

Comment on Application 25/504039/OUT: Land South of London Road, Ospringe.

Introduction

Faversham Town Council's Active Travel Committee asked Berendt Consulting Ltd to comment on the above application in respect of active travel. In reviewing the documents on the Swale Council planning portal, it became apparent that as well as active travel matters, there are other underlying issues which have wider transport implications. Faversham Town Council might wish to raise these with Kent County Council:

Comments

1. The Transport Assessment is limited to a neutral/negative statement that *"there are no material highway or transport impacts as a result of the proposed development"*. The policy context set out on page 4 fails to refer to Faversham Town Council's Neighbourhood Plan or LCWIP. This has the result that the applications fails to say:
 - 1.1. How the development will contribute to Faversham Town Council's sustainable and active travel ambitions as stated in its Neighbourhood Plan:

Aim 4: "To promote sustainable transport and active travel, including cycling and walking"
 - 1.2. How the proposal will enable greater numbers of people to make journeys sustainably in Faversham, principally wheeling, walking or cycling, rather than using a motor vehicle. In particular, how those going to Ospringe Primary School will be more likely to get there sustainably.
 - 1.3. How the developer has taken note of the Faversham LCWIP, including reference to the "Parishes to Town" section on active travel from local communities such as Painters Forstal.
2. References at 2.3 to the Strategic Road Network are not relevant, as the A2 is not part of that network
3. The quote at 3.2. is not substantiated, as it does not say how the issue of congestion on London Road and Water Lane will be alleviated. The Ospringe AQMA covers the Water Lane junction and the congestion at school starting and leaving times when there is considerable pedestrian traffic is a significant factor in relation to air quality

3.2 Part of the proposals includes provision of a car park to serve the school and alleviate traffic congestion at school set-down/pickup times.
4. Re 3.6 neither footway on London Road appears to comply with current standards as they are too narrow.
5. Re 3.17 states that the location is a "convenient cycle" to railway station, but fails to state that the route doesn't meet current standards set by Active Travel England.
6. Re 3.21 states that the location is "conducive for walking" but fails to mention that London Road is extremely busy with poor crossing facilities.
7. There is a statement at 4.7 which indicates that an aspect of the development will be decided at a later stage. This is a key part of the development and needs to be agreed in the early stages

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4.7 When considering the layout arrangements at later detailed stages, it is recommended to consider providing a largely separate route access for users of the school car park, as far as possible, so as to minimise the impact of through traffic to residents of the site

8. On page 3, the number of dwellings is stated as 85 dwellings, whereas there are 180 dwellings stated on page 4. Which number has the Transport Assessment been based on? The implication is that a further 95 dwellings are being considered. This is a critical aspect, as 180 dwellings, whether built now or later would require additional infrastructure. Approving a lower S106 developer contributions would be more and could generate significant that would entail, even if approval were limited to the first phase of 85 dwellings.
9. IDensity and design of housing can impact the take up of active travel. In order to encourage active travel, housing density should be maximised and it is recommended that car parking is minimised and not placed at the front of the dwellings, as proposed, but either at the back, or a distance away. Bike parking, on the other hand, should be convenient for people as they step out of the front door.
10. The transport assessment refers to the need to move westwards the existing speed limit signs on London Road. We recommend that the speed on the new development and on London road should be 20mph (or a distance to be agreed) and that the developer should fund the change.
11. There is no analysis of the current or future catchment area of the school. Presumably the new dwellings will bring the catchment area down, or the school expanded. This means that there is no justification for the car park, or the statement.

“The proposed school car park is forecast to require around 46 spaces to accommodate the estimated vehicle movements at school start/finish times. Whilst recognising local policy considerations around provision of car parking for schools, given the circumstances of Water Lane, where school traffic currently accumulates, it is felt a bespoke facility will be beneficial on balance.”

12. Reference is made to the promoted walking route, which runs along Water Lane to the church along ZF13 and ZR352 to Painters Forstal. However, no mention is made of the possibility of connecting ZF10 to ZR352 by formalising the the informal track linking the two , which is already heavily used by walkers, as a public right of way. Nor of upgrading all of ZR352 t to enable use by all, such as those in wheelchairs or scooting to school and residents of the new development visiting local community provision like the Painter Forstal community hall, Lorenden Park .Lorenden School and Brogdale
13. Of particular relevance is the fact that this promoted route forms part of the Augustine Camino, a pilgrimage trail, which runs from Rochester to Ramsgate.
14. Note: new guidance from Active Travel England on designing active travel interventions in more rural areas is expected early in 2026. Once available, this is likely to have implications for how footpaths and bridleways such as those identified in the Parishes to Town report can be used as potential active travel corridors.
15. Water Lane features in the Parishes to Town report referenced in Faversham’s LCWIP as cycle route to Painters Forstal and beyond, but it does not meet Active Travel England’s standards.

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Upgrading ZF352 and converting it to a bridleway could make it a suitable alternative for cycling particularly useful for accessing the school.

16. A Travel Plan Framework is referred to at 6.8, but with no detail. If the application were to be approved, a Travel Plan should be a condition precedent. This brings into question, the statement at 6.9 that “there are no highway impacts”. The statements of what the Travel Plan will contain at 6.17 are no more than informing residents about walking, cycling and bus routes.

If the SBC Planning Committee was to agree to support this application, we would propose that the following conditions are agreed:

Upgrading of the current controlled pedestrian crossing on Ospringe Street to become a toucan crossing usable by cyclists as proposed in the draft Swale LCWIP.

Creation of a new public right of way utilising the existing well used informal pathway which links ZF10 and ZF352

Improving the surface of ZF10 where it runs through the allotments so it is usable by residents of the new development as a cycling route to the town centre.

Upgrading the surface of ZF352 and the informal path that links it to ZF10 so that it can be used by cyclists, pedestrians and wheelchair users through out the year.

Improvement of the pavements on the A2 leading from the development towards the A2 so they meet current standards.

Development and agreement of a plan with the Highways Authority which reduces vehicle congestion and increase pedestrian safety on Water Lane at school leaving and starting times.

Meeting the initial costs of implementing this plan.