Chapter 1: Introduction

Question 1: Do you agree with the description of what a Statement of Community Involvement is and why it is relevant? Do you have any additional comments on Chapter 1?

Response by	Reference	Summary	SBC Response
Mr Nigel Heriz-Smith	SCI25/3-3	1. The comment argues that all households affected should be consulted on key planning issues, specifically the Local Plan (both Reg 18 and Reg 19), Conservation Areas, and the revocation of AQMAs. It stresses that these are central to SBC's responsibilities for national and local planning objectives. The comment opposes reliance on only "those who have shown interest" in the past, as this excludes new residents and others not actively following Council updates.	**No change agreed** 1. The consultee makes a good point about involving all households in the borough. However, writing to all residents each time there is a local plan consultation, a Conservation Area Appraisal consultation or a revocation of an AQMA would be extremely costly to the Council in terms of printing and delivery. To address this issue in a more cost effective way, the Council will continue to publish details of consultations and to encourage general involvement in planning issues in its biannual Inside Swale Magazine (which is delivered in paper form to all households across the borough) and through the Swale Means Business website and ebulletin - and to make engagement in planning issues regular items in these publications. The Council will also issue press releases, and engage in social media and other engagement events (eg with parish councils, members, community groups, the public generally etc), as appropriate, to ensure that consultations/planning issues are advertised through paper and digital news outlets to enable widespread engagement.
Graveney with Goodnestone Parish Council	SCI25/4-4	1. Agrees that the SCI introduction clearly explains its role, scope, and the importance of early, ongoing community engagement. Suggested improvements include: 2. Adding brief definitions or a glossary for technical terms like "Supplementary Planning Documents" and "unauthorised development." 3. Expanding on how communities, particularly underrepresented groups (non-digital users, young people, minorities), will be proactively engaged, with specific inclusive practices. 4. Providing examples to clarify the distinction between legal requirements and additional actions in paragraph 1.5. 5. Briefly referencing other relevant legislation, such as the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011, to establish the statutory foundation.	**Partial changes agreed** 1. Welcomes support 2. Agree that a glossary would be very useful and this will be included 3. Paragraph 2.5 of the SCI sets out the principles for involving communities and a commitment to including potentially disengaged groups. How this will be done will vary for different planning matters, but for local plan consultations may include methods such as presentations/videos to, for example, school groups and consultation with representatives of the Travelling Community. The SCI makes clear that digital and online technology will play an important part in the planning process going forward but that engagement via other methods, including letters to those on our consultation database, newsletters promoting signing up for that database, specific engagement events, publication of paper as well as online documents and maps and press releases will also play a key role. The Council will also look to borough and parish councillors to help cascade information to its electorate. 4. With regard to the distinction between legal requirements and additional actions, it is felt that this is made very clear with the explanation in paragraph 1.5 and the distinctions set out in subsequent chapters, for example in Chapter 4 - 4.7, 4.8, 4.11, 4.12, 4.14, 4.15, 4.17, 4.18, 4.20, 4.21. It should be noted that where eg 4.12 the document says 'will also' these are not legally required engagement methods. 5. Agree that a reference to the legislation would be helpful and this will be included as a footnote to paragraph 1.1.

Duchy of Cornwall	SCI25/5-7	1. The comment welcomes the SCI's clarity and relevance but suggests: 2. Making it clearer who the intended users of the SCI are. 3. Emphasising that the SCI forms part of the Local Plan framework. 4. Expanding Section 2.6 to highlight that the SCI not only guides the Council's consultation but also sets a minimum standard that third parties are encouraged to follow.	**Change agreed** 1. Welcomes support 2. Agree that the users of the SCI could be made clearer and reference to 'residents, businesses and other stakeholders' will be added as a description of 'the community' in paragraph 1.1. 3. With regard to the SCI being part of the Local Plan framework, paragraph 1.1 will be amended to make clear that the SCI is a statutory planning document. 4. With regard to expaning Section 2.6 (chapter 2), this will be amended to include reference to neighbours and businesses. The paragraph clearly sets out what is expected of developers in terms of pre-application engagement and, while it is encouraged, it is not considered necessary to make this a 'minimum standard'. (See also responses to SCI25/5-5 in Chapter 7 below).
Bredgar Parish Council	SCI25/9-1	No comment	**No response required**
Mrs K Murphy	SCI25/10-1	1. Comment raises concerns with a current planning application and democracy in planning, but also raises the issue of people who do not use computers and their ability to engage in consultations.	**No change agreed** 1. The point about the need to engage with people who do not have access to computers is well made. In our Digital Age, it is an essential that planning consultations continue to make provision for those who prefer/need to look at paper documents and speak to people, rather than access information digitally. Section 4 of the draft SCI sets out how this will be done for the Local Plan (eg paper documents and mapping being available at Council offices/libraries) and chapters 5 & 6 set out the process for SPDs and Neighbourhood Plans. With regard planning applications and chapter 7: applications of certain types are advertised in newspapers, site notices are posted which include contact details, and letters are sent to neighbouring residents with contact details for submitting responses in writing. Contact details are available on our website at https://swale.gov.uk/your-council/contact-us/contact-a-council-service/planning or by telephoning the Council on 01795 417850. These details have been added to the draft SCI.
A Ayres	SCI25/11-1	1. Although the comment is mainly regarding a planning application and several impacts of it, this comments on people without computers, or private cars, which could impact their way of communicating with the Council on future consultations.	**No change agreed** 1. The point about the need to engage with people who do not have access to computers, or private cars, is well made. In our Digital Age, it is an essential that planning consultations continue to make provision for those who prefer/need to look at paper documents and speak to people, rather than access information digitally. Section 4 of the draft SCI sets out how this will be done for the Local Plan (eg paper documents and mapping being available at Council offices/libraries which are generally reasonably accessibly by public transport) and chapters 5 & 6 set out the process for SPDs and Neighbourhood Plans. With regard planning applications and chapter 7: applications of certain types are advertised in newspapers, site notices are posted which include contact details, and letters are sent to neighbouring residents with contact details for submitting responses in writing. Contact details are available on our website at https://swale.gov.uk/your-council/contact-us/contact-a-council-service/planning or by telephoning the Council on 01795 417850. These details have been added to the draft SCI.
Mr P Dixon	SCI25/12-1	No comment	**No response required**
Natural England	SCI25/13-1	1. Natural England welcomes early and meaningful engagement in local planning and supports community and statutory body involvement in shaping policy and decisions. However, it cannot comment in detail on individual SCIs.	**No response required** 1. Grateful for comments made and support for meaningful engagement.
Canterbury City Council	SCI25/14-1	No comment	**No response required**

Mr H Boswell	SCI25/16-1	1. Writing as a holiday park owner - agrees with the SCI definition. Notes that planning decisions impact tourism business, infrastructure, visitor economy. They urge the Council to acknowledge tourism operators and static caravan park owners as key stakeholders, noting their importance to the local economy, infrastructure, visitor experience, and land management with environmental and community implications.	**No change agreed** 1. The Council agrees that tourism operators and static caravan park owners are key stakeholders in the borough, however, it is not felt that specific reference to them needs to be made in the SCI. The document already recognises (eg paragraph 2.4) that it will be necessary to tailor the engagement approach for specific issues and audiences and listing specific groups would lead to unnecessary detail in the document, making it overly long and potentially less flexible.
Planning Policy Tunbridge Wells Borough Council	SCI25/17-1	1. TWBC agrees with the definition and relevance of the Statement of Community Involvement in paragraph 1.3 and supports the approach in paragraph 1.5, distinguishing between consultation methods the Council is legally required to do ("will") and additional, optional methods ("may").	**No response required** 1. Welcomes support.

Chapter 2: Principles of Community Involvement

Question 2: Do you have any comments on the principles of community involvement set out here, or any suggested amendments to Chapter 2?

Response by	Reference	Summary	SBC Response
Mr Nigel Heriz-Smith	SCI25/3-3	1. Criticises the ambiguity in paragraphs 2.4 and 2.5, arguing that vague phrases like "where necessary" and "fit for purpose" allow for weak communication practices. It calls for stronger commitments. 2. Swale-wide issues: - Letters should be sent to all households and businesses. 3. Localised issues (e.g., AQMA revocations): All directly affected households and businesses should be contacted, with "impacts" interpreted broadly, not just by postcode. 4. Clarity in consultation lists: The current wording risks overlooking groups. The default should be that all residents and businesses within or near the scope of a policy are notified, given the significant impacts of planning decisions.	**No change agreed** 1. The Council considers the language used in paragraphs 2.4 and 2.5 to be appropriate and allows a flexible range of engagement types to suit different events. 2./3. /4. For a response to comments that all residents and businesses should be contacted by letter, please see the Council's response to comments SCI25/3-3 and SCI25/11-1 above.

Graveney with Goodnestone Parish Council	SCI25/4-5	1. The comment welcomes the clear principles in Chapter 2 and the Council's commitment to engaging communities, but suggests several improvements: 2. The list of principles in paragraph 2.5 should be reformatted for clarity, as some points are too long and cover multiple themes. 3. Expand on commitments to reach non-digital users through printed materials, phone consultations, drop-in events, and use of libraries/local centres. 4. Go further in outlining how participation from harder-to-reach groups will be actively encouraged. 5. Welcomes committment to feedback which should be prompt and accessible including clear summaries of how decisions were made. 6. Require developers/landowners submitting major applications to provide a Community Engagement Statement summarising feedback and how it shaped proposals. 7. Strengthen the equalities section by referencing the use of Equality Impact Assessments and inclusive venues/communication methods.	**Partial changes agreed** 1. Grateful for support and suggestions for improvement. 2. List under paragraph 2.5 has been amended to improve clarity. With regard the longest point of paragraph 2.5 (about appropriate representations), it is felt that his needs to be kept as is, due to the number of inappropriate representations received. 3. With regard to detail of how to reach non-digital users, this is set out elsewhere in the draft SCI as is too detailed for this section about 'principles'. 4. With regard to detail of how to reach hard to reach groups**,** this is set out elsewhere in the draft SCI as is too detailed for this section about 'principles'. 5. Noted 6. The draft SCI (7.17) sets out that 'information on how engagement has been undertaken, the issues raised and how these have been responded to should be submitted as part of any application'. Not including such a statement of engagement would not be a reason for refusing planning permission and as such, while it is encouraged, it is not considered appropriate to make it a 'requirement'. 7. An Equalities Impact Assessment for the Local Plan will be published at the Regulation 19 stage and will be published on the SBC website. A reference to this will be added to Chapter 3. Equalities Impact Assessment are not mandatory for planning applications but can be useful to inform both an assessment in relation to the application of the Equalities Act 2010 and the assessment of a planning application. If an applicant chooses to submit one, the Council would have regard to it.
Duchy of Cornwall	SCI25/5-3	1. The comment values the Council's focus on accessibility and transparency but recommends two enhancements: 2. Explicitly include early engagement by landowners/applicants within the Council's own principles (to align with Section 2.6 and set a clear example). 3. Add a principle on conducting Equality Impact Assessments (EQIAs) to better understand diverse community needs, linking to sections 2.5.v and 2.9, with reference to pro forma EQIAs used by other councils.	**Partial changes agreed** 1. Welcomes comments and suggestions for improvement. 2. With regard to recommended enhancements: a new bullet point has been added about engagement by landowners/applicants 3. An Equalities Impact Assessment for the Local Plan will be published at the Regulation 19 stage and will be published on the SBC website. A reference to this will be added to Chapter 3. Equalities Impact Assessment are not mandatory for planning applications but can be useful to inform both an assessment in relation to the application of the Equalities Act 2010 and the assessment of a planning application. If an applicant chooses to submit one, the Council would have regard to it.
Sarah Moakes	SCI25/6-2	1. Developer consultations are one-sided and should show how community concerns were addressed. 2. Calls for more transparency in developer–planning officer interactions, with all discussions minuted and publicly available.	**No change agreed** 1. The draft SCI (7.17) sets out that 'information on how engagement has been undertaken, the issues raised and how these have been responded to should be submitted as part of any application'. Not including such a statement of engagement would not be a reason for refusing planning permission and as such it is not considered appropriate to make it a 'requirement'. 2. Best practice applications will set out the history of the application process, the engagement undertaken and how the community's concerns have been addressed. However, in order to enable frank discussions between officers and applicants, it is necessary for meetings such as these to remain confidential and this is standard practice across the industry.

Mr H Boswell	SCI25/16-2	1. Agrees with the principles, especially the use of varied engagement methods 2. Suggests adding seasonal businesses (like holiday parks) to the groups needing tailored engagement 3. Suggests avoiding consultations during peak tourism seasons to allow meaningful participation.	**No change agreed** 1. Welcomes comments and overall agreement with principles. 2. Specific reference to seasonal businesses in this chapter of the SCI (about principles) would not be appropriate. Please also see responses to SCI25/16-1, SCI25/16-4 and SCI25/16-5. 3. Local Plan consultations seek to avoid key holiday periods or if they can't be avoided are generally lengthened. It is considered that this valid point is rather detailed to be explicitly referenced in the principles of the SCI, for example as it cannot apply to planning applications (where there is a legislative requirement to consult once applications are validated). In general, the point about 'using a variety of methods (paragraph 2.5) which make it easier for people to take part in the planning process' covers this issue.
Planning Policy Tunbridge Wells Borough Council	SCI25/17-2	1. The community involvement principles in paragraph 2.5 clear are fair but suggests amendments: 2. Renaming the subheading to "Early pre-application engagement by landowners and developers" to stress early public/stakeholder input. 3. Adding a requirement for a Record of Community Involvement with planning applications. 4. Including a section on the Duty to Cooperate with neighbouring authorities under Section 2 for greater emphasis.	**Partial changes agreed** 1. Welcomes support and suggested amendments. 2. The subheading above paragraph 2.6 about 'engagement by landowners and developers' has been renamed 'Pre-application engagement by landowners and developers' and the point about early engagement by these bodies has also been added to the principles under paragraph 2.5. 3. The draft SCI (7.17) sets out that 'information on how engagement has been undertaken, the issues raised and how these have been responded to should be submitted as part of any application'. Not including such a statement of engagement would not be a reason for refusing planning permission and as such, while it is encouraged, it is not considered appropriate to make it a 'requirement'. 4. An explanation of the Duty to Cooperate process and statement has been added to chapter 3.

Chapter 3: Planning for the future of Swale Borough Council

Question 3: Do you have any comments on Chapter 3 and the documents that are produced in planning for the future of Swale?

Response by	Reference	Summary	SBC Response
Graveney with Goodnestone Parish Council	SCI25/4-1	No comment	**No response required**
Duchy of Cornwall	SCI25/5-6	1. The comment praises the clear outline of planning documents but suggests strengthening the chapter by: 2. Adding brief explanations or links on how each document is prepared, including its evidence base and approval process (better placed here than in Chapter 4). 3. Including information on democratic oversight and decision-making, clarifying how documents are ratified. 4. Providing a short explanation of the hierarchy of plans (from the NPPF down to local planning documents) to give context to the Council's obligations and the purpose of each document.	**Changes agreed** 1. Welcomes comments and suggested amendments. 2. Reference to evidence base has been added to this chapter, as well as links to the sections of the website where documents are available. 3. More detail has been added on the context for planning in Swale, the role of councillors etc. Brief detail on the role of Council in ratifying local plan stages is also included in Chapter 4. 4. Detail on the hierarchy of the planning system has been added (3.1-3.6)
Sarah Moakes	SCI25/6-1	1. Regrettable that SBC does not use the Community Infrastructure Levy (CIL), noting it's a fixed, non-negotiable charge tied to development size and type, making it harder for developers to avoid paying	**No change required** 1. Comment noted.
Mr H Boswell	SCI25/16-3	No comment	**No response required**

Planning Policy Tunbridge Wells Borough Council	SCI25/17-3	1. List of main policy documents comprehensive but suggests adding the Authority Monitoring Report to show how policy effectiveness is monitored. 2. The list should be kept under review in light of upcoming national plan-making guidance.	**Partial change agreed** 1. Reference to the Authority Monitoring Report has been added to Chapter 3. 2. SCIs need to be reviewed every 5 years. References to this has been added to 3.7. Any changes to processes and required documents will be updated during that review, or earlier if deemed necessary.

Chapter 4: Engagement process for Local Plans

Question 4: Do you have any comments or suggestions on Chapter 4, around the engagement process for Local Plans?

Response by	Reference	Summary	SBC Response
Environment Agency	SCI25/2-1	No comment	**No response required.**
Mr Nigel Heriz-Smith	SCI25/3-4	1. The comment is strongly critical of SBC's past public engagement in the Local Plan Review, arguing that failures during the Reg 18 and Reg 19 stages caused public distrust. The commenter calls for a proactive, universal notification policy and a clearer, more inclusive list of consultees to rebuild trust and ensure meaningful engagement. 2.The comment also requests that water companies should be specifically included in the list of non-statutory consultees.	**Partial change agreed** 1. The strength of feeling behind this representation is understood. However, as set out above, the cost of writing to all residents and businesses at all stages of the Local Plan process, as is being requested, is beyond the scope of the Local Plan's budget and as such, the approaches set out in Chapter 4 are considered appropriate in the circumstances. 2. With regard to the inclusion of water companies in the list of consultees, water companies are already included as 'utility companies', but for clarity this has been amended to 'utility companies, including water companies'.
Graveney with Goodnestone Parish Council	SCI25/4-7	The comment requests greater clarity and stronger commitments in Chapter 4: 1. Clearly explain how individuals/consultees can register to be notified or informed (Sections 4.5 ix, 4.17 iii, 4.20 ii). 2. State the minimum notice period for intention to produce a Local Plan (Section 4.7 i). 3. Make provision of paper copies of the Inspector's Report and adopted Local Plan at main libraries mandatory, not optional (Sections 4.18 i, 4.21 i), to match the approach in 4.12 i.	**Partial change agreed** 1. Agree that details of how to be added to the consultation database would be helpful and this has been added to the end of paragraph 4.5 2. Regulation 18 of the Town and Country Planning Regulations 2012 concerns the preparation of a local plan. The minimum notice period is not set out explicitly, however, we would consider it to be 6 weeks. 3. It is our intention to provide paper copies of the Inspector's Report and the adopted Local Plan at main libraries, however, final decisions on this will be made at the time, depending on resources within the Local Plan's team.
Duchy of Cornwall	SCI25/5-1	1. The comment welcomes the clarity of this chapter but suggests several improvements. 2. Clarity of stages: Explicitly name statutory stages (e.g., Regulation 18 and 19) for easier cross-reference with national guidance. 3. Add a diagram showing the planning hierarchy from national to local levels for accessibility. 4. In section 4.6 soften wording about elected members' responsibility for notifying residents, as it may be misleading. 5. In sections 4.7 & 4.12 Expand on communication methods by incorporating a wider mix of digital channels and site notices alongside print media. 6. In section 4.10 provide a fuller explanation (or hyperlink) on the Planning Inspectorate's role. 7. Insert a description of the Council's internal democratic processes for finalising the Local Plan before submission to the Inspector.	**Partial changes agreed** 1. Welcomes support and suggestions for improvements. 2. Agree reference to the Regulation stages would add clarity and these have been added to paragraph 4.3. 3. The planning hierarchy has been explained in further detail in amendments to Chapter 3. It is thus not considered necessary to include a diagram to this chapter as well. 4. The last sentence of 4.6, around Ward Members, has been included following member request and discussion at **Policy and Transportation Planning Working Group, 17th Sep 2024,** however the emphasis has been amended. 5. 4.7 and 4.12 are considered appropriate for the resources the Council has and flexible enough to go further when needed. 6. A hyperlink to the Planning Inspectorate has been added. 7. A reference to the local plan needing to be agreed by relevant committees and ratified by Council has been added to 4.19.

SARAH MOAKES	SCI25/6-3	1. Local Plans should be subject to referedum like Neighbourhood Plans.	**No reponse required** 1. This is a matter of national legislation, and not one that can be addressed in this SCI.
National Highways	SCI25/7-1	1. Comment emphasises early engagement with National Highways in plannning related matters and gives details of how to do this.	**No response required.** 1. Welcomes comment on importance of early engagement.
Mrs V Rook	SCI25/15-1	1. The comment raises concern about the hamlet of Dargate and the fragmentation of its surrounding farmland following its sale. Much of the land has been converted into various uses with multiple new highway accesses created, often without formal change of use. The request is for the Council to adopt strong policies to protect farmland, questioning whether the existing Boughton and Hernhill Fruit Belt Policy is sufficient to safeguard this important local asset and its historic orchards.	**No response required** 1. This is a matter for the Local Plan itself, not the SCI. The comment is noted.
Mr H Boswell	SCI25/16-4	1. The process is thorough but recommends directly consulting holiday park owners on Local Plan proposals affecting tourism, rural land use, or environmental designations, and giving clearer guidance on how Local Plans will address tourism-related development and infrastructure improvements.	**No change agreed** 1. Businesses, including holiday park owners etc, will be consulated on the Local Plan directly if they have signed up to the consultation database. This will be encouraged through press and publicity, including through the Swale Means Business website and emails. The Local Plan team is grateful for the effort Mr Boswell has put into his responses to this consultation and **will contact him** to discuss how best to get holiday related businesses to sign up to the consultation database. Issues about how the Local Plan will address tourism-related development and infrastructure improvements will be made through the forthcoming Local Plan consultations and is beyond the scope of the SCI itself.
Planning Policy Tunbridge Wells Borough Council	SCI25/17-4	1. The chapter clearly explains the Local Plan preparation process and supports the proposed consultation methods, while noting the need to review them in light of future national guidance. They suggest: 2. Adding “residents” higher in the list of consultees under paragraph 4.5 for inclusivity. 3. Referring to social media and newsletters as possible engagement tools at all plan-making stages for consistency. 4. If Swale has a consultation database, including details in this section on its existence and how to join.	**Partial change agreed** 1. Welcomes comments and suggestions for improvements. 2. Considers the current listing of people to be involved is appropriate, as it generally follows a logical scale from the national to the local. 3. Social media and newsletters are already included as potential methods of engagement. 4. Agree - details of how to be added to the consultation database are included at the end of 4.5.

Chapter 5: Engagement process for supplementary planning documents

Question 5: Do you have any comments or suggestions on Chapter 5, around the engagement process for Supplementary Planning Documents?

Response by	Reference	Summary	SBC Response
Mr Nigel Heriz-Smith	SCI25/3-1	1. The comment is highly critical of SBC’s approach to consultation in Chapter 5, arguing it is bureaucratic, passive, and inaccessible to most residents. The commenter calls for mandatory, proactive outreach and extended consultation times (to 12 weeks) to ensure genuine public involvement in planning.	**No change agreed** 1. Comment on more proactive engagement and 12 week consultation period for a range of Council consultations is well made. However, Council resources and the timetable for local development consultations would rarely allow such approaches. It should be noted that the consulation period of 4 weeks which is mentioned in this chapter is a statutory minimum. It is likely that most consultation periods will be for 6 weeks, depending on circumstances at the time.
Graveney with Goodnestone Parish Council	SCI25/4-8	No comment	**No response required**.

Duchy of Cornwall	SCI25/5-4	1. The comment supports the approach to SPDs but recommends that all SPDs adopt a minimum six-week consultation period, consistent with Local and Neighbourhood Plans, to align with best practice and public expectations.	**No change agreed** 1. The consulation period of 4 weeks which is mentioned in this chapter is a statotory minimum. It is likely that most consultation periods will be for 6 weeks, but this is dependant on circumstances at the time.
National Highways	SCI25/7-2	1. Comment emphasises early engagement in plannning related matters	**No response required.** 1. Welcomes comment on importance of early engagement.
Mr H Boswell	SCI25/16-5	1. Supports the approach but calls for more targeted engagement with tourism and leisure businesses on SPDs affecting holiday parks, and for specific guidance to address the unique planning challenges holiday parks face.	**No change agreed** 1. Welcomes comment and suggested amendments. Any SPD related to holiday parks would seek to involve targeted consultation with those experienced and working in leisure and toursim locally, in line with point i of 5.5 (Early engagment and preparation of a draft SPD). The need for specific guidance on holiday parks is outside the scope of the SCI.
Planning Policy Tunbridge Wells Borough Council	SCI25/17-5	1. This chapter is comprehensive, covering all relevant stages and consultation methods in line with Regulations.	**No change required** 1. Welcomes support for this chapter.
Chapter 6: Engagement process for neighbourhood development plans **Question 6: Do you have any comments or suggestions on Chapter 6, around the engagement process for Neighbourhood Plans?**			
Response by	Reference	Summary	SBC Response
Graveney with Goodnestone Parish Council	SCI25/4-3	No comment	**No response required.**
National Highways	SCI25/7-3	1. Comment emphasises on early engagement in plannning related matters	**No response required.** 1. Welcomes comment on importance of early engagement.
Mr H Boswell	SCI25/16-6	1. Council should ensure that local businesses, especially holiday parks, should be actively invited to participate in planning. They warn that ignoring tourism in planning policies could harm growth and investment in the sector.	**No change required but action for planning policy team recommended**. 1. The planning policy team will carry out an exercise to ensure that local holiday park operators are included in the consultation database where possible.
Planning Policy Tunbridge Wells Borough Council	SCI25/17-6	1. The chapter on Neighbourhood Plan preparation is thorough and useful but suggests: 2. Adding under paragraph 6.14 that the LPA submits the Plan to the examiner. 3. Including a brief explanation of what a referendum is and how voting works, either in paragraph 6.17 or in the section's introduction.	**Changes agreed.** 1. Welcomes support and suggested recommendations. 2. Additional text has been added to 6.12 to reflect these comments. 3. Additional text has been added to 6.17 to reflect these comments.
Chapter 7: Engagement process for planning applications **Question 7: Do you agree with the engagement process for planning applications as set out in Chapter 7? Do you have any additional comments?**			
Response by	Reference	Summary	SBC Response

Graveney with Goodnestone Parish Council	SCI25/4-2	1. Para 7.4 Parish councils should be provided with information on 'prior approval' developments within their parish. 2. Para 7.15, the table on 'Major Applications' should include placing an advert in the local press.	**Partial change agreed.** **1.** Prior approval applications appear on the weekly list that is circulated to those who have requested it and is available at https://pa.midkent.gov.uk/online-applications/search.do?action=weeklyList . This allows a search by parish or ward. Details of how to access the weekly list will be added paragraph 7.20. 2. Table 1 is a list of engagement activities that developers can engage with, not requirements for the council to do, which are set out in paragraph 7.22. 7.22 will be enhanced with a reference to newspaper adverts, a link to where the statutory publicity requirements are set out, which for major applications includes newspaper adverts. A hyperlink to the relevant legislation will also be added.
Duchy of Cornwall	SCI25/5-5	1. The comment welcomes the Council's explanation of planning application engagement but suggests several improvements: 2. Section 7.3: Add a link to more information on permitted development rights. 3. Section 7.3(b): Clarify the term "time limits," which may be misleading. 4. Consultation summaries: Require applicants for minor, major, and large-scale major applications to submit a Summary of Consultation, supported by a standard template. 5. Section 7.26: Strengthen wording to confirm that all issues will be considered "up to the point of determination." 6. Scope: Expand Chapter 7 to cover strategic sites, hybrid/outline applications, masterplans, reserved matters, and discharge of conditions (especially pre-commencement and pre-occupation). 7. Guidance: Include links to further guidance and policy documents to aid users seeking deeper understanding.	**Partial changes agreed.** 1. Welcomes comment and suggested improvements. 2. Link to more information on PD rights added (GPDO and Planning Portal) 3. Phrase 'time limits' has been removed - phrase 'time periods' remains 4. The draft SCI (7.17) sets out that 'information on how engagement has been undertaken, the issues raised and how these have been responded to should be submitted as part of any application'. Not including such a statement of engagement would not be a reason for refusing planning permission and as such, while encouraged, it is not considered appropriate to make it a 'requirement'. 5. Paragraph 7.26 has been amended to include this point about consideration of issues up to point of determination. 6. Strategic sites, hybrid, outline, reserved matter applications are handled in the same way as full applications for planning permissions and no distinction has been made in the SCI between them, and is not needed. As a rule the Development Management team do not consult the public in relation to discharge of condition applications. 7. Reference to the NPPF and PPG as material considerations has been included in paragraph 7.7 of this chapter
SARAH MOAKES	SCI25/6-4	1. Applicants should not just be encouraged, but requried, to consult affected parties and provide evidence they have done so.	**No change agreed**. 1. Planning Practice Guidance (Paragraph: 027 Reference ID: 5-027-20150415) directs us to where pre-application public consultation is mandatory. Otherwise, pre-application engagement with the local community is encouraged (and specifically referred to in paragraph 41 of the NPPF and in the SCI (Chapters 2 & 7)), but is discretionary.
National Highways	SCI25/7-1	1. Comment emphasises on early engagement in plannning related matters	**No response required**. 1. Welcomes comment on importance of early engagement.
Southern Water Services Ltd	SCI25/8-1	1. Comment suggests that sustainaility should mention sustainable urban drainange solution. Additionally, although water companies are not statutory consultees they prefer to be consulted	**Change agreed** 1. 'Flood risk, water quality and water resources' have been added to the (non-exclusive) list of material considerations to improve clarity and understanding.

Mr H Boswell	SCI25/16-7	1. Supports the process and pre-application engagement but asks that: 2. Holiday park owners be notified and consulted on nearby developments due to their insight on tourism and local impacts. 3. The Council provide plain-English summaries of complex applications to help busy small business	**Partial change agreed** 1. Welcomes support and specific requests. 2. Sections 7.22 and 7.23 outline the processes for consulting neighbours, including neighbouring businesses. It is noted that this might not include all neighbours that the commentor is requesting. In response more detail on how information on planning applications in Swale can be found is now set out in paragraph 7.20 (details of Planning Public Access and the weekly list of planning applications). 3. A plain English summary of complex applications is a welcome suggestion, but would be too resource intensive for the Council. However, Council's website of planning applications, mentioned here and now included in paragraph 7.20 of the SCI, includes a succinct summary of the application in the application title. Once the application has been found, the 'Document Types' which outline the applications best are generally the Design and Access Statements and the Planning Statements where they have been prepared and well as 'proposed' plans.
Planning Policy Tunbridge Wells Borough Council	SCI25/17-7	1.Generally agrees with the proposed engagement process for planning applications but notes it should be reviewed pending potential government changes. Suggested additions include: 2. 'Before the Application is Submitted' - define what constitutes a major and larger-scale major application in Table 1. 3. Include reference to submitting a Record of Community Involvement with planning applications. 4. 'During the Application Process': clarify when letters or site notices will be used, suggesting consistent use of one or both methods. 5. Include reference to amendments to applications and the associated re-consultation process.	**Partial change agreed** 1. SCIs need to be reviewed every 5 years. Any changes to processes will be updated during that review, or earlier if deemed necessary. 2. Explanation of development scales has been included as a footnote. 3. The draft SCI (7.17) sets out that 'information on how engagement has been undertaken, the issues raised and how these have been responded to should be submitted as part of any application'. Not including such a statement of engagement would not be a reason for refusing planning permission and as such, while encouraged, it is not considered appropriate to make it a 'requirement'. 4. Reference to legislation/guidance on site notices (Development Management Procedure Order) will be added as a hyperlinks to 7.22 and 7.22 will be expanded to add reference to newspaper adverts. 5. As a rule the Council does not reconsult the public in relation to amendments and discharge of conditons applications. This is in accordance with the Planning Practice Guidance (Paragraph: 026 Reference ID: 15-026-20190722) “Where an application has been amended it is up to the local planning authority to decide whether further publicity and consultation is necessary in the interests of fairness. In deciding what further steps may be required local planning authorities should consider whether, without re-consultation, any of those who were entitled to be consulted on the application would be deprived of the opportunity to make any representations that they may have wanted to make on the application as amended.” A judgement will be made in each case as to who should be consulted and how long the window of opportunity to comment should be.

Chapter 8: Dealing with unauthorised development

Question 8: Do you have any comments on Chapter 8, around how the Council deals with unauthorised development?

Response by	Reference	Summary	SBC Response
Mr Nigel Heriz-Smith	SCI25/3-2	1. The comment argues that enforcement should not be left solely to Council discretion. 2. It suggests creating a formal mechanism for residents and businesses to trigger stronger enforcement responses, such as through referenda or petitions. It also proposes that local councillors should be empowered to initiate formal action when requested by their communities. This would make the process more democratic, transparent, and responsive.	**No change agreed.** 1. Planning Practice Guidance (Paragraph: 003 Reference ID: 17b-003-20140306 at https://www.gov.uk/guidance/ensuring-effective-enforcement) advises that planning enforcement is discretionary , as does paragraph 60 of the NPPF which states that 'Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control'. 2. There are mechanisms in place to allow residents, buisnesses and councillors to raise concerns and initiate enforcement processes. Anyone can report a suspected breach online, and Councillors are already empowered to act on behalf of the public, who can submit enforcement enquiries on behalf of residents, and raise matters directly with senior staff.

Graveney with Goodnestone Parish Council	SCI25/4-6	No comment	**No response required.**
Duchy of Cornwall	SCI25/5-2	1. The comment appreciates the Council's explanation of enforcement but suggests improvements: 2. Avoid language that implies enforcement is unlikely or optional. 3. Include a clear statement that planning consent is a legal requirement. 4. Provide an outline of the enforcement process and the potential costs/risks for those who breach planning rules, to strengthen understanding and deterrence.	**Partial changes agreed**. 1. Welcomes comments and suggested amendments. 2. The PPG (Enforcement and post-permission matters) sets out that local authorities have discretion to take enforcement action - when expedient and in the public interest, acting in a proportionate way. The SCI aligns with this approach. 3. Paragraph 8.1 has been amended in response to this comment and after further consultation with the enforcement team. The SCI now makes it clearer that unauthorised development can be unlawful. 4. Paragraph 8.1 has been amended to briefly set out the steps the Council takes when making decisions on whether and how to take enforcement action.
SARAH MOAKES	SCI25/6-5	1. The comment argues that SBC's enforcement stance does not align with government guidance by adding "where resources permit," which suggests action may be rare. This risks undermining public confidence in the planning	**No change agreed.** 1. The PPG (Enforcement and post-permission matters) sets out that local authorities have discretion to take enforcement action - when expedient and in the public interest, acting in a proportionate way. The SCI aligns with this approach.
Mr H Boswell	SCI25/16-8	No comment	**No response required.**
Planning Policy Tunbridge Wells Borough Council	SCI25/17-8	No comment	**No response required.**