



Strategic Planning & Research Unit

**For and on behalf of  
MLN (Land and Properties) Ltd**

**Swale Borough Council – Local Plan  
Resumed Hearings MIQs Matter 1  
Procedural Matters**

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## **1.0 INTRODUCTION**

- 1.1 These representations have been made on behalf of MLN (Land and Properties) Limited in respect of their interests in the land at Scocles Road (Site SW133), in response to the Inspector's MIQs for the resumed hearings.

## **2.0 PROCEDURAL MATTERS**

### **Matter 1.1 Has the modified Plan been the subject of appropriate sustainability appraisal and strategic environmental assessment?**

- 2.1 Our position on this matter is set out in the representations and the work undertaken by URSUS submitted to the Main Modification consultation regarding the Sustainability Appraisal. Therefore we see no merit in repackaging that information to the Inspector.
- 2.2 We note that the Council and AECOM prepared a further document (SBC/PS/117, Appendix 9) which contains a 'rebuttal' of the information we submitted to the consultation.

#### **Sustainability Credentials of Scocles Road – SW133**

- 2.3 We note the comments made by Council and AECOM in their 'rebuttal' document. This document addresses 3 points raised within the URSUS re-appraisal of the site, contained within Table 4 (page 17).

#### **Access to services**

- 2.4 We do not support the view reached by AECOM, Scocles Road is clearly in a sustainable location for access to services and in effect forms a logical extension of the on-going development at Thistle Hill. Appendix 1 to this representation clearly illustrates this point, which has been put to the Council throughout the examination.

#### **Landscape Impact**

- 2.5 This is an unclear response from AECOM.
- 2.6 We note that a further document has been prepared by the Council (SBCPS122a&b). We note that this document was issued to the Council on 22 December 2016. Assuming it was made public on that day, this would give approximately 7 working days from that date, to the deadline for preparing week 1 representations for interested parties to consider and potentially respond to the document.
- 2.7 As the Inspector has not listed Landscape as part of the MIQs, we question the purpose of this document for the examination.
- 2.8 Cumulatively this has resulted in a situation where interested parties have no formal route through the examination to address this document and the amount of time (approximately 7 days) to consider the document is significantly shorter than other evidence base documents prepared by the Council.

#### **Heritage Asset Impact**

- 2.9 AECOM state the assessment by URSUS is helpful, but conclude whether there is sufficient evidence to form a view there is no issue in relation to the setting. The SA undertaken by AECOM assess that the site performs 'poorly' against the listed building criteria in the appraisal findings. However our issue regarding the listed building of Scocles Court is not addressed (grade 2 listed). The listing clearly states it is the asset's fabric and not its setting that gives it the listing. Furthermore the Landscape assessment prepared by PGLA (appended to our Main Mod consultation reps) notes there is no direct visual connection with the asset.
- 2.10 Therefore we question again, the scoring of the site for this criteria. The evidence available for the assessment does not justify this scoring.