

# *LOCAL PLAN CONSULTATION*

Faversham Town Council Response



*Faversham*  
TOWN • COUNCIL

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## Executive Summary

There is a recognition that housing targets are set by central government and that the local plan is an attempt to deliver a predetermined target. It is also recognised that the Borough of Swale has limited landscapes available for housing, with constraints from marshland, high grade agricultural land and protected landscapes. However, the residents survey for the Neighbourhood Plan (attached) demonstrates strong opposition to the size of the developments and the likely impacts on “infrastructure” (health care provision etc.) and character of the town.

A number of parishioners raised concerns about the lack of a meaningful Regulation 18 consultation. The concern is that the nature of the plan at regulation 19, and the considerable impacts of the strategic allocations made in late 2020, were not immediately apparent or real at Regulation 18.

The progressive environmental policies, and in particular DM3 and DM24, are welcomed. However, the language could be strengthened to mandate rather than recommend action. In addition, there is no mention of how these policies will be measured, monitored and enforced.

The Town Council confirms that it wishes to be invited to participate in an examination hearing if held.

## Introduction

This response is comprised of input from both community engagement through the town council, and from the town council itself. As such this response is representative of a spectrum of views, sometimes at odds with one another. Faversham town councils feels that, in lieu of a recent Regulation 18 engagement, it is important to capture a wide range of stakeholder inputs.

This representation of interests is drawn from the following sources:

- Extraordinary town council meeting - March 4<sup>th</sup>, 2021
- Public meeting held with Swale Borough Council officers – March 23<sup>rd</sup>, 2021 - [You can see the recording here.](#)
- Faversham town council meeting – April 6<sup>th</sup>, 2021
- Community engagement through Neighbourhood Plan surveys and exhibitions

## General Strategy

TC Ref	Comment	LP Ref
GS001	<p>There is a general recognition that housing targets are set by central government, with little opportunity to challenge the volumes given to local authorities. It is disappointing that the Members of Parliament whose constituencies intersect the borough of Swale have taken vastly different approaches to these targets. The MP for Faversham and Mid Kent, Rt Hon. Helen Whately, <a href="#">did not sign a letter</a> from Kent MPs urging the Secretary of State for Housing to reconsider the increases in housing targets for Kent.</p> <p>The letter, which was signed by the MP for Sittingbourne and Sheppey, Rt Hon. Gordon Henderson, did say that increased targets were, "... inherently unreasonable, particularly to those local authorities who have already successfully worked with the government to deliver the homes we need." It is also regrettable that the MP for Sittingbourne and Sheppey has suggested that all future housing allocations should sit outside of his constituency and therefore to East of the borough.</p> <p><a href="#">The letter can be found here.</a></p>	4.1.1 ST1
GS002	<p>It is disappointing that the Regulation 18 consultation, which should invite residents to identify how planning policy can address key issues (including housing allocations), was conducted (Spring 2018) prior to Swale Borough Council formulating strategic options for housing allocation (Sept/Oct 2020.) This has left many residents in Faversham feeling that they have not had an adequate opportunity to raise concerns about the significant developments to the East of the town.</p> <p>It should be noted that the recent Neighbourhood Plan survey conducted by Faversham Town Council (Nov/Dec 2020 &amp; Jan 2021) received more responses than the Regulation 18 engagement. 307 of 511 respondents aligned to a key theme objecting to further development around Faversham.</p>	
GS003	<p>Policy DM3, "Mitigating and adapting to climate change through sustainable design and construction", is particularly welcomed. However, we would urge Swale Borough Council to strengthen the language to mandate action, rather than suggest it, wherever possible. As an example, it would be preferable to use "must" rather than "should" when defining requirements.</p>	DM3
GS004	<p>One particular concern was raised over the internal consistency and therefore the potential credibility of the plan. 5.5.11 (4) suggests, "It is imperative that any new retail is not in competition with the town</p>	5.5.11 (4)

	<p>centre but is serving a local need only.”, which seems to be at odds with potential retail options in the new developments.</p> <p>It is important that the vitality and viability of Faversham Town Centre is maintained. This was a theme of responses to the residents survey for the neighbourhood plan.</p>	
GS005	<p>Most of the borough is defined as rural in character. This is true in terms of KM<sup>2</sup>, but not in proportion of population, with many residents residing in towns.</p> <p>There is a need for good design for town life. New settlements must ensure they integrate with the existing fabric of the town.</p>	2.0.3 5.1.11 (1)
GS006	<p>At the public meeting, a question was raised about how land previously identified as unsuitable in strategic land availability assessments, has since been “upgraded” to suitable.</p>	
GS007	<p>There has been recognition that development to the East of Faversham would be preferable to the West, which would reduce “traffic pressure to some degree.”</p>	
GS008	<p>Enforcement of targets around types of housing and affordability will be crucial in ensuring that the delivery of the Local Plan matches its ambition.</p>	ST 5 DM 15

## Housing Allocation (for Faversham)

TC Ref	Comment	LP Ref
HAF001	<p>There are 3,340 houses (minimum) allocated in new settlements to the East of Faversham. The volume of these that reside within the parish is still required as an input to the Neighbourhood Plan. This volume, combined with the 200 allocated to the Faversham Parish Neighbourhood Plan in development, will be the total volume of houses expected across the term of the plan. Faversham Town council expect a definitive view of the proportion of the 3,340 houses that will sit within the parish from Swale Borough Council, otherwise it will make its own determination.</p>	MU 1a MU 1b MU 1c 4.2.6.1 5.5.9
HAF002	<p>A significant volume of residents, respondents to a survey for the Neighbourhood Plan, have voiced concern about the sheer volume of additional housing. Concerns cover:</p> <ul style="list-style-type: none"> <li>• supporting infrastructure (schools, healthcare, sewage, etc.)</li> <li>• the impact on the historic market town context</li> <li>• housing needs</li> <li>• visual impact</li> </ul> <p>This was echoed in the public session hosted by Faversham Town Council for residents to engage with the planning team at Swale Borough Council. (23/03/21)</p>	MU 1a MU 1b MU 1c

	It was also voiced that the volume proposed, when displayed as volume of housing development by major conurbation (Sittingbourne, Faversham), is misleading. The proportion of housing allocated to Faversham looks considerably worse than for Sittingbourne when viewed by the initial population / size of the town.	
HAF003	The housing needs assessment conducted for Faversham Town Council identified a need for 1900 housing units for affordable housing.  Affordable housing was also raised during the public session hosted by Faversham Town Council for residents to engage with the planning team at Swale Borough Council. (23/03/21)	ST 5
HAF004	The housing needs assessment conducted for Faversham Town Council identified a need for a range of types of housing: <ul style="list-style-type: none"> <li>• singles</li> <li>• couples</li> <li>• elderly (downsizing)</li> <li>• families.</li> </ul>	
HAF005	It is recognised that the Borough of Swale has limited landscapes available for housing, with constraints from marshland, high grade agricultural land and protected landscapes.	
HAF006	Concerns have been raised about the duration of the developments and the sustained impacts of the developments, such as increased traffic congestion, on the current residents of the town.	MU 1a MU 1b MU 1c
HAF007	The Faversham Community Land Trust seeks ongoing support from Swale Borough Council in its appropriation of Kiln Court and Osbourne Court for affordable housing.	
HAF008	It is important to understand whether the housing allocated to the proposed developments (MU 1a, MU 1b, MU 1c) would be revised if the Highsted Park development is approved on appeal.	MU 1a MU 1b MU 1c

## Housing Allocation (to the West of Faversham)

TC Ref	Comment	LP Ref
HAW001	The Area of Opportunity outlined at Teynham, with a potential allocation of 1,100 houses, could have considerable impacts on the transport links in to and through the West of Faversham, particularly the A2 and AQMA site in Ospringe. Further clarification is sought on the traffic modelling and the resultant transport strategy that would alleviate those impacts and potential increases in the already dangerous levels of pollution.	AO 1

## Infrastructure

TC Ref	Comment	LP Ref
INF001	<p>A repeating theme, in responses to the resident's survey and exhibitions for the Neighbourhood Plan, has been the need for supporting infrastructure, such as schools, health care provision, roads, sewerage systems etc., to accompany any developments.</p> <p>The timing of the infrastructure delivery has been raised, noting that a lag between housing delivery and the infrastructure could add pressure on existing resources within Faversham.</p>	MU 1b MU 1c 5.5.9
INF002	There has been a recognition that the strategic developments (MU 1b and MU 1c) will provide additional schools. However there seems to be little or no consideration made for Early Years support / provision.	
INF003	<p>There is considerable anxiety around the impact of the additional population on the health services for Faversham. This has been voiced at public meetings and through the Neighbourhood Plan engagement. Whilst it is understood that the CCG and PCT believe that additional physical premises are not required, it is vitally important to establish what a "plan for growth" would look like.</p> <p>It is also important that the ongoing consultation with the local practices is conducted with a view to making plans public as soon as possible.</p>	
INF004	New drainage systems provided to the South of the A2 / Watling Street should include existing properties.	

## Healthcare

TC Ref	Comment	LP Ref
HC001	As with INF003, there is considerable anxiety around the impact of the additional population on the health services for Faversham. This has been voiced at public meetings and through the Neighbourhood Plan engagement. Whilst the PCT may feel that there is enough physical capacity (as distinct from serving GPs), the experience locally is of practices being overwhelmed.	
HC002	Whilst the PCT does not feel that further physical premises are required, there is concern that there will be insufficient parking for the existing surgeries with an increased number of doctors and patients.	

## Transport

TC Ref	Comment	LP Ref
TR001	The Transport Strategy and the modelling that underpins it should be updated in light of the strategic allocations made within the Draft Local Plan.	
TR002	<p>There is a particular concern about the impacts of the developments to the East of Faversham on Junction 7 of the M2/A2 (Brenley Corner), which is already at or approaching full capacity.</p> <p>Constraints should be made to the volume of housing delivered in the developments to the East of Faversham until the capacity limitations of Junction 7 of the M2/A2 are addressed.</p>	MU 1a MU 1b MU 1c
TR003	The Local Plan should make some consideration for the management of car-share schemes. Homestall Lane, Brenley Lane and the Ashford Road (A251) have significant issues with cars parking. Ideally there would be some provision for proper car parks to support car-sharing.	
TR004	The promotion of active transport is welcomed.	
TR005	There is likely to be an increase in traffic in the town centre, however the Local Plan makes no additional provision for car parking.	
TR006	The Area of Opportunity outlined at Teynham, with a potential allocation of 1,100 houses, could have considerable impacts on the transport links in to and through the West of Faversham, particularly the A2 and AQMA site in Ospringe. Further clarification is sought on the traffic modelling and the resultant transport strategy that would alleviate those impacts and potential increases in the already dangerous levels of pollution.	
TR007	Concerns were raised at the public meeting about the lack of engagement with the businesses to the North West of Faversham and the impacts on congestion and pollution through Ospringe. With industrial areas planned to the East is hoped a meaningful dialogue will be raised with businesses to the North West.	
TR008	<p>Although the Local Plan aims (TR004) for a modal shift towards active transport, this does not seem to align with the Kent County Council's ambition to increase traffic volumes at the A2 (Watling Street) / A251 (Ashford Road) junction. There appears to be a lack of holistic vision across local government about transport between the Western Link and Brenley Corner roundabouts.</p> <p>The ability to cross Watling Street for pedestrians and cyclists seems limited. It is felt that this will create a barrier between the settlements.</p>	



## Local Green Spaces

TC Ref	Comment	LP Ref
LGS001	The guideline figure per 1000 does not breakdown the forecasted population for Faversham. It is questionable whether sports provision on some proposed developments is adequate.	DM17
LGS002	Provision for children and young people should be 400m from new development, neighbourhood parks and gardens also 400m. Is it preferable to have less small sites and additional larger site for better provision of facilities and easier maintenance. Local sites are sited 800m from new development.	DM17
LGS003	Provision of space for young people, does not necessarily need to be green but important to be central and not marginalised.	DM17
	The policy on retaining individual character and setting of settlements by following local countryside gaps provides a buffer between Faversham and Oare, Ospringe and Goodnestone. There is gap between Selling, Boughton-under-Blean and Dunkirk	DM27
LGS004	<p>The NHP SG have already submitted a comment on LGS/078“Footpath parallel to Brent Road” as a local space designation (LGS/078). Whilst the Faversham Neighbourhood Plan Steering Group acknowledge the importance of the footpath, I would point out that, (i) the path already enjoys protection as a PROW and (ii) the indicative site plan shows an area more extensive than the footpath itself.</p> <p>The site surrounding the path (which encompasses a factory car park) is under the ownership of BMM Weston and has been nominated for potential mixed use development through the neighbourhood plan call for sites process. This site, alongside others, is currently being evaluated. Should the site be designated as a LGS, it would impact our ability to plan for sustainable development within our Parish and Neighbourhood Plan boundary.</p>	DM28

## Environment

TC Ref	Comment	LP Ref
ENV001	Policy DM3, “Mitigating and adapting to climate change through sustainable design and construction”, is particularly welcomed. However, we would urge Swale Borough Council to strengthen the language to mandate action, rather than suggest it, wherever possible. As an example, it would be preferable to use “must” rather than “should” when defining requirements.	DM 3

ENV002	Policy DM 24, “Development proposals will ... provide a minimum 20% net gain in biodiversity against a pre-development baseline”, is particularly welcomed. It is noted that this is above national targets. The biodiversity themes generally are all strong. The ones on Internationally and nationally designated sites (pp 169-170) are good but fall into the usual trap of only singling out birds for special mention. The presence of other important species, including the critically endangered European eel, should also be flagged, and the likely presence of endangered and protected non-avian species which are found in Swale are equally as important. However little or no mention is made of how these targets will be measured, monitored and enforced.	DM 24
ENV003	The two suggested “strategic green corridors” in the Faversham area are welcomed, the first leading south along the Syndale Valley and the second eastwards towards Blean Woods and Canterbury. This second one is interesting because any potential green or pedestrian corridor to the east is pretty much blocked at the moment by the A299/Thanet Way, as well as by the absence of a good foot- or cycle-path from Faversham to Canterbury. Identification of that priority corridor in the Local Plan might give us an opportunity to change that.	MU 1
ENV004	There’s good language on chalk streams in the section on water. The development management policy for that section says nothing however about reducing abstraction and/or restoring water levels, which I suggest we should push for. (I suspect SBC considers that they are the responsibility of DEFRA and the EA.) The language on the remarkable series of springs that characterise this section of the North Kent coast, and measures to safeguard them, should be strengthened as well.	DM35

## Young People

TC Ref	Comment	LP Ref
YP001	FTC has conducted resident surveys as part of the NHP. In the residents survey 82.2% of respondents said there is not enough provision for youth facilities.	
YP002	FTC has conducted a youth survey as part of the NHP. Key Theme 1: “We want to have youth clubs and meeting places to chill and hang out”, with 51.9% of respondents aligned to this theme. Key Theme 2: “We want a proper, bigger and better skate park”, with 32.7% of respondents aligned to this theme.	
YP003	The Marmot review is a pivotal work that has shaped the development of British health services and puts emphasis on early intervention and the importance of early years in the health outcomes of children and adults. The first of it’s five policies is “giving every child the best start in life”. This is also the principle of the Surestart programme and a priority in the Swale Borough	

	<p>Council Health and Wellbeing plan. It is well documented that supporting families early can reduce health inequality. It is welcome to see plans for two new educational facilities in Faversham as part of the local plan however there is no comment on early years provision and how the increased numbers of housing will impact on this. There should at the very least be comment on the amount of fully funded places there are available for children that are most at need. Lack of available childcare can impact on employment and contribute to financial inequality and the Borough Council should be fighting for the residents of Faversham to have their needs met.</p>	
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