

Erection of 10no. dwellings. Weston Works Front Brents Faversham Kent ME13 7EB

Application Reference: 22/503389/FULL

The Town Council supports the principle of residential development on this site. The site is site allocation in the extant Faversham Creek Neighbourhood Plan and again in the emerging Faversham Neighbourhood Plan.

However, there are a number of material and design considerations that the Town Council wish to raise. These are set out in this representation.

Additional Supporting Information:

- No Statement of Community Involvement, setting out how they informed the proposed development through early engagement with the community and stakeholders has been provided.
- There is no statement on the delivery of Affordable Homes, which must be an integral part of the development. The requirement is 35% of all new dwellings to be affordable.
- There is no Flood Risk Assessment (FRA), required as part of any new development.
- No approved drainage strategy that has been approved by the competent authorities, including SUDS has been provided. This has also been raised by Kent County Council in their planning response.
- There is no Landscape Plan and ecological assessment, demonstrating how the loss of green space has been considered, impact on habitats, and biodiversity net gain will be delivered.

Conclusion to Planning Representation:

We cannot support the current application and would recommend the applicant withdraws the application, provide the additional supporting evidence required and inform the design and layout, taking into account the material considerations raised in this planning representation.

Relevant Policy

Bearing Fruits Adopted Local Plan

There are a number of relevant policies from the adopted local plan. However, the application has only referenced policy DM8 to make clear how it does not meet the requirements in the planning statement.

Policy DM8 requires development of 11 or more to include an affordable housing provision. As the scheme is only 10 units, this is not a requirement. However, the planning statement fails to identify the relevant corresponding policy requirement in the Faversham Creek Neighbourhood Plan of 35% of all new dwellings.

Faversham Creek Neighbourhood Plan

The site is identified as an allocation in the made Neighbourhood Plan. The relevant policies include:

DQ1: The proposed development meets this policy in terms of scale, height and massing, all proposed development is 2 storey or less, with plain clay tiles for roofing materials. Predominantly the external materials proposed are red brick, however there is white painted render which would be contrary to this policy requirements.

Policy CRL3 requires “Community involvement and consultation must be carried out as part of the planning application process.”. There is no Statement of Community Involvement (SCI) form with the application. It is noted that representatives from James Claque Architects attended the Planning Committee on 07/02/22, but we are unaware of wider community involvement or engagement with other stakeholders.

HO2: Makes a clear requirement of 35% of all new dwellings to be affordable. The scheme does not propose any affordable homes as part of the development.

Policy FL2 requires a Flood Risk Assessment (FRA) as part of any new development. There is no corresponding or supporting evidence on this element.

Policy FL5 includes a requirement for new development of 6 units or more to include a drainage strategy that should be approved by the competent authorities, including SUDS. This has also been raised by Kent County Council in their planning response. Further information is requested to understand the drainage strategy and any potential impacts.

Emerging Faversham Neighbourhood Plan

The relevant policies from the emerging Neighbourhood Plan include:

FAV3: Residential Mix and Standards

This policy sets the requirements for the type and mix of dwellings, based on the AECOM Housing Needs Assessment 2022. The application is for two 5-bedroom and eight 4-bedroom dwellings. This scheme does not make a positive contribution to delivering the type and mix of homes required, nor a contribution to affordable housing and fails to meet these and the design criteria of the policy.

There are no details about how the proposed development meets clause 5 providing super-fast connectivity.

There are no design features or landscape details provided to demonstrate how the scheme will reduce its carbon impact and promote biodiversity.

FAV4: Mobility and Sustainable Transport

The Town Council supports the secure covered storage of cycles and mobility scooters integrated into the garage design.

Electric Vehicle Charging:

Plan reference 'Proposed Masterplan – Roof Plan, 21110_PL_04 C includes in the key reference to Electric Vehicle Charging Points (EVCP), however there are none shown in the corresponding plan. Having reviewed all proposed elevations of each plot and the garages, again there are no details of any proposed EVCP. Therefore, the proposed development fails to meet this key criterion, soon to be included in national legislation for all new dwellings to include EVCP. The development is not a future proof design.

Active Travel Connectivity: The site plans indicate parallel to the boundary wall near the site entrance that there is opportunity and intent to provide pedestrian connectivity. Whilst this principle is strongly supported there is insufficient detail to show where these connections will be made into the wider network.

There are also missed opportunities within the proposed development to strengthen and create new connections through future site allocations particular areas to be explored are adjacent to Plot 8. It is vital to the objectives of the LCWIP to promote and create active travel (cycling and walking) through all new development in Faversham. The Town Council understand the constraints of the site and issues relating to topography, however through creative design we are confident these can be made.

FAV7: Natural Environment and Landscape

Clause 1 makes clear there must be no adverse impacts on green and blue infrastructure shown in the related plans. Plan NEL1 identifies 3 'Green Linear Features' in the site and in plan NEL4 priority habitats that it includes 'low distinctiveness habitat'. The application is not supported by any ecological assessment or landscape character assessment and therefore there is insufficient evidence to determine what the impact would be. However, indicatively it would appear that the proposed new dwellings would be built on the 'Green Linear Features'. Further supporting evidence is required, with a revised design potentially or layout to ensure it does not have an adverse impact on the identified features.

Again, in clause 2 the requirement for. A 20% biodiversity net gain is required. There is no proposed biodiversity net gain, which is a minimum of 10% currently in national policy. The removal of trees to deliver the proposed layout would have a detrimental effect on biodiversity, without any proposed mitigation. As part of a landscaping plan, we would also draw the applicant's attention to clause 3 encouraging a balanced mix of soft landscaping areas to be integrated into the design.

FAV8: Flooding and Surface Water:

Faversham is a water stressed area, the proposed design should be revised to include Sustainable Drainage Systems (SDS), together with details of how rainwater and grey water can be harvested and re-used.

There are no details of permeable surfaces or a landscaping plan.

FAV10: Sustainable Design and Character

Building Heights: The proposed development meets the requirements of clause 1 as the structures are all 2 storey or less.

Urban Design: The scheme does seek to create natural surveillance to the street, however the proposed boundary treatments of 1.8m panel fencing or brick walls will reduce this capacity and create inactive frontages. Boundary treatments should be low walls to the front and where possible include soft landscaping between gardens.

There is also the concern that whilst 10 units are proposed in the grounds of the current office building, there is a future intent to further intensify the site through conversion of the office building to residential, presumably through a MA prior approval application. A development of this scale, plus the conversion of the office building at this current scale would be considered overdevelopment of the site.

We would strongly encourage the applicant to reduce the proposed number of units within the grounds and include the proposed conversion of the building in the same application. This would address the issue of overdevelopment and enable the conversion to be undertaken at a later stage, forming part of the same application, reducing the risk of refusal at a later stage due to overdevelopment.

Innovative Design: The scheme does not include any features or design elements within the public realm or the new dwellings that has superior energy performance (thermal solar or solar shading etc..) or contributes to on site energy production. This is a missed opportunity. However, the design does propose local roofing materials of clay tiles. The white painted render is not supported.

Water Recycling/Harvesting and SDS:

The proposed development does not include any details of water recycling or collection or indeed management within the site. Faversham is a water stressed area, the proposed design should be revised to include Sustainable Drainage Systems (SDS), together with details of how rainwater and grey water can be harvested and re-used.

FAV11: Heritage

Clause 3c makes clear that development must have no adverse impact on the archaeological zones shown in the plan Figure 14. The site is within Zone 2 archaeological zone, there is no reference in the Heritage Statement to how the scheme has considered this impact. Therefore, there is insufficient evidence to fully understand and assess any potential impact. The data forms part of the Kent Historic Towns Survey, 2003, by Kent County Council and relates to local plan policy for the historic environment.

FAV26: BMM Weston Ltd (Parcel 2) Land at Brent Road

The site is identified as an allocation for residential development in the emerging Neighbourhood Plan. The application meets the site specific policy requirements, in that it retains the office building, including the brick boundary wall and takes account of the topography, with the scale and massing of the proposed development limited to 2-storeys.