

Erection of 70no. one, two, three, four and five bedroom houses and maisonettes, and a community hall, with associated roads and paths, public open space, and continuation of the Heritage Greenway.

### Phase 3 Faversham Lakes Faversham Kent

#### Application Reference: 23/502775/FULL

The application site forms part of a strategic mixed-use site allocation in the adopted Local Plan known as 'Oare Gravel Workings, Oare Road'. The allocation is for 330 new dwellings and 1,500sqm of industrial/office floorspace.

The Town Council notes that this is the application provides a higher level of growth than identified in the strategic site allocation policy of the adopted Local Plan.

The Town Council raises the following comments in relation to the applications additional and amended information submitted in September 2023 only.

This representation should be read together with the previously submitted representation on the 18<sup>th</sup> August 2023 where wider planning matters were raised.

#### Design:

- It is noted in the Design and Access Statement that the scheme is tenure blind, siting that there is no difference in the appearance of market housing and affordable housing design. While this commitment to consistent design is welcomed, the scheme does not reflect a tenure blind proposed layout plan.

The affordable units remain grouped in 4 small clusters in close proximity. The design and layout should be revised to deliver a tenure blind scheme. If the layout has been requested and agreed with a third party please could the Town Council be informed.

- The proposed materials pallet is noted for the building types. However, there are no details in the proposed 'detailed layout' plan of the materials for shared surfaces, roads or parking areas other than a generic term. These should all be durable, permeable surfaces and integrate into the SuDS scheme.

The Town Council supports the revised boundary treatments to now include hedge planting throughout the site. These make a more positive contribution to biodiversity net gain and soften the appearance of the development. It is noted that the more urban boundary treatments have been reduced in response to our previous representation and this is welcomed.

#### Active Travel and Transport:

- The Transport Assessment has been prepared against out-of-date census data. It uses the 2011 data rather than the available 2021 data. Therefore, the calculations and assessment are inaccurate. This should be revised to reflect the most recent dataset that was available in December 2022.

This information does not appear to have been updated as part of the amended documents submitted. Clearly without utilising the most current data it is not possible to determine the true impact of the proposed development. We request again the applicant updates these technical reports to reflect the 2021 Census data and its impacts.

It may also be useful to consider the recently revised Faversham LCWIP and make reference to it as a tool to inform the design and approach to promoting active travel.

<https://favershamtowncouncil.gov.uk/active-travel/>

#### Natural Environment:

- We note the covering letter provides some explanation about the ecological value and states it is not possible to undertake Biodiversity Net Gain (BNG) calculations. However, if the baseline is zero then the applicant can demonstrate how all the proposed landscaping works would deliver in excess as anticipated the minimum 10% BNG.

As raised previously the Town Council acknowledged the comments of Natural England regarding HRA and any potential impacts. We also noted that the application did not include a supporting phase 1 habitat survey or other habitat/ecological reports. This was also highlighted by Kent County Council's ecology team in previous representations and does not appear to have been addressed in the additional submission documents. We continue to support their request for further information to be submitted in order to make an informed representation regarding the natural environment.

We do understand that information was submitted as part of the earlier application granted consent in September 2017. However, there has been a change to national planning policy and environmental legislation in this time. These supporting technical reports were prepared in April 2014 and are now out of date.

#### Parking:

- Will users of the Community Centre be able to use the car park at Ham Road (out of school hours) as overflow carpark.