

CPRE Kent

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Swale Borough Local Plan – Main Modifications

Matter 4: AX4 Land at Preston Fields, Faversham

Matter 4

ID429231

Representation

Numbers: LP734

4.1 Is the allocation justified by robust evidence, including landscape character assessment and Sustainability Appraisal as the best option for delivering the borough’s housing.

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3.2 Deliverable within the Plan Period?

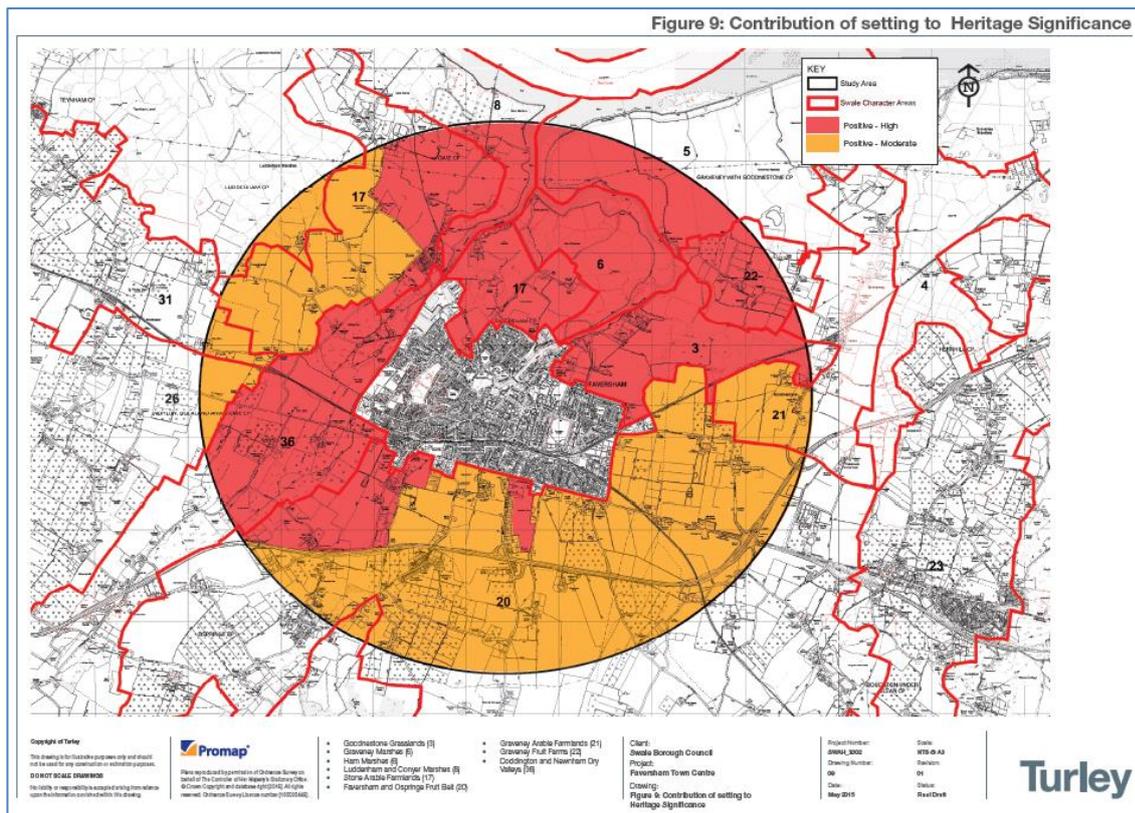
3.3 Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?

4.4 Supported by clear and deliverable measures to address transport implications of the proposed development?

CPRE comments on this site are set out at Comment LP733

1. While Sustainability Appraisal and ‘the ranked assessment of reasonable site options’, rightly assist with site selection, they are tools to assist with decision-making. In the case of landscape, for example, the assessment of sites does not assess whether sites are valued, only whether they are designated (or adjacent to designation). Site visit and detailed assessment is also essential. They are useful but ‘blunt’ tools and decisions must also be informed by consultation and with knowledge of the sites themselves.
2. This is especially the case in view of the recent appeal decision (APP/V2255/W/15/3067553 and APP/V2255/W/16/3148140) at the Pond Farm site at the other end of the Borough where landscape issues were crucial to the decision to reject the appeal and refuse planning permission.
3. CPRE believes that the indicative (June 2016) ‘Ranked Assessment of Non-allocated Site Options’ needs to be used with caution. For example, the issues associated the BMV land and air quality constraints have been omitted from the ranking assessment. Both are relevant to this site and are important issues.
4. Within the Sustainability Appraisal, the site performs poorly in terms of AQMA, landscape and heritage impacts, and loss of agricultural land. These issues amount to substantial planning concerns and appear not to have been given sufficient weight in the decision-making process. For example, despite the site not being a designated landscape, CPRE argues that it is an attractive and *valued* landscape and its loss would detrimental to the setting of the Conservations Area. You can see from the extract plan from the Faversham Town Heritage Study¹ (overleaf) that the Preston Fields site has been assessed as making a ‘high’ positive contribution to the heritage significance of the town, as distinct from land either site that makes a moderate contribution. This indicates that the heritage values of the town can be easily understood and appreciated from this land, described in the study as areas of “*historic landscape and built form that retain largely intact and strong visual, functional and historic links with the core of the town*”.

¹ Faversham Town Heritage, Landscape Setting and Characterisation Study, Swale Borough Council (June 2015)



Map Extract (Figure 9) from Faversham Town Heritage, Landscape Setting and Characterisation Study, Swale Borough Council (June 2015)

5. The study explains this relationship (para 7.5):

“This study highlights that the relationship of the ‘heritage asset’ of Faversham Town’ to its setting is distinctive and specific to this historic settlement. Right across the study area there are many areas within the surroundings of Faversham where the heritage significance of the place, and our understanding and appreciation of its own unique history, can be experienced very strongly. It is inevitable that the historical, functional and visual relationship between the town and its countryside surroundings will continue to evolve over time. However it is important that change should be managed in a way that sustains and , where appropriate, enhances the significance of this historic asset. It should also be recognised that inappropriate development within the setting of the town has the potential to cause harm to its significance, and that efforts should be made to avoid or minimise this.”

6. As stated above the recent appeal decision at the Pond Farm site argued that landscape issues were crucial to the decision to reject the appeal and refuse planning permission. Landscape issues should be more important in this part of the Borough. The divide between Faversham and the Thames Gateway is important, in part at least, for ensuring the maintenance of the preservation of the setting of the historically important Faversham. Thus, it is CPRE’s view that landscape issues should be accorded more weight in this part of the Borough.

7. The shallow valley landform and extensive attractive views are highly valued CPRE argues this land should be preserved. It is valued for its scenic and rural character and its importance in the setting of the historic town (and historic links to it). The landscape is revealed from the A2 itself. Any urbanising elements on the A2 have a very limited impact on this scenic and rural character.



8. In terms of the AQMA, CPRE argues that it is not sufficient to disregard this issue in anticipation that it can be dealt with at the planning application stage. It is essential that the health risks associated with development are understood and planned for. It is at the allocation stage that cumulative impacts and the implications for deliverability can be anticipated.

9. The importance of protecting air quality cannot be underestimated. Given the poor air quality at Ospringe, the urgency of meeting limit values for air pollutants should not be ignored. This urgency was given emphasis by the November 2016 'Client Earth' decision by the High Court. The court found that the Government's Air Quality Plan should seek to achieve compliance by the earliest possible date, and that the Government has adopted too optimistic a model for future vehicle emissions.

10. Planning Practice Guidance (ID32-002-20140306) states that *'it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality'*. The guidance goes on to say:

"Drawing on the review of air quality carried out for the local air quality management regime, the Local Plan may need to consider:

- *the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments;*
- *the impact of point sources of air pollution (pollution that originates from one place); and,*
- *ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable".*

11. Assessing the cumulative impacts of development, together with transport interventions is critical to ensure local plan sites are deliverable – i.e. that there will not be an adverse impact on AQMAs. It is important that air quality at Ospringe is improved as soon as possible and this may prove to be an issue that affects deliverability of the site.

12. A planning appeal decision at Newington (to the west of the borough) in January 2017 (APP/V2255/W/15/3067553 and APP/V2255/W/16/3148140), was refused in part because the appeal proposal was likely to have an effect on air quality. The Inspector concluded:

Para 105 *"Drawing all this together, I find that it is more probable than not that both appeal proposals would have at least a moderately adverse impact on air quality in the Newington and Rainham AQMAs, and thus a significant effect on human health. While measures are proposed to mitigate those adverse impacts, there is*

no clear evidence to demonstrate their likely effectiveness, and it may well be that the contributions to fund the measures fail to reflect the full scale of the impacts.

106. I therefore conclude on the eighth main issue that, even after taking into account the proposed mitigation measures, the appeal proposals are likely to have an adverse effect on air quality, particularly in the Newington and Rainham AQMAs. I reach this conclusion for the reasons set out above, notwithstanding that the Council raise no objection to the proposals on air quality grounds. Both proposals would thereby conflict with the guidance in NPPF paragraphs 120 and 124”

11. It should be noted that the air quality evidence presented by the developers for this site relies on the so-called ADMS-Roads model. Whilst this model is in wide-spread use, in a previous submission the CPRE showed that the accuracy of this model, when applied to actual sites is very low and so evidence and mitigation measures based on the output of this model should be treated with caution.
12. It is the view of CPRE that the evidence base is not sufficiently robust to demonstrate that this site is deliverable. Insufficient efforts have been made to demonstrate that the plan generally will not give rise to unacceptable risks to human health in terms of air pollution – both from individual sites and cumulatively.