

SUMMARY SUBMISSION TO REG18 – Nigel Heriz-Smith

Question 1

SBC should specifically rule out an AoO based around Teynham and Lynsted with Kingsdown Parishes (popularly referred to as the Teynham Area of Opportunity - "TAO"). NPPF Paragraph 22 does not define "larger scale", which could be interpreted to include TAO because it also features a "Masterplan-led" approach. This places Teynham/Lynsted in a category that SBC elsewhere argues is NOT SUITABLE except to the West (Bobbing/Iwade) and ("Duchy" land) East ends of the Borough. The Reg18 document does not differentiate TAO from other major developments.

Question 2

INTERIM!! Swale Borough Council's "rush" of the due processes of consultation in only four weeks (six weeks were allowed for "Bearing Fruits") without ANY public engagement beyond a few letters to those already on the SBC database.

On top of that failure, we are being asked for views and contribution to the Reg18 process when the Sustainability Appraisal is still in draft and there is a total lack of Transport analysis and agreed position with KCC Highways in light of the massive increase in housing proposed by SBC - without challenging the housing figures!

The Regulation 18 "Consultation" is fatally flawed and should not have been launched in a state that deprives residents (voters) the right to a full picture before commenting on what we must all live with.

Question 4

SBC's policy treatment of pollution along the A2 is entirely inadequate.

SBC's Vision states "At Faversham, a thriving market town and heritage destination that has successfully managed 21st century demands. It has been achieved by enabling sympathetic and symbiotic growth whilst reducing congestion and air quality issues along the A2 over the period to 2038 and beyond."

The SBC text makes heroic claims about 'progress on congestion and pollution' that are not supported by the evidence-base. SBC relies on flawed and incomplete data that promises increased harms and no protection into the future. Continuous monitoring (NO₂, PM_{2.5} and PM₁₀) is the ONLY way to detect "exceedances" in one hour, one day and 12 months. SBC are irresponsible when it comes to measuring and responding to the harms experienced along the A2. Flawed reliance on single (and sometimes absent) "dispersion tubes" in Teynham are designed to condemn residents to continuing harms from pollution, vibration, and noise.

SBC asserts in the Reg18 document as fact that their "evidence" proves that all the housing proposed through the Local Plan will have a negligible impact on pollution and congestion across Swale Borough. What SBC is failing to explain to Residents is that pollution from housing and congestion/pollution is averaged across the whole Borough. This is simply not the "real world" where pollution harms are generated along the A2 where villages, motorists, towns suffer from being ADJACENT to those concentrations. SBC has failed to make a case that "active travel" is relevant to the communities along the A2 outside the two major urban centres of Faversham and Sittingbourne.

SBC Para 3.1.3 States under a table of "Weaknesses" - "Increasing congestion and air quality problems, [leads to] limited provision and low usage of public transport."

"Threats" include "Lower Thames Crossing; potential increased traffic through Swale which could impact on transport capacity and air quality."

SBC para 3.2.1: SBC conclude as one of their key issues and challenges: "Embedding sustainable and active travel options and behaviour into our existing and new developments to improve air quality, reduce traffic accidents, reduce congestion and improve the health and wellbeing of residents."

Question 6

QUESTION 6 – SBC should challenge their own housing figures and assumptions and present them to the Secretary of State.

Swale Borough Council should review their own calculations to reflect the available evidence that shows they are proposing about twice as many homes as are necessary according to the Office of National Statistics,

AMBIGUOUS HOUSING CALCULATIONS

Housing numbers have become confused between Local Plan Panel promoted housing figures and the Reg18 Consultation document at Table at PARA 5.1.16 (Reg18).

THIS REG 18 TABLE confirms the total housing for Swale Local Plan period as amended by the Standard Method currently stands at 1,048 per annum (16,768 across the whole period). AFTER REMOVING existing commitments/approvals (5,087), allocations under "Bearing Fruits" (2,968), neighbourhood plan proposals (210), and heroic supposed windfalls (2,750) the RESIDUAL HOUSING REQUIREMENT OF JUST 5,753, NOT 10,105 AS STATED BY SBC.

THE CHAIR OF THE LOCAL PLAN PANEL (LPP) HAS STATED DURING AN ONLINE MEETING WITH PARISH COUNCILS AND THROUGH FACEBOOK:-

"Basically, the calculations are as follows:

- The number of housing units in Bearing Fruits for the period 2014-2022 is 6,208.
- The number needed for the review 2022-2037 is 16,608.
- This gives a total demand for the entire period 2014 to 2037 of 22,816, of which 13,192 was contained within Bearing Fruits.
- 22,816-13,192 leaves 9,624 to be allocated.
- A 5% buffer on this figure would take us to 10,105."

Again, the process of "Reg18 consultation" has become flawed by contradictory signals from SBC LPP as to the scale of likely impacts on local communities. At worst, this is deliberate MISDIRECTION of residents' understanding of the 'problems' and 'opportunities'.

This failure in communication has been made much worse by illustrative maps supporting each of the five Options. SBC's use of anonymous "locator pins" means that NONE OF THOSE MAPS CAPTURE THE LIKELY SCALE OF IMPACT BASED ON WHAT IS KNOWN FROM THE DRAFT SUSTAINABILITY APPRAISAL, SHLAA, AND THE LATE PLOTS VOLUNTEERED BY LANDOWNERS UNDER THE FAILED REG19. That mechanism gives EQUAL WEIGHT to modest SHLAA land-supply candidates and the Strategic Policies tied to 'masterplan approaches' that underpin proposals for S.E. Faversham ("Duchy Land"), 'Teynham Area of Opportunity', Highsted Park, and Bobbing/Iwade. SBC effectively disguises the scope and nature of what is impliedly threatened under Question 25.

Whether and how those figures can be reconciled will be far too late to inform the public response to Reg18. The Chair of LPP has been challenged to explain these contradictions but, so far, the ambiguity has been repeated.

SBC has declared that it cannot challenge the housing numbers set by the Standard Method. We have received a letter from the then Secretary of State Robert Jenrick that explicitly states housing figures under the old algorithm were only a starting point – local authorities are responsible for justifying their figures in Local Plans based on local knowledge, need and capacity. should be realistic

The Office of National Statistics (ONS) latest housing and population analyses for Swale between now and 2038 (the Local Plan Review period) state:

- The population for Swale in 2021 as 153,596. The estimate for 2038 is 172,878 – an increase of 19,282 people.
- The ‘housing requirement’ to 2038 in the REG 18 document is 16,768 new dwellings. That would suggest an occupancy level per dwelling of 1.15 people.
- According to the ONS, the average household size in SWALE in 2038 is forecast to be 2.28 people – almost exactly double what SBC’s figures suggest.
- A population growth of 19,282 would, in fact, require a total of 8,457 new dwellings. The housing requirement stated by SBC between now and 2038 of 16,768 new dwellings is therefore DOUBLE the number of dwellings needed to accommodate local population growth!

SBC must see sense and challenge these "Standard Method" numbers with Central Government as a matter of priority.

Question 9

Has Swale ever achieved this figure of 250? If not, the Local Plan is misleading.

Question 10

This is SBC’s ‘fallback’ position if TaO is abandoned (see Q25). If they don’t get housing under TAO, SBC will argue here that Teynham/Greenstreet is “thriving” under the “Settlement Hierarchy” of 2020.

There is clear evidence, submitted under Reg19 but repeated in the Response from Lynsted with Kingsdown Parish Council that there have been diminishing services/assets over twenty years steadily eroding the idea that Teynham’s status is a thriving “service centre” into question and new housing has no prospect of improving that position through social engineering. Loss of a GP may be all that is needed to downgrade Teynham.

Dumping housing in some forlorn hope that urban services will be duplicated or enhanced in villages is tendentious. For example, Health Commissioners (Love Lane development) have already said health centres in towns are the way forward – so when we lose our last one, our status drops further.

BRIEFING: Building in Teynham is a strategy for building for cars. Asserting a link between the label of “thriving” and new housing is a misdirection away from a rational/strategic approach to placing new housing. The dubious label of “thriving” villages is not an argument for changing them with out of scale developments. Those homes will be isolated from the most stable and diverse mainstays of our Borough – the towns. Towns plus garden communities are more sustainable. So, reject the premise of this question.

As has been stated by KCC and CPRE – Teynham is just about the worst possible place for investing in more housing. Adding homes will not change use of the railway – no local parking, fewer services – few fast services. There is simply no capacity in the system to change that. There can be no mitigation. To pretend otherwise is dishonest.

Question 11

The presentation of Options is almost impenetrable to the lay reader.

SBC begins with weighting 3000 words and difficult (large) tables before the first Option. Thereafter, the descriptions are truncated.

The Maps throughout this section make it impossible to answer this question. The pins are anonymous as to which SHLAA or other plots of development land are being discussed; the lack of quantum/scale for each "pin" means a modest plot that is suited to ten homes is treated in the same way as the Highsted Park proposal or the "Duchy" land.

The discussion of "Options" is thereby fatally flawed.

Sittingbourne is the economic hub of the Borough and needs serious investment and the bulk of housing to achieve critical mass for wider business opportunities and service providers. A focus on Bobbing/Iwade (as PROPOSED by SBC as the "suitable" strategic planning site "to the West" of the Borough) would also develop a key attractive/premium community development opportunity, strengthening the Sittingbourne and Swale "offer" to investors, commuters, active travel.

Sittingbourne needs to get a grip on building greater capacity (push through a wider road) between the existing industrial/commercial north-edge of the town and the A249 where road investment is being made and planned for.

Across this whole Section (Q11 onwards), SBC dismisses the work already undertaken under Reg19 regarding 30% of all responses across the whole Borough were opposing Teynham Area of Opportunity (TAO) option(s). Dissent is being treated as an outlier, in spite of the quantum of those responses.

In the "evidential table":-

Air Quality: This is deliberately misleading to Residents. There is absolutely no justification for assumptions that the 776-1054 new homes each year will have no material impact on "air quality" without, at the same time, making clear that is untrue for AQMAs where "exceedances" WILL continue to rise. SBC appear to be generalising about impact averaged across the geography of the Borough? SBC simply don't reference the adverse CUMULATIVE impact on AQMAs under this Question. The reality is that the housing is 'local' and the impacts of traffic are local – harms are narrowly focussed along and close to lanes and roads where people live and work. It is simply wrong to suggest, as they do here, that there is potential for mitigation that solves the pollution levels in the real world – in the "local world".

AQMAs emerge for discussion under Q13 for the first time.

This whole discussion is misdirected through pinned maps that give no sense of the balance of development options, nor their spread.

Potential disadvantages of the focus given under all five options is that it is economically illiterate/unbalanced. It fails to consider 'strategic-scale' option around Sittingbourne/Bobbing/Iwade to help the Borough compete for national resources and attract investment based on availability of housing stock, commercial centres/suppliers/distribution, strategic planning for "active travel", access to major road networks (A249 is under way to improve connection between Sheerness, Sittingbourne, Maidstone, London (M2), Canterbury (M2) and the eastern Duchy development in Faversham. SBC have said - Reg18 Para 5.1.85 - that the westerly major development is an option but goes no further to help residents understand the balance of argument.

Questions 13, 15, 17, 19

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Question 20

Option 5 – “Strategic Development Sites”. SBC argue that this could only be delivered through TWO Strategic Development Sites to east and west of the Borough. "Duchy" land and an ambitious focus around Bobbing/Iwade and Sittingbourne itself.

However, SBC interprets this "Option" as ONLY the two Garden Communities, leading to the worst option for all villages (villages would have to bear 29.5% of all homes + 17.5% windfall; all other Options suggest 10.5%+17.5%). This contrast is not justified/evidenced. It reads as deliberate ‘scaring the horses’ tactic designed to pressure villages into joining their opposition to Quinn etc.

Question 22

Reg18 Para 5.1.85: [Option 5] “Given market conditions, it is likely that at best only two strategic development sites could be delivered, one in the east and one in the west of the borough should the council consider this an appropriate approach to meeting development needs.”

SBC has not developed their thinking around their option for focussing heavily around Sittingbourne/Bobbing/Iwade. There are valid economic arguments for an ambitious and truly visionary approach that sits on existing infrastructure (that can be more readily 'flexed' than it can in rural sites), serves the interests of the whole Borough as an employment and service centre instead of turning new homes into commuter homes that rely on increased car use in the most inappropriate places.

Come on SBC, let's see all the arguments and alternatives.

Question 24

The “five options” fail to take a strategic economic case into account. Emphasising “distribution” instead of planning analysis and strategic “focus of resources and access to those resources” – which argue for an urban-centric approach to the benefit of all. I include here an ‘Aunt Sally’ table to illustrate how a more economically robust and coherent shape to ‘place-making’ based on existing SHLAA candidates and urban centric investment, infrastructure and services. All this without eroding the rural character and Heritage-rich ‘heart’ of the Borough that makes living and working in the Borough attractive.

I include this table ONLY to illustrate that SBC does have other “Options” available to it but they behave as though Option 3 is the only ‘balanced’ option.

Bobbing and Iwade, and Faversham

TARGET 10,000 TOTAL=from this Table-10,554 ADD more/other sites that come out of the woodwork through Reg19 stage earlier this year

18/001	Land West of Sheppey Way, Bobbing	100	
18/054	Land South and Southwest of Iwade	472	
18/060	Land at Wallend, Sheerness	?	35.57 Ha
18/062	39 Abbey Fields, Faversham	175	
18/065	Land East of Abbey Farm, Faversham	1300	
18/101	Land at Hill Farm, Bobbing	190	
18/107	Land east of Faversham Industrial Estate, Graveney Road	50	
18/135	Land at Graveney Road, Faversham	240	
18/165	Land East of Queenborough	540	
18/166	Land Rear of Solna, Keycol Hill, Bobbing	85	
18/178	Preston Fields, Canterbury Road, Faversham	250	
18/184	Land at Pheasant Farm, East of Sheppey Way, Bobbing	80	
18/219	Land East of Iwade	572	
SLA18/224	Land at Bobbing, west of Sittingbourne Amended to retain Green Space to Newington.]	3000	[Including 9.4 Ha flexible employment. 410 Ha
SLA18/226	South-east Faversham	2500	Plus 15,000-20,000 sqm business/commercial/retail space
18/232	Land at Stickfast Lane, Bobbing/Iwade	1,000	114 Ha. rejected for lack of services, transport, etc But could be made part of a wider Strategic Development Plan under a more focussed promotion of Iwade/Bobbing axis.

The fact that more sites are being added outside the Reg18 Consultation period further restricts the value of judgements made here. Again, we are left with incomplete evidence alongside the "Interim" Sustainability Appraisal.

Question 25

I have had to email this Response as it exceeded the 5,000 character limit on comment boxes!

Question 29

I support NPPF objectives for tree-lined streets favoured. Achieves benefits to health and wellbeing alongside economic benefits of helping nature to manage temperature changes. All new developments should incorporate broad avenues to accommodate trees. You need look no further than Bell Road, Sittingbourne, to see the positive impact - provided the species is appropriate.

Built or paved areas should emphasize the use of drought-tolerant trees and favour native species. Preference to be given to Field Maple, Beech, London Plane, Hornbeam, Common Hawthorn, Holly, Common Crab Apple, Blackthorn, Whitebeam, Service Tree, Wild Service Tree, Yew.

Avoid Native and Non-native water-demanding trees – Eucalyptus, Poplars, Willows, Sessile Oak, Elm, Horse Chestnut. Cypresses. [Ref: P.G. Biddle, 1998]

Question 30

Support. Important not to destroy/disrupt the organic evolution and uses for BMV, woodland and ancient woodland, chalkland meadows, reinstate hedgerows. Without a firm commitment SBC is simply allowing building homes that will result in more houses and cars. Also, the destruction of Green Spaces will add interference with the artesian system of abstracted groundwater on which Kent relies in this part. Southern Water should be our ally in this last point.