which 15ha for office floorspace, is provided for in the Local Plan Review.

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The plan seeks to address infrastructure needs arising from the plan, and this is set out in the Infrastructure Delivery Plan supporting the Local Plan Review. MBC supports the overarching development strategy for Swale which focusses new development in those areas best suited and best able to accommodate growth, taking into account infrastructure and existing constraints.

The Local Plan review is supported by a suite of evidence base documents, including a sustainability appraisal which assesses the reasonable alternatives including growth scenarios and sites.

We note that the Detailed Simulation Area in the Swale Transport Model extends beyond the Borough and we welcome that this enables consideration to be given to the potential impact of the plan on roads in Maidstone borough, particularly the A249. To reduce the impact on the highway network, SBC will seek through their local plan to encourage sustainable travel, so as to reduce the need for car journeys. MBC notes that the Swale Transport Model indicates that this will result in a mitigated impact on J17 of the M20.

In terms of duty-to cooperate, whilst the Statement of Community Involvement sets out the requirements for cooperation and defines the cross boundary strategic matters, the Regulation 19 deposit draft should ideally be accompanied by evidence to demonstrate the steps SBC has taken to address cross boundary strategic matters. Maidstone Borough Council and Swale Borough Council have undertaken significant engagement so as to ensure effective and ongoing engagement on cross boundary strategic matters. MBC considers that SBC have fulfilled their duty to cooperate, however, MBC would wish to see the work both boroughs have undertaken on this matter to be better reflected in the submission.

In summary, aside for some clarification in respect to the precise needs for gypsy and traveller sites and the need to evidence duty-to-cooperate, MBC considers the plan to be positively prepared, justified, effective and consistent with national policy.

Yours sincerely

Rob Jarman
Head of Planning