

Written rep s only:

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Representation Number: 1011 593
Matter 1
AX6 Local Plan 160 and 161

Matter 1. Procedural Matters.

1.1 Has the modified Plan been the subject of appropriate sustainability appraisal and strategic environmental assessment?

No. The Plan has not fully considered the sustainability and environmental issues on certain sites. It feels like a panic reaction to events in Medway. The Council is responsible for the safety and quality of life of its residences as well as preserving natural resources for future generations. The decisions made now effect many future generations. The Council accept that sustainability means 'ensuring that better lives for ourselves don't mean worse lives for future generations.' (National Planning Policy Framework). The most sustainable sites have not been selected in the **Councils response to Point 4 Alternatives Proposed (SBC/CSR/5)** they have said 'Almost any prospective allocation would have a range of issues associated with them and the Council must balance together with the need to provide for future housing needs. The Council has set out its approach to the choice of sites in its evidence, including its Sustainability Appraisal'. The allocation of AX6 (Newington) which would mean: loss of Grade 1 Agricultural Land; Pushing Air quality over Government limits; have a detrimental effect on Wildlife being next to two conservation areas; have an impact on Landscape and Countryside including the loss of a Major part of the Strategic Gap between settlements; impact on a Historical Settlement being the site of the original Roman Road; increase problems with drainage in an area where drains are inadequate (raw sewerage overflows during heavy downpours) and a junction which will add to Air Pollution and delay Emergency services. Other sites such as SW/778 (Selling Road), may have a few of these issues but the totality. The **Councils response to point 2 Summary of Modifications sought (SBC/CSR/5)** 'The site at Brenley Corner (SW/778) came forward late in the plan process. It has been considered and rejected for this Local Plan as the scale of development would not represent a 'proportional boost, for Faversham and would have transport impacts which would not be capable of mitigation without major and currently unplanned for improvements'. SW/778 would not have the massive transport impact on its surroundings of AX6 on the A2 as AX6 (Newington) will the additional factors listed above. There are NO Major planned improvements to the A2 to mitigate problems other than a Junction that in itself will create a Pinch point increasing the problem. The Council has not demonstrated that a development at AX6 will not have a detrimental effect on the quality of life and health of local residents. In a document **Sustainability Appraisal of the Swale Borough Local Plan (June 2016)** **9.2.2** 'Allocations at Newington give notable concerns that all traffic associated with the major new allocation (115 dwellings) will pass through the AQMA and indeed there will be a need for a new junction within the AQMA. However, it is noted that the junction will be at the eastern extent of the AQMA which is a positive as the predominant direction will be East towards Sittingbourne'. This does not make sense. The junction will be in the AQMA, but it is nonsense that traffic would be more predominant in travelling East when Medway (West) have more amenities and employment opportunities. In **the same document 9.2.6** 'In conclusion the proposed modifications give rise to some concerns particularly the allocation of land north of High Street Newington (New Policy AX6) Policy requires innovative solutions; however it is not clear the extent to which such solutions will result in reduced traffic through the AQMA on balance it is appropriate to conclude the potential for *significant negative effects*, however there is much uncertainty.

1.2 Has the modified Plan been subject to Habitats Regulations Assessment?

No. According to Natural England (letter dated 21 March 2016) in respect of AX6 (Newington) *'The consultation documents do not include information to demonstrate the requirements of Regulations 61 and 62 of the Habitats Regulations have been considered by Swale Council. I.e. the consultation does not include a Habitats Regulations Assessment.'*

1.3 Is the modified Plan consistent with national planning policy in the NPPF?

No. The National Policy Framework policy seeks to protect good quality agricultural land for Food security and the ability to feed a growing population and direct development to lower quality land. Paragraph 112 states. *'Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality'*. Other areas of lower Grade land are still available within the Borough, including Sheppey, land North of Faversham and the Boroughs Southern borders. The Council has not demonstrated that the NPPF guidance should be set aside, to use land of best and most versatile quality when alternative land of lower quality should be used in preference. It would also be good to know how much land has been approved for building but is being 'Land Banked' by developers waiting for values to increase, has this been investigated by Swale Council as surely this should be given a priority before committing further land. The Council should be doing all it can to prevent land banking when that land is more suitable for development. It might be cheaper for large building companies to build on land which is better agricultural land but the role of the Council is not to protect large companies profit margins but to protect our environment for the long term.

The Councils response to Brownfield sites Environmental issues point 9 (SBC/CSR/5) *'There is no support in Government policy to use brownfield land first.'* . It does not protect most versatile agricultural land despite the NPPF Core planning principles paragraph 17 stating *'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.'*

The NPPF paragraph 32 states *'improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'* In the case of AX6 the Impact will be severe; creating another pinch point will have a severe impact on the A2 which is already a subject of an AQAP Zone and will delay Emergency vehicles on the main arterial route between Medway and Sittingbourne. Due to the width restrictions an HGV will not be able to pass a car in the ghost lane. If the KCC give the go ahead for Brick-earth to be removed from Paradise Farm (some 100 Lorries per day) coming through Newington AX6 would add to the Cumulative impact, as would Planning at Pond Farm. The Council is invited to see for themselves the problems in the village when lorries try to pass. They can see for themselves the huge delays through Newington to Rainham and Sittingbourne whenever there is anything which has causes a slow down in the traffic. There are a number of photographs showing the stationary traffic through Newington.