

Erection of 9no. dwellings. Weston Works Front Brents Faversham Kent ME13 7EB

Application Reference: 22/503389/FULL

Key Points to Make

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

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

Additional Supporting Information:

- Provide a more detailed Statement of Community Involvement, setting out how they informed the proposed development through early engagement with the community and stakeholders. The current submission simply indicates the timescale of engagement, without reference to points raised and how these have been considered and addressed in this revised version.
- 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.
- Update the Flood Risk Assessment (FRA) to reflect the amended scheme of 9 units.
- Update the drainage strategy to reflect the amended scheme of 9 units that should be approved by the competent authorities, including SUDS.

Conclusion to Planning Representation:

We are pleased to see the applicant has made positive attempts to address some of the previously raised material considerations. However it remains that the recommendation is to withdraw 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 or the scheme is refused as it remains overdevelopment of the proposed site and fails to contribute to the affordable housing supply of Faversham in line with policy HO2 of the Faversham Creek Neighbourhood Plan.

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 has now been revised from 10 to 9 units, this is still not a requirement. However, there has been no further information submitted to demonstrate how the application meets the Faversham Creek Neighbourhood Plan policy of 35% of all new dwellings to be affordable. There has been no further

information submitted to demonstrate how the application meets the Faversham Creek Neighbourhood Plan policy of 35% of all new dwellings to be affordable.’ Particularly as the Faversham Creek Neighbourhood Plan was Made after Bearing Fruits.

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 the scheme still proposes white painted render which would be contrary to this policy requirements.

DQ4: Makes clear that the layout, form and density should reflect the urban grain of the area. It could be argued that the proposed development fails to meet this policy requirement in involving the loss of green space that reflects the character of this area. You just need to consider if this is a point you want to make as it is also a redline allocation in the emerging Neighbourhood Plan

Policy CRL3 requires “Community involvement and consultation must be carried out as part of the planning application process.”. It is noted that a Statement of Community Involvement (SCI) has now been submitted. The statement is exceptionally brief, and states there has been engagement between 2021 and early 2022 with the Town Council. However, it does not summarise the points we raised and how these have been taken into account or how the revised application addresses them.

For the benefit of the case officer, we have summarised our key points from these discussions below:

- Statement of Community involvement
- Statement of Affordable Housing
- Flood Risk Assessment
- Drainage
- Landscape Plan and Ecological Assessment
- Connectivity
- Design
- Density

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. Whilst this has now been submitted it is based on a previous design for 10 units and does not reflect the amended application of 9 units. This should be

updated and resubmitted as it also includes the drainage strategy which is now inaccurate.

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. As previously raised the submitted information is based on a previous design for 10 units and does not reflect the amended application of 9 units. This should be updated and resubmitted as it also includes the drainage strategy which is now inaccurate.

Emerging Faversham Neighbourhood Plan

The relevant policies from the emerging Neighbourhood Plan include:

FAV2: Housing Development

Proposed development fails to meet the policy as it does not meet the criteria of clause 1 (infill in existing built frontage, redevelopment of existing buildings or sensitive refurbishment). It also results in the loss of landscaped area and trees; however, these are not publicly accessible.

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 has been revised in terms of mix to now include 2 5-bedroom, 6 4-bedroom and 1 3-bedroom dwellings.

Clause 1a of FAV3 Residential Mix and Standards makes clear that the predominant part of the mix should be 3-bedrooms. We support the applicants attempt to revise the mix, however the predominant mix of 4-bedroom and 5-bedroom properties still fails to meet policy requirements.

Despite there being an Affordable Homes requirement in the FCNP there is no contribution, therefore it also fails clause 2 and 4.

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. It is noted that a biodiversity metric has now been applied and submitted.

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.

FAV4: Mobility and Sustainable Transport

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

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 now supported by any ecological assessment which makes a number of design recommendations on pages 20 and 21. Many of these have not been translated into the amended application. There is also limited information on the hard and soft landscaping strategy plan reference 2110_PL_25 C.

FAV8: Flooding and Surface Water:

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

There are now details of all permeable surfaces in the hard and soft landscaping strategy plan reference 2110_PL_25 C. This is welcomed by the Town Council. However, there is still no Sustainable Drainage Systems (SUDS) plan for the revised development.

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. We support revisions to the scheme where boundary treatments include low walls and soft landscaping between gardens.

There is also the concern that whilst 9 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 further 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. It is noted the scheme has been revised from 10 to 9 units. These comments are also raised as objections by the Design and Heritage Officer who notes:

"Broadly speaking, I am of the view that the scheme has materially improved over the original submission, but that critically, it still remains a little too dense for the site, and slightly visually cramped as a result. Given the prominent nature of the site within the Faversham Conservation Area and adjacent to listed buildings/structures, including grade II listed Davington Manor, my view

remains that 7 new build units, plus the existing (converted) office building represents a more appropriate quantum of development to achieve a sufficiently contextually sensitive scheme offering a good standard of amenity to all the residents of the scheme.”

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.

The doors and the windows do not match.

Water Recycling/Harvesting and SUDS:

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 (SUDS), 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.

It is also noted that there are significant concerns raised by the Design and Heritage team at Swale Borough Council who currently do not support the revised scheme.

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.

Plot 8 There is no connectivity to the existing footpath/cyclepath

Plot 9 The roof is unnecessarily high. There is no off street parking on this plot, which potentially may result in residents using visitor spaces.