

From Newington Parish Council ID/73197 Matter 2 & 4
For examination of the Swale Plan January/February 2017

Further to comments submitted in August 2016:

1 Flawed Principles

A basic tenet of the Swale Plan (Original, Recent and proposed modifications) is the concentration of development in the Local Rural Service Centres. The designation of these centres is historic and based upon relative size and potential for development at the time of original designation. Newington Parish Council submits that the designation does not take account of recent developments in the Village and the real ability of the Village to sustain further development of the scale proposed.

With the new remit of the SE LEP and its focus including all North Kent we believe the split between Thames Gateway and Faversham/rural Swale to be out-of-date and no longer relevant.

We question the premise that 85% of development should be in this part of Swale. Faversham now has much improved rail links to the capital – certainly better than Newington. Yet Faversham and the east of Swale is only to be allocated 15% of developments under the now out-of-date principles behind this plan. Other planning applications (Pond Farm and St Mary's View) have recently been rejected by the planning committee – an acknowledgment that Newington cannot sustain further development.

The proposed modifications to the local plan merely scale-up the allocations in designated areas Swale Borough Council has chosen to compound problems in its towns and RLSC villages rather than taking a longer-term view by designating additional villages to become Rural Local Service Centres.

Policy ST3 States: that Newington, designated tier 4 in the settlement hierarchy
'new development may be acceptable on previously developed land within the defined built up areas or in the case of new services for the settlement and the surrounding rural area, on other suitable sites that do not harm the settlement pattern or character of the surrounding countryside'

The proposed site is not on previously developed land and we submit that the proposed development would harm the settlement pattern and the character of the countryside. The proposed site is designed best and most versatile.

NPPF (para 112) *'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 a higher quality.'* The Bearing Fruits 2031 document (Page34): *'We believe that the high quality agricultural land around the A2 corridor and the character of settlements and their separation should be influences upon where growth should be located.'*

The proposed modifications directly contradicts Swale Borough Council's own 'Value of Best and Most Versatile Agricultural land in Swale' (October 2015) *'Swale contains some of the highest quality land in the UK. Assessment of future options should take into account that Best Most Valuable land is a finite resource, losses of this land are likely to be irreversible'*

Bearing Fruits 2031 Local Plan (Tier 4 Page 55) states: *'Despite Newington's role and level of services, development opportunities are relatively limited due to the valued and important heritage. Landscapes and habitats to the north of the village, poor pedestrian connections between north and south of the village, a restricted internal road network, poor air quality and surrounding high quality agricultural land'*

2 Air Quality

The Newington Village centre is monitored for air pollution where levels of NO₂ pollutant as often exceeded EEC safety limits. The factors the applicant describes as causing this (canyon effect and congestion) are constant factors due to narrowness of the road and proximity of unbroken buildings; this development could only increase congestion and so cause greater harmful air pollution to pedestrians and village-centre residents.

Following a Public Planning Inquiry in November 2016 (Appeal A – Ref: APP/V2255/W/15/3067553 London Road, Newington, Kent ME9 7NL Appeal B – Ref: APP/V2255/W/16/3148140 London Road, Newington, Kent ME9 7NL) the Inspector's decision was published on 9 January 2017.

From the Appeal Decision:

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.

Appeal B was concerning the proposal for 140 dwellings 300 metres west of Newington. The proposed modifications include '99 High Street and Land North of the High Street'. Traffic from either development would travel East or West in, probably, equal numbers. Therefore the Inspector's decision regarding the Gladman Appeal extracted above would apply to the proposed Persimmon development north of the High Street – ie bringing about 'a significant effect on human health'

3 Sustainability of the proposed development in Newington

Newington is Village and the residents here wish it to remain one. We have one convenience store, Indian and Chinese takeaways, one public house, a Church, Methodist Chapel, Village Hall and CofE Primary school. Our landscape is rural and, as stated above the road and pedestrian networks are restricted and air quality is a real concern.

The 2011 census shows a Newington population of 2551 in 1089 household spaces. Since then there have been planning applications approved for 12 flats 32 houses and 2 bungalows; applications are currently in progress for 16 further houses, giving an organic increase in population (approx. 130 spaced over the first four years of the decade since the census), which we believe to be the sustainable limit for this Village. The Planning Application for 115 (now increased to 140) would bring a sudden population increase of

approx. 350 people, representing a 13% increase in the population of the Village. Newington Parish Council believes that the already-approved applications described above, those in progress and other small applications likely in the next few years, make a contribution to the housing needs of the Borough appropriate to a village of our size and amenities. For this reason the LDP proposed a growth of 1.3% for Newington; very different to the unacceptable increase that the proposed modifications would bring about.

Newington School is close to capacity (Ofsted May 2015, 184 children in 6 classes and nursery), meaning many children would have to make longer journeys to Rainham or Sittingbourne, or be bussed to the Regis Manor School suggested, by KCC, for S 106 funding. It is KCC policy that Newington School should not expand due to traffic congestion in Church Lane.

Public transport to and from Newington is limited: one slow train per hour to London or Dover; a poor bus service, with no buses at all on Sundays.

Newington does not have a doctor's surgery or dentist. The Persimmon proposals originally included land for a surgery, but this was dropped following the response from NHS England. The land freed up has been re-designated for three-storey flats – out of keeping with the Village. These appear to be of 'stock design' and because of the lack of lifts would be unsuitable for the elderly, disabled or those with babies and young children.

The National Planning Policy (Paragraph 35) states *'create safe and secure layouts which minimise conflicts between traffic and cyclist or pedestrians'*. The Swale Transport Strategy _ Draft 2014 -2031 states the aim of: *'Improvements to transport infrastructure is the removal of pinch- points which are barriers to development and growth'* Access and egress to and from the proposed development would be by a dangerous new junction directly onto the A2 High Street, with the road too narrow to permit the necessary traffic lanes and satisfactory width pavements. The site is 200 yards from the Village centre, well-known as the narrowest part of the whole A2, where it is not possible for lorries to pass at the same time as vehicles from the opposite direction (a frequent problem due to a large cold store two miles to the west). Traffic collisions at this point have necessitated the frequent replacement of the pedestrian-safety railings. This very busy road continues westwards to Rainham, two and a half miles away, with traffic congestion at the start and end of each working day. Eastwards the road leads to Key Street which KCC have highlighted as a point of congestion especially at the start and end of each working day. This junction feeds the A249 which, southbound, leads to the Stockbury roundabout, designated for a future traffic intersection with the M2 when funds permit.. This road is at standstill several times each day at this point. Further south the A249 reaches a busy intersection with the M20 motorway and the route into Maidstone; again this is heavily congested in morning and evening rush hours. Newington was seen as a priority for a bypass by KCC, due the congestion through the Village; the programme was stopped by national government in 1997.

Newington Parish Council believes that the proposal for 99 High Street and Land north of the High Street (originally 115 houses, now revised to 140 homes) should be deleted from the modifications proposed.

Stephen Harvey
Chair of Planning Committee
Newington Parish Council
11 January 2017