

The Faversham Society

Response to Inspector's Questions

January 2017

The Faversham Society welcomes this opportunity to respond to the Inspector's Questions for the resumed examination hearings commencing 31 January 2017.

Two matters are central to our response:

First, **the implications of new housing allocations on matters that were already of concern to the Society** when we responded previously in August 2016; those concerns are further exacerbated by the new allocations.

Second, **the pace of recent and current change in Faversham**, which means that new information is now available to augment the Faversham Society's previous submission. For example, the decision of Swale BC's Joint Transportation Board to implement innovative measures in the form of a 20mph default speed limit across Faversham and the wider Borough is, we believe, highly relevant. In a similar vein, the Faversham Society's proposal for a Faversham Neighbourhood Plan, with associated transport strategy and conservation area appraisals, is an example of robust and locally meaningful infrastructure planning that the modified Plan is currently missing.

We address our comments in this response to Matters 4 & 5 of the Inspector's Questions, these matters being consistent with our previous submission. We restate extracts from that submission, which we have re-ordered and expanded upon to make them directly relevant to the Inspector's Questions.

Matter 4**4.1 Robust evidence**

The Faversham Society does not consider the proposed new allocation policies or modifications to be backed by sufficiently robust evidence. Our concerns relate to local job creation, the scale of proposed growth and countryside gaps.

Local job opportunities

The plan states (4.3.102) that efforts are needed to improve local job opportunities while damping down housing demand, yet it is apparent (36/4.2.27) that the Borough is not developing appropriate strategies to increase employment in line with the increase in housing numbers. We are concerned about a) the types, b) the locations and c) the levels of employment.

Types - there is too much of an emphasis on office employment as distinct from other kinds of employment to meet local needs. The risk is that the current diverse range and balance of employment opportunities in Faversham will be imbalanced by an over-emphasis on office jobs.

Locations - where office jobs are proposed close to the A2/M2 junctions, these locations suit inward commuting and work against satisfying the need to improve local job opportunities.

Levels - we have concerns about the increased level of office employment, given the transport infrastructure constraints we set out later (Matter 5).

Scale of growth

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

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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.

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.

Countryside gaps

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.

4.3 Robust infrastructure planning

The Faversham Society considers there to be a significant shortfall in infrastructure proposed to support the new allocation policies or modifications. We do not believe that all the infrastructure implications have been identified and addressed in appropriate detail, in particular regarding wastewater infrastructure and transport infrastructure. We cover transport infrastructure shortfalls in 5.1 of this response.

The previous version of Bearing Fruits 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,

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this remains demonstrably true. Inflating the housing numbers without addressing the infrastructure limitations is not sustainable development.

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.

Wastewater infrastructure

(This also relates to Matter 9.1 of the Inspector’s Questions)

The Faversham Society is 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 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. Combined Sewer Overflows 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 under-capacity 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.

4.4 Clear and deliverable measures

The Faversham Society does not believe that new housing allocations and modifications to existing allocations are supported by sufficiently clear and deliverable measures to address transport implications of the proposed development. Our concerns cover air quality and sustainable transport, and we believe the recent decision for Faversham to have a 20mph default speed limit should be referenced in the modified Plan as an innovative measure.

Air quality

The Air Quality Management Area 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.

As outlined under “Wastewater infrastructure” above, the Faversham Society’s, 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

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toxic surface deposits from higher traffic volume and greater congestion has implications for water quality and its impact on sensitive environmental sites downstream.

Sustainable transport

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”. 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”.

20s Plenty

The Faversham Society is pleased that KCC and Swale Borough Council via the Joint Transportation Board (JTB) have agreed to the implementation of a 20mph default speed limit across Faversham. This will have a beneficial impact on the movement of pedestrians and cyclists, as well as vehicular traffic, making it safer for all, reducing congestion, improving air quality and helping to reduce damage to the built environment. However increased levels of vehicle movements from more housing could have an adverse impact on this initiative if not properly integrated with a traffic plan for Faversham and the roads around it.

The Faversham Society believes that the creation of a 20mph speed limit across Faversham and the rest of Swale is precisely the kind of innovative measure that

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should be explicitly referenced in the modified Plan in order to address our concern that new housing allocations and modifications to existing allocations are supported by clear and deliverable measures to address transport implications of the proposed development.

(See 5.1 below for further responses on transport matters.)

4.5 Heritage, Wildlife, Biodiversity

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, and especially given the new housing allocations of the modified Plan.

The Faversham Society strongly supports the core policy for conserving and enhancing the historic environment. Faversham needs a Heritage Strategy as well as updated Conservation Area Appraisals, which will help to conserve heritage assets as well as to promote them through education, accessibility, interpretation and access.

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. The 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

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this plan, these impacts will destroy the very things that make Faversham attractive, and viability will diminish.

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. We are concerned at the deletion of the reference to English Heritage (now Historic England) since its views remain valid and should be respected.

5 Infrastructure

The Faversham Society contends that the Modifications do not constitute a viable policy for handling the road traffic growth associated with the additional housing allocations listed in the Plan. We believe the Modifications should acknowledge the distinct challenges faced by heritage towns such as Faversham, together with the need for action to conserve and improve the built environment.

5.1 Transport infrastructure – deliverability of development

The Faversham Society has fundamental concerns about the deliverability of the proposed development since we believe this is not supported by sufficiently robust infrastructure planning. The Modifications include substantial increases in the allocation of housing units in the area surrounding the Town but the Plan does not demonstrate that the increase is deliverable in transport terms.

It is well known that peripheral housing development has a disproportionate effect on road traffic mileage. Residents in outlying areas must travel further to achieve their ends and are more likely to travel by car than those living near the centre. Consequently, each peripheral housing development generates disproportionately more car mileage per household and puts disproportionately more pressure on the existing road network.

While traffic demand might grow steadily, its consequences do not. When the flow along a street approaches capacity, the queues and delays begin to escalate, so that in a relatively short time, a small percentage increase in vehicle demand can lead to unacceptable levels of congestion, noise, dirt, vibration from heavy vehicles, and atmospheric pollution. This is already happening on the A2 at Ospringe, in lower West Street and in The Mall, where queues now tail back for a considerable distance during peak periods. In addition to delaying vehicle passengers, heavy traffic affects pedestrians, who tend to view motorised traffic as intimidating and dangerous. The perceived safety risk discourages walking and encourages more people to use their cars for short journeys, which in turn leads to a greater increase in the level of vehicular traffic.

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 Combined Sewer Overflows – see our response in 4.3 above) and thus on sensitive environmental sites.

Uncontrolled road traffic growth quickly reduces a place to a non-place. The damage is usually irreversible. Faversham is a medieval market town whose backbone is formed from three conservation areas whose streets and housing frontage were not designed to cope with year-on-year increases in motor traffic at current levels. Vehicle queues are occurring on narrow streets with houses fronting the carriageway, many dating from the medieval period. High traffic volumes, whether flowing or queuing threaten the very fabric of Faversham that makes it so attractive a place to develop. The Faversham Society believes, for example, that the Maison Dieu, one of Faversham's most important historic buildings, is at risk of significant if not catastrophic harm from traffic .

In addition to the above-mentioned environmental damage, in the longer term congestion can lead to palliative measures that are out of sympathy with their surroundings: an epidemic of traffic signs, road markings, pedestrian guard rails, and traffic signals in an attempt to ease traffic flow.

For a town like Faversham, the objective of delivering growth *per se* is not sustainable. The Town needs coherent infrastructure planning to cope with traffic demand before matters get out of hand, including 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 the alternative policies, and plans for dealing with it.

In the absence of policies to provide these measures, we believe that the modified Plan remains fundamentally unsupported by robust infrastructure planning and, therefore, that it does not demonstrate that the proposed development is deliverable.

5.4 Infrastructure planning - highway network, with particular regard to the impact on J7 of the M2

It is the Faversham Society's view that the modified Plan does not include robust infrastructure planning to ensure that the highway network can accommodate the level of growth proposed in and around Faversham.

In our previous submission, we did 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, and even more so with the new housing allocations. 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.

The modified Plan 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.

Absence of transport modelling

There is no model to test whether the developments are deliverable in terms of the additional traffic generated across the Town's road network. 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 significantly expanded those proposals.

Without up-to-date traffic forecasts for key streets that take into account the cumulative effect of housing growth from the most recently proposed schemes in the outlying areas, no-one knows whether the network can sustain the resulting growth

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nor whether the results are environmentally acceptable in terms of road safety, public health or conservation of the built environment.

As far as we can determine from the published documents, the highway authority has no substantive plans for upgrading the existing network, nor for managing road traffic levels to meet recognised environmental standards. The current Kent County Council Transport Plan LTP4 acknowledges that there is a problem across the county as a whole. For example, in relation to the Dartford area it admits that ‘*a significant modal shift is needed to accommodate the projected growth*’, meaning that people must switch from car to other forms of transport. But it doesn’t say how they will be persuaded to do this. We would like to see a bolder and more innovative approach along the lines recommended by the Sustainable Transport Panel of the Chartered Institute of Highways and Transportation, whose chair was recently quoted as saying that a ‘*...paradigm shift is required in the way transport is planned...designing places in a way that (promotes) walking, cycling and public transport is essential*’.

The Plan should feature *conservation* as an objective in its own right, in order to protect irreplaceable assets such as heritage streets and buildings for future generations. Effective solutions start with a better knowledge base: a review of the traffic likely to arise from future housing development. The Plan should require housing developers, as a condition for planning permission, to assess the impact of their proposals *cumulatively across all housing developments, including those with planning permission and those in the pipeline*. They should submit (a) systematic forecasts for traffic growth across the network as a whole, (b) an assessment of the resulting economic, environmental and health impact, and (c) alternative measures for dealing with it.

Cumulative impacts in and around Faversham

The modified Plan does not include a methodology for determining the cumulative impact of developments on traffic growth in and around Faversham. The requirement for individual developers to assess “cumulative” impact is misleading and ineffective.

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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.

Absence of robust and detailed transport planning

The Faversham Society believes the modified Plan needs to include policies that are tailored to the needs of Faversham in the light of the proposed development. For example, little or no consideration is given to active modes of transport (walking and cycling) except within new developments, which will have little impact on the use of vehicles to access the town centre of Faversham unless more attention is paid to connectivity.

The plan should promote policies and schemes that manage levels of vehicular traffic through (for example):

- measures that naturally encourage people to shift from car usage to other modes of transport that are less damaging to the environment and more beneficial to public health and the local economy
- lower speed limits (20s Plenty) to reduce (unintended) intimidation by moving vehicles through noise and accident risk that creates an atmosphere hostile to pedestrians
- traffic calming and other streetscape measures to improve the quality of the environment and encourage walking and cycling
- environmentally friendly cycle routes and pedestrian routes, providing convenient and direct connections that encourage people to walk and cycle from outlying

estates into the central area, with special attention to the pedestrian routes over the railway that currently divides the north and south of the Town

- 'park-and-walk' and 'park-and-cycle' facilities built into new housing developments
- more effective parking enforcement to protect the street environment and to ensure that the regulations don't fall into disrepute.

Junction 7 of the M2

In our previous submission, the Faversham Society believed there was 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 at Junction 7, which will do little more than keep pace with growth at existing levels, *and* since the modified Plan includes further development that will rely on this junction, we reiterate and amplify our concern that the modified Plan should clearly state that J7 continues to be a significant constraint on the quantum of growth that can be accommodated at Faversham.

The modified 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.

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A new link between the A2 and M2 west of Faversham

The layout of Faversham means that access to the Motorway network requires traffic to go either through the town centre or through the Air Quality Management Area at the narrow part of the A2 in Ospringe. The Faversham Society believes furthermore that the modified Plan should identify a viable route for a new link between the A2 and the M2 to the west of Faversham (or east of Sittingbourne) which is needed to relieve the most congested stretch of the A2 through Ospringe together with other roads leading to and from the town centre.

Unless planned for in advance, a robust and sustainable route for this new link may be precluded by new developments, which would then force a route that is environmentally inappropriate or economically unviable.

Ends