

Application Reference: 20/500015/OUT

Outline application for the development of up to 180 dwellings with associated infrastructure including internal access roads, footpaths, cycleways, parking, open space and landscaping, drainage, utilities and service infrastructure works (All matters reserved except Access). Land At Abbeyfields Faversham Kent ME13 8HS

This representation should be considered in conjunction with comments previously raised in the representation submitted on the 28/01/20, 08/04/21 and 21/09/21.

The application should be refused on the grounds that:

- The emerging Neighbourhood Plan positively plans for the level of growth required by Swale Borough Council with the site allocations for residential and mixed-use development.
- The proposed development would encroach into the open countryside, resulting in the loss of Grade 1 agricultural land that is 'best and most versatile'.
- The site has been discounted through SHLAA assessments and the AECOM site options and assessment report October 2021 prepared for the emerging Faversham neighbourhood plan, which also concludes that using the RAG rating the site was amber owing to the constraints including the high sensitivity of the landscape character.
- The application fails to assess the true archaeological impacts of the proposed development and would result in the loss of designated historic landscape.
- The site is within an unsustainable location on previously undeveloped land.
- There are no planning merits or gains to justify departure from national, local and emerging neighbourhood plan policy.

Growth Strategy:

The application site is within the Faversham Neighbourhood Area. Swale Borough Council have allocated 219 homes to be delivered within the Neighbourhood Area over the plan period. The emerging neighbourhood plan currently at Regulation-14 stage caters for and above the level of growth required. Therefore, there is no material reason to support speculative development at this scale that results in the loss of previously undeveloped land as a greenfield site and Grade 1 agricultural land.

Furthermore, in the Local Plan review this site was not taken forward as a preferred option in the growth strategy to help deliver the housing need for the borough and was discounted as a potential site allocation.

There is no planning case to support this application. It should also be noted that the submitted Planning Statement and many of the supporting reports are based on the 2019 version of the NPPF. The NPPF has been updated in 2021 and a version currently being consulted on. Clearly this application was developed against out-of-date national planning policy context and does not seek to deliver the government priority of building on brownfield sites first.

#### Site Assessment:

The application site is across SHLAA site SLA18/062 39 Abbey Fields and SLA18/065. The assessment makes clear that the application site is an unsustainable location and is a greenfield site. It also makes clear that development at the scale proposed would have a significant impact on the landscape.

The is also supported in the AECOM site options and assessment report October 2021 prepared for the emerging Faversham neighbourhood plan, which also concludes that using the RAG rating the site was amber owing to the constraints including the high sensitivity of the landscape character.

#### Historic Environment:

Para 2.1 of the Archaeological Desk Based Assessment states:

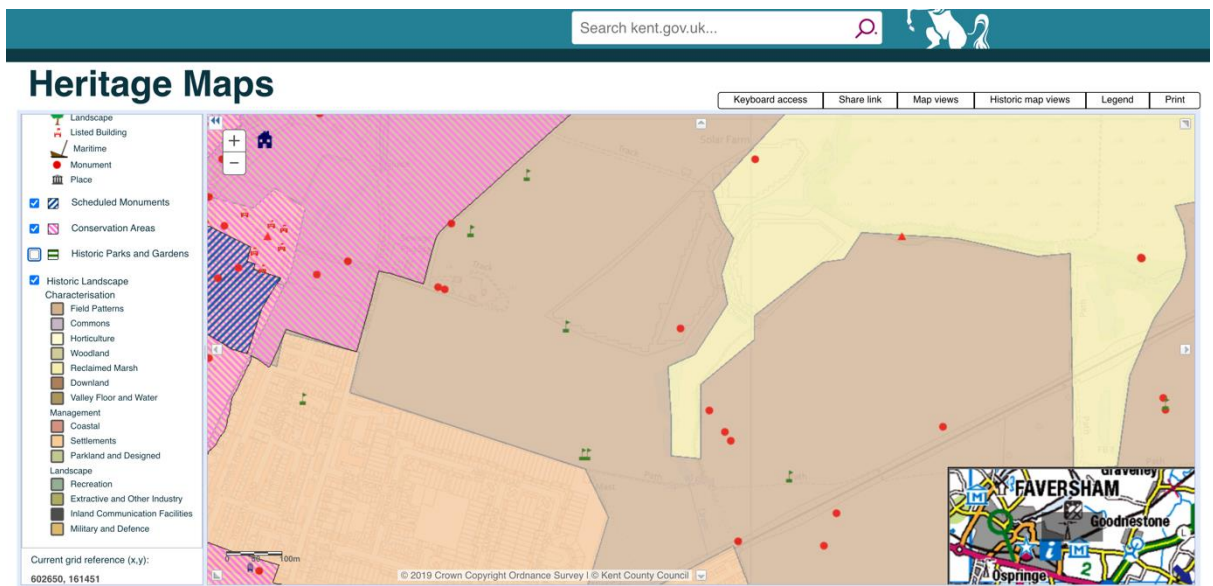
*“The Site does not contain any designated archaeological heritage assets, such as scheduled monuments or registered battlefields, where there would be a presumption in favour of preservation in situ and against development proceeding.”*

However, Kent County Council mapping data shows the site includes the following assets and designations:

- Findspots;
- Is adjacent to a conservation area and scheduled monument;
- On the northern boundary has 2 monuments and a number within close proximity to the eastern boundary; and
- The site is predominantly identified in the Historic Landscape Characterisation as ‘field patterns’ with a small portion identified as ‘horticulture’ to the east of the site.

The mapping data can be viewed at:

<https://webapps.kent.gov.uk/KCC.HeritageMaps.Web.Sites.Public.Default.aspx>



Therefore, the desk-based assessment is inaccurate and fails to acknowledge or fully assess the potential archaeological impacts of development on this site.

#### Additional Comment:

- 60% of the proposed site will be impermeable, forcing rain to run off and enter drain/sewage system. This threatens to pollute water courses including the two ponds.
- The ecology report indicates that habitat is a suitable environment for great crested newts.
- Eels (a protected species) are known to migrate in the area, evidenced in Faversham and Thorn Creek, and therefore possibly the two ponds.
- This proposal would make the Whitstable Road/Abbeyfields Junction critical. The junction to Abbeyfields cannot be widened as there are houses on either side.
- Faversham Emerging NHP - FAV 7: Natural Environment and Landscape; 4. Trees, woodland and hedges must be retained and be incorporated into the layout and landscape design of development proposals.