



THE FAVERSHAM SOCIETY

FOUNDED 1962

FLEUR DE LIS HERITAGE CENTRE

ESTABLISHED 1977

Swale Local Plan Main Modifications – Faversham Society Responses, August 2016

MM5, 3.0.2

JUSTIFIED? - NO

The Faversham Society does not consider it justified to claim that the proposed levels of new housing are needed to “provide the workforce needed to support our economic ambitions”. There is no shortage of local labour to justify increased housing levels. We have 65% out-commuting already (4.3.102), markedly higher than anywhere else in the borough. The plan states (4.3.102) that efforts are needed to improve local job opportunities while damping down housing demand, yet it is clear (36/4.2.27) that the Borough has no intention of developing active strategies to increase employment in line with the increase in housing numbers.

The previous version of this text stated explicitly that higher housing numbers [beyond the 10,800 in the original plan] “would result in goals which are not attainable, and ultimately expose communities to uncertainties and *demands for infrastructure that have little prospect of being provided.*” In the case of Faversham, this remains demonstrably true. Inflating the housing numbers without addressing the infrastructure limitations is not sustainable development.

MM26, 4.2.13

JUSTIFIED? – YES

EFFECTIVE? - NO

The Faversham Society strongly supports the recognition of constraints to growth at the levels proposed. These constraints apply particularly to Faversham’s infrastructure, environmental and heritage assets. We agree that these constraints will come under greater pressure if development is steered to the most economically viable areas to build – and this is exactly what is happening in Faversham. While we recognise the pressure on the council to satisfy the OAN, we are deeply concerned at the volume of housing development being steered towards Faversham, one of the most environmentally and historically sensitive parts of the Borough, solely on grounds of viability, since it is recognised that there is no other justification for it (4.3.48). This does not constitute sustainable development.

We also object to decisions being based on the 2015 Faversham Town Heritage, Landscape Setting and Characterisation Study. This study was commissioned by Swale Borough Council without any local input or consultation, and in our view it is seriously flawed.

MM29, 4.2.16

JUSTIFIED? - NO

The Faversham Society considers that it is not justified to claim that the road transport infrastructure is adequate to accommodate the modified proposals for growth. We have

serious concerns about the impact of the proposed growth levels on the strategic and local road network in and around Faversham, and the consequent impact on our environmental and heritage assets.

It was recognised in the original plan (5.2.5) that there had been no modelling of transport movements arising from development proposals in the Faversham area, and the modified plan has now dramatically expanded those proposals.

There is no justification for the deletion of the sentence: “At Junction 7 of the M2 with the A2(T), there are limitations in capacity with no improvements currently planned. This would have a bearing on the amount of growth that could be accommodated at Faversham.” Since only minor improvements are planned, which will do little more than keep pace with growth at existing levels, it must be clearly stated that J7 continues to be a significant constraint on the quantum of growth that can be accommodated at Faversham.

MM36, 4.2.25

JUSTIFIED? – NO

EFFECTIVE? – NO

The Faversham Society agrees that “achieving the objectively assessed need cannot be achieved without adverse impacts on local environmental resources in some locations”, hence our concern that Faversham is one of the locations that will be most adversely affected.

We do not consider the statement that “impacts on strategic and local road networks can either be avoided or minimised to acceptable levels” to be justified in relation to the Faversham area. There is no evidence for this assumption, with no up-to-date, credible modelling data for the cumulative impact, and no coherent strategies for avoiding or minimising it.

MM40, Table 4.2.2

JUSTIFIED? – NO

EFFECTIVE? - NO

The Inspector fully endorsed the original plan’s settlement strategy (higher growth in Sittingbourne and Sheppey, lower growth in Faversham and rural areas) and said that the allocation of additional sites *should maintain the broad proportional balance between the two planning areas*. The proposed increase from 13.4% to 15% is not justified, since it does not maintain the broad proportional balance. Nor is it effective, since the modified allocations for Faversham and the rest of Swale are far higher than this, with 17.2% for Faversham alone (4.3.16).

MM41, 4.2.20

JUSTIFIED? – YES

EFFECTIVE? - NO

The Faversham Society welcomes the statement that “there should not be significant deflections of growth away from the Swale Thames Gateway area to other locations”, but objects to the deletion of the statement that “that there will be no ‘in-principle’ acceptance of major replacement/additional development at the Faversham planning area” since this weakens the effectiveness of this commitment. Its effectiveness is further undermined by the deletion of any reference to this principle in the modified policy ST2. We consider it essential to send a clear signal that the Borough will stand by the plan policies and defend against the deflection of growth to Faversham.

MM42, ST2, final paragraph

JUSTIFIED? - NO

The Faversham Society does not consider it justified to delete the statement “Where a failure to achieve a Borough five-year supply of housing land arises due to the non-delivery of sites within the Swale Thames Gateway planning area, this will not give rise to further replacement/additional provision within the Faversham and rest of Swale planning area unless otherwise in accordance with Policy ST3 and ST7” to be justified.” This must be retained, to reflect the principles laid down in 4.2.20, and to send a clear signal that the Borough will stand by the plan policies and defend against the deflection of growth to Faversham.

MM43, 4.3.1

JUSTIFIED? – YES

EFFECTIVE? – NO

The Faversham Society fully endorses the reasons given for a reduced scale of growth in Faversham. However, the modified plan no longer accords with these statements. It is not accurate to say that the scale of growth now proposed for Faversham is reduced. The scales of growth in Faversham and Sittingbourne, in proportion to settlement size by population, are almost identical (9:100). While we were supportive of moderate and manageable housing growth, as proposed in the original plan, we do not consider this scale of growth to be sustainable. The statement that the level of growth at Faversham “avoids significant adverse impacts on heritage assets, limits the release of high quality agricultural land, limits upward pressures on out-commuting” is no longer true.

MM44, 4.3.2

JUSTIFIED? - NO

The Faversham Society considers that the modified level of growth at Faversham does **not** limit the use of land sensitive for heritage, landscape or biodiversity, and will **not** maintain – but will significantly harm – its small market town character. It breaches the urban border which ensures that the approaches to Faversham still retain the setting of a historic market town within a rural setting – a border which has protected Faversham from the damage suffered by other towns, such as Ashford and Sittingbourne.

It is explicit in 4.3.48 that the proposed growth for Faversham has no relationship with locally based needs. We object to the deletion of the reference to diverting growth back to the Thames Gateway area, since this is not justified. The reasons for this diversion have not changed, and in fact are strengthened by the removal of the major transport constraint at Sittingbourne.

MM45, 4.3.3

JUSTIFIED? – NO

The Faversham Society does not believe it is justified to delete the principle that growth at Faversham should be “at levels well below the other urban areas”. The historic importance of the town, the quality of its surroundings and the need to manage levels of out-commuting are dependent on growth being limited to levels well below the other urban areas. Furthermore, the statement in 4.3.4 that Air Quality Management Areas declared in the A2 corridor are a strong constraint on growth in Teynham applies equally to Faversham/Ospringe, and reinforces the requirement for growth levels to be held well below those of the other urban areas.

MM56, 4.3.15 (2)

JUSTIFIED? – NO

EFFECTIVE? - NO

While supportive of moderate growth as proposed in the original plan, the Faversham Society does not consider that the modified level of growth at Faversham can be accommodated without significant harm to its smaller scale character and built and natural assets. This should certainly be the intent, but the modifications invalidate this statement.

MM56, 4.3.16, Table 4.3.4

JUSTIFIED? – NO

The figures in table 4.3.4 are not in accordance with 40/4.2.2, nor with the Inspector's requirement to maintain proportionality between the two planning areas. 40/4.2.2 indicates that Faversham and rural areas should have 15% of total housing development, which in itself is significantly higher than the proportions in the original plan. This table allocates 17.2% to Faversham alone, and 12% for rural areas – a total of 29.2%, which is almost twice the policy level of 15%.

MM58, ST4 – Faversham allocations

JUSTIFIED? – NO

The Faversham Society considers that the proposed housing growth is not proportionate and not sustainable. We recognise that many of these allocations have already been given planning permission, and these together with windfall sites will generate growth in excess of what we would consider sustainable, and in excess of the indicative proportions in 4.2.2. We do not consider that the addition of further greenfield sites at Preston Fields and Lady Dane stage 2 is justified. We also have concerns about the increased level of office – as distinct from other kinds of employment to meet local needs – given the transport constraints.

MM88, 4.3.47

EFFECTIVE? - NO

The Faversham Society strongly supports the promotion of sustainable transport, but we consider that the plan falls far short of policies and strategies for achieving it. We do not consider it justified to say that rail, and particularly road, links are “already excellent”, and the modified scale of development proposed in the plan will put immense strains on both, which is not reflected in this plan. There is little or no mention of active transport (walking and cycling) except within new developments. Transport strategies *for the existing settlements* are also essential because of the strain that new developments will put on them.

Bus links, with disability access, are needed not only for outlying areas, but from new edge-of-town developments, and the Borough should ensure their delivery rather than merely “seeking opportunities”.

The AQMA at Ospringle should be recognised as a constraint on the scale and type of growth *anywhere* in Faversham, since all new developments will increase use of the A2 in both directions, and there are no modelling data to assess the cumulative impact on either traffic flows or pollution levels. The call for “innovative measures” to deal with the problem of air quality does not constitute an effective policy. If there are proven, effective measures, the plan should identify them and make them a requirement.

At Faversham, concerns about increased traffic pollution are not limited to air quality. Surface water runoff is discharged directly into Faversham Creek via CSOs, and the increase of toxic surface deposits from higher traffic volume and greater congestion has implications for water quality and its impact on sensitive environmental sites downstream.

The plan should specify that development *will* (not ‘may’) be required to fund improvements to M2/J6 and J7 and to other parts of the road network, and there must be a coherent strategy for dealing with the cumulative impact of traffic growth from all proposed developments. The final part of the sentence (“pending more major longer term enhancements resulting from the national roads programme”) should be deleted since it gives a false impression that longer term enhancements are in the pipeline.

MM89, 4.3.48

JUSTIFIED? – NO

EFFECTIVE? - NO

The Faversham Society does not consider it justified that the modified scale of development at Faversham should be so far above the requirement to meet local needs. Even the potential increase in social housing will not necessarily benefit Faversham’s residents, given the provision within the plan for commuting social housing contributions to other parts of the Borough. There is an objective need for more affordable housing in Faversham. We do not consider it justified to sacrifice the character, fabric and heritage of Faversham when there is so little benefit for the town. We would also note that viability assumptions do not factor in the impact of development on the town, particularly traffic congestion and damage to the environment, heritage, character and distinctive sense of place. Without careful planning and management, for which there is insufficient provision in this plan, these impacts will destroy the very things that make Faversham attractive, and viability will diminish.

MM90, 4.3.49

JUSTIFIED? – NO

The Faversham Society does not accept that the proposed developments have “good access to the town”. The existing network is fragile, there is no consideration of the effect on traffic *within* the town, or of joined-up walking and cycling links.

MM92, 4.3.51

JUSTIFIED? - NO

The Faversham Society agrees that Oare gravel works is a highly sensitive site, but the emphasis implies that it is the only sensitive site. There are concerns about many of the additional sites, which should be added. We also question the suggestion that developments at Perry Court Farm and Preston Fields will contribute to levels of natural green space, since these are greenfield sites where development will result in loss of green space.

MM94, 4.3.53

JUSTIFIED? – NO

EFFECTIVE? - NO

The Faversham Society strongly supports the statement that “This urban form and its setting is unique in terms of A2 towns in Kent,” and that it is under pressure, but it is not justified to say that the town (Faversham) is seeking to expand. The town is not seeking to expand; the borough council is seeking to expand it, not in the interests of Faversham but in its own interests. We are concerned at the deletion of the reference to English Heritage (now Historic England) since its views remain valid and should be respected. The lack of definition of “essential development” and the use of “as far as possible” are too vague for these statements to be effective.

MM95, ST7

EFFECTIVE? – NO

14: The Faversham Society does not have confidence in the effectiveness of this plan's policies on air quality. The problems at the Ospringe AQMA are not being addressed now, with current levels of traffic. Calling for "innovative measures" is not an effective policy. If there are proven, effective measures, the plan should identify them and make them a requirement. If there are not, then development which increases traffic growth should not be permitted, as it can only exacerbate pollution levels which already breach legal limits.

15: The introduction of the wording "where possible" to this policy makes it ineffective, and should be deleted. We would also wish to see the reference to recreational pressures reinstated (... minimise and mitigate impacts, *including recreational pressures*, on ...)

Section 5.2 – Promoting sustainable transport (whole section)

JUSTIFIED? – NO

EFFECTIVE? - NO

This is not a comment on a modification, but on the **absence** of effective modifications to sustainable transport strategy and policies which should have been made in response to the modifications in the scale of growth.

The Faversham Society considers that fundamental and radical modifications are essential to address the impact of the substantial increase in development, particularly the massive increase in peripheral housing development now proposed for Faversham. It is well known that such peripheral development generates disproportionately more car mileage per household and more pressure on the road network than developments within a town centre.

It is also the case that traffic growth is not a steady progression: as roads approach capacity, a small percentage increase in traffic flows can very quickly lead to unacceptable congestion, noise, dirt, vibration and pollution. In Faversham, traffic pollution leads to a decline not only in air quality, but also in the water quality of Faversham Creek (through direct discharge of road surface runoff into the Creek via CSOs), and thus on sensitive environmental sites.

The plan also fails to address the impact of traffic in town centres, dealing only with the strategic road network and transport within new developments, and does not consider heritage impacts. Faversham has three conservation areas whose streets and frontage are particularly sensitive to traffic growth, which can irreparably damage the building fabric and architectural heritage.

Little or no consideration is given to active modes of transport (walking and cycling) except within new developments, which will have little impact on use of vehicles to access town centres unless more attention is paid to connectivity.

Most importantly, the plan does not include methodology for determining the cumulative impact of developments on traffic growth. The requirement for individual developers to assess "cumulative" impact is misleading and ineffective. The word "cumulative" should be replaced by "incremental", since in reality a developer will only predict the effect of traffic generated by the site on the roads in the immediate vicinity. We have already seen this with the proposed development at Oare gravel works, where consideration has been given to traffic growth on local roads but not to the impact when traffic from those roads reaches historic streets in Faversham town centre.

The lack of cumulative assessment also applies to air pollution. While the incremental effect of any particular scheme may be relatively small, the cumulative effect of all the proposed

developments is likely to be significant. The expectation of being able to deliver nil impact in practice is unrealistic, and the call for “innovative measures” to deal with pollution is not effective. While innovation is always welcome, the plan should not accept unproven measures. If there are known, effective measures, they should be specified.

A further area of concern is the failure to identify a viable route for a new link between the A2 and M2 west of Faversham (or east of Sittingbourne) which is needed to relieve the most congested stretch of the A2 and other roads leading to and from Faversham town centre. This must be recognised as a constraint on any development to the west of M2/J6, since it could preclude viable routes for such a link and ultimately force a route that is environmentally and economically inappropriate.

The Faversham Society therefore calls for the substantial modifications in growth levels to be accompanied by substantial modifications in sustainable transport strategy and policies, specifically:

1. A coherent strategy for coping with cumulative traffic demand **before** development is permitted, including:
 - A thorough review of the traffic likely to arise from the proposed housing developments
 - A systematic model for predicting the effects of such growth on people’s travel behaviour
 - An assessment of the economic, environmental and health impact of alternative policies
 - A plan for dealing with it.
2. Up-to-date and meaningful modelling must be provided for the SRN, and severe constraints such as M2/J7 must be recognised and provided for.
3. The term “cumulative” relating to individual developments should be replaced wherever it appears by the term “incremental”.
4. The cumulative impact in the true sense of the word should be addressed through an additional policy that includes:
 - The development of up-to-date and meaningful traffic forecasts for roads on the core network
 - A transport strategy that effectively prepares for and manages traffic growth in order to protect Faversham’s heritage and to sustain a healthy environment for residents and visitors. This strategy must include all modes of transport including walking and cycling.
 - Consideration of a new A2/M2 road link to the west of Faversham, and its planning implications as a constraint on new housing development, planning decisions made during this plan period should not reduce options for a link from the A2 to the M2 in future.

MM97, 5.2.1

JUSTIFIED? – NO

EFFECTIVE? - NO

The Faversham Society considers that the impact of increased development at Faversham upon the area’s SRN has not been addressed, and is concerned that the limitations of the A2 corridor are not even mentioned. We consider that individual developer contributions will not be sufficient to resolve the problems that Faversham faces, and that the modified growth plans are not sustainable without public funding for an integrated programme of transport improvements to cater for the cumulative impact.

MM99, 5.2.3

JUSTIFIED? – YES

EFFECTIVE? - NO

The Faversham Society supports the recognition that the capacity of M2/J7 is a challenge to the delivery of sustainable growth at Faversham, but the plan has not identified any way of dealing with it. We are concerned that the challenges presented by the A2/M2 connection at J6 are not recognised. We also do not consider it justified to delete the statement of intent to provide a new A2/M2 link to the east of Sittingbourne. This seems to be based on considerations only of Sittingbourne, without considering the impact on Faversham. This is an illustration of the need for a joined-up transport strategy. We need to plan for a new A2/M2 link originating between Faversham and Sittingbourne.

MM101, 5.2.5 (Swale Transport Modelling)

JUSTIFIED? – NO

EFFECTIVE? – NO

The Faversham Society is alarmed at the inadequacy of modelling data, and in particular the lack of any modelling of the impact of increased development in the Faversham area. In the absence of such essential data, the development proposals cannot be considered sustainable. Discrete assessments by development promoters are not an adequate basis for a reliable evaluation of the cumulative impact. We are also concerned that the plan's concerns are restricted to the SRN and there is no consideration of transport impact on Faversham town centre, and that "multimodal" modelling does not include active transport modes (walking and cycling).

MM101, 5.2.6

JUSTIFIED? – NO

EFFECTIVE? - NO

The Faversham Society considers that significant modification is required, since (a) it is acknowledged in 5.2.5 that the modelling data are inadequate, and (b) the statement has not been updated to reflect the greatly increased housing numbers. The % traffic growth has not been revised and the statement about the acceptability of congestion levels is unchanged from the original development strategy of much lower growth. We are concerned as to what is considered "acceptable" and consider that even low levels of congestion are damaging to the character and fabric of Faversham town. The focus on Sittingbourne in 5.2.6 may have been reasonable given the original plan allocations, but Faversham now requires greater consideration given the massive increase in allocations for our area and the sensitivity of our environmental and heritage assets.

MM105, 5.2.9

JUSTIFIED? – IN PART

EFFECTIVE? – NO

The Faversham Society shares the Council's view that development at Faversham should be limited since there are no proposals to improve M2/J7, beyond minor developer funded mitigations, and that growth should be focused on the western part of the Borough in areas where there are committed infrastructure improvements. We would wish to see the wording amended from "may limit the quantum of development" to "**will** limit the quantum of development".

We do not accept that the scale of growth at Faversham is lower than elsewhere, given the amendments to housing allocations and office space, and it is not justified to say that most new developments are in close proximity to M2/J6 – 62% of them are not. In addition, we consider that traffic impact on the town centre should be of equal importance in limiting growth at Faversham.

We welcome the focus on bus, cycle and walking networks, but emphasise that development will not be sustainable unless these are improved throughout the existing settlement and not just within the confines of new developments.

We would also note that, while Faversham may at present be *reasonably* well served by rail links, there is no consideration of the increased out-commuting arising from the increased levels of housing, and in-commuting from the increased office space. Faversham is less well-served than Sittingbourne, which has shorter journey times to London, and for which there are proposed improvements in station capacity. Increasing capacity at Faversham station would be difficult given its central location and its listed building status.

MM107, 5.2.11

JUSTIFIED? – YES

EFFECTIVE? - NO

The Faversham Society agrees with the council's concerns about rural lanes coming under pressure with inappropriate development proposals, but we cannot see any effective policy to ensure that this does not happen. There is nothing, for example, to protect rural lanes around the Oare Lakes development. We would like to see effective policies and, where developments do impact on rural lanes, we would like to see measures that incorporate the lanes into safe walking and cycling networks.

MM106, 5.2.1

JUSTIFIED? - NO

The Faversham Society considers that transport network schemes for improvement of M2/J7, links between M2/J6 and the A2, and routes within Faversham town centre are necessary to support sustainable growth and implementation of the Local Plan strategy insofar as it relates to Faversham, and these requirements should be listed.

MM115, 5.5.1

JUSTIFIED? - NO

The Faversham Society considers that, for the proposed scale of development at Faversham to be sustainable, improvements will definitely (not “potentially”) be required at M2/J7, and also at M2/J6 and its links with the A2. It is important that development choices made during the currency of this plan do not preclude development of links between the A2 and the M2 other than through areas and valleys of considerable conservation value.

MM116, 5.5.2

JUSTIFIED? – NO

The Faversham Society does not consider it justified to delete “protecting European biodiversity habitats” from the list of priorities for developer contributions.

MM118, 5.6.1

JUSTIFIED? - YES

The Faversham Society welcomes the addition of a process for monitoring the effectiveness of green infrastructure measures put in place through the tariff payments.

MM119, Map 5.6.1

JUSTIFIED? – YES

EFFECTIVE? – NO

The Faversham Society strongly supports the inclusion of Faversham Creek within the Green Infrastructure Network, but would not wish this to be based on the 2005 Green Cluster Study, which is out of date. The area should encompass all aspects of natural and

cultural heritage along the Creek, including the Westbrook and the linkages to the marshes and the Swale.

MM120, CP4

JUSTIFIED? - YES

The Faversham Society welcomes the modifications in wording (4/5 and 6/7) and the introduction of a requirement for sites within 6km of the North Kent Marshes to contribute to its Strategic Access Management and Monitoring Strategy.

MM121

JUSTIFIED? - YES

The Faversham Society strongly supports the proposal to prepare a heritage strategy, and urges the council to proceed rapidly so as to have an effective strategy in place as soon as possible. The Society would wish to be closely involved in the preparation of the strategy insofar as it relates to the Faversham area.

We note that Action Plans are proposed for Sittingbourne and Sheerness but not for Faversham. We would wish to see an Action Plan for Faversham and surrounding villages.

We support the definition of criteria to identify areas where new development would be inappropriate because of their historic significance (5.7.1.16) and designated landscapes (5.7.1.3). We would encourage an integrated approach recognising the link between natural and cultural heritage and the importance of conserving cultural landscapes, as per UNESCO's approach since 1992. North Kent has a series of distinctive landscapes which reflect natural, cultural, built and historic heritage (Map 5.6.1 shows, for example, the various grazing marshes initiatives, examples of cultural heritage landscapes).

MM122, CP5

JUSTIFIED? - YES

The Faversham Society strongly supports the core policy for conserving and enhancing the historic environment. We welcome the commitment to preparing a Heritage Strategy, and to promoting the enjoyment of heritage assets through education, accessibility, interpretation and access.

MM124 (Graveney Road – Nova site)

The Faversham Society welcomes the inclusion of a requirement to undertake archaeological evaluation and mitigation of impacts prior to development.

6.5.61

QUERY

The Faversham Society queries the requirement for open space, since the area has decreased even though the number of dwellings has increased.

6.5.62

JUSTIFIED? - YES

The Faversham Society welcomes the addition of a requirement for public transport improvements.

6.5.67 / 6.5.68

JUSTIFIED? – NO

The Faversham Society considers that, since the number of dwellings in 6.5.67 is expressed as a minimum, the area of open space in 6.5.68 should also be expressed as a minimum.

We are concerned about vehicular access and unconvinced that it will be possible to achieve nil-detriment to air quality on the A2 at Ospringe.

MM156-157 (Preston Fields)

JUSTIFIED? – NO

The Faversham Society opposes the allocation of this site for housing in the Local Plan. The site is high-quality agricultural land, and it is acknowledged that it makes a high positive contribution to the heritage setting of the town, and that development is likely to create recreational disturbance on the SPA. The proposed development will make no contribution to local employment.

As indicated in other comments, we consider the increased housing allocations for Faversham to be excessive and disproportionate, delivering little or no benefit to Faversham and causing significant damage to the character, heritage and environment of the town. Counting only developments which already have planning permission, together with windfalls over the plan period, growth at Faversham alone will be in excess of the proportions indicated in 4.2.2 for the whole planning area of Faversham and rest of Swale. The addition of this site is unnecessary and inappropriate, particularly given the infrastructural constraints we have highlighted in other comments.

MM166 (Ham Road Faversham)

CORRECTION/QUERY

The Faversham Society assumes that the requirement for a development at Ham Road to contribute to A249/A2 improvements is an error.

MM166 (Land W of Brogdale Road)

The Faversham Society welcomes the addition of requirements for a strong landscape buffer to rural facing boundaries, and maintaining the rural character of Brogdale Road.

MM207-215 (Lady Dane phase 2 – additional 60 dwellings)

JUSTIFIED? - NO

The Faversham Society opposes the increased allocation of 60 dwellings for phase 2 of this site. As indicated in our comments elsewhere, we consider the increased housing allocations to be excessive and disproportionate, delivering little or no benefit to Faversham and causing significant damage to the character, heritage and environment of the town. Many of the additional allocations already have planning permission, and other applications have been made which are more acceptable (eg, the Cherry Orchard at the A2/Western Link junction). These, together with windfalls, will generate an increase in housing allocations far in excess of the proportions indicated in 4.2.2. There is no necessity for the addition of these 60 dwellings. By extending the boundary of the built-up area, they would damage the compact shape of the town which is recognised as a significant aspect of its character which should be preserved. They would also not be sustainable given their proximity to the M2/J7 which is identified as a major constraint on development.

MM218 (Perry Court)

6.6.70

JUSTIFIED? - YES/NO

The Faversham Society welcomes the council's view that larger scale retail and leisure development is unlikely to be acceptable due to adverse impacts on the town centre. We are, however, concerned at the statement that the site is well placed for B1a (office) uses due to its relationship with the M2 and other routes. The implication is that these offices are

not expected to provide employment for Faversham residents, but to attract in-commuting. This will add further pressure to M2/J7, M2/J6 and the A2, which are already serious constraints on development.

6.6.79/80

JUSTIFIED? – IN PART

The Faversham Society welcomes the requirement for a transport assessment and contributions to improvements, but these must not be considered in isolation and must be integrated within a wider transport strategy which addresses the cumulative impact of all developments affecting Faversham.

6.6.81

EFFECTIVE? – NO

The Faversham Society would wish to see a requirement that development will (not 'may') be required to contribute to enhanced bus provision, and that the quality of pedestrian links across the A2 must (not should) be enhanced. The latter should be part of a comprehensive travel plan for Faversham, since the impact of every development creating its own links could be chaotic. We welcome the requirement for a travel plan to encourage sustainable modes of transport between the site and (not 'at') the town centre.

MM241

EFFECTIVE? – NO

The Faversham Society strongly supports the intent of this statement, but we do not consider it to be sufficiently strong or effective. It cannot be effective without an area-wide assessment of the cumulative impact of all proposed schemes, not just the incremental effect of individual schemes. The plan should also identify proven methods for reducing impact, rather than leaving it to developers to come up with "innovative" schemes which may not be proven.

MM242, DM3 (Managing transport demand and impact)

JUSTIFIED? – YES, CONDITIONALLY

The Faversham Society welcomes the addition of a statement that developments will be refused if the cumulative transport impacts are severe and highway improvements cannot be carried out. We also welcome the addition of a requirement to take account of the cumulative impact of development schemes within or likely to impact on Air Quality Management Areas – *provided that* "cumulative" is being used in the true meaning of the word – ie, the combined impact of all developments within an area. The word used for the impact of individual developments should be "incremental". There is a need for comprehensive transport modelling to provide criteria for the approval or refusal of developments.

MM250, 7.3.8

JUSTIFIED? – NO

It is made explicit in 4.3.38 that for reasons of viability Faversham is seen as the main source of affordable housing for the entire borough, and the Faversham Society is very concerned that the provisions in 7.3.8 will result in affordable housing quotas for Faversham developments being commuted to other parts of the Borough. A mixed population is part of the distinctive character of Faversham, and the presence of local working families going back for generations is an integral part of our living heritage. It is essential that such families are not priced out of the town, nor young people who have grown up in Faversham and will be the future custodians of our heritage. It is essential that a mixed population is maintained with the provision of genuinely affordable housing.

MM276-277 (water-related issues)

JUSTIFIED? – NO

EFFECTIVE? – NO

The Faversham Society is seriously concerned that water-related provisions address only water supply and drainage insofar as it affects flooding. In our view, a comprehensive strategy for wastewater infrastructure in Faversham is an absolute essential. The town's drainage system is less than robust. Roads are constantly being dug up, to the detriment of the heritage fabric of the town. CSOs discharge directly into Faversham Creek, with the risk of sewage outflows, and carry road surface pollutants into the Creek, at levels which will increase with the higher traffic volume and congestion associated with the proposed increase in development.

The sewage treatment plant – which is distant from all the proposed large developments – also discharges directly into Faversham Creek. Even now, there are serious concerns locally about the capacity of the plant and the impact of its effluent, including the environmental impact downstream on sensitive habitats and oyster beds. The proposed housing growth in this plan represents a population increase of at least 20%, and a piecemeal approach to expanding the wastewater infrastructure through contributions from individual developments will not suffice. Southern Water does not have a good reputation in East Kent, with multiple instances of pollution resulting from undercapacity and slow response, and we are not convinced by their assurances that the proposed levels of growth can be safely accommodated

The town needs a strategic wastewater plan and significant investment in the sewage infrastructure – pipes and treatment works - to deal with the cumulative impact of proposed developments on a system which is already giving cause for concern.

MM278, DM13

The Faversham Society is concerned at the lack of any policy on separation of settlement and countryside gaps for Faversham. The separation between Faversham and Oare has already been destroyed, and with the increase in housing levels and *de facto* relaxation of the built-up boundaries, defined separation of settlements is essential to prevent harmful urban sprawl.

MM283, DM17

JUSTIFIED? – YES

1. The Faversham Society welcomes the addition of a reference to non-designated heritage assets, but we do not consider that local significance should be of lesser value than national significance.

3. The Faversham Society welcomes the requirement for post-excavation study and assessment.

MM286, 8.1.8

JUSTIFIED? – NO

EFFECTIVE? – NO

The Faversham Society is concerned at the lack of any coordinating mechanism for Faversham. This may not have been necessary at the levels of growth in the original plan, but is essential for the much higher levels now proposed, in a town with so many infrastructural, environmental and heritage constraints. Faversham needs to be viewed strategically as a cohesive development area, rather than a disconnected collection of development sites.

We suggest the creation of a Faversham Development Panel, to meet monthly, with four principal objectives:

- (1) To consider significant development proposals at an early stage so as to provide developers with design advice and commentary which can be taken forward into planning applications.
- (2) To coordinate the production of a sustainable development plan for Faversham that addresses the wider needs of the town in terms of infrastructure (transport, energy, waste), urban form, employment, education, healthcare, heritage and environmental impacts, at a level of detail that the local plan cannot address.
- (3) To ensure co-ordination between development and infrastructure providers.
- (4) To monitor the spending of developer contributions within the Faversham area.

MM289, 8.1.1

JUSTIFIED? – NO

EFFECTIVE? - NO

The Faversham Society considers this statement to be over-complacent with respect to Faversham. Many of our proposed large developments already have planning permission and, with fewer viability constraints, it is likely that they could be completed ahead of essential infrastructure. The infrastructural constraints need to be addressed as a matter of urgency.

294/8.1.16

JUSTIFIED? - NO

The Faversham Society considers that major improvements at M2/J7 of the M2, and the M2/J6 and A2 links, together with other infrastructure improvements including sewage/wastewater provision, are essential to meet local plan growth at Faversham. They should be included and there should be provision for review of the plan if they are not delivered.

+++ ends +++