

**Additional statement from Faversham Town Council's Active Travel Committee to support
Town Council's current objection to Perry Court 25/501495/OUT 29th June 2025**

Introduction

The concerns of Faversham Town Council (FTC) fall into two parts:

- 1) Generic: the application takes no account of how the development will contribute towards FTC's overall objectives of making Faversham a walking and cycling town. There is no reference to FTC's LCWIP, to the "Parishes to Town report" submitted to Swale Borough Council's Eastern Area Committee, or to the National Planning Policy Framework focus on the need for sustainable transport.
- 2) Specific: opportunities to provide walking and cycling infrastructure into Faversham town centre and railway station appears to have been missed.

Generic

- 1) The application makes no reference to the statements in FTC's Neighbourhood Plan about improving active travel, such as *"3.4 Movement and Sustainable Transport" To ensure a balanced and sustainable range of transport options and promote active travel and accessibility for people with a range of mobilities.* As a result, there is nothing in the transport assessment prepared by Brookbanks Consulting for the applicant which explains how the development will increase the number of people walking and cycling in Faversham.

- 2) The application does not comply with LTN 1/20, for example Summary Principle 8:

Cycle infrastructure must join together, or join other facilities together by taking a holistic, connected network approach which recognises the importance of nodes, links and areas that are good for cycling.

- 3) The list of documents and policies at 4.1/4.2 is incomplete, out of date or irrelevant

- a. KCC Local Transport Plan 4 was superseded by LTP5 in December 2024.
<https://letstalk.kent.gov.uk/local-transport-plan-5-2024>. With different priorities from LTP4, LTP5 has a greater focus on active and sustainable travel. It places a responsibility on developers to contribute towards the vision for a particular area. From the introduction *"[KCC's] role here is to work with the district and borough councils to mitigate the impact of new development on [its] road network and help ensure that new residents and businesses have access to sustainable travel options.*
- b. The Kent Cycling and Walking Infrastructure Plan (KCWIP) is not relevant without reference to Faversham Town Council's LCWIP, which is not mentioned.
- c. SBC Eastern Area Committee Parishes to Town report (not mentioned)
- d. Faversham Neighbourhood Plan (not mentioned)
- e. DfT guidance on setting local speed limits [DfT guidance on Setting Local Speeds Limits 01/2013](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/611111/dft-guidance-on-setting-local-speed-limits-01-2013.pdf) (not mentioned)
- f. Design Manual for Roads and Bridges (irrelevant, as it only applies to the Strategic Road Network) <https://www.standardsforhighways.co.uk/dmrb>.

Specific

- 1) The assumption in the application is that pedestrians and cyclists will exit the development onto the A251 Ashford Road, from where they are expected to fend for themselves in reaching the railway station and the town centre. This is a particularly hostile environment for those walking or cycling, with limited or no segregated infrastructure. A better solution is to exit via ZF18 to the A2 near the Abbey School, where a surface level walking and cycling crossing is planned.
- 2) At 2.11, it states that Tettenhall Way is 30mph. With no segregated infrastructure for cycling, this does not meet LTN 1/20 design standard. While it is understood that Tettenhall Way is not part of this application, the developer is encouraged to press for a 20mph speed limit throughout the site, in line with the stated ambitions of FTC to have 20mph on all residential streets.
- 3) In the Transport Assessment it states at 1.3 “Brookbanks Consulting have prepared this Transport Assessment (TA) in accordance with the Department for Transport’s Guidance of Transport Assessments and Travel Plans, the National Policy Framework and the relevant local planning policies”. It makes no reference to the Department of Transport Guidance on Cycle Infrastructure Design LTN 1/20. <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>, nor to Faversham’s Neighbourhood Plan.
- 4) Incorrect statement at 2.12 “The A2 forms part of the SRN and runs from east to west between Dover and London”. It does not – the SRN follows the M2. <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://nationalhighways.co.uk/media/u4apnjvk/nh-srn-simplified-map-2023.pdf>.
- 5) The travel patterns at 2.26 onwards take no account of the desire from FTC, SBC and KCC for modal shift towards active and sustainable travel.
- 6) References to active travel in 3.1 onwards take no account of the need for suitable infrastructure if those journeys are to be walked or cycled.
- 7) The statement at 3.8 “Based on observed and proposed traffic movements, crossing the road is considered to be acceptable for able bodied people with only a minor delay experienced” takes no account of the needs of less able people
- 8) The statement at 3.9 “There are no controlled crossings as the traffic volumes are light with minimal HGV movements. The speed limit is 30mph making the route acceptable to many users and there is good visibility for all” is incompatible with Manual for Streets and LTN 1/20 and with the [DfT guidance on Setting Local Speeds Limits 01/2013](#), which specifies 20mph as the appropriate speed limit where people and motor vehicles mix.
- 9) The statement at 3.10 “A footway is provided on one side of the road north of Tettenhall Way to the A2. The footpath has no obvious signs of damage; however some parts of the footway have overgrown vegetation. The road benefits from natural surveillance from road traffic and existing properties and Streetlighting is provided” ignores the following:
 - a. Pedestrians will have to cross the road to reach the footway, via a controlled crossing which prioritises the movement of vehicles
 - b. The footway is frequently obstructed with bins and parked cars
 - c. During wet weather, there is a lot of surface water and pedestrians are sprayed with water

- d. The speed and proximity of vehicles, which makes walking unpleasant, particularly for those in wheelchairs or other mobility aids
 - e. There is no provision for those wishing to cycle.
- 10) Active travel provision to the south of Tettenhall Way is worse, with a 50mph speed limit and little or no provision for cycling or walking.
 - 11) The entire paragraph at 3.15 paints a rosy picture of able-bodied pedestrians and cyclists accessing the town centre via the A2. This is not easy without significant improvements to infrastructure. Neither is there any consideration for those who are not able-bodied.
 - 12) At 3.22 there is no more than a brief mention of ZF18, despite this being the most suitable access route for pedestrians and cyclists to reach Faversham Town Centre. As a promoted route within KCC Public Rights of Way network, ZF18 is KCC's preferred route for walking and cycling.
 - 13) There is no mention of the new access road planned to the Preston Fields development onto the A251 south of Tettenhall Way. This could provide a useful active travel link between Perry Court and developments east of Ashford Road. for those wanting to access facilities in either development. This particularly strengthens the case for using ZF18 for those wanting to access the Abbey School.