

**8Di,1 and 8Di.2****1: Background**

1.1 Comments concern East Kent outside Ashford and particularly Faversham. Proposals for the area rest on too low a level of growth, i.e. 29,900 dwellings pa, for the region, so that issues on the area need to be viewed against the prospect of higher growth having to be accommodated. The absence from the Plan of testing of alternative growth scenarios makes that unnecessarily difficult, and the Plan is inflexible, a particular problem in East Kent. At the sub-regional level, Option 2 is too readily discarded (E3 2.3 - 2.7). The Plan correctly focuses on main urban areas to accommodate the lion's share of growth but fails to take adequate account of both the need for development in smaller towns and rural areas and the contribution they can make to overall growth targets and to sustainability.

1.2 Concentration of growth at Ashford is supported, and also the proposition that the benefits of that growth be shared with other East Kent towns (E3 3.2 and EKA1). However, the Plan is prematurely prescriptive in postulating a spatial allocation of scales of growth as between the various coastal towns (EKA1 and EKA2), failing to take adequate account of the key and persistent problem they all share of generation and sufficient and reliable economic growth.

The matter of long-term persistent economic weakness in all the coastal towns requires every opportunity to improve the economy. The restrictive treatment of opportunities at Faversham (3.5; EKA3, which is inconsistent with EKA1) needs to be rectified.

## **2: Overview in the Context of Questions 8Di.1 and 8Di.2**

- 2.1 The sub-regional strategy for East Kent outside Ashford attempts on the one hand to be too detailed and location-specific for an RSS, without adequate evidence but on the other, insufficiently specific to provide reliable location-specific guidance at the local level. Examples are the attempt to distinguish growth opportunities at Dover and Thanet from those at other coastal towns, while failing to establish key differentiations between the three towns comprising Dover Borough (Dover, Deal and Sandwich), and similarly offering no adequate distinction between the ancient city of Canterbury and the other two towns within its administrative boundary, Whitstable and Herne Bay. It similarly refers to Swale (part) in Policy EKA1, (i.e. Faversham) but omits any reference in 2.22 concerning business floorspace. It thus could have the effect of both misleading through setting policy which overlooks local differences yet also limiting local discretion to respond to those differences.
- 2.2 Some recognition is paid to the key issue of encouraging a much improved economy for this area, eg 2.8. The long history of economic deprivation in East Kent is detailed in the Attwood Trust comments on the draft RSS (13/06/06; eg para 4.2) and the Panel is invited to revisit that. The current proposals appear to take a too rosy view of economic prospects, eg 2.13 et seq. by focusing on the areas strengths and opportunities with little attention to its fundamental weaknesses, some of which (eg geography) are irredeemable. That is not to deny the function of the strategy to encourage but that should not extend to a lack of reality. That failing is compounded by the extent to which the strategy appears to perceive economic improvement as stemming directly from the area's environmental qualities. Their importance is considerable but substantial economic growth is likely to depend more on a wide choice of attractive sites and much improved road communications to enable the small labour pools that characterise the area to interconnect.

2.3 The sub-regional strategy responds to uncertainty in achieving the requisites for growth, such as economic improvement and infrastructure, by proposing a reduction in the scale of growth if those elements do not appear in time (eg 2.8). That is unrealistic as a basis for planning at this level. The issue, however, is a real one, and would be better approached by adjusting the rate of growth and determining exact location rather than altering its amount. The inherent uncertainty about rate of economic growth suggests that the strategy should be less prescriptive at this stage about location, especially as to plumping for Dover and/or Thanet to play the lead role; rather to establish the overall growth level to be achieved with locations settled as economic growth establishes itself. Growth levels at the coast towns are not so great as to pose large infrastructure issues, apart from inter-town connections.

2.4 The matter of achieving sufficient economic growth to support the housing growth intended is of such key importance, that no sensible opportunity can be ignored. The coastal towns of the area are mostly small to medium in size with limited labour resources and none of them can be relied upon to yield sufficient economic growth. Two conclusions follow: first, that it is unwise to place premature reliance on Dover and/or Thanet to play the lead role in this matter; both suffer from severe problems in that regard. Second, that all the coastal towns should contribute what they can and are best suited to. That not only contributes to overall growth potential but would help to reduce travel to work which currently is excessive in the sub-region and is difficult due to inadequate communications.

- 2.5 The Draft Plan completely ignores the western part of East Kent which contains one of the county's Principal Urban Area's i.e. Faversham. Omission of any meaningful reference to Faversham not only misses an opportunity to address current difficulties but also fails to recognise the current status of Faversham where the Adopted Local Plan proposes major employment at Abbey Park. The economic and sustainability arguments for maintaining this level of employment in the town are stronger than ever. If the overall dwelling figure of 29,900 pa is to be increased then the Principal Urban Areas must play their part. Swale Borough have already commented to SEERA that they have less than 5 years supply of employment land.
- 2.6 On this basis, the treatment of Faversham is unsatisfactory. Faversham is smaller than the main coastal towns but unlike most of them, enjoys a good location on one of the main routes to the ports of both Dover and Ramsgate. It is an historic market town with an attractive environment and would not be regarded as a candidate for substantial growth but it has an intrinsic need for employment to rectify excessive out-commuting (over 60% working population), easy access to the strategic road system and land for an urban extension currently being promoted at the local Plan Inquiry to replace Abbey Park. Moreover, the town has a number of brownfield sites turning to residential use which enable a greater contribution to housing in the sub-region than EKA1 now suggests (400, 2006 - 16 and 300, 2016 - 26). Those figures reflect the highly restrictive approach to development which the Borough Council proposes, coupled with an equally limited view of employment growth which accounts for there being no business floorspace attributed to Swale in the table in 2.22. Those features are currently under scrutiny at a Local Plan Inquiry. The case of Faversham in this sub-regional strategy exemplifies the fact that it is a bottom-up exercise, reflecting more what local council's say can be comfortably accommodated than what is practicable and desirable in the light of an evidence-based assessment; see eg para 24's reference to Faversham; contrast with para 23. Inclusion of Herne Bay and Whiststable in Policy EKA 7 would indicate that Faversham should not be omitted, it has better prospects than either of those towns to

attract business uses.

### **3: Responses to Questions 8Di.1 and 8Di.2**

#### **8D1.1**

- 3.1 The foregoing Overview indicates that the answer is “No”. The Strategy lacks realism regarding the serious and longstanding economic problems of the area. These are to some extent acknowledged but too little is proposed by way of solutions. Reliance on the “gateway” function shows little appreciation of how unpredictable its effects can be. There are major opportunities cited, such as Manston Airport, but past events suggest hope rather than confidence in their success. The strategy reads as relying too much on the areas unquestioned environmental quality in supporting growth but also cites that frequently as a limiting factor on growth. The need for substantial and sustainable economic growth as an essential ingredient in the areas future should guide the strategy to a greater extent than it appears to have done. It is right that the growth proposed at Ashford would be spread wider to the coastal towns but the characteristics of those towns need to be recognised and the fact that they are so individual that the effort to prescribe for them at this sub-regional level is unlikely to succeed. Instead it should be accepted that all the coastal towns, of which Faversham is one, should be encouraged to contribute economic improvement and housing growth levels appropriate to that, rejecting locally-founded limitations as an inappropriate evidence base for planning at this level. The figures in EKA1 and those in para 22 should not form the basis for this strategy.

## 8Di.2

- 3.2 EKA 3-7 read confusingly, with no clear overall message emerging, as it should given the importance of economic growth here. There is an attempt to distinguish between the capabilities of the various towns which fails because it cannot accurately reflect their true variety. There is also an unsatisfactory attempt to prescribe functions, which in some cases leads to an apparent over-reliance on some features - for example, the benefits of highspeed rail links, the gateway function of Manston are not fully established. Similarly, EKA4, prescribes attributes and functions to various towns with little basis in evidence; is the emphasis there on small businesses correct? - much of East Kent's more successful economy has been transport-related, with large sites well sited on the transport network. What evidence is there for prescribing in an RSS that such uses are not encouraged at, say, Whitstable, Herne Bay or Faversham on suitable located sites? RE5 could usefully do more to identify transport uses (logistics, warehousing, make-and-break bulk, and associated services) as a key element to be provided for in the area's economy. EKA6 and 7 similarly are too ambitious, limiting and prescriptive.
- 3.3 These Policies are too numerous and complicated and therefore potentially misleading. It would be preferable to state broad objectives for substantial improvement of the economy throughout East Kent, with all coastal towns contributing to overall targets, demonstrable and significant harm to important planning objectives being required to justify those objectives not being achieved.