

Response to proposal 23/505533/EIHYB 'South East Faversham'

1. Context

Selling residents have had the opportunity to attend three monthly parish council meetings when the Duchy's planning application was on the agenda. At the Selling Annual Parish Meeting 2024 residents were also able to raise their views. In addition, Selling Parish Council held an extraordinary meeting focused solely on the Duchy application. See [Selling Parish Council meetings](#). We also produced a handout for residents, available online on our website (see [Selling Parish Council Planning Handout](#)) or Facebook page or in printed form, which offered a summary of key facts and guidance on writing a planning response focused on material planning considerations.

All residents felt the planning application was speculative, harmful to the future of the whole area and neither grounded in any existing development plan nor the true facts and conditions of everyday life around Faversham and surrounding rural villages. It was noted that while the Duchy have clearly held extensive community engagements based in Faversham, no consultation was offered by the Duchy to meet with Selling Parish Council until an invitation in the past two weeks. We are grateful for the opportunity to hold a robust discussion and thank the Duchy representatives for a thorough and well-informed briefing and willingness to engage so readily.

Like surrounding parish councils, we are concerned that this application is made in the absence of a current development plan. Swale Borough Council has an out-of-date Local Plan. They have recently issued a 'Call for Sites' ahead of a review due next year. We contend that the right place to test such a controversial and huge planning development is within the proper Local Plan statutory process expected later in 2024. Any decision to approve the application prior to the Local Plan review breaches the integrity of the process and makes a nonsense of "Plan-led development".

Although just 9% of the Selling Parish boundary is within the area of the current Duchy application, the wider and more complex issues arising from the application have significant and direct impact on our residents. There is no doubting the professional quality, worthy intent and obvious experience brought to bear on the Duchy's approach. It is the impact of specific aspects of the proposal on our rural village and quality of life that largely concern residents of Selling, which we have tried to capture in our response. Many residents have already submitted their individual responses on the Planning Portal or direct to Swale BC. We have actively encouraged this.

We have structured our response around the following material planning considerations:

2. Traffic generation - Although Faversham is not a 'primary destination' within the Primary Route Network, and the A2 Canterbury Road from Brenley Corner to Faversham is not a 'primary route', it is impossible to avoid the A2 Canterbury Road for any vehicles intending

to access and exit Faversham: the town has a northern border with its Creek and the Thames Estuary beyond. There is insufficient evidence of understanding trip distribution (number of trip origins and destinations) and lack of detail or substantive planning consideration of the impact of the proposed development on current traffic conditions, especially the A2 - based on an outdated traffic modelling exercise carried out in 2021.

The A2 j/w Love Lane is a known traffic hot spot exponentially affecting journey times at any time, including peak hours. The increase of vehicles from the planned Duchy development adjacent to this junction (with its re-routed traffic from Selling Road, also a well-known 'rat-run' in times of strategic road network difficulties involving the A252, A251, M2 and A229) can only make any solution more complex and the application singularly fails to account for this or offer any details of tangible, sustainable improvements.

This planned development, alongside recent and new housing developments in the Faversham area (currently about 1,600 new houses across four new developments in the past three years) will have even more significant implications for the A2, the M2 J6 and J7 (Brenley Corner) and surrounding strategic road network. Residents are concerned that the re-routing of Selling Road would mean increased and more difficult journey times for blue light emergency services called to Selling.

While there is ongoing high-level discussion between national bodies on the future of the A2 primary route from Canterbury and Brenley Corner, any solution is not yet decided and there is yet further decision-making paralysis meaning funded improvements are unlikely until at least 2030. National Highways predicts delays, at this notorious collision hotspot, are expected to worsen by 2031 ("Strategy Initial Overview Report: Kent Corridors to M25" *May 2023*). Such delays have an immediate and dramatic effect on the local road network as all types of vehicles look for alternative routes, of which the A2 Canterbury Road past the proposed Duchy development is the one chosen by satnavs. There must be clearer and more substantial plans for managing traffic generation on an already dangerously overloaded road network included in the application. The Duchy's own peak flow measure highlight the intense pressures on key roads around Faversham.

3. Highway safety - The re-routing of Selling Road, an important connection heavily used by residents of Selling to access Faversham and its station, health centres, shops and leisure facilities, is given short mention and no impact assessment of the consequences of diverting traffic through what is intended as a mainly housing Phase 2 of the development in 2027. This road is currently a lifeline for Selling and its widespread hamlets, used not only by vehicles but by horse riders (there are large stables close by, further east along Selling Road), cyclists, walkers and runners.

We note the Duchy's peak flow measurements assigned to Selling Road adjacent to the planned development at 200 vehicles per hour. The use of Selling Road by LGVs accessing the A2, A229, M2 and other parts of the strategic road network (many of which are articulated vehicles transporting full size containers) and local farm vehicles and often large machinery has clearly not been considered.

By the existing design, all this additional rat run traffic, including LGVs and agricultural vehicles, may be generated in the very centre of the Phase 2 development. Traffic will necessarily flow into and out of the residential area, alongside the intended large primary school and through a 'community hub' onto and off the A2. This re-routing represents an inherent and heightened safety risk to all road users and we call for a condition of the application to include re-consideration of the planned removal of vehicle access to Selling Road.

Access to Faversham, other than via M2/A2/A299 requires use of Selling Road or the A251 to the south. The A251 is acknowledged and reported by Swale Borough Council, Kent Highways, and Kent Police as a dangerous road with frequent collisions, many serious and involving personal injury. Selling Road already suffers from inappropriate use by LGVs, including container lorries (principally Maersk, which we have reported to KCC Freight Team via Lorry Watch). These roads are highly unsuitable for additional traffic. Two lorries cannot pass one another on A251. To further expand a town that has so few access roads is foolhardy.

Junction 7 of the M2 which is situated at the Eastern end of the site is recognised as in urgent need of upgrading. No scheme to do so has yet been adopted or funding identified. The applicants' agents have stated in public that this application will produce insufficient 'profit' to allow contributions to improve either Junction 6 or 7.

The A2 on the northern boundary of the site is already a bottleneck. Introducing yet more traffic onto this road, allied to several more junctions and pedestrian crossings will make this far worse. This will have a negative impact on the local economy inevitably leading to employers relocating away from Faversham with local unemployment and/or more unsustainable commuting. With the A2 increasingly gridlocked, traffic to and from the Development will be forced to use the local rural lanes, already over used and dangerous, to attempt to access the National Road network especially the M2 and M20.

4. Adequacy of parking – The Duchy's off-road parking proposals are unrealistic and at odds with the recommended Police and national crime prevention models for designing out crime. The structure for parking planned requires CCTV as well as safety and intrusive crime prevention lighting, which is not in the application. This will be contrary to the style, and broad architecture of the development. There is no detail on how parking space will match the needs of housing set against typical vehicle ownership in England of two per household. It is unclear whether there is sufficient residential parking space built into the design.

The Duchy's Walkability study suggests the proposal's *landscape* design will encourage the new residents to walk or cycle and be able to access existing Faversham communities, facilities and services without car travel. The 'Walkability' study also suggests the new population will have the opportunity to walk to Faversham town centre and the station. From the farthest reaches of the housing development to the station will entail a 1.8 mile walk and to the town centre nearly two miles. From the proposed housing near to Macknade the walk is nearly a mile to the station.

There are very few options to reduce this distance by clever use of new footpaths / footways and the marginal gains are insignificant, although we acknowledge this is an ambition. Commuters will typically use their vehicles for a walk to the station beyond c. 20 mins as transportation forecasting models have demonstrated ad nauseum. The volume of vehicles used to commute in inclement weather doubles.

Faversham Station currently has just two consistently full car parks as of now. The other nearest station at Selling has no official car park and no more than 15-20 vehicles can use the congested narrow Station Approach and very small open space next to the station. There is no cycle storage facility at Selling train station.

5. Intrusion into the open countryside – The Duchy readily admits in its Master Plan and Vision that building on prime agricultural land goes against its preferred approaches to sustainable development. It specifically references Swale Borough Council as the body responsible for identifying this very large area of Best and Most Versatile (BMV) land for development – high quality land invaluable for scarce food production of fruit and vegetables. It was however the Duchy themselves that first approached Swale Borough Council some six years ago to offer this best most versatile land as an option for development. This BMV land is all in open countryside representing a staggering 70% (58% formerly known as Grade 1) of the proposed area.

The food group for which the UK is most reliant on imports is fruit and vegetables, with the UK producing just 17% and 55% respectively of supply. (DEFRA, *Food Security Index*, May 2024). Fresh fruit and vegetables together remained the highest value category for imports in 2022, totalling £6.6 billion (DEFRA, *Overseas Trade*, Feb 2024).

“Strong domestic [food] production is dependent on sustainability of the whole food system, particularly on healthy biodiversity, soil, and water. The UK Government is supporting increased domestic production, particularly of UK fruit and vegetables, to strengthen our food security.” (DEFRA, *Food Security Index*, May 2024).

The first United Kingdom Food Security Report (UKFSR) set out analysis of data relating to food security, required by the Agriculture Act 2020. The aim was to present a report on food security to Parliament at least once every three years. “The UKFSR examines past, current, and predicted trends relevant to food security to present the best available understanding of food security at the time of publication”. The first UKFSR was published on 16 December 2021 and the next will be published towards the end of 2024. (Gov.UK DEFRA *United Kingdom Food Security Report*)

A Key Recommendation of The House of Lords *Land Use Committee* in December 2022 was to “create a Land Use Commission tasked with producing a land use framework. The framework must consider several factors, including food, nature, housing needs and the push for net zero.”

In March 2024, the Commons Select Committee *Environmental Audit Committee* (EAC) published a communication with Defra Ministers. This omitted to set a date for the publication of a Land Use Framework. The Framework was promised by UK Government

during 2023 but has not yet been delivered. It will map the “proportion of land currently used for different activities, such as housing, agriculture, forestry and nature conservation, and how these proportions will need to change in the future for binding policy targets to be met. This resource will be necessary for strategic planning to maintain food security, the EAC has repeatedly stated.” (<https://www.edie.net/mps-press-uk-government-for-land-use-framework/>)

Most recently, on 14 May 2024 at the 2024 Farm to Fork Summit, the annual [UK Food Security Index](#) was published, which highlights the lower amount of fruit and vegetables produced in the UK relative to other products. At the summit, the Prime Minister identified fresh produce as a key growth sector and priority for government. A new “Blueprint to grow the UK fruit and vegetable sector” was launched (Gov.uk DEFRA May 2024). In this blueprint, the Prime Minister sets out government’s ambitions to increase domestic fruit and vegetable production and grow the fresh produce sector.

All of the land owned and offered by the Duchy for housing development is of the highest quality (70% best most versatile) suitable for fruit and vegetable production. This is now clearly acknowledged and supported by HM Government as of key significance and importance to UK food security.

We call upon the Duchy to pause its planning ambitions for South East Faversham and demonstrate strategic leadership to the sector and beyond by proactively calling or lobbying for the Government to: 1) introduce a much-needed Land Use Framework later in 2024 and 2) publish the second United Kingdom Food Security Report also later this year 2024. Clearly, we are aware that the machinery and outcome of a general election may cause some obfuscation, but this would further emphasise the need to have a clearer picture and leadership of land use strategy and food security as essential context for the planning application.

6. Nature conservation - It goes without saying that the large areas of open countryside and prime agricultural land earmarked for development (70% BMV land) have abundant, diverse ecosystems of flora and fauna. This wildlife and associated habitats rich in biodiversity face destruction. There is little detail in the application that offers reassurance of conserving existing nature and biodiversity plans are not complete. At this moment, it is not unreasonable to conclude that construction will unavoidably remove or at best drastically alter the natural landscape and endanger a number of protected species despite best intentions.

Although not directly within the North Kent National Landscape literally the other side of the M2, there is no difference in the nature and appearance of this open countryside. Notwithstanding the ambitious 20% biodiversity gains for the development claimed, there appears no reasonable rationale for destroying the peace and environment of the open countryside and then attempting to ‘make good’ the impact of such a large development of housing, new roads, commercial premises and space and additional population.

7. Risk of flooding – The Duchy states: “Surface water will be directed to sustainable drainage systems (SuDs), and an onsite Waste Water Treatment Works (WWTW) will

process all waste water and sewerage from homes and businesses...this system will require approval from the Environment Agency". Phase 1 of the development (2027) includes the water recycling centre

Southern Water refers to the impact of additional foul sewerage flows from the proposed development on the existing public sewer network. Their initial study indicates that these additional flows may lead to an increased risk of foul flooding from the sewer, although their job is to mitigate that.

Southern Water also stipulate that where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development

These details do not appear to be in the application.

Much essential information on the risk of flooding, SuDs and government approval is yet to be offered in the application. As Phase 1 also includes the water recycling centre, planning permission would seem premature. While the Duchy focuses on the ambitious plans for a SuDs and WWTW, it neither refers to existing flooding issues in Selling Road and the A2 nor any plans to mitigate against the risk of the development exacerbating flooding.

8. Density of build and scale – The vastness of the development site, replacing hundreds of hectares of open countryside and best most versatile land, is hard to fathom. There is no doubt that, coupled with the recent and ongoing housing developments along the A2, Love Lane and Graveney Road, the charm and allure of Faversham is ruined forever.

The trade-off between the proposed housing density of 28 dph based on green credentials and consequent increased scale causes much unease for the future of this area of Faversham, Swale and East Kent. The role of commercial premises is not properly explained, and prima facie seems an odd fit within this enormous development. There is irony that the intended sustainability sought by the Duchy, and required by the National Planning Policy Framework, is undermined by the sheer unnecessary scale of the project.

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