



HELEN WHATELY MP
Member of Parliament for Faversham and Mid Kent

HOUSE OF COMMONS
LONDON SW1A 0AA

Ms Larissa Reed
Chief Executive
Swale Borough Council
Swale House
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Sittingbourne
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By email: chiefexecutive@swale.gov.uk

26 April 2021

Dear Ms Reed,

Swale Borough Council's Local Plan Review (Regulation 19) Pre-submission Consultation

As one of the Members of Parliament representing the Borough of Swale, I would like to contribute to Swale Borough Council's Local Plan Review (Regulation 19) Pre-submission Consultation.

I am only too well-aware of the balance that residents expect the Council to strike between protecting the countryside and providing housing. It would be wrong to oppose all house building, but at the same time we must make sure our area does not take more than its fair share, protect the countryside, and invest in the infrastructure people need.

I appreciate that in my capacity as a local Member of Parliament, I do not have a formal role in planning decisions at the local level. I fully respect that the Local Plan is the domain of locally elected Borough councillors. However, as an elected representative I have a duty to represent the thousands of people who write to me about housing, planning, and infrastructure on a regular basis. I want to make sure that local residents' voices are heard and ask that you take note of what they are saying.

This is clearly something people feel strongly about. As well as many people writing to me about the proposals, over 1,000 people took part in a survey on my website about the Local Plan. 91 per cent of responders said they were either opposed or strongly opposed to the proposals, with less than 4 per cent saying they were in favour of the Local Plan. 79 per cent of responders said the Local Plan would have a direct impact on their lives.

I would like to highlight my main concerns about the Local Plan in this letter. Firstly, although I welcome the Council's decision to extend the consultation period, I am worried about the unnecessary speed at which the Plan is being progressed. I am particularly disappointed that the Council chose to skip the regulation 18B consultation which would have given residents the opportunity to review the Council's preferred approach – rather than just comment on its soundness. This is especially concerning given that the current Plan is dramatically different from the previous iteration.

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Hard copies are available upon request. Please let me know if you have any questions about these arrangements.



Due to this lack of consultation and opportunities for residents to have their say, many of the sites proposed have been met with strong local opposition. This could have been avoided had residents been given the chance to help shape the Plan as a whole – seeing it as an opportunity to improve local infrastructure and enhance the local area. Only 5 per cent of responders to my survey said they felt they had been properly consulted on the latest changes to the Local Plan, and just 3 per cent said they had enough information on what the terms ‘legally non-compliant’ or ‘unsound’ meant in the consultation.

One resident who contacted me about the consultation neatly summed up this sentiment by saying:

“The current consultation does not give residents any options or choices. We are asked to comment on just one option or nothing. The time scale is too short for proper consultation and there are many people who even now are unaware of what is being proposed.”

A Local Plan review process should be a chance for a council to work with residents to find solutions to infrastructure problems including roads, as well as the best way to meet a council’s housing need. Huge development in East Faversham is not the only way to achieve this objective, and residents have not been given the chance to explore alternative solutions.

As the Planning Advisory Service of the Local Government Association (LGA) recommends as best practice:

“Where you are undertaking a full or extensive update to your Local Plan, it may be prudent and appropriate to undertake public consultation on a full draft policies update together with supporting documentation at the Regulation 18 stage. This provides you with the opportunity and ability to make any necessary changes to the policies update prior to the publication of your Regulation 19 Submission Local Plan.”

Secondly, I am concerned about the number of houses proposed to the East of Faversham. They not only threaten the look and feel of the town, they entirely hinge on an unconfirmed infrastructure project. This was regularly raised by responders to my survey, and I feel that the Council would have understood this had they taken more time to ask for residents’ views.

As one resident who took part in my survey said: *“Brenley roundabout still gets grid locked. I just think that having more houses just off the roundabout is going to cause extreme chaos and more accidents will happen.”*

As we all know, once land has been earmarked for development in a Local Plan it is almost impossible to undo at a later stage. 89 per cent of responders to my survey said they were opposed to the proposed allocation of housing around Faversham and the surrounding villages, with the impact on traffic and local roads being one of people’s biggest concerns about new housing.

One resident who took part in my survey explained this concern by saying: *“The whole road network of the A2 will not be fit for purpose, we already get gridlock if there is the slightest problem on the M2 or M20.”*

I have the following specific points to make in response to the proposals in the Plan:



Policy ST 2: Swale Settlement Strategy

I am pleased to see that sustainable growth, enhancing health and wellbeing, climate change, and the prioritisation of brownfield sites as a first port of call for development sites are major policy areas in the proposed Plan.

Policy ST 3: Delivering sustainable development in Swale

I would like to see the commitment to deliver sustainable development strengthened to provide electric charging points at all new developments. As a rural district in the Garden of England I fully back the Council's efforts to support the rural economy and sustainable farming which will become even more important as we rebuild the local economy post lockdown.

Policy ST 4: Building a strong, competitive economy

One of my election promises was to provide better broadband across Faversham and Mid Kent, and our experiences of lockdown have shown that strong internet connections have never been more important. I fully support the principle that new homes should include fibre to the premises to support gigabit broadband. This together with the Government and Kent County Council's ongoing work should result in improvements for local people and businesses over the next few years.

Policy ST 5: Delivering a wide choice of high-quality homes

As the country faces an acute housing shortage, I support the Council's ambition to provide a wide range of affordable housing across all tenures. I am particularly pleased to see a focus on family homes. On an almost daily basis, I receive letters from constituents who are struggling to find homes – both to rent and buy – at an affordable price in this area. Often this can lead to families, many of whom have lived here their whole lives, being forced to move further afield, which can result in difficulties in maintaining employment and, in particular, continuity for children in full time education.

I urge the Council to ensure that any affordable homes that are built, especially social rented, are close enough to the support services that people on lower incomes depend on or are easily accessible by a good public transport network.

Going forward, a greater emphasis on retirement and supported housing for disabled people would be beneficial. Building more retirement accommodation not only encourages older people to live in more suitable accommodation that is often less isolated, cheaper to heat, and with fewer hazards that can cause falls - but it also frees up much needed family homes. More supported housing for disabled people will better enable independent living.

Policy ST 6: Good design

Good design can enhance the local area and I am pleased to see this marked as a priority in the proposed Local Plan. It is good to see the Council working with developers, such as the Duchy of Cornwall, who I know have taken great care over the design of new housing in developments elsewhere. This is essential if Faversham is to maintain its look and feel as a historic market town.



Policy ST 7: Health and Wellbeing

Local planning is vital to building healthy communities, and it is good to see health and well-being feature prominently in the Plan.

Policy ST 8: Planning for Infrastructure

As stated, I have serious reservations about the scale of development hinging on the upgrade of Brenley Corner. Although I have lobbied hard for an upgrade, funding from the Road Investment Strategy (RIS 2), is so far only available for a feasibility study. I will continue to do everything I can to secure funding to deliver the upgrade – but it is by no means certain. I am concerned to see so much development dependent on a single, but uncertain infrastructure project. This is especially worrying because in my experience, once development is approved in a Local Plan, it is very difficult to undo at a later stage.

Policy ST 9: Promoting Sustainable Transport and Active Travel

As a bus user myself I am pleased to see plans promoting sustainable transport and active travel in the proposed Local Plan. I have been campaigning for better bus routes, more cycle lanes and footpaths since I was elected as MP.

Policy ST 10: Conserving and enhancing the natural environment and Policy, and ST 11: Conserving and enhancing the historic environment

From the correspondence I have received from constituents about the Local Plan, it's clear that people care deeply about the natural and historic environment of Faversham. Development must conserve and enhance this. That includes planning transport infrastructure: footpaths, pedestrian crossings, cycle lanes, bus routes etc.

In summary, I believe many of the flaws in this Plan are down to the fact that local residents have been denied a meaningful say on these proposals. In many respects, this is a consultation in name only. As one resident who took part in my survey said: *"There has been no proper consultation, and everything is being rushed through"*.

By not involving as many residents as possible in its design, the Council is risking approving a plan that could divide residents - when it could have been a plan that the whole community could support.

It is not too late for the Council to rethink these plans, consult residents properly, and deliver a Local Plan that people can be proud of.

Best wishes,

Helen Whately MP
Member of Parliament for Faversham and Mid Kent