

**The representations made by the Attwood Trust on the 13th June 2006 were made with particular reference to Faversham.**

### **SUMMARY OF KEY POINTS**

- 1.1 The Plan is correctly urban oriented in its development proposals but has no adequate response to the fact that the smaller towns, many villages, and rural areas are the location for a significant proportion of the region's population and of its economic activity (D2. 1.2). The extent to which the region generates much of the nation's wealth makes this important. The Plan gestures towards rural issues but is ambivalent. Section B5 acknowledges rural importance but setting a thread running through the Plan, dwells on "blending" development and economic aims with environmental protection (B5. 5.1), and on "balancing" those matters (D8.5. 5.1) and fails to emphasise the prioritising between those matters that are necessary if the rural economy is to thrive and provide the essential foundation for rural land management (B5. 5) without which environmental objectives will be at risk.
  
- 1.2 East Kent, outside Ashford, is an example of a sub-region with no large towns but with a range of medium-sized and small towns, villages and rural areas which although individually not all significant as development locations, taken together are important. That is especially the case in regard to some of the economic activities at which East Kent excels, such as distribution and logistics related to the ports, and processing/storage/distribution of farm produce, fruit etc., uses which can require large sites and good road access and so cannot usually fit into urban areas. For example, a town like Faversham continues to lose business and industry from urban sites unsuited to modern requirements, with excessive out-commuting and loss of sustainability resulting, and illustrates the need for strategic policy to identify the case for some key economic activities to be provided for at suitable

locations, of which Faversham is one. The urban/rural fringe is particularly important in that respect.

- 1.3 The Plan should be more specific concerning quantification and location of key economic and employment uses. As submitted it leaves those matters too much to local settlement, see eg Policy RE1.(i). D2. para.3.1, leading to Policy RE2. It rejects identification of floorspace quantities or strategic locations for employment, requiring instead that LDD's perform that role. There will often be a local dimension to provision for employment uses, but equally some have a key regional dimension; land to support port activities is one example affecting East Kent. These can only be partly influenced by considerations of the "local economy and workforce" mentioned in RE 2. Often such uses will be difficult to locate and should not be left entirely to local or sub-regional policies to determine, especially when as in the case of this Plan, the sub-regional elements are a patchwork quilt of local inputs. Strategic locations should be specified in the Plan, thus making them part of the criteria by which soundness will be assessed when LDD's are considered. Locations with good transport links to serve East Kent port and distribution are one category of use meriting this treatment.
- 1.4 Medium sized and small towns, villages and rural areas cannot thrive, or make their proportionate contribution to the region's wealth, on a diet of small-scale enterprises, Bed and Breakfast and Cream Teas alone, nor can the necessary range and amount of business and industry be permitted only if served by public transport. Carefully sited businesses of some major size are essential to be sited at smaller towns and in rural areas, which the Plan should recognise and provide guidance for.
- 1.5 The Plan defines "small" towns as having 3,000 to 10,000 population. The Panel's question 2C2 more usefully refers to "smaller" towns. That reflects the variety of size and functions which characterises such towns, and is especially relevant to East Kent. The significance of the coastal settlements for economic growth in this area is emphasised by the fact that the adopted

Kent and Medway Structure Plan (July 2006) shows no Rural Service Centres away from the coast. It designates a number of coastal towns as being Priority Areas of Economic Regeneration, from Thanet in the north to Folkstone/Hythe in the south, each of which is proposed as a location for one or more Strategic Development Locations. No such strategic locations are proposed for the northern settlements, Herne Bay, Whitstable and Faversham, despite the first two also being Priority Areas of Economic Regeneration. Faversham is a Principal Urban Area under the Kent and Medway Structure Plan. All three have good links to the strategic road network and are capable of contributing at appropriate levels to the essential economic growth of the area and have local needs justifying such a role. Faversham is ignored. As in other respects, this sub-regional strategy for East Kent outside Ashford is no more than a reflection of the Structure Plan, which itself is a vehicle to justify District Councils' limited vision for the area.

- 1.6 Smaller towns and rural areas also accommodate significant proportions of the region's housing needs. It is not suggested that they provide for major development but in aggregate they can provide substantial quantities of housing. Where that can be done in association with local employment, travel to work can be reduced and social and community life benefit. In the smaller towns where some larger units of housing can usefully be provided, such developments are more able to contribute to supplies of affordable housing than the small sites that generally characterise house building outside the larger towns. Faversham is a case in point in East Kent, where there is both a range of small to medium sites and a potential urban extension and where a moderate scale of house building accompanied by business development on a strategic scale would benefit the town itself and contribute sub-regionally. Policy H3 does not sufficiently reflect this. GOSE's comments regarding affordable housing (GOSE Part B page 13 re H4) address this and are supported.

1.7 The Plan's ostensible recognition of the importance of smaller towns and rural areas for economic, housing and social reasons requires a greater commitment to prioritisation of objectives in place of the comfortable emphasis on balancing and blending of economic and environmental interests. That will call for a greater willingness to be specific about quantities and locations of development where these affect issues of regional or sub-regional importance.

## **2: Responses to Questions 2C.1,2 and 3**

### **Question 2C.1**

2.1 The answer is "no". Lip service is paid to the importance of smaller towns and rural areas, both as to their intrinsic needs and also their role in the region's economy and life (eg D2 1.2) but there is inadequately specific guidance as to amounts and locations for significant development, see Summary of Key Points above. The Plan chooses to avoid being specific on such matters, eg Policy RE1 (i) leaves it to LDD's to "ensure land and premises are available to meet specific requirements of regionally important sectors and clusters" and D2 3.1 and Policy RE2 rule out specifying for strategic sites. That reliance on local planning plays to current fashion in local government but ignores the fact that "regionally important" developments often raise difficult planning issues and local controversies which are rarely resolved satisfactorily through the "balance" and "blend" approach this Plan advocates. Strategic developments, to take Kent examples, such as Kent Science Park near Sittingbourne, Pfizer Pharmaceuticals, Sandwich and Kingshill Business Park, West Malling, all required bold settlement of priorities and none of them is located in an urban area.

- 2.2 As an example, the Plan shows ample evidence that East Kent has serious economic problems which require a step change in economic planning to resolve. RE2 calls for LDD's to take account of sub-regional strategies in these matters but as those strategies are the product of the self-same local authority dominated restrictive approach to development in smaller towns and rural areas that is a pointless, circular injunction. Policy RE5 (ii)a) asks LDD's to prioritise delivery of land for economic development. Experience in East Kent illustrates the weakness of that, in the absence of specific guidance in the RSS as to amounts and locations. Pressure for previously used land to contribute to housing delivery forces up land prices, making employment sites unaffordable and local politics makes it unattractive to allocate greenfield sites to compensate for such losses. Faversham is a case in point, where a dire shortage of local employment and attractive employment sites cause excessive outcommuting, recognised by the LPA, but who resist provision of sufficient and suitable employment land that is deliverable, despite that being in the form of an urban extension providing key transport improvements for the town.
- 2.3 Against this background, Swale Borough Council propose to remove from an Adopted Local Plan, a planned urban extension to provide employment land, where the economic and sustainability arguments for its retention are greater than ever. Faversham is a Principal Urban Area in the Kent and Medway Structure Plan. Box BE2 and Policy BE4 illustrate the confusion of guidance on such matters. Box BE2, lists the "key functions" of the urban/rural fringe, where many developments of strategic importance tend to locate; there is no reference to major business, industry, logistics, etc; Policy BE4 uses Box BE2 as a checklist but includes urban extensions. This ambiguity is common throughout the Plan, Policy C39iii) allows only for small scale development to meet "local needs"; D2 3.4 appears to countenance only SME's in rural locations. By contrast RE5 calls for maximising of business from key ports such as Dover in the "surrounding areas"; often that means large sites in rural and urban fringe locations. It is idle for the Plan to hope that LDD's will deal effectively with economic growth in smaller towns and rural areas without specific and unambiguous guidance.

2.4 The treatment of smaller towns and rural areas under housing is similarly limiting. It is not suggested in this representation that major growth be allowed other than in major centres but the view of rural and smaller town housing in this Plan focuses on small scale and especially on affordable housing, with frequent references to assessing needs, local assessments etc. There is a place for that approach but it will not on its own meet the situation in East Kent. D3 4.2 typifies that approach, as does the last para, in Policy H3. It is that view of rural planning policy for housing that played a large part in producing the dire housing problems now common in rural areas. Emphasis on use of previously used land makes matters harder in rural areas, against which the qualifying remark “having regard to local circumstances” in H3 is no adequate protection. Smaller towns and many villages can benefit from an injection of market housing on occasion, on a scale fitting the settlement, which also can assist the provision of affordable housing, a problem where most housing sites are small. In addition, such housing in total makes a useful contribution to sub-regional targets. Town such as Faversham can make such a significant contribution and at the same time remedy local shortages but the Plan postulates only 700 dwellings for 2006 - 2026, at a declining rate over that period, a rate less than that in the newly adopted Structure Plan which simply promoted the limited approach of the Borough Council.

### **Question 2C.2**

2.5 The response to Question 2C.1 above, which should be read as applying to this question also, indicates the answer is “no”. Policy BE5, typifies the approach in this Plan, with a clear emphasis on small scale, local needs, local assessments etc. Establishing the appropriate scale of development is important, but smaller (not “small” as defined in the Plan) towns have a key role not only as centres for their localities but at sub-regional and regional levels, and one-small-size-fits-all is not sensible. That is notably the case in East Kent where there is an absence of truly large centres and very few rural service centres, unlike mid-Kent. In East Kent, smaller towns such as

- 2.6 Faversham, local circumstances and sub-regional objectives call for a less restrictive approach. Where physical planning considerations allow, (such as site availability and suitability, absence of strategic environmental constraints, adequacy of transport links, labour suitability and availability), development on a scale significantly greater than “small scale’ should be encouraged, and the Plan should give positive guidance to that end. East Kent’s need for substantial economic improvement is urgent and major and needs to be made the first priority of the sub-regional E3 section of the Plan.

### **Question 2C.3**

- 2.7 The Plan correctly notes the importance of the urban/rural fringe (D8.4. 1-4.3, Box BE2 and Policy BE4) but fails to carry that importance through effectively into policy and provision. That has particular significance in East Kent due to its structure with no major towns and few rural centres and because the area badly needs sustained economic growth. The nature of the area’s economy, with a strong focus on transport/logistics, means that a generous supply and range of large sites with good transport links is required and the urban/rural fringe is often best suited to that. Faversham, Whitstable and Herne Bay all show that characteristic.
- 2.8 Policy BE4 enjoins LPA’s to “be proactive” as regards opportunities for development in the fringe areas, including urban extensions but using Box BE2 as a “checklist”. BE2, apart from a reference to recycling and renewable energy centres and an impenetrable one to be “an engine for regeneration”, contains no guidance that could lead to significant economic and employment uses being allowed in the urban/rural fringe areas. This sort of ambiguous guidance does not match the importance of these fringe areas nor the need to actively encourage economic vigour and an appropriate level of housing in smaller towns and rural areas such as East Kent, where such encouragement is essential.