

**Faversham Neighbourhood Development Plan
Consultation Statement
June 2023**

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1. Introduction

This Consultation Statement accompanies the submission of the Faversham Neighbourhood Development Plan to 2038. It summarises the community engagement programme and the Regulation 14 consultation. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

2. Summary of Community Engagement

2.1 Approach to community engagement

Faversham Town Council and Swale Borough Council jointly commissioned Design South East to organise design workshops on 28th and 29th October 2016. The report and recommendations of these workshops is published in the report More Faversham <https://favershamtowncouncil.gov.uk/wp-content/uploads/2023/03/More-Faversham.pdf>

At the Annual Town Meeting held on Tuesday 28th May 2019, the Chair of Faversham Future Forum asked if a neighbourhood plan should be created for Faversham as it was considered vulnerable to development. Faversham Future Forum had been formed in May 2016, it was a non-political group bringing together residents of Faversham, many of which had professional expertise to share. A Technical Committee had been formed bringing these technical experts together. <https://favershamtowncouncil.gov.uk/community/faversham-future-forum/>

The proposal to develop a neighbourhood plan was explored further and on 21st November 2019, when two Stakeholder and Community events were held.

Event 1 was an explorative workshop to consider a range of planning options to inform the future growth of Faversham Town. Attendees looked at the current planning situation and considered how recent developments and proposals have impacted the area. A range of planning options were discussed and ways that the views and opinions of the town could be best represented to inform future growth, identifying key issues and themes that may be used in a form of land use planning, such as the capacity of infrastructure, heritage or important open and green spaces.

Event 2 was a community drop in event with the aim that people would gain a better understanding of the planning process and informing future growth in Faversham.

The Town Council resolved to create a Neighbourhood Plan at its meeting on 11th November 2019, they also resolved that Faversham Town Council would immediately elect members of the Council to sit on a Neighbourhood Plan Steering Group, alongside the community representatives from Faversham Future Forum.

Throughout the process Faversham Future Forum has been represented on the Steering Group. These representatives provided an important link with the technical committee which was instrumental in building the evidence base for the plan. These professionals have been called on throughout the process as needed.

The Technical Committee was made up of professionals with expertise in the following areas:

- Creek Regeneration
- Economic Development and Tourism
- Education
- Health and Community Care
- Historic Built Environment
- Housing
- Mobility and Public Realm
- Natural Heritage
- Sport Leisure and Recreation
- Transport and Air Pollution
- Water and Sewage
- Youth

2.2 What was done?

The Town Council aimed to engage with the community throughout the process through a wide range of communication methods including:

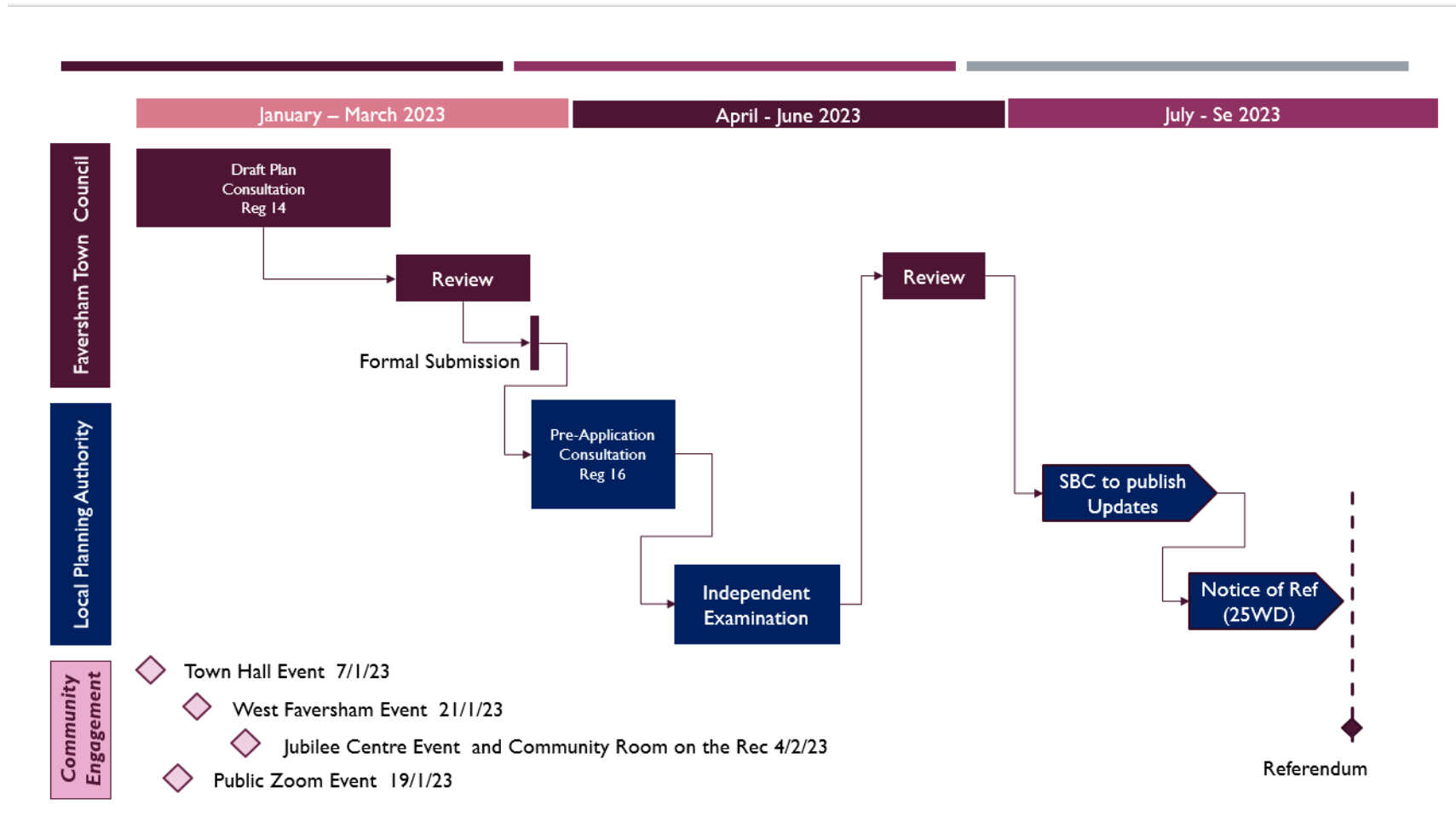
- Open Steering Group Meetings;
- three exhibitions at the Town Hall;
- a Neighbourhood Plan Section on the Town Council Website <https://favershamtowncouncil.gov.uk/neighbourhood-plan/> (where the three exhibitions can still be viewed),
- Town Council Facebook Page,

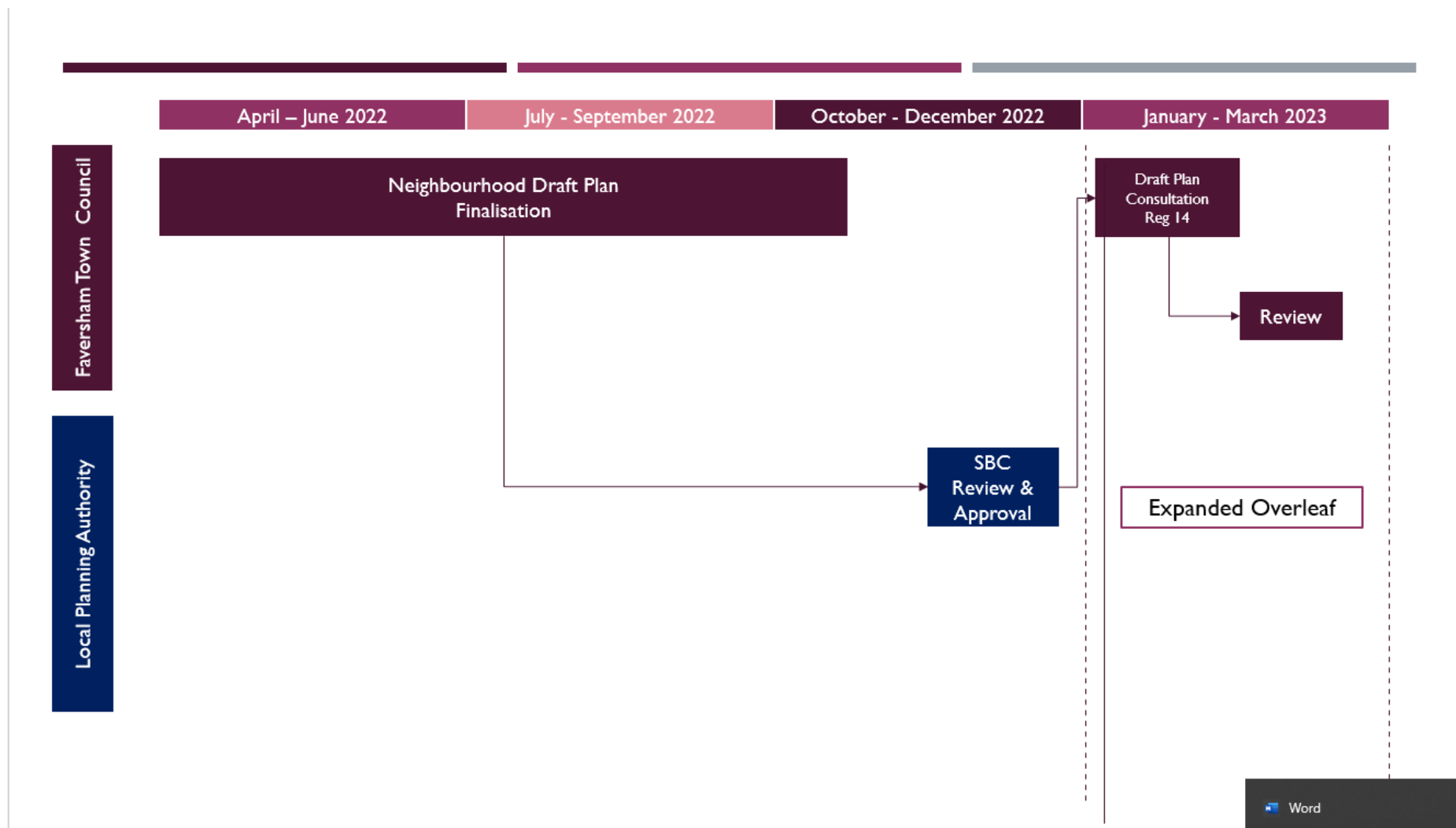
- articles in the Town Council Newsletter and Faversham Eye (a local free newspaper).

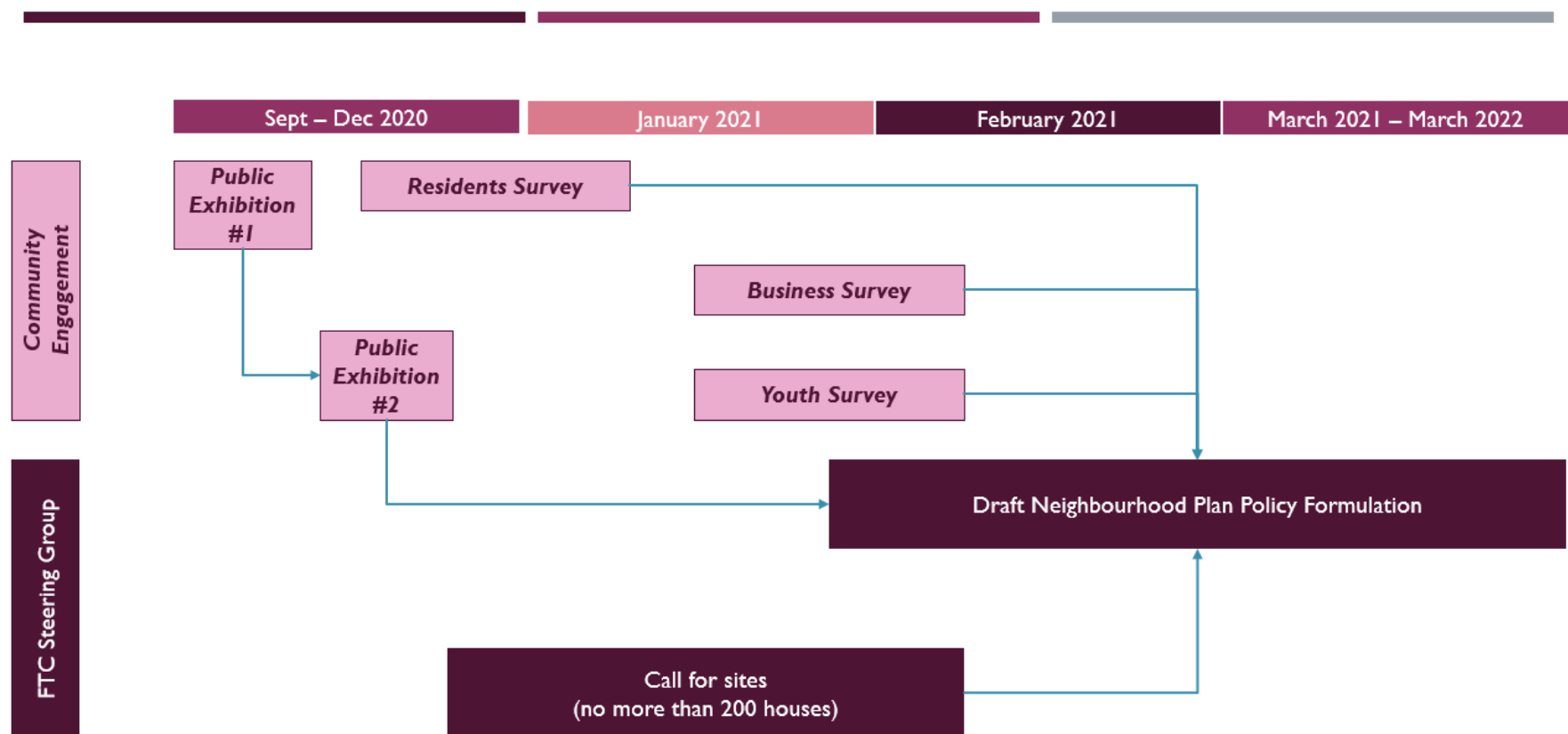
In addition, the Chair of the Steering Group provided an update at the Annual Town Meeting each year. The Annual Town Meetings were cancelled in 2020 and 2021 during to Covid 19 Pandemic, which also curtailed other face to face engagement in 2020. A household survey was sent to every to every address in ME13 7.., ME13 8... and ME130..., the survey was also available online. Youth and Business Surveys were also undertaken.

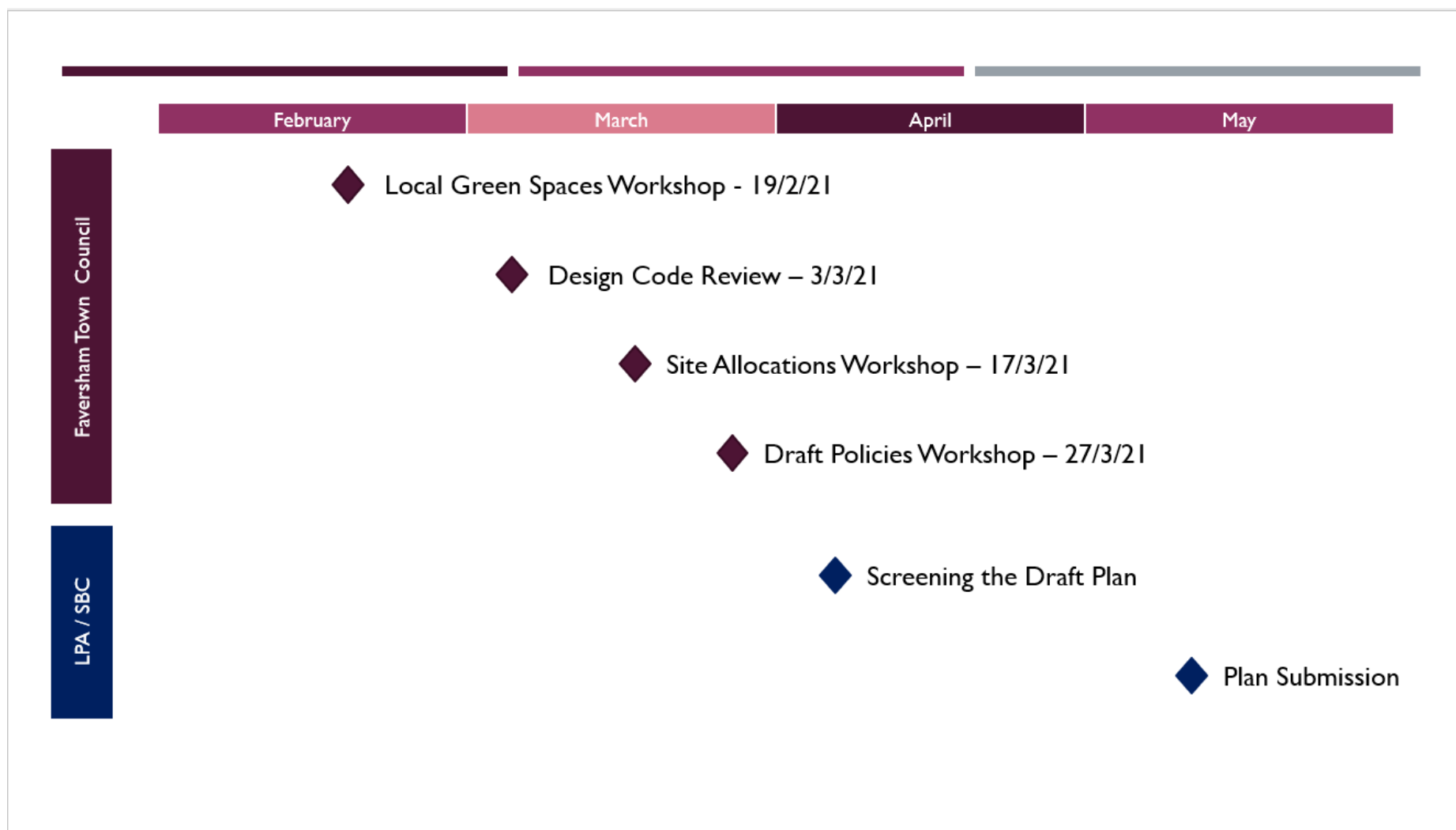
A summary of the activities throughout the process can be found on the following pages.

Timeline









Meetings, Exhibitions and Website

DATE	ACTIVITY	AUDIENCE	WHERE	ADDITIONAL DETAILS
2019				
28 th May 2019	Annual Town Meeting	Public	The Assembly Rooms	Chair of FFF asks for a NHP to be created
2 nd November 2019	Stakeholder and Community Engagement Event 1	Targeted Invited Attendees and Public	The Town Hall, 12 Market Place	
2 nd November 2019	Community Engagement Event 2	Public	The Town Hall, 12 Market Place	
11 th November 2019	Town Council Meeting	Public	The Guildhall	Resolved to create a NHP and Steering Group
2020				
6 th January 2020	Steering Group	Public	The Guildhall	
3 rd February 2020	Steering Group	Public	The Guildhall	
21 st January 2020	Steering Group Meeting with Neighbouring Parishes	Invitation to Neighbouring Parish Council Clerks	The Guildhall	To update neighbouring parishes on the plan and receive update on their plans.
29 th April 2020	Steering Group	Public	Virtual - Zoom	
21 st May 2020	Steering Group	Public	Virtual – Zoom	
15 th June 2020	Steering Group	Public	Virtual – Zoom	
20 th July 2020	Steering Group	Public	Virtual – Zoom	
21 st September 2020	Steering Group	Public	Virtual – Zoom	
21 st September – 4 th October 2020	Exhibition One – What is a Neighbourhood Plan	Public	The Town Hall, 12 Market Place	To explain to the public what a neighbourhood plan is and how to get involved in the process. To manage

				expectations on what can and cannot be achieved and managed through the process.
19 th October 2020	Steering Group	Public	Virtual – Zoom	
19 th October – 1 st November 2020	Exhibition Two – Policy and Design	Public	The Town Hall, 12 Market Place	<p>AECOM produced design boards and the public were invited to indicate/comment on what they liked and didn't like.</p> <p>SG displayed draft policies in the following areas and the public were invited to comment.</p> <p><i>Flooding and Surface Water</i></p> <p><i>Site Specific Policies</i></p> <p><i>Smaller Sites</i></p> <p><i>Faversham Creek</i></p> <p><i>Community Infrastructure and Services</i></p> <p><i>Green Infrastructure</i></p> <p><i>Heritage Assess and Public Realm</i></p> <p><i>Active Transport</i></p> <p><i>Transport Related Issues</i></p> <p><i>Diversity and Standards in New Housing</i></p> <p><i>Town Centre</i></p> <p><i>Affordable Housing</i></p>
26 th October 2020	Introduction to NHP	Public	Website	
26 th October 2020	How to get Involved	Public	Website	
26 th October 2020	Useful Links – Area Designation, South East Housing Manual, Swale Landscape Sensitivity	Public	Website	
26 th October 2020	Exhibition One – What is a Neighbourhood Plan	Public	Website	

16 th November 2020	Steering Group	Public	Virtual - Zoom	
20 th November 2020 – 21 st January 2021	Household Survey	Public	Delivered to every address in ME13 7..., ME13 8... and ME13 0... And available online.	Paper copy of survey delivered to properties in Faversham inviting the residents to respond.
30 th November 2020	Exhibition Two – Policy and Design	Public	Website	
18 th December 2020	Call for Sites	Public	Website	
21 st December 2021	Steering Group	Public	Virtual – Zoom	
21 st January 2021	Steering Group	Public	Virtual – Zoom	
21 st January 2021 – 1 st April 2021	Youth Survey			Link to survey forwarded to Schools and Youth Clubs to be circulated to parents/carers of children aged nine and upwards.
21 st January to 1 st April 2021	Business Survey			Link to survey forward to Town Council database of businesses
27 th January 2021	Survey Key Themes Report	Public	Website	
4 th February 2021	Timeline	Public	Website	
15 th February 2021	Steering Group	Public	Virtual – Zoom	
15 th March 2021	Steering Group	Public	Virtual – Zoom	
19 th March 2021	LGS Call for sites	Public	Website	Call for Local Green Space Nominations
7 th May 2021	Site Selection Criteria	Public	Website	
7 th – 21 st May 2021	Site Selection Criteria – Public Consultation	Public	The Town Hall, 12 Market Place	

18 th May 2021	Steering Group	Public	Virtual – Zoom	
20 th May 2021	Design Codes	Public	Website	Publication of AECOM report on Design Codes
23 rd May 2021	Exhibitions One and Two – Key Themes Report	Public	Website	Publication of Key Themes and comments that had emerged from Exhibition One and Two
21 st June 2021	Steering Group	Public	Virtual - Zoom	
19 th July 2021	Steering Group	Public	Virtual – Zoom	
23 rd July 2021	LGS Consultation	Public	Website	
30 th July – 7 th August 2021	Summer Exhibition – Overview and Update	Public	The Town Hall – 12 Market Place	Update on the process and developments to date
4 th – 25 th August 2021	Local Green Spaces – Public Consultation	Public	The Town Hall – 12 Market Place	SG public consultation on eight LGS.
1 st September 2021	Summer Exhibition – Overview and Update	Public	Website	
20 th September	Steering Group	Public	The Guildhall	
18 th October	Steering Group	Public	Virtual – Zoom	
11 th November 2021	Net Carbon Toolkit	Public	Website	
15 th November 2021	Steering Group	Public	Virtual – Zoom	
2022				
18 th January 2022	Steering Group	Public	Virtual – Zoom	
21 st February 2022	Steering Group	Public	Virtual – Zoom	
1 st to 28 th March 2022	Site Selection – Public Consultation	Public	The Town Hall – 12 Market Place	Following the publication of the AECOM report “Site Options and Assessment” the SG held its public consultation on site selection
21 st March 2022	Steering Group	Public	Virtual – Zoom	
19 th April 2022	Steering Group	Public	Virtual – Zoom	

Tuesday 26 th April 2022	Annual Town Meeting	Public	The Assembly Rooms	Chair of SG gives Annual Update
4 th May 2022	Timeline	Public	Website	
23 rd May 2022	Steering Group	Public	Virtual – Zoom	
25 th June 2022	Stakeholder Engagement Workshops: 1) Town Council 2) Community Land Trust 3) Faversham Creek Trust 4) Faversham Society	Invitation	The Guildhall	Stakeholder Engagement Workshops facilitated by Urban Vision. Representatives from each group invited to attend and raise issues from their members.
27 th June 2022	Steering Group	Public	The Guildhall and Virtual – Zoom	
19 th July 2022	Steering Group	Public	Virtual – Zoom	
26 th September 2022	Steering Group	Public	The Guildhall and Virtual – Zoom	
24 th October 2022	Steering Group	Public	The Guildhall and Virtual – Zoom	
28 th November 2022	Steering Group	Public	The Guildhall and Virtual – Zoom	
5 th December 2022	Steering Group	Public	The Guildhall and Virtual – Zoom	
2023				
3 rd January 2023	Regulation 14	Public	Website	
3 rd January – 14 th February 2023	Regulation 14 Formal Consultation	Public		Leaflet detailing Regulation 14 and advertising the Pop Up Events

				delivered to every address in ME13 7.. and ME13 8...
7 th January 2023	Regulation 14 Pop Up Event	Public	The Town Hall, 12 Market Place	Opportunity for the public to speak to representatives from the SG and have their questions answered.
19 th January 2023	Regulation 14 Virtual Neighbourhood Plan Event	Public	Zoom	Representatives from the Steering Group give update and receive questions. Recording is available on Town Council Website.
21 st January 2023	Regulation 14 Pop Up Event	Public	West Faversham Community Centre	Ditto
4 th February 2023	Regulation 14 Pop Up Event	Public	The Jubilee Centre	Ditto
4 th February 2023	Regulation 14 Pop Up Event	Public	The Community Room on the Recreation Ground	Ditto
20 th February 2023	Steering Group	Public	The Guildhall and Virtual – Zoom	Ditto
14 th March 2023	Annual Town Meeting	Public	The Assembly Rooms	Chair of SG gives Annual Update
27 th March 2023	Steering Group	Public	The Guildhall and Virtual – Zoom	Ditto

Publications

An article from the Steering Group was included in the following editions of the Town Council Newsletter which is distributed to every address in ME13 7.., ME13 8... and ME130...

The Newsletters are available from the Town Council website <https://favershamtowncouncil.gov.uk/community/newsletter/>

2020
Spring 2020 Newsletter
Summer 2020 Newsletter
Autumn 2020 Newsletter
Winter 2020 Newsletter
2021
Spring 2021 Newsletter
Summer 2021 Newsletter
2022
Summer 2022 Newsletter
2023
Spring 2023 Newsletter

Articles included in the Faversham Eye:

2020
October – The Neighbourhood Plan Special Edition
December – Christmas Edition
2021
March – Edition 13

2.3 Who was targeted?

The Steering Group approach was to target all residents and businesses in the Faversham Town Council Postcode (Neighbourhood Area). To achieve this articles have been published in eight editions of the Town Council Newsletter. The household survey (20th November 2020 to 21st January 2021) and a Regulation 14 leaflet were also sent to these addresses. The youth and businesses were consulted at the questionnaire stage.

The Town Hall is in the centre of Town and as such an ideal location to hold the three exhibitions, What is a Neighbourhood Plan, Policy and Design and Overview and Update, as well as the first pop up event for Regulation 14.

Other communication methods used to engage include Facebook, Mailchimp to contact those that had signed up to be kept informed, section on Town Council Website, Faversham Eye and open meetings. At different stages in the process posters were displayed around the town.

As previously stated the Steering Group worked closely with the FFF Technical Committee creating a communication channel with the groups they represented.

2.4 Outcomes/Feedback

Initial consultation through the Exhibition One – What is a Neighbourhood Plan (21st September to 4th October 2020) and Exhibition Two – Policy and Design (19th October to 1st November) and the Household Survey (20th November 2020 to 21st January 2021), Youth and Business Surveys (21st January to 1st April 2021) fed into the plan at an early stage.

The Key Themes Report from Exhibition One and Exhibition Two is available on the website at the following link:
<https://favershamtowncouncil.gov.uk/neighbourhood-plan/key-themes-from-exhibitions-one-and-two/>

The Key Themes Report from the three surveys is available on the website at the following link:
<https://favershamtowncouncil.gov.uk/wp-content/uploads/2021/03/FTC-Surveys-Key-Themes-Report-1.pdf>



As a result of the community engagement the key issues and themes for Faversham Neighbourhood Plan were identified and from these the vision and aims were formed which shaped the policies in the plan.

- To promote the vitality and viability of Faversham Town Centre, as resource for local people and visitors
- To support sustainable housing growth to meet the diverse needs of the local community
- To create more sustainable live-work patterns, based on neighbourhoods with residential, employment and community facilities in easy Walking distance
- To promote sustainable transport, cycling and walking
- To protect Faversham's green spaces and natural environments and ensure environmental quality
- To promote sustainable design, to complement Faversham's locally distinctiveness and sense of place
- To preserve or enhance Faversham's heritage and promote heritage – led economic development

3. Pre-Submission Consultation (Regulation 14)

3.1 How the Consultation Was Undertaken

Formal consultation on the draft neighbourhood plan took place from Tuesday 3rd January 2023 at noon to Tuesday 14th February 2023 at noon in accordance with Regulation 14, Town and Country Planning, England Neighbourhood Planning (General) Regulations 2012. This was a six-week statutory consultation period.

The consultation was widely publicised including the following:

- Leaflet detailing the period of consultation, virtual engagement meeting and pop-up events sent to every address ME13 7.., ME13 8.. and ME13 0...
 - Posters were placed outside of the Town Hall, and displayed at the Alexander Centre, the Library, the Jubilee Centre, West Faversham Community Centre, St Mary of Charity, Bank Street Medical Centre, Newton Place Surgery, The Swimming Pool, Arden Theatre, Central Car Park Noticeboard, Creek Creative, Sainsburys, Morrisons, Macknade and numerous local shops
- The plan was available to download and link to consultation form at <https://favershamtowncouncil.gov.uk/neighbourhood-plan/regulation14/>
- Statutory Consultees and Locally Nominated Consultees were written to.
 - Hard copies of the plan with paper response forms were available from:
 - a. The Alexander Centre
 - b. The Library
 - c. The Town Hall, 12 Market Place
 - d. The Jubilee Centre
 - e. St. Mary of Charity Church
 - f. West Faversham Community Centre
 - Virtual Neighbourhood Plan Event on Zoom on Thursday 19th January 2023 at 7.3pm, recording available <https://favershamtowncouncil.gov.uk/neighbourhood-plan/regulation14/>
 - The Steering Group held pop up events at:
 - a. The Town Hall, 12 Market Place – Saturday 7th January 2023 10am to noon
 - b. West Faversham Community Centre – Saturday 21st January 2023 10am to noon
 - c. The Jubilee Centre – Saturday 4th February 2023 10am to noon
 - d. The Community Room at the Recreation Ground – Saturday 4th February 2023 10am to noon

Responses were invited by various methods – online submission form, be email to nhp@favershamtowncouncil.gov.uk, by post or by had to the Deputy Clerk, Faversham Town Council, The Town Hall, 12 Market Place, Faversham, ME13 7AE

3.2 Statutory Consultees

The following list of Statutory Consultees were provided by Swale Borough Council.

Consultation Body	Email address
Environment Agency	KSLPlanning@environment-agency.gov.uk
Natural England	Luke.Hasler@naturalengland.org.uk
Historic England	e-seast@historicengland.org.uk
Network Rail	TownPlanningSouthern@NetworkRail.co.uk
National Highways	planningse@nationalhighways.co.uk
Swale CCG	kchft.comms@nhs.net
Southern Water	southernwaterplanning@atkinsglobal.com
Southeast Water	WRE@southeastwater.co.uk
National Grid	nationalgrid.uk@avisonyoung.com
SGN (gas)	plantlocation@sgn.co.uk
UK Power Networks	ConsentsEnquiries@ukpowernetworks.co.uk
KCC Highways	swaleHC01@kent.gov.uk
KCC Ecology	biodiversity@kent.gov.uk
KCC SUDS (drainage and flooding)	suds@kent.gov.uk
KCC Assets Management	assetmanagement@kent.gov.uk
Oare PC	oarepc@aol.co.uk
Luddenham PC	dawncroucherlpm@hotmail.com
Norton PC	judithparishcouncil@gmail.com
Ospringe PC	ospringepc@gmail.com
Sheldwich PC	sblpc@live.com
Selling PC	clerk@sellingparishcouncil.gov.uk

Boughton PC	boughtonclerk@gmail.com
Graveney PC	sblpc@live.com
Swale Borough Council	policyresponses@swale.gov.uk
Jill Peet	JillPeet@swale.gov.uk
Aaron Wilkinson	aaronwilkinson@swale.gov.uk

Other Stakeholders

Faversham Society
Community Land Trust
Kent Wildlife Trust
Faversham Creek Trust
Farms, Fields and Fresh Air
Peel Ports
Carter Jonas
Faversham Footpaths
Lees Court Estate

3.3 Issues

The main issues and concerns raised by the persons consulted and how these issues and concerns have been considered and, where relevant, addressed in modifications to the proposed neighbourhood development plan are set out in the next part of this statement.

4. Responses to Representations

The following table sets out representations received and how they have been considered and whether the Plan has been amended.

In the analysis of representations, it became apparent that a small number were duplicated. These have been taken into account and given the same weight as any other representations.

The table is divided into groupings which include statutory responses, developers and landowners, residents and local societies and response forms (paper and online).

4.1 National and Statutory Bodies

Page No	Policy/ Site Ref	Representation	Response
Avison Young on behalf of National Grid			
	General	Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has no record of such assets within the Neighbourhood Plan area.	Comments noted no change.
Environment Agency			
	Flood Risk	The Environment Agency highlighted requirements to consider flood risk with various links to guidance.	Policy FAV8 deals with flooding and surface water more generally. Each site allocation makes clear where there is a potential flood risk and that a Flood Risk Assessment will be required as part of any planning application. Development is likely to be permitted only where it satisfies the Exception Test. No change necessary.
	Flood Defences	Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure. No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences.	Policy FAV8 deals with flooding and surface water more generally. It would be for the LPA to determine whether any financial contribution was necessary. No change necessary.

	Ecology	<p>We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the main river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.</p> <p>Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.</p> <p>We would not support development proposals if there was shown to be a likely detrimental impact on the water environment.</p>	<p>Clarification from the Environment Agency on whether they would impose the 8m or 16m buffer zone and for which sites was sort. They were unable to clarify this matter. FAV15 and all relevant site-specific policies interpretation updated to advise early engagement with the Environment Agency for a site and design specific response.</p>
	Ground water protection and quality	<p>Water Management and Groundwater protection Local level actions and decision making can help secure improvements to the water environment. Water Framework Directive (WFD).</p> <p>Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us. Development must not cause pollution to the water environment. Some of your local area, and specific potential</p>	<p>Policy FAV15 deals with impacts on water quality. No change necessary.</p> <p>Asked the Environment Agency (EA) for clarifications about SPZ1 and the implications for site allocations. EA responded with <i>“(SPZs) are areas of groundwater where there is a particular sensitivity to pollution risks due to their proximity to a drinking water source and how the groundwater flows. Generally the closer the activity is to a groundwater source,</i></p>

		site allocations, may be located upon or within aquifers and Source Protection Zones. SPZ 1 is especially sensitive.	<i>then the greater the risk. SPZ1 is the most sensitive zone and so the implications for site allocations are that we recommend high risk potentially contaminating development, such as a petrol filling station, to be located on sites that are not SPZ1."</i> The site allocations are generally for housing and employment. The Neighbourhood Plan does not deal with high risk potentially contaminating development. It would be for the Local Planning Authority to consider such proposals on their merits.
	Land contamination	You must consider land contamination when preparing your plan.	The AECOM site assessment report considered land contamination, and this is explicitly referred to in the interpretation to some policies. No change necessary.
	Water supply and foul drainage	When allocating sites foul drainage and water supply drainage need to consider. Your local water company can provide further information about water supply and sewerage capacity.	A developer would need to consider this in liaison with the utility provider. No change necessary.
	Surface water drainage	The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site.	Policy FAV8 deals with surface water, flood risk and sustainable drainage. Adjusted to explicitly deal with Sustainable Urban Drainage Systems.
	Views	Several of the proposed allocations include reference to "taking account of views of' churches within the town. Without greater detail it is difficult to see how this would work in practice. Assessment work should be undertaken to identify key viewpoints of significant assets and put forward ways to manage these.	The intention is to highlight views in a general way without setting onerous requirements that could unnecessarily compromise the development of the site. No change.
	FAV2	Policy wording open to wide interpretation, e.g. sensitive to heritage. Suggestion to include explore and support the	The policy actually refers to sensitive refurbishment of heritage. Heritage is dealt with also dealt within FAV11.

		opportunity to sustain/conserve or enhance the significance of designated and potential non designated heritage assets including their setting and the significant local character of the conservation area.	Obviously national and local policies would also apply and, for conservation areas and listed buildings, the special statutory duties. The suggested additional wording is unnecessary. There is no point in repeating national and local policy. No change.
	FAV11	Heritage-led regeneration and the adaptation and reuse of historic buildings omits other key types of heritage, e.g. scheduled monuments. Alternative wording could be sustain/conserve or enhance the significance of designated and potential non designated heritage assets including their setting.	The suggested wording would replace a positive policy on heritage-led regeneration with general wording repeating national policy. No change.
Pg94		The bullet point list of key issues for policies to address includes reference to TS Hazard, the Old Pump House and Town Quay and is too restrictive - some commercial uses could still provide public access and suggest the policy refer to suitable sustainable uses which provide a level of public access.	Policy FAV15 allows for uses that enhance the economic, leisure, maritime or recreational use of the Creek including visitor facilities. It also supports uses set out in FAV16 in the Maritime Heritage Gateway Area. The policy also cross-references to various site allocation policies. We think this wording is clearer than that suggested. No change.
	FAV16 FAV17	The area for proposed allocation FAV 17 seems to overlap with FAV 16 suggested to amend to add clarity.	FAV16 applies to the Maritime Heritage Gateway Area, which includes 2 sites subject to specific allocation policies (including FAV 17 and FAV23) and some additional land. FAV17, FAV23 and FAV28 have now been merged into FAV16, which focuses on heritage-led regeneration. FAV15 also applies, as part of the wider Faversham Creek Area. The interpretation to FAV16 cross references to FAV15, FAV17 and FAV23. The area-based policies and site allocations have been drafted to work together. No change.
	FAV18	This relates to redevelopment of modern farm buildings in rural part of Ospringe Conservation Area and adjacent to two grade II*'s and a grade II. There are concerns about the principle of development here in open countryside.	Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings whilst further development of the site would remove a green gap.

		<p>The policy requires additional detail to specify how many houses may be appropriate on the site and which specific key views to maintain.</p> <p>The drawing specifies retention of a small green space (marked in red) which suggests the remainder of the site might be used for residential development. Development on such a large area has the potential to negatively impact both the significance of the adjacent highly graded listed buildings including setting and the Conservation Area.</p> <p>Within the policy wording there appears no reference to drawing on significant local character and distinctiveness which here is a rural farmstead character.</p>	<p>The policy does specify the area that may be developed. Policies cannot set a maximum number of houses. The policy and interpretation do contain some detail on views, but without being excessively restrictive.</p> <p>Policy FAV10 deals with design and FAV11 deals with heritage impacts. These would be used to assess whether development impacted positively or negatively, together with national policy and the special statutory duties for heritage.</p> <p>Reference to 'rural farmstead character' added to clause 2.</p>
	Local Context	<p>Make reference to the County Council's ROWIP in the Neighbourhood Plan.</p> <p>There is also omission of the recently opened National Trail, the England Coast Path (ECP), the regionally promoted Saxon Shore Way, multiple promoted routes and National Cycle Routes, which all are significant assets to the area, offering both Active Travel and leisure and tourism opportunities.</p>	<p>Added Reference to ROWIP into the Interpretation for FAV4 and the rationale for chapter 3.4 movement and sustainable transport.</p>
2.3	Aims	<p>The County Council supports the Aims within the Neighbourhood Plan. However, point 4 should include specific reference to the PRow Network as a significant element of sustainable transport.</p>	<p>PRow is too specific an issue for the aims. However, updated aims to refer to active travel.</p>

	FAV1	The County Council recommends that Policy FAV1 includes additional text to highlight the need to ensure pedestrian and cycle connectivity for any proposed development.	This is already dealt with in FAV6 and FAV10 also deals with pedestrian permeability and connectivity. No change.
	FAV2	<p>The policy should address the need to ensure links to amenities, public transport as well as green and leisure space. Also recommend reference to the need for improvements to the PRoW network to enable safe and attractive walking and cycling connections and links from and to new developments. The policy should also include some general wording around the need to secure improvements to PRoW to ensure the highly regarded links are not degraded.</p> <p>Policy FAV2 wording should include the consideration of strategic approach for the protection and enhancement of the PRoW network.</p>	<p>This is already dealt with in FAV6 and FAV10 also deals with pedestrian permeability and connectivity. No change.</p> <p>It is not clear how or why a developer would fulfil this. This appears to relate to the roles of public bodies. No change.</p>
3.4	FAV4 FAV5 FAV6	<p>Highways and Transportation: Policy wording should encourage access to public transport hubs on pedestrian desire lines and the hubs themselves should be equipped with cycle parking, shelter, rubbish bins and seating.</p> <p>Include reference to PRoW as part of the Local Cycling and Walking Infrastructure Plan -existing PRoW routes provide opportunities to enhance this policy.</p> <p>The assessment of Faversham Critical Junctions should consider the proximity to PRoW for safety issues as well. The majority of the strategic Faversham sites will have an impact on the PRoW network. Also recommend reference to KCC ROWIP as it is a statutory policy document for PRoW.</p>	<p>This relates to infrastructure and would be the responsibility of public bodies. No change.</p> <p>The Plan already makes reference to the LCWIP in the rationale to policies FAV4, FAV5 and FAV6. Additional reference has been added to the ROWIP.</p> <p>The PJA Faversham Critical Road Junctions report takes account of proximity to PRoW. This was built into the assessment. Reference added to ROWIP.</p>

	<p>FAV4 Point 4 makes reference to secure and covered storage for cycles and scooters. It is not clear what scooters are being referred to.</p> <p>Where PRoW would be directly affected by development proposals, the Neighbourhood Plan should encourage applicants to provide plans that should clarify intentions for positively accommodating, diverting, or enhancing paths.</p> <p>Uncertain of how the junctions have been prioritised and what evidence has been used to rate them. To list the junctions as being unlikely to be supported in forthcoming planning applications if further impacted is unreasonable and cannot be justified without a sound transport modelling evidence base.</p> <p>Developers are only required to mitigate their own development impact and are not required to address the existing network. Therefore, any trips on a junction that is currently above capacity still has to be considered on the level of additional impacts being generated and whether or not that impact is deemed to be severe. Severity is not defined and appeal cases to date suggest that only impacts that are detrimental to highway safety are objectionable, not those of capacity or journey time delay. It is recommended that FAV5 is removed.</p> <p>Policy states that "Development not to encroach onto footpaths, bridleways or cycleways". It should be recognised that there are options for stopping up, diversion or extinguishment and creation that should be considered before a blanket ban is put on development that may encroach onto any public highway.</p>	<p>FAV 4 clause 4 updated to refer to other personal vehicles.</p> <p>Paragraph on diversion added to the interpretation of FAV6.</p> <p>Junctions with potential traffic problems were considered in the PJA Faversham Critical Road Junctions report, May 2022.</p> <p>The policy addresses the impact of development. It does not place any requirements on developers to address issues with the existing highway network. Wording adjusted to clarify this further. The policy is evidenced based. Similar policies have been included in other Neighbourhood Plans that have passed through the examination process.</p> <p>Paragraph on diversion added to the interpretation of FAV6.</p>
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		<p>The Interpretation section of FAV 6 should also ensure that there is clear forward visibility along footpaths and that no part of a footpath is unknown to users.</p> <p>The County Council would recommend that the title of Policy FAV6 should be amended to the "PROW network, National Trails, promoted routes and Cycleways". Later in the letter it recommends that this policy is renamed to the "Public Rights of Way Network and Cycleway".</p> <p>Within the Interpretation section, references to footpaths should be amended to PRoW.</p> <p>KCC would welcome future engagement with the Town Council to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.</p>	<p>Reference to viability added to interpretation.</p> <p>The current wording is clearer than both of these suggestions. No change.</p> <p>Not all footpaths are designated PRoW. No change.</p> <p>Comment noted. Town Council would welcome this.</p>
	FAV7	<p>The County Council would recommend that this policy includes consideration of street trees to enhance street scenes, assist drainage, reduce harmful pollutants and mitigate high summer temperatures.</p> <p>Recommend that the policy makes reference to the need to consider adverse impact or loss of landscape and visual amenity on the PRoW network, the National Trail (England Coast Path) and cycle routes.</p> <p>Suggest making reference in relation to clause 1 that it should be noted that where development will impact on these features, the impact and details of any appropriate mitigation must be demonstrated within an Ecological Impact Assessment, which shall be submitted and approved.</p>	<p>Provision of street trees and garden trees has been added into the list of green design features in the interpretation to policy FAV10. Reference has also been added into the interpretation of FAV7. Clause 4 (now 4 and 5) of FAV7 has also been amended to make reference to new street or garden trees and hedges as part of a landscape design.</p> <p>This is already dealt with in FAV6. No change.</p> <p>Text added to the interpretation.</p>

		<p>Recommend that the policy specifies which applications will be required to deliver at least 20%. There have been issues caused within other areas where this type of policy also takes into account householder applications. The County Council would also draw attention to the Dunkirk Neighbourhood Plan where a similar policy was reduced to 10% as opposed to 20% though the Examination of the Neighbourhood Plan.</p> <p>For clause 3, this must be demonstrated within the documents submitted as part of the planning application including the Ecological Impact Assessment, Landscaping plans and the Biodiversity Net Gain assessment.</p> <p>For clause 4, recommend the inclusion of 'and wildlife functionality' at the end of this sentence.</p> <p>For clause 5, recommend consideration of whether this should be a requirement to use native species as opposed to should to strengthen the policy.</p>	<p>Wording changed to "major development proposals should create...". Comment on Dunkirk Neighbourhood Plan noted. Policy amended to require biodiversity net gain of 20% for greenfield and 10% for brownfield sites.</p> <p>Text added to the interpretation.</p> <p>The meaning of this is unclear. The intention is to set clear requirements for development in terms of trees and hedges. Policy wording amended in response to previous comment on street trees.</p> <p>There could be instances where use of other species with high environmental value could be appropriate. Clause 7 has been amended to 'or species with high value for wildlife' in response to other representations.</p>
	FAV8	<p>Advise that clause 4 may be onerous on some developments given that the underlying geology may not be suitable for infiltration of surface water and so it would be advisable to include where appropriate.</p> <p>Brownfield sites within the Neighbourhood Plan and the redevelopment of these areas can provide valuable opportunities to improve and increase flood resilience through improvements to their existing drainage networks.</p>	<p>Amended clause to refer to 'where ground conditions allow'.</p> <p>Text added to the interpretation.</p>

	FAV9	<p>Recommends that the policy should consider the impact of local air quality on PRoW users. There is no reference in the policy of the ROWIP that can develop safe walking and cycling routes both within a new development and connecting to the wider environment. Increasing levels of Active Travel participation improves public health and well-being, in addition to improving air quality by reducing short vehicle journeys and vehicle congestion.</p>	<p>Agree with these benefits of Active Travel. Active Travel and health and well-being are promoted in the aims (as amended) and various policies in the Neighbourhood Plan. No change necessary.</p>
	FAV10	<p>Recommend that this policy includes reference to the opportunities offered for connectivity to the existing PRoW network.</p>	<p>This policy and also FAV4 and FAV6 deal with permeability and connectivity. This would include consideration of the PRoW network. No change necessary.</p>
3.7	FAV11	<p>The heritage of Faversham goes well beyond the visible historic buildings and Conservation Areas. It also includes archaeological sites. County Council welcomes the use of the Urban Archaeological Zones from the Historic Towns Survey in the Neighbourhood Plan, noting the need for some updating as mentioned above.</p> <p>This rural area is a historic landscape that contains many surviving historic features, such as the patterns of tracks, lanes and hedgerows that give character to the area. Alternative wording added to clause 3 suggested.</p> <p>Given the potential of Faversham's archaeology and historic landscape, in addition to the historic buildings and Conservation Areas, KCC would suggest section 3.7 be re-titled as simply 'Heritage'.</p> <p>KCC welcomes the recognition of the role of historic industries in Faversham and the commitment to the conservation of relevant heritage assets.</p>	<p>It is not necessary for the Neighbourhood Plan to repeat national policy or local plan policy on archaeology. Comment on urban archaeological zones noted. Wording on urban archaeological zones moved to a sperate clause and strengthened.</p> <p>Comment noted. Clause 3 broken into separate elements to give greater emphasis to archaeological zones and rural setting of the historic landscape character.</p> <p>Updated section 3.7 to 'Historic buildings, places and landscapes'.</p> <p>Comment noted. Wording amended slightly to recognise the economic and cultural value of these assets. Also, this is made into a separate clause, so that it applies to designated and non-designated heritage assets.</p>

	FAV12	KCC would also like any future provision of playing pitches to take into account priorities for future provision (list of priorities provided).	List of priorities have been included into the rationale to the policy.
3.11		Add reference to the Public Footpath ZF39 and the England Coast Path National Trail (ECP) are aligned along the side of the Creek and the protection and enhancement of these assets should be included in the Key Issues.	Suggested text added to the list of key issues.
	FAV15	The County Council recommends policy consideration should seek to minimise impact on PROW routes which offer significant leisure and tourism opportunities. Public Footpath ZF39 also provides connectivity to the West into the Town Centre and East to the surrounding network including National Cycle Route 1. This detail could be included within this policy.	FAV15 deals with public access to the waterfront and existing footpaths. FAV6 provides protection to existing footpaths.
	FAV17	PROW ZF39 and the England Coast Path (ECP) are on the site boundary. KCC recommends that point 3 of the policy should highlight that development should have no adverse impact on these routes.	FAV17, FAV23 and FAV28 have been merged into FAV16. FAV6 provides protection to existing footpaths.
	FAV18	This site is coincident with Sub-Alluvial River Terrace deposits. To ensure this site is acceptable, there is a requirement for investigations into the extent and quality of the potentially threatened with sterilisation safeguarded mineral with a Minerals Assessment. If the mineral deposit is found to be useable and a prior extraction of this resource is considered inappropriate, a Minerals Assessment must be undertaken. The Minerals Assessment will identify which exemption from the presumption to safeguard the mineral resources is appropriate to invoke from Policy OM 7 of the KMWLP.	Site allocation policy FAV18 has been deleted in response to other representations. FAV2 would allow redevelopment of existing buildings but not development of the wider site.

	FAV19	PRoW ZF39 and the England Coast Path (ECP) are on the site boundary. KCC recommends that the policy should highlight that development should have no adverse impact on these routes. Point 6 refers to a public walkway along the Creek edge and any future development should therefore, in partnership with KCC and Natural England, seek to vary the route of the ECP to the Creek edge, away from the existing alignment on Abbey Street.	FAV6 provides protection to existing footpaths. Reference to footpath added into planning rationale.
	FAV22	The County Council recommends that reference is made to Public Footpath ZF24, which is within the site boundary. The County Council also understands that Swale Borough Council Active Travel are working on a project to improve the rail crossing and connectivity on this route into the Town Centre. The County Council is also seeking to secure s106 appropriate funding from developments for improved connection along this route into the Town Centre and the Recreation Ground. The rail crossing safety must therefore be addressed, and these projects taken into consideration.	FAV6 provides protection to existing footpaths. Comment on infrastructure project noted. Reference to footpath added into planning rationale and added as an additional clause to policy.
	FAV23	The ECP is located on the south boundary, Conduit Street, and on Bridge Road. KCC recommends that the policy should highlight that development should have no adverse impact on these routes.	FAV6 provides protection to existing footpaths.
	FAV25	The County Council notes that Public Footpath ZF40 is in close proximity to the south of the site. The County Council would recommend that the policy encourages development contributions towards improvements to the route. The ECP is adjacent to the site and KCC recommends that the policy should highlight that development should have no adverse impact on these routes.	FAV6 provides protection to existing footpaths. Reference to footpath added into planning rationale.
	FAV27	Public Footpath ZF40 is directly affected by this proposal. It is recommended that the policy should include reference to encouraging development contributions towards footpath	FAV6 provides protection to existing footpaths. Reference to footpath added into planning rationale.

		improvements as part of the "community uses" in light of new residential use.	
	FAV28	The ECP and ZF39 is adjacent to the site and KCC recommends that the policy should highlight that development should have no adverse impact on these routes.	FAV6 provides protection to existing footpaths. Reference to footpath added into planning rationale.
	FAV29	In respect of Kiln Court, the County Council recommends that the policy must address development contributions towards for Public Bridleway ZF17 to improve pedestrian and cycle link onto Western Link.	FAV6 provides protection to existing footpaths. Reference to footpath added into planning rationale.
	Minerals and Waste	The Minerals and Waste Planning Authority notes that the Neighbourhood Plan is entirely silent on waste and mineral planning matters.	Minerals and waste are excluded matters for Neighbourhood Plans.
	General	<p>The Neighbourhood Plan should consider limitations on any expansion or creation of new development proposals that would generate further HGV movements along the A2 corridor, particularly in the vicinity of Ospringle.</p> <p>The Plan should seek to reduce crime and preventing pavement parking and inconsiderate parking by not supporting rear parking courts in new development that is often rarely used (unless options to park at the front of the house in the street is not possible).</p> <p>All parking standards should be aligned with the adopted Swale Parking Standards and more cycle parking facilities should be included at key destination in the town.</p> <p>More seating to be installed on longer walking routes between residential settlements and the town centre.</p>	<p>Policy FAV5 addresses critical road junctions including those onto the A2.</p> <p>In terms of reducing crime FAV10 promotes active frontages to streets to create overlooking and natural surveillance. The Plan does not support the use of rear parking courts. No change necessary.</p> <p>The Neighbourhood Plan does not seek to amend parking standards. The Plan does encourage cycle parking within development (FAV4). Provision of town centre cycle parking is a matter for the highway authority.</p> <p>This sounds like a project rather than a matter for planning policy. FAV10 and FAV4 address pedestrian permeability and</p>

			connectivity, including for people with limited mobility. No change necessary.
	Site Allocation s	We note that the current FNP, as submitted, details a list of policies, which are later supported by analysis of key issues, national and local policies, and relevant evidence documents. With relevance to National Highways, a series of Site Allocations (FAV17 - FAV29) are listed in the FNP, with each allocation given a land use. The Plan further makes allocations for the area, however, the level of development proposed is not specified, and this information will need to be submitted for review.	The AECOM Site Assessment report included an estimated capacity for each site. This was referenced in the Plan. A summary of the capacity for each site has been forwarded to National Highways for information.
		The representation includes general advice on Neighbourhood Plans.	Advice noted. An SEA and HRA have been prepared and will be submitted with the Neighbourhood Plan.

4.2 Local Authorities and Parish Councils

Page No	Policy/ Site Ref	Representation	Response
	Local Context	The church of St Peter and St Paul in Water Lane is in the parish of Ospringe, albeit close to the boundary and within clear view from the parish of Faversham.	Deleted reference to the church of St Peter and St Paul in Water Lane.
	FAV1	Policies which sensitively encourage and promote use of existing space in the town centre whether by re-use or more ergonomic use are welcomed. The success of Faversham town centre and its improvement and further vitalisation are important for many reasons, including as a resource and hub for rural and semi-rural neighbouring and nearby parishes.	Comment noted.
	Growth Strategy	Growth Strategy: The housing numbers should be subject to review in light of the ongoing changes to Government policy regarding "from on-high" imposition of housing target numbers. In turn, this should impact on the extent to which development - and the type of development - should be encouraged in the FNP.	The Neighbourhood Plan will be tested at examination against national policy and guidance in place at that time. Waiting for changes to occur to national or local policy is likely to delay the Neighbourhood Plan indefinitely. No change.
	FAV2	We agree. However, it was noted that the FNP does not make specific reference to the residential housing developments mooted for around Faversham even though these have the ability to have a very significant impact on the parish and neighbouring areas, including in respect of pressure on roads, health and social services, education, shopping, utilities and sewage. If the FNP were to consider and cover such future possible developments we would propose modest development to the east as the least damaging option although the scale of such development should be reviewed against revised housing numbers as well as the	This appears to relate to current planning applications and potential strategic site allocations in the emerging local plan. The Town Council has made representations on planning applications and the now withdrawn emerging Local Plan. The Neighbourhood Plan deals with small and medium sites only and these have been selected for allocation not just to meet housing numbers, but also to achieve regeneration of brownfield sites.

		contested proposal to disproportionately earmark development for the east of the Borough.	
	FAV3	<p>"Self-build" and community-led housing schemes have not in the past always worked as well as intended or hoped. Given the crucial need to ensure that development land (or any existing building) is used as efficiently as possible, care must be taken with such schemes.</p> <p>The draft FNP emphasises its focus on provision for "local needs". We agree but see no detail (including in the references to affordable housing) as to how this will be achieved so that housing stock is not taken up by people from outside the "local" area, or subsequently loses its "local" connection. That said, some mobility of people can be positive and bring diversity and other attributes.</p>	<p>The Neighbourhood Plan policies would set similar standards regardless of the developer, so would apply equally to self-build or community-led schemes.</p> <p>The AECOM Housing Needs Assessment address this issue. In addition, the local planning authority has provided a figure for housing need. These are referenced in the rationales to the housing policies. The Neighbourhood Plan does not seek to amend strategic local policies on affordable housing but does seek to shape how affordable housing is provided. No change.</p>
	FAV4	We broadly agree, but we face increasing cuts to public transport which in turn reduces scope for reducing car journeys. There is also limited scope to increase safe and/ or dedicated cycle links both inside the FNP area or outside to neighbouring and nearby parishes. We are aware of, and are participating in, an ongoing study and report on this subject (Parishes to Town). Allied to this, Faversham should be seen as crucial for providing for all the day to day needs of the nearby areas. This would then mean it was unnecessary or less necessary for people to travel further afield, thereby saving road miles. The possibility of large-scale development within or around the FNP area will present a challenge if it is to deliver sustainable transport.	Comment noted. Public transport services are outside of the influence of developers. Pedestrian and cycle permeability and connectivity and facilities are addressed in the policy and in FAV6 and FAV10. Development of local facilities are dealt with in FAV1, FAV12 and various site allocation and area-based policies.
	FAV5	We were surprised at the exclusion of the A2/Water Lane junction from the list of Critical Road Junctions, given a number of recent	These were not identified in the PJA Faversham Critical Road Junctions report, May 2022, so insufficient evidence.

		<p>consents for development both within and outside the FNP area which have and will impact this heavily-used junction.</p> <p>One of the sites proposed for residential development (in FA V 17) is Queen Court Farm which will use Water Lane as its means of access and egress. The congestion caused at the junction of Water Lane/ A2 (a combination of the number of users as well as the constrained narrow entrance) contributes to the poor air quality in Ospringe Street.</p> <p>Although included as a Critical Road Junction we regard the recently revamped A2/ A25 I/The Mall/Preston Grove junction as inadequate to cope properly with present traffic levels.</p> <p>We question why one of the criteria has been set as "severe impact" rather than a lesser impact, given the knock-on effects an overused or inefficient junction can have.</p> <p>Although outside the FNP area we were expecting some references to the Brenley Corner junction, given its current inadequacies and the need for improvement.</p>	<p>This site has been deleted in response to other representations.</p> <p>This is already listed in the policy.</p> <p>The term "severe" reflects national policy. No change.</p>
	FAV6	We agree but para 3 should include cycleways.	Reference to cycleways added.
	FAV7	We agree	Comments noted.
	FAV8	We agree, but given the justified concern at the inefficiency and lack of capacity at Faversham WTW, consideration might be given to requiring all development which may result in any additional burden on the WTW to contribute towards the cost of improving the WTW's efficiency and capacity.	This is a matter for the utility provider and outside of the scope of the policy. No change.
	FAV9	We agree but, for example, the development of Queen Court Farm will result in additional traffic and hence congestion along Water	This site has been deleted in response to other representations.

		<p>Lane and the junction with the A2, so there is some inconsistency here. There will be other examples, including larger scale developments on the eastern side of Faversham.</p> <p>The use of the word "significant" in para 1 potentially weakens the effect of this Policy (in various other places throughout the FNP the word is not used before "adverse" or similar, so a distinction is implied).</p>	The term “significant” is used to achieve compliance with national policy.
	FAV10	We agree but para 5 is not understood.	Clause 5 amended for clarity.
	FAV11	We agree	Comments noted.
	FAV12	We agree, especially as Faversham is the local "hub" for the surrounding rural and semi-rural parishes, so it is essential to provide the range and amount of public facilities which cater for the needs of those other communities.	Comments noted.
	FAV13	We agree. It should be noted that Joyce Field allotments, off Water Lane at the rear of Ospringe County Primary School and so just outside the FNP area, also provide a valuable local green space capable of use by Faversham residents.	Comments noted.
	FAV14	Given the importance of green and sustainable energy - the need, we would expect a greater emphasis on encouraging or compelling local renewable energy schemes.	The Plan does support and encourage renewable energy, but cannot compel developers to provide such schemes. No change.
	FAV15	We agree. We did not see specific reference to the restoration of the swing bridge (albeit that it is covered by the Faversham Creek Neighbourhood Plan), and given its importance in the redevelopment of the Faversham Creek Policy Area would have expected specific reference to it here to emphasise its role.	This is an infrastructure project. Reference has been added to the rationale for policy FAV15.

	FAV18	As previously noted, we are concerned at the additional traffic the development will generate and the effect on air quality and the Water Lane/ A2 junction. If permitted, a binding agreement to secure in perpetuity public access and use of the area north of the existing buildings to the east of Water Lane (part of which is referred to as the dry riverbed area) would achieve some of the other aims in the FNP.	This site has been deleted in response to other representations.
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4.3 Residents and Local Societies

Page No	Policy/Site Ref	Representation	Response
Resident 6			
8		The historic district of the Brent and North Preston has been omitted and should be added.	Text amended to make reference to the Brents.
13		Preservation of agricultural land should be added to aims.	Policy FAV7 could be updated to make reference to agricultural land to protect 'best and most versatile'.
14		Design guide could be used against planning authority by ingenious developers. Illustration labelled pantiles shows clay plain tiles, needs correction.	Unclear on the suggestion for amendment on page 14. This is a summary of the planning strategy behind the policies. Comments appear to relate to the Design Code Evidence Document, which is not policy.
15		Amend policies heading to policies for the development of Faversham.	Suggestion to amend Chapter heading 'policies' is unnecessary as the whole neighbourhood plan relates to development in Faversham.
32		The Town Council should seek the connection of Hazebrouck Road to Lower Road.	Comment on page 32 noted but this is an action and not a matter for planning policy. No change.
38	FAV5	Two dangerous junctions have been omitted, Davington Hill and Brent Hill and Davington Hill, Priory Row and Priory Road.	These were not identified in the PJA Faversham Critical Road Junctions report, May 2022, so insufficient evidence.
39	FAV6	FAV6 Two further policies should be added. (I) Action will be taken to ensure that obstructions to public footpaths are removed or, where this is not possible, suitable diversions are made.	These are all actions and not matters for planning policy. Policy FAV15 clause 4 already deals with public access to the waterfront.

		<p>(2) Action will be taken to add all public footpaths that are not public highways to the Definitive Map of Public Rights of Way.</p> <p>(3) Action will be taken to create a footpath along the banks of the creek through control of development or by applying for footpath creation orders.</p>	
51	FAV7	The RAM SAR site should be included in the protected areas.	Include plan of all designated landscapes. Remove fig 10-14 as they are duplicated and make ref to figures 6-9 in policy.
77		At 1. The Front Brents Town Green should be included in the list of Local Green Spaces.	This is already a Local Green Space, designated by Swale Borough Council.
81		The whole of Crab Island, Town Green should be included, including the bed of the old creek. The old creek bed contributes as much to the green space as the sailings.	This is already a Local Green Space, designated by Swale Borough Council.
95		FAV15 paragraph 5. Development must complement the character of Faversham Creek area, including a mixture of building heights from three-storey to six-storey to complement the remaining traditional buildings on the creek-side.	The policy refers to the predominant height of 3-storey. The change suggested could open the door to inappropriate development harming the character of the Creek. No change.
102	FAV17	FAV 17. Swan Quay, formerly TA Whittle's timber yard. A condition should be included requiring the development to include a public walkway along the creek-side connecting the Town Wharf to Belvedere Walk for future incorporation into the new England Coast Path.	Policy FAV15 clause 4 already deals with public access to the waterfront. Amend Clause 3 to also include a public walkway along the creek-side.

107	FAV19	FAV 19. Former Coach Depot. The condition requiring a public walkway along the creek edge should be expanded to say that the path is to connect the path on the former Oil Depot site to Standard Quay for future incorporation into the new England Coast Path.	Policy FAV15 and FAV19 already deal with public access to the waterfront. Incorporation into the new England Coast Path is beyond the control of the developer.
110	FAV20	<p>FAV 20. Ordnance Wharf. The condition requiring a Creekside public walkway should be clarified.</p> <p>The views of Davington Church tower are peripheral, being mostly obstructed by trees.</p> <p>The comments made on FAV15 on the height of new buildings apply to this site.</p> <p>It is important not to put too many restrictions on development of this site to ensure it is redeveloped and is not left derelict.</p> <p>If the Basin is to be regenerated, including having an opening bridge, and become an asset to the Town, all of the banks must be developed with Creek-side footpaths, and the provision of moorings encouraged.</p>	<p>This Policy and FAV15 already deal with public access to the waterfront.</p> <p>Trees only obscure the view in summer and even then, the top of the tower is still visible.</p> <p>See previous comments on FAV 15 height of buildings.</p> <p>The policy enables development of the site.</p> <p>FAV 15 already deals with Creekside Access.</p>
115	FAV22	FAV 22. A vehicular access from the planned New Development at the Faversham Rail Yard connected to the rear of the Recreation Lodge should be provided to eliminate the vehicular traffic on the pedestrian promenade that endangers walkers and children at play.	Vehicular access to the Railway Yard is from Beaumont Terrace not through the recreation ground.

117	FAV23	<p>FAV 23. This site is in Conduit Street, not North Lane.</p> <p>A public footpath should be provided along the creek-side to connect Bridge Road to the Town Wharf for future incorporation into the new England Coast Path.</p>	<p>FAV23, and also FAV17 and FAV28 have been merged into FAV16.</p> <p>FAV 15 would already require access to the waterfront. However, additional clause now added to FAV23 also.</p>
	General	<p>A Neighbourhood Plan should encourage development of the right type in the right place and should not seek to obstruct the progress and economic development of the Town by imposing unnecessary and often pointless conditions on building such as protection of views that are of little interest to the average resident and building heights for which there is no historic precedent or practical reason.</p> <p>The plan would be improved if the sections on wildlife were put into an annex and the important policies that will govern the future of Faversham are more easily accessed, clear and easily found and understood.</p>	<p>The Plan has sort to sort to achieve a balance between growth and environmental protection.</p> <p>See previous response on building heights and views.</p>
Faversham & Oare Heritage Harbour Group			
	General	<p>FOHHG supports comments made by the Faversham Society and Faversham Creek Trust.</p> <p>Land-use policies and site-by-site allocations appear reasonable. But no overall vision for the town and its environs.</p>	<p>Noted - see response to representations mentioned.</p> <p>The aims are included within the Neighbourhood Plan (section2.3) together with the overall planning strategy in section 2.4. No change.</p>

		<p>Nor are the key indicators or the necessary scope for social and physical infrastructure required to achieve the desired results.</p> <p>For example, assessments of residential sites do not appear to be set in the context of overall housing needs.</p> <p>The Faversham & Oare Heritage Harbour, centred on both Creeks, has been nominated for a network of national centres being developed as part of the National Historic Ships Shipshape Network, supported by the Maritime Heritage Trust and Historic England, copy of the heritage harbours joint statement published 8th June 2022 supplied.</p>	<p>Infrastructure requirements are set out in FAV3, FAV4, FAV6, FAV7, FAV8, FAV10, FAV12, and various area-specific and site-specific policies.</p> <p>Housing need is dealt with in the AECOM Housing Need Assessment, which is referenced in the Plan.</p> <p>Supporting information noted. The Plan deals with several of the issues mentioned. No change.</p>
	FAV15 FAV16	<p>There appears to be no recognition in policies FAV15 and FAV16 and related sites of the desired nature, quality and sustainability of the proposed site-by-site allocations, related physical infrastructure, linked to conditions placed on planning consents.</p>	<p>Infrastructure requirements are set out in FAV3, FAV4, FAV6, FAV7, FAV8, FAV10, FAV12, and various area-specific and site-specific policies. In addition, various policies set design requirements including FAV10.</p>
	FAV17 FAV19 FAV20 FAV22 FAV23 FAV24 FAV25 FAV26 FAV27	<p>For general developments and environmental improvements around the Faversham Creek Basin, essential precursors are delivery of an opening Creek Bridge and sluice gates, to allow passage of vessels, as well as dredging of the Basin itself. Without these, development of these sites is unlikely to be viable or sustainable as desired, alternatively to only an undesirable quality.</p>	<p>The bridge and sluice gate are desirable infrastructure, and the Town Council is looking at ways of talking this forward. However, it would be unreasonable to require individual developers or individual sites to provide such infrastructure. In addition, it would make development of the sites unviable. No change.</p>

Faversham Creek Trust			
	General	<p>FCT is very disappointed that this Plan will supersede and extinguish the Faversham Creek Neighbourhood Plan. Objectives of the Faversham Creek Plan and many of the details covered in this comprehensive Plan should still apply, in particular the recognition of the importance of an opening bridge, with navigation and sluicing/flushing functions (01).</p> <p>As the Creek is such a central and important part of the history and future of Faversham as a vibrant market town, Cinque Port Limb, place to work and live, and a popular tourist destination, we believe that a greater focus on the future viability of the Creek as a centre for maritime and related activities than FAV16.</p> <p>There are supporting documents for FCNP which have not been transferred to this plan, for example the Streetscape Strategy (by Urban Initiatives). Have these documents been studied by the Steering Group? There are still relevant sections including views and sight lines to be protected and historic remnants to be retained.</p> <p>Unfortunately these have been ignored since by planners, so some have already been removed, for example the old railway tracks on Standard Quay.</p> <p>Please also see comments from Faversham & Oare Heritage Harbour Group, on which FCT is represented.</p>	<p>The reasons for preparing a new neighbourhood plan include:</p> <ul style="list-style-type: none"> • A wish to cover the whole town council area; • To give certainty where development goes across the area; • A wish to clearly separate out projects from planning policy (something that is blurred in the Faversham Creek Neighbourhood Plan); • To ensure that key issues are addressed in robust policy and not just text; and • A wish to draft clearer and less vague policy requirements. <p>The Faversham Creek Neighbourhood Plan has informed many of the policies of the new Plan (not just the Faversham Creek policy). Faversham Creek is not just dealt with by FAV16, but by the full suite of policies, including those dealing with land use, design, heritage and environment.</p> <p>The bridge and sluicing are key infrastructure projects, rather than matters for development management policies.</p> <p>The Urban Initiatives Streetscape Strategy (2012) has been taken into account, though this deals with issues outside of the scope of planning policy, such as public realm projects. In addition, the new Plan has taken account of the more recent AECOM Design Code document (2021) and National Design guidance (2021).</p> <p>No change necessary.</p>

	FAV1	<p>We concur with the Plan's emphasis on retaining retail use wherever possible on the ground floor throughout the Town Centre. It would be useful to include a definition of the Town Centre, presumably the major streets which lead to and from the Market Place, in particular Preston Street, West Street, East Street, Court Street and Abbey Street.</p> <p>We agree with the policies set out in FAV1.</p>	<p>Comments noted. Update figure 5 to show main shopping frontages.</p>
	FAV2 FAV3	<p>We accept the policies set out in these two sections, but suggest that FAV2 lb. should include doing nothing detrimental to the character or curtilage of heritage assets as well as prohibiting demolition of them.</p> <p>We are not sure whether there is a definitive list of the heritage assets referred to here and elsewhere.</p>	<p>Design and heritage impacts are dealt with in FAV10 and FAV11. Interpretation to FAV2 has been modified to clarify this.</p> <p>Heritage Assets are defined through the Conservation Area boundaries and statutorily listed buildings. There is currently no local list. Reference could also be made to the Kent County Council's Historic Environment Record. This has been added to the interpretation of FAV11, for clarity.</p>
	FAV4	<p>FCT is pleased with the emphasis on sustainable transport and mobility. It is inevitable that many people will still come into town by car for business, shopping and leisure purposes. There is already a shortage of parking for residents and visitors. Consideration should be made to providing additional parking spaces for both cars and bicycles.</p>	<p>It is unclear whether this relates to parking standards for development or to public parking provision. The latter falls outside of the scope of the Neighbourhood Plan.</p> <p>The Neighbourhood Plan does not seek to modify local plan car parking requirements, but does explicitly address active travel. No change necessary.</p>

		<p>We suggest the addition of these critical road junctions:</p> <ol style="list-style-type: none"> 1. Whitstable Road and Abbey Fields; 2. Whitstable Road and Millfield Road (two junctions); 3. London Road with Ospringe Road and Water Lane; 4. Preston Street and Stone Street; 5. Stone Street with South Road and Napleton Road; 6. Court Street, Abbey Street, Quay Lane; 7. Belvedere Road and Quay Lane/Conduit Street. <p>Flood Lane and Brent Hill is not a problem currently as very limited traffic use. However, if development were permitted on Ordnance Wharf the number of vehicles using Flood Lane would increase significantly. This would create a serious problem at the junction, where sight-lines are poor. We oppose any idea of making Flood Lane a through route.</p>	<p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Court street, Abbey Street, Quay Lane is already in the policy. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>This is conjecture. Traffic impacts would need to be considered based on a specific planning application. There is no evidence to support adding this junction to the policy.</p> <p>No change necessary.</p>
42-43	FAV8	<p>We believe that insufficient attention is given to the regular tidal flooding which takes place around the Creek, sometimes exacerbated by high rainfall. Flood designation of 3a(i), to allow housing development on Creekside was a mistake. Flooding is likely to become an increasing problem, as sea levels rise.</p> <p>It seems to us unreasonable that properties can be built on a known flood risk area with the ground floor for commercial use, where both the resident</p>	<p>This appears to relate to the Strategic Flood Risk Assessment (SFRA) which identifies 3ai as developed land within the flood zone. FAV8 sets general requirements to consider flood risk, augmenting local plan and national policies. The Neighbourhood Plan cannot modify the SFRA. No change.</p> <p>Insurance cover falls outside of the scope of the Neighbourhood Plan.</p>

		<p>and the business owner have difficulty obtaining appropriate insurance cover.</p> <p>We applaud the attention to water quality.</p>	<p>Comment noted.</p>
	FAV7	<p>We agree with the careful attention that is being given to our natural environment.</p>	<p>Comments noted. No change.</p>
	FAV10	<p>We agree with these policies, particular the emphasis on scale, massing and height, and the requirement to complement the predominant 2-3 storey character of the area. We hope this will enable planners to prevent any more proliferation of four storey houses, a number of which have been approved in recent years. The policies set out in this section are very appropriate.</p>	<p>Comments noted. No change.</p>
	FAV11	<p>This section appears to be comprehensive except that it does not designate heritage views, eg views from different places of St Mary of Charity, Davington Church and possibly other key monuments. Is there a list of non-designated heritage?</p>	<p>Clause 4 already refers to views of these two assets and some individual site policies also deal with views. Interpretation expanded to mention non-designated heritage.</p>
	FAV12	<p>Some of our major facilities are not mentioned here, for example the Swimming Pool, The Jubilee Centre, the West Faversham Community Centre, the Library, the Cinema and the Arden Theatre. We suggest these should be added to point 5.</p>	<p>List of community facilities of particular value moved to interpretation and expanded as suggested.</p>

Pg 72		<p>The last full paragraph on page 72 includes some items which don't seem particularly appropriate for Faversham (amphitheatre? multipurpose street furniture for skating? what is parkour? We doubt we will get any water fountains - the one in the Recreation Ground hasn't worked for years.)</p>	<p>The text referred to is about existing facilities rather than providing interpretation for the policy. This falls outside of the scope of the Neighbourhood Plan, text deleted.</p> <p>This could perhaps form part of a separate action or project plan for the area.</p>
	Local Green Space	<p>We are glad that these areas are proposed for designation as local green space. We would prefer to see the town envelope ending at Springhead Road/ Upper Brents/ The Brents Shipyard, as part of the Creekside natural environment of the town. In particular the farmland areas alongside the Creek on both sides should be designated green space.</p>	<p>FAV7 already deals with landscape. The policy has been modified to protect the 'best and most versatile' agricultural land. It would not be appropriate to designate this agricultural land as Local Green Space, having regard to the criteria in the NPPF.</p>
3.11	Faversham Creek	<p>FCT recognises that, within the context of this Plan, the Creek has been allocated a significant proportion of the space. Nevertheless, we are concerned that it does not replace all of the policies and safeguards set out in the FCNP which, in the Referendum Version, comprised 61 pages solely about the Creek. Since this Plan will supersede FCNP it is important to take care not to lose anything of importance.</p> <p>The Interpretation section on page 95 states 'The policy sets out specific requirements for development in the defined Faversham Creek area. It complements other policies in the Neighbourhood Plan, rather than replacing them.' We find this unclear.</p> <p>We would prefer that FCNP continued to be a supporting document to this plan, referred to by</p>	<p>The Faversham Creek Neighbourhood Plan has informed many of the policies of the new Plan (not just the Faversham Creek policy). Faversham Creek is not just dealt with by FAV16, but by the full suite of policies, including those dealing with land use, design, heritage and environment.</p> <p>This is an error – the text “rather than replacing them” delete.</p> <p>Although the FCNP has a lot of content, it did not always translate into clear policy requirements. A key issue for the new Plan has</p>

	<p>planners to assist in determining the appropriateness of development in the Creekside area. This is especially important for the land not specifically referred to in this plan as that land is not at this time being defined for possible development. These areas include the Brents Shipyard and Iron Wharf.</p> <p>The eight objectives in FAV15: Faversham Creek Policy Area do not fully replace the 16 objectives on page 9 of FCNP. The most important omission is FCNP objective 01 which relates to the Creek itself: '01 Enhance navigation and the sluicing/flushing functions of the Creek so as to provide full access and mooring opportunities for larger craft, including within the basin via an opening bridge.'</p> <p>Policy 05 refers to the 'predominant 3-storey building height of buildings'. Please note that 3-storey buildings predominate due to new construction, not to the original buildings along the Creek. Only a small number of the original buildings were 3-storey warehouses and industrial buildings. We believe this should be very clearly stated as a maximum height, with the definition already clearly provided under Interpretation.</p> <p>We agree with Policy FAV16: Maritime Gateway Heritage Regeneration Area as it focuses on the primacy of non-residential development, with residential development being acceptable only as part of a mixed-use scheme. This should clearly state that mixed-use does not mean single units with the</p>	<p>been to draft clearer and more effective policies. The wider suite of policies would apply to any development proposals involving Brents Shipyard and Iron Wharf. It would be unlawful to seek to apply both existing and proposed Neighbourhood Plans. No change.</p> <p>Some of the objectives in the FCNP related to projects and proposals rather than planning policy matters. One option would be to prepare a project and proposals plan in parallel to the Neighbourhood Plan. Reference to the proposed bridge has been added to the rationale preceding FAV15, for information.</p> <p>The historic environment does include a mix of heights from 2-storey to 4/5-storey, with 3-storey being the predominant height. 3-storey as an absolute maximum height would not be reasonable, given the presence of taller historic buildings. No change.</p> <p>Sentence added into the interpretation on the possible use of conditions.</p>
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		ground floor defined as an atelier, office, garage or other non-residential area of a single property. This was a planning stipulation for previous Creekside developments, but in many if not most cases the ground floors have been subsumed into the residential areas of the houses.	
	FAV17	<p>The FCNP stated in SWQI: Use classes: the site shall be used for a mix of office and workshops (Class BI), retail, maritime, general industrial (Class B2 limited by condition), and may be used for a gallery (Class D1), it shall not be used for dwelling houses (Class C3).</p> <p>FCNP states in SWQ4 'Existing buildings and features identified as making a positive contribution to the character and appearance of the Conservation Area, both within the site and in its surroundings, should be retained and where practical enhanced, within proposals for new development through the careful design of new buildings and landscaping and sensitive reuse of historic structures.' We oppose residential development.</p> <p>We cannot see that it would be possible to retain the existing grouping of buildings, using them for the various purposes stated in FAV17, and still build 8-10 dwellings on this site.</p>	<p>FAV17, FAV23 and FAV28 have been merged into FAV16 which focuses on heritage-led regeneration. Residential is supported at upper levels, but as part of a mix of uses, including E use class. Allowing residential as part of the mix is helpful to making development viable.</p> <p>Design and heritage requirements are also dealt with in other policies of the Neighbourhood Plan in addition to national policy and the special statutory duties relating to heritage.</p> <p>The policy requires the retention of the listed building and curtilage buildings. Development would involve re-use with possible additional building. Interpretation has been updated to make clear that any new build would need to complement the character and townscape of the existing grouping. This makes clear that standard suburban style dwellings would not be appropriate.</p>

		<p>The flood risk on this site is proven. We are concerned that the phrase 'appropriate mitigation' against flood risk does not include any changes to the quay itself.</p> <p>We are opposed to any proposals to remove the historic open timber-framed shed in the corner of this site. At the FCNP meetings we strongly supported retaining this open shed as one of the last remaining buildings relating to Faversham's history as an importer and distributor of timber from the Baltic and elsewhere. It was accepted that this shed makes an important contribution to our maritime and industrial history.</p> <p>The parking area in front of The Quays Hotel provides parking. It would be better to include proposals for improvements to this space.</p> <p>The buildings and slipway on Swan Quay are currently largely unused. Great care should be given to attaching the labels 'redundant' or 'no longer required' to these buildings or the slipway.</p>	<p>The policy takes account of the NPPF. It would clearly be unreasonable to ask developers to undertake public infrastructure projects.</p> <p>FAV17, FAV23 and FAV28 have been merged into FAV16 which focuses on heritage-led regeneration.</p> <p>This is outside of the site and outside of the control of the developer. Setting this requirement would be unreasonable. No change.</p> <p>The policy has been amended to include merging the clause relating to the slipway into clause 2, for consistency and reference to 'no longer required' deleted.</p>
	FAV19	<p>This site will require cleansing before construction due to its previous industrial uses. Care must be taken to ensure no pollution reaches the Creek.</p> <p>It will be a difficult junction for road access for both vehicles and pedestrians.</p>	<p>Any planning application must make clear if there are known contamination issues and submit evidence and mitigation technical reports accordingly. Water quality is dealt with in FAV15. No change.</p> <p>Access was considered by the AECOM Site Assessment report.</p>

	FAV20	<p>We agree in principle with the objectives stated. We suggest that the building height of 2 to 3-storeys including into the roof be included here, as elsewhere.</p> <p>There should be requirements for on-site parking for all uses, as there is restricted parking availability.</p> <p>Any cleaning of potential land contamination should not be allowed to leach into the Creek (this may already have happened from the piles of soil created from previous work by the owner).</p> <p>Please correct the spelling to 'sight lines' here and elsewhere in this plan.</p>	<p>FAV15, the area wide policy sets the building height. Amend the interpretation to include a cross-reference to FAV15 and other relevant policies in all site allocations in the Creek area.</p> <p>The Neighbourhood Plan does not seek to modify Local Plan policy on parking, which is strategic local policy.</p> <p>Any planning application must make clear if there are known contamination issues and submit evidence and mitigation technical reports accordingly. Water quality is dealt with in FAV15. No Change.</p> <p>Amend the site map to correct the typo.</p>
	FAV21	We agree with the proposals for this site.	Comments noted.
	FAV23	<p>We suggest that the height of any buildings as 2-3 storeys should be repeated here, as this is a particularly sensitive site by the Bridge.</p> <p>We suggest that car parking on site for all uses should be required.</p>	<p>FAV15, the area wide policy sets the building height. Amend the interpretation to include a cross-reference to FAV15 and other relevant policies in all site allocations in the Creek area.</p> <p>The Neighbourhood Plan does not seek to modify Local Plan policy on parking, which is strategic local policy. No change.</p>
	FAV25	We agree with the building heights specified and the concerns regarding site access. It is difficult to see where an appropriate access road could be built.	Comments noted. No change.

	FAV26	<p>This site is already allocated for development, and I understand that the planning permission secured was for about 28 dwellings, not the 15 dwellings allocated under this plan. We concur with the difficulties of road access, for both vehicles and pedestrians. As there is currently a great deal of green space at this location, we agree with the points about a woodland priority habitat.</p>	<p>The site allocation would not affect any extant permissions. The policy does not specify the number of dwellings or an indicative figure. No change.</p>
	FAV27	<p>The viability of this site for any of these kinds of development will be greatly enhanced by an opening bridge.</p> <p>We propose that any development is set well back from the Creek path to allow space for boat related activities, with the frontage space being used to improve the Creekside footpath and to provide space for boat repair work.</p> <p>Mitigation of noise may be necessary for any residential properties, both from repair activity.</p> <p>The height requirements should be repeated here as elsewhere.</p> <p>Land remediation may be necessary due to previous use of this land as a coal yard. Run-off into the Creek should be prevented. Parking on site should be provided.</p> <p>The existing road access is probably sufficient for the proposed development.</p>	<p>Comment noted, reference to possible infrastructure project added to the rationale to FAV15.</p> <p>FAV15 deals with public access to the waterfront. No change.</p> <p>Interpretation updated to refer to possible noise mitigation.</p> <p>FAV15, the area wide policy sets the building height. Amend the interpretation to include a cross-reference to FAV15 and other relevant policies in all site allocations in the Creek area.</p> <p>Any planning application must make clear if there are known contamination issues and submit evidence and mitigation technical reports accordingly. Water quality is dealt with in FAV15. No Change.</p> <p>Noted.</p>

	FAV28	We hope that the existing Creek Creative business is retained as stated in objective 2. We agree with the issues raised regarding access and parking.	Comments noted. The Neighbourhood Plan deals with use but cannot specify who occupies development. No change.
	FAV29	We agree with the aspiration to use the Kiln Court/ Osborne Court site for truly affordable housing in perpetuity for local people, possibly through the Community Land Bank. Some green space should be retained within the development.	Comments noted, FAV2 and FAV3 deal with residential development. FAV29 allocates for residential development. It is not the intention to modify local plan requirements for green space. However, FAV10 sets general design requirements. No change.
	Conclusion	FCT would like to thank Faversham Town Council and all the volunteers who have worked so hard on this plan. We hope the outcome will be successful.	Comment noted.
		I endorse the comments of Sir David Melville, the comments made by David Pollock on behalf of the Faversham and Oare Heritage Harbour Group, and the comments made by Sue Akhurst.	Comments noted.
	Made Creek Neighbourhood Plan	<p>Certain critical protections in the FCNP have been diluted in this new Draft Plan.</p> <p>Important prescriptions to the effect that development "must" or "shall" conform to a particular standard have been compromised by the use of the word "should".</p> <p>Considerable efforts have been made to secure a new opening bridge giving access to the Creek basin. Development must not prejudice the potential for</p>	<p>Although the FCNP has a lot of content, it did not always translate into clear policy requirements. A key issue for the new Plan has been to draft clearer and more effective policies.</p> <p>The use of 'must' or 'shall' has been determined by the specific content of the policy and informed by previous examiner feedback.</p> <p>The proposed Creek bridge is an infrastructure project and reference has been added into the policy rationale. Various policies that operate area-wide or to specific sites set clear requirements for development.</p>

		<p>the basin to become a regional hub providing marine services and local amenity.</p> <p>Please reverse this watering down process and, for example, mandate the number of storeys in any new building, and require the provision of public wharfage and moorings, clearly and unambiguously.</p> <p>I concur with FOHHG that the delivery of related infrastructure is essential in approving development, particularly in the Creek including increased sewage capacity. The number of outfalls from combined sewer overflows into the Creek is threatening ecology and the safety of leisure like rowing.</p>	<p>The historic environment does include a mix of heights from 2-storey to 4/5-storey, with 3-storey being the predominant height. 3-storey as an absolute maximum height would not be reasonable, given the presence of taller historic buildings. No change.</p> <p>Updated clause 4 of FAV15 to set clearer requirements for access to the waterfront, including moorings. However, it would be unlawful to set prescriptive requirements for the developer to provide wharfage and moorings.</p> <p>Comment noted. Sewers are a matter for the building regulations and also the water utility service provider. FAV15 deals with the impact of development on water quality. However, a sentence has been added to the interpretation of FAV15 based on Southern Water's suggestion.</p>
Faversham Footpaths Group			
	FAV6	<p>Earlier drafts included as Point 4: 'Landowners and developers are encouraged to create new public footpaths through their developments and ensure they connect to the existing footpath network.' We believe that this requirement should be reinstated to strengthen the requirement on landowners.</p> <p>While the LCWIP identifies a number of desirable new pedestrian crossings, and the LCWIP initiative is referenced in the NP, the FFG feels that it would strengthen the likelihood of these being</p>	<p>We are unsure where this text appeared, but it is not worded as policy. However, FAV4 and FAV10 deal with pedestrian convenience and connectivity. Clause 2 of FAV6 deals with improvement of existing footpaths, including accessibility. There are further requirements in specific area and site policies. These policies set stronger requirements than the suggested wording. No change.</p> <p>This relates to specific improvements to the existing highway network, rather than infrastructure requirements for development. They would fall outside of the scope of planning policies for development. The LCWIP has been taken into account</p>

		<p>implemented if some were specifically referenced in the NP itself. Our suggestions for this would be:</p> <ul style="list-style-type: none"> • of the A2 at BROG DALE Road • of the A2 at Abbey School • at Gatefield Lane across Newton Road • at Cross Lane over South Road • on North Lane near Partridge lane • on Love Lane to link the public footpath • across West Street at Curtis Way to Stonebridge Pond <p>It is noted that the Neighbourhood Plan currently also does not cover or mention the Designation of Local Paths/ National Lost Ways Initiative.</p>	<p>in the preparation of the Neighbourhood Plan and has helped to shape the policies. No change.</p> <p>The Neighbourhood Plan has no means to designate PRow or national routes. However, it does include policies to protect existing footpaths. No change.</p>
	FAV15	<p>The FFG is pleased to see that this policy includes as point 4. However, we believe that this is not 'positive' enough in ensuring public access and should be reworded to be similar to policy INF2 in the current Creek Neighbourhood Plan.</p>	<p>FAV15 - format and wording of clause 4 modified to set clearer requirements.</p>
	FAV17 FAV19 FAV20 FAV23	<p>FAV19 (Former Coach Depot) and FAV20 (Ordnance Wharf) include a requirement that the 'Development should include a public walkway along the Creek edge.' However, this has been omitted from the policies for FAV17 (Swan Quay) and FAV23 (Chaff House & Car Park).</p>	<p>Amended FAV17 and FAV23 as suggested.</p>
	FAV16	<p>FAV16 which includes FAV17 & FAV23, should also include reference to a Creekside path as this will strengthen '... , hospitality, leisure, assembly, recreation, tourism and visitor and community</p>	<p>The issue is already addressed in FAV15 and also FAV17 and FAV23. Reference to these policies is added into the interpretation.</p>

		related uses' mentioned in the first point of this policy.	
	FAV27	This says at point 3 that any scheme should ' .. , take account of the Public Right of Way running along the southern edge of the site .. ,'. The FFG feel that this should be strengthened to say that any scheme should ' .. , improve and enhance the Public Right of Way running along the southern edge of the site'.	FAV27 – Wording updated to cross reference to FAV6.
	FAV22	We support the requirement in the policy that the development should not be occupied until a new footway is provided to link the development to Station Road. However, while the development provides a footpath link to the Recreation Ground, we feel this policy should also request a footpath link to Jubilee Way. This would support the aims of the FNP's Movement and Sustainable Transport section and the LCWIP initiative.	This is an infrastructure project unrelated to the development of the site. The suggested requirement would be unreasonable. No change.
	FAV18	The policy should support the creation of a PROW through the site, not just a 'permissive' path as in the current planning application, and suggest this links to nearby PROWs.	This is outside of the scope of the Neighbourhood Plan. No change.
	FAV1	Add definition of Town Centre as: From the Market Place extending out along the lengths of West St, Court St/Abbey St and Preston St plus East St as far as the Recreation Ground 3.2 Add Hop Festival alongside Faversham Literary Festival	Comments noted. Update figure 5 to show main shopping frontages. Modification made.

	FAV3	We reaffirm our opposition to inappropriate large-scale housing development. We support the priority for affordable, smaller three-bedroom housing units to affordable 1-2 bedroom dwellings. We also support prioritisation for rental or ownership property affordable in perpetuity, including social housing or community-led development.	Comments noted.
	FAV4	Add to 2. : In particular more fully accessible pedestrian crossings of A2 serving growing population to the south, including locations used heavily as school routes such as near Abbey School and at Mall/Forbes Rd junction and facilitating access between town and Kent Downs AONB	Comments noted. This appears to relate to specific infrastructure improvements rather than general requirements for development. No change.
	FAV5	Add: <ul style="list-style-type: none"> • London Rd I Ospringe Rd I Water Lane; (confluence of built heritage, pedestrian/school safety and traffic growth) • Mall/Forbes Rd; (traffic sight lines and busy schools route) • Preston St/Stone St; • South Rd/Napleton Rd; 	Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.
	FAV6	Add 4. : Opportunities should be taken for footpaths, bridleways and cycleways to become corridors for wildlife as well as humans if appropriately planted.	Comments noted. Updated interpretation to make reference to enhancement of active travel routes as wildlife corridors also.
	FAV7	Modify 1. to replace "and the Westbrook and Cooksditch Chalk Streams, and Thorn Creek" with "chalk streams including the Westbrook, Cooksditch and Thorn Creek".	Modification made.

	FAV8	<p>Add 5. Developments should have no significant adverse impact on water quality in the Creek and chalk streams due to discharge of untreated or partially treated wastewater.</p> <p>Add 6. :Plans by the Environment Agency to raise sea defences along Faversham Creek by 2035 must be taken into consideration for all Creekside developments.</p>	<p>FAV15 requires development to have no adverse impact on water quality in Faversham Creek. FAV7 deals with impact on chalk streams. Wider environmental legislation would deal with unauthorised discharge.</p> <p>FAV15 and all relevant site-specific policies interpretation updated to advise early engagement with the Environment Agency for a site and design specific response.</p>
	FAV12	Add under 5. : Town Hall, QEII Jubilee Centre, West Faversham Community Centre, Library, Umbrella Centre, Abbey Physic Garden.	Comments noted. Interpretation updated to include suggested facilities.
	3.11 Faversham Creek	<p>Add to Purpose -and encouraging public access</p> <p>Note image and caption of Ordnance Wharf are inappropriate.</p> <p>Augment final bullet point of Key Issues for Policy to Address to read: Improve public access to Faversham Creek; through walking and cycling, and particularly on the water including to the Creek Basin via an opening Creek Bridge.</p>	<p>Modification made.</p> <p>Images and captions updated.</p> <p>The opening bridge is an infrastructure project rather than a matter for planning policy to address. However, a reference to this possible infrastructure project has been added to the policy rationale.</p>
	FAV15	<p>In 5. Change .. "predominant 3-storey building height" to ... "maximum 3-storey building height"</p> <p>Add: 9.Plans by the Environment Agency to raise sea defences along Faversham Creek by 2035 must be</p>	<p>The historic environment does include a mix of heights from 2-storey to 4/5-storey, with 3-storey being the predominant height. 3-storey as an absolute maximum height would not be reasonable, given the presence of taller historic buildings. No change.</p> <p>FAV15 and all relevant site-specific policies interpretation updated to advise early engagement with the Environment Agency for a site and design specific response.</p>

		taken into consideration for all Creekside developments.	
	FAV17	Modify 3. To read: Development should create a continuous public walkway and boat moorings, and ensure good connectivity with Town Quay and Belvedere Road	Comment noted. Updated clause 4 of FAV15 to set clearer requirements for access to the waterfront and moorings. Clause 3 of FAV17 has also been amended.
	FAV19	Add to 6 . and boat moorings	Updated clause 4 of FAV15 to set clearer requirements for access to the waterfront, including moorings.
	FAV23	Add to 3.: e. provide a continuous public walkway and boat moorings along the Creekside	Updated clause 4 of FAV15 to set clearer requirements for access to the waterfront, including moorings. FAV23 added a clause 5.
	FAV27	4. Need to strengthen protection to ensure space alongside PROW. ie prevent building close to path	Clause 4 amended to cross reference to policy FAV6.
	FAV29	Add to Interpretation Kiln Court and Osborne Court are particularly suited to affordable housing	Residential mix and standards are dealt with in FAV3. No change.
	FAV29	FAV29 identifies 2 unrelated sites. These have nothing in common in respect of location, size or possible uses and the NP says little about them. We feel that the Kiln Court and Osborne Court site should have a separate policy section because of its size and potential. It is one of the few sites in the plan large enough to achieve significant affordable housing and its location could include community facilities.	FAV29 has been amended to separate out the site at Beaumont Davey Close (now in a separate policy). Kiln Court and Osborne Court are larger brownfield sites and are required to achieve housing numbers.
	FAV12	This section of the NP covers open space, sport, healthcare and recreational activities. However, it says nothing about using existing and new	Reference to training and education added to interpretation.

		community facilities for education and training activities.	
	Employment	There are limited references to encouraging employment in the plan and we think it should be one of the core objectives. There should also be a policy of protecting existing employment sites. An example would be the Brents Industrial Estate, which is protected in the Creek Neighbourhood Plan, and provides a location for employment uses that would be hard to accommodate in other locations. Where planning permissions include commercial/ employment uses the NP should encourage the retention of these when the permissions are implemented.	Employment is addressed in the aims. It is not the intention to modify employment policies in the Local Plan. Employment is addressed in several of the policies including FAV1, FAV12, FAV15, FAV16 and various site allocations. Policy FAV12 and its interpretation have been amended to make more explicit reference to employment.
	FAV4	Section 2. should state that new pedestrian crossings should be those identified in the LCWIP.	This is too prescriptive and also will normally be provided by the highway authority rather than the developer (with the possible exception of very large sites where a crossing was necessary in order for the development to be approved). No change.
	FAV6	There should be a clearer requirement for landowners and developers to create new public footpaths through their developments and ensure they connect to the existing footpath network. This would strengthen the active travel ambitions of the NP.	This is already dealt with in FAV4, FAV6 and FAV10. No change necessary.
	FAV15	The statement in point 3 of this policy needs to be stronger. It should specifically require the provision of a Creekside footpath on any sites developed around the Creek.	Wording amended to create a clearer and stronger requirement.

		Where Creekside paths are created the NP should encourage Natural England to divert the England Coast Path (ECP) onto them, so that the NCP runs as close to the coastline as possible.	This is outside of the control of the developer. No change.
	Creekside Sites FAV16 FAV17 FAV27 FAV23	<p>FAV17 Swan Quay and FAV23 Chaff House & Car Park, The requirement for a public footpath to be provided is specified in FAV19 (Former Coach Depot) and FAV20 (Ordnance Wharf) but is omitted from FAV17 (Swan Quay) and FAV23 (Chaff House & Car Park). This weakens the footpath requirement in FAV15 and is inconsistent. We ask that the requirement for a Creekside public footpath is added to FAV17 and FAV23</p> <p>FAV16 Maritime Heritage Regeneration Policy Area. This also includes FAV17 and FAV23 and for consistency should also include the requirement for provision of a Creekside public footpath. This would also strengthen the policy's own desire for hospitality, leisure, assembly, recreation, tourism and visitor and community related uses in the area.</p> <p>FAV27 BMM Weston Ltd (Parcel 3) land at Brent Road. The requirement in the policy for any development to 'take account' of the existing PROW on the southern edge of the site should be amended to say 'improve and enhance' the PROW.</p>	<p>The requirement for Creekside is in FAV15. A cross reference to this requirement has been added into the interpretation of the other site allocation policies in the Creek area.</p> <p>FAV17, FAV23, FAV28 have been merged into FAV16. FAV15 deals with access to the Creekside.</p> <p>The suggested requirement to improve and enhance would be unreasonable and contrary to national policy. However, FAV6 does encourage enhancement of public footpaths. No change.</p>
	Maps	The maps included in the site are difficult to read with very small print. Some, especially the proposed development sites, do not have a symbol indicating 'North' which does not help with interpreting them.	Maps have been updated to include North points.

		The development site maps appear to be taken at an angle, which also does not improve readability.	
	Engagement	<p>It is disappointing that those who do not use Face book and are signed up to the Mailing Preference Service (MPS) could well know nothing about the NHP. Households registered with MPS do not receive the FTC quarterly Newsletter and nor did they receive the NHP flier inviting participation in the Reg. 14 consultation.</p> <p>In addition, the FTC Reg. 14 Virtual Event of 19 January is available to watch on Facebook but was not uploaded to the FTC Youtube channel; again precluding those not on Face book from watching after the event.</p> <p>When I click the FTC website link for the consultation, I am presented with three documents: 'Regulation 14 Version of Faversham Neighbourhood Plan'; 'Strategic Environmental Assessment' (SEA); and 'Habitats Regulation Assessment' (HRA). I can find no explanation or mention of the SEA or HRA within the plan. Are they merely supporting evidence (in which case why are all the other evidence documents, eg Housing Needs Assessment, not also given the same prominence within the website link)? Without any explanation, I am unclear if I am being asked to comment on only the main Reg 14 Plan document or all three of these documents.</p>	<p>The flyer was sent to every household in the Neighbourhood Area, separate to the Town Council newsletter.</p> <p>The video is directly available on the Town Council Website.</p> <p>Comment noted. SEA and HRA are legal requirements as part of the Plan submission, rather than evidence documents. Text has been added into the Neighbourhood Plan to recognise that SEA and HRA were undertaken.</p>

	Maps	Many of the maps within the document are too small to read and zooming in loses resolution and renders them illegible.	Where possible maps have been replaced with clearer plans.
	Housing Figure	I do not think the plan makes clear that any dwellings allocated in the plan are additional to the vast numbers included in the emerging Swale LP. To give context, I would have expected a section on the overall potential housing numbers for Faversham.	This has already been recognised in the rationale to the site allocations. The text has been clarified further.
	Site Allocations	FAV17 - FAV29, when read in conjunction with the IMC data (within the Habitats Regulations Assessment Oct 22), would indicate allocation of a total of 350 dwellings (371no. less sites ref. FNP13 and 18/169). Is this a fair assumption? Why does this far exceed the 219 requested by SBC and why is this indicative number not clear in the plan?	The IMC was an initial figure based on site area. The Neighbourhood Plan policies considered site constraints, taking account of the SEA and HRA and also the AECOM Site Assessment report. For many sites this reduced the housing capacity considerably. The detailed content of policies recognises the site constraints. No change.
	FAV29	Kiln/Osbourne Court, by far the largest of the sites, seems to have been added as an afterthought rather than worthy of its own policy. I would like to see comments on, at the very least, connectivity to surrounding areas, social housing and provision of community facilities.	The sites were not an afterthought and were subject to detailed assessment in the SEA, HRA and AECOM site Assessment Report.
Pg5		How "regular" will the Monitoring Report be prepared and by whom? Should there be an expressed commitment to review the NHP once the Swale LP is adopted?	The regularity will depend on various factors including those set out in the Plan. So, it is difficult to predict the timeframe.
Pg6		Faversham also has a rail link to Cannon Street.	Comment noted. Station added as recommended.

Pg7		As well as the cinema etc, also have the Arden Theatre.	Comment noted. Reference to Theatre added.
Pg8		<p>Why when the comparative census data for 2021 is now available has 2011 data been cited?</p> <p>I cannot see anywhere in the plan mention of the total population of, or number of households in, Faversham. I would say this is most relevant to section 2, "Local Context".</p>	Comments noted. The census data has now been updated to reflect the 2021 information published during Regulation-14 and includes total number of households.
Pg 18		Town Centre- overarching purpose states "To enhance the vitality and viability of Faversham Town Centre and assure access for those with disabilities". The addition of "and assure access for those with disabilities" would seem to be superfluous and would appear to be a specific reference to the long term debate around the pedestrianisation of the town centre. If the sentence expressly refers to "those with disabilities", why not other sections of the community eg children, visitors etc?	Comment noted. Reference to those with disabilities in this policy replaced by expanding the purpose to the movement and sustainable transport chapter.
	Countryside Gaps	Has consideration been given to SBC policy document DM25 "Swale Importance of Local Countryside Gaps Jan 2021" which discusses maintaining the separate identities and character of settlements by preventing their merger/safeguarding their open and underdeveloped character? Could this be considered in the light of the potential Duchy development which would merge Faversham with two other parishes?	Policy DM25 applies to other settlements in Swale. The 2021 document has been considered. Goodnestone is well outside of the Neighbourhood Area. Oare to Faversham settlement gap is partly within the Neighbourhood Area and comprises mainly mudflats and watered areas. These would be protected in FAV7, FAV11 and FAV15 (in the Neighbourhood Area). Ospringe is entirely within the Neighbourhood Area. A small part of the settlement gap forms one of the site allocations FAV18 Queen Court Farmyard. Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would

			allow redevelopment of existing buildings whilst further development of the site would remove a green gap.
	Potential Fruit Belt	The inspection stage of the Boughton and Dunkirk NP concluded in October 2022 and goes to referendum on 16 March 2023. B&D have designated the Duchy land which falls within its boundary as protected fruit belt. Can a similar approach be taken by Faversham?	Given the boundary to Faversham parish, this approach is problematic. However, a clause has been added to FAV7 to protect 'best and most versatile' agricultural land and fruit orchards. The policy already protects trees and woodland.
	Agricultural Land and FAV27	<p>Why is there not a specific policy stating you will not support building on Best and Most Versatile (BMV) or agricultural land? A priority set when allocating sites was that they should "have the least environmental or amenity value and avoid development on existing agricultural land" (FTC Strategic Environmental Impact Assessment Dec 22).</p> <p>If not a specific policy, why is this not at least made explicit in the interpretation section of FAV27 At the virtual event on 19 January, it was stated that the NHP did not support the building on farmland - then why not state it in the plan document? In addition, I note the references made to BMV Land in the FTC's strongly worded opposition to the housing allocations contained in the Swale LP Reg 18 consultation.</p>	<p>Comment noted. A clause has been added to FAV7 to protect 'best and most versatile' agricultural land and fruit orchards.</p> <p>Site FAV27 does not contain agricultural land. The Town Council representation referred to relates to a different site.</p>
Pg34		The reference to the Faversham LCWIP needs to be revisited as the version from which you quote (Dec 2021) has been superseded by the October 2022	Reference to LCWIP updated to October 2022 version.

		version. In the latest LCWIP, the section quoted has been revised to include reference to centre-lining.	
	FAV4	"Development proposal should be informed by the latest active travel design guidance, currently LTN 1/20, Gear Change". This makes _it sound like there is a single document titled "LTN 1/20, Gear Change". These are in fact two separate documents: 'LTN 1/20- Cycle Infrastructure Design'; and 'Gear Change -A Bold Vision For Cycling and Walking'.	Comment noted. Interpretation updated to list the two separate documents.
Pg38		Your list of Critical Road Junctions includes "A2 Canterbury Road/ Preston Avenue" and "Preston Avenue with Canterbury Road". What is the difference? If these are in fact the same- page 36 needs changing as you have 20 not 21 critical junctions. Why are the following not considered to be Critical Junctions: Whitstable Road/ Abbey Fields, AZ/Salters Lane, AZ/Selling Road, Water Lane/A2 and Ospringe Road/A27	Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.
	Infrastructure	<p>The new developments in Faversham have several streets with no footpaths eg Perry Court, Love Lane causing pedestrians to walk in the road. This seems at odds with the FTC Public Spaces/Active Travel committee which, quite rightly, does not support even pedestrian/cycle shared space in alleyways (as deemed too dangerous for pedestrians). Can this be addressed?</p> <p>The new developments are 30mph as KCC advise me the streets are designed to slow vehicles so no need for 20mph designation. Can this be addressed?</p>	<p>Comments noted. FAV4 and FAV10 deal with pedestrian and cycle permeability and connectivity. In addition, site allocation policies address more specific pedestrian infrastructure.</p> <p>This falls outside of the scope of the Neighbourhood Plan.</p>

		As regards accessibility, could new build developments be required to make use of continuous footways (ie the roadway is raised at all junctions so pedestrians don't have to step down to the roadway level)?	This relates to highway design and is a matter for the highway authority. No change.
Pg43		"The previous image illustrates the impact and extent of flooding in Faversham". They illustrate neither the impact nor the extent of flooding in Faversham.	Images removed.
Pg45		"species like hedgehogs or axes". What are "axes"?	Wording amended for clarity.
Pg57		"Where insufficient information is submitted to demonstrate compliance, planning applications should normally be refused, having regard to Section 38 of the Planning and Compulsory Purchase Act 2004". Why is section 38 quoted only in relation to air quality? Is this not relevant to all policies within the plan, as stated on page 57	Reference to Section 38 deleted.
Pg58		Under 'National Planning Policy'. "The National Design Guide (2021) establishes that well-designed places have ten characteristics." This (final) sentence looks odd without going on to elaborate.	Rationale updated to include the ten characteristics for clarity.
Pg71		Reference to an historic 2012 document on health care is misleading. The section reads as if this is current information when in fact the 'Eastern and Coastal Kent Primary Care Trust' no longer exists (primary care trusts were abolished on 31 March 2013); the 'Minor Injuries Unit' has been upgraded	Health data outside of the scope of the Neighbourhood Plan, has been deleted.

		to an 'Urgent Treatment Centre'; emergency care is no longer available at Kent and Canterbury Hospital (only William Harvey and QEQM); and Faversham Cottage 'Hospital' is now primarily a rehabilitation facility.	
	FAV22	There seems to be a leap from 'policy' 4. to 'interpretation' regarding pedestrian access to the recreation ground. Any development without access to the rec would appear to be a missed opportunity, particularly for commuters wishing to travel from the railway to the rec/Eurocentre Business Park and beyond.	Clause 4 has been amended to include reference to pedestrian links to the recreational ground.
	Grammatical Errors	<p>1 was distracted by the many grammatical errors. Is this the correct version of the document, as it does not appear to have been proof read? This is by no means a comprehensive list, just a few examples:</p> <p>Page 11. There should not be an apostrophe in "16 year olds"</p> <p>Page 19. Re SBC Retail and Leisure Needs Assessment should say "concluded" rather than "conclusion".</p> <p>Page 29. AECOM Housing Needs Assessment 2022- the first sentence ie " prices have consistently risen in the area over stating ". Should this read "The Housing Needs Assessment (HNA) 2022 summarised that over the last decade house prices have consistently risen in the area - stating that the market housing, even with the benefit of a higher-</p>	<p>Apostrophe removed.</p> <p>Wording amended.</p> <p>Wording amended.</p>

	<p>than-average income, is likely to remain out of the reach of most"?</p> <p>Page 29. "the policies seek to: Ensure that the economic and social benefits provided by broadband can secured". What does this mean?</p> <p>Page 31. lb should read "2 bedrooms or fewer"</p> <p>Page 33. "The Department of 'Transport's Road Traffic Estimates: Great Britain 2019". Erroneous open quotation mark before Transport.</p> <p>Page 34. With your addition of the words 'the policy context stating that', the following direct quote is rendered incomprehensible: <i>'Whilst this includes practical solutions and evidenced data, beyond the scope of Neighbourhood Plan policy, it does make clear how the proposed interventions support the policy context stating that:</i> <i>"1 The strategic objectives and policies of Kent County Council, Swale Borough Council and Faversham Town Council, particularly regarding climate change, sustainability, pollution, active travel and transport.</i> <i>•The objectives and strategies in the emerging SBC Local Plan and the FTC Neighbourhood Plan</i> <i>•The overall policy objectives are to prioritise the needs of people over vehicles and of place over movement."</i></p> <p>Page 35. "the 6th of December 2021". of needs removing</p>	<p>Wording amended.</p> <p>Wording amended.</p> <p>Modification made.</p> <p>Policy quotation deleted.</p> <p>Wording amended for clarity.</p>
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		<p>Page 37. "Development must be designed to accommodate the needs of people with a range of mobilities or impaired vision." The word "of is missing from 'range of mobilities'</p> <p>Page 44. "The part of the A2 corridor is a designated Air Quality Management Area". Should say "Part of the A2 corridor is a designated Air Quality Management Area."</p> <p>Page 50. "To ensure that development does not impact adversely on flooding and air quality". "flooding" should be "risk of flooding"</p> <p>Page 51. FAV7 "Loss of green or natural landscape through development must be balanced through provision of green infrastructure ... " "though" should be "through"</p> <p>Page 63. "The conservation of the historic environment is the primary planning aims." "aims" should be "aim"</p> <p>Page 67. "to assesses the archaeological potential of the historic towns ... " "assesses" should be "assess"</p> <p>Page 67. ""Thinking about our 'town's heritage, are there any buildings or places you suggest for local listing"?" quotation marks</p> <p>Page 74. "c) local in character and is not an extensive tract of land. The NPPF sets out that development</p>	<p>Word of added.</p> <p>Modification made.</p> <p>Modification made.</p> <p>Modification made.</p> <p>Sentence deleted.</p> <p>Modification made.</p> <p>Text amended.</p> <p>Text amended.</p>
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		<p>within a Local Green Space should be consistent with those for Green Belts". The closing quotation mark should be after 'tract of land'. This is a quote from sections 100 and 101 of the NPPF and you have erroneously included your own final sentence within the quote.</p> <p>Page 74. "as well reconsidering" should be "as well as reconsidering"</p> <p>Throughout the document the four references to the Frank and Whittome site are misspelt as Whittsome</p>	<p>Modification made.</p> <p>Modifications made.</p>
Resident 2			
		<p>Main concern is the bottom of Dark Hill opposite the pond. There is no way to cross a very dangerous road where the 20mph restriction does not seem to apply. A parking bay for three vehicles is still directly opposite a bus stop. I am sure that all the people, or most at least, are residents in Stonebridge Way- all with driveways and garages but too lazy to use them. Also, whenever events are held in the town and to avoid parking fees too many people park on Dark Hill itself making it at times impossible for buses to pass.</p>	<p>This appears to relate to a specific highway matter rather than the policies of the Neighbourhood Plan. Comments passed to the local highways authority for information.</p>
	General Comments	<p>Between pages 46 to 56 there are 4 maps that are duplicated.</p> <p>Overall I find the draft difficult to read, in places repetitive, with inevitable minor grammatical and context problems.</p>	<p>Duplications removed.</p> <p>Inevitably a Neighbourhood Plan will be repetitive. Minor errors corrected.</p>

	<p>It has some significant omissions, and because some of its contents are shortened versions of other texts and references there is an incomplete evidence trail to support some statements.</p> <p>On all the maps and charts north as a compass point is omitted hence references to the points of the compass make little sense.</p> <p>Some specifically named locations are omitted. Much of the data and surveys referenced do not include critical information or seem significant.</p> <p>Within each of the pages there are few references to on-line data, and there is no glossary or bibliography.</p> <p>Also there is no detail on who was involved on the committee, in consultations, or with specialist advice. Neither is there a reasonable description of the timeline.</p> <p>There is a general confusion between Faversham Town and the Faversham Town parish boundaries that runs through the document. Hence descriptions of Faversham tend to relate to the town with much of the town's parish omitted.</p> <p>The description of Faversham parish could read" An area that from just beyond the north west of the Western Link roundabout, following along to the southern edge of Oare Creek, then to the Shipwrights Pub at Hollow Shore, around the Saxon</p>	<p>References to relevant evidence documents are referred to throughout the Plan, including in the Policy rationales.</p> <p>Maps have been updated to include North points.</p> <p>It is unclear which parts of the document this refers to.</p> <p>Full titles of background and evidence documents are given throughout the text. Glossary not included – it is better to rely on definitions in planning policy and guidance. No change.</p> <p>This information is available on the Town Council website and is not necessary to include it in the Plan. Details of community engagement and consultation are provided in Chapter 2, in this statement, and on the Town Council website.</p> <p>The policies relate to the whole Neighbourhood Area, except where they make clear that they apply to a specific area or site.</p> <p>Comment noted. The intention is to provide a brief description of the Parish in terms of its location, linkages, and general characteristics. No change.</p>
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		Shore Way and across the Faversham Creek to the sewage works, and to the south west at the Tin Bridge, crossing the A2 to the M2, then following the railway line with a detour the edge of Coplon, along to Brogdale then over the M2 and along the footpath to Vicarage Lane, Mutton Lane and Water Lane and back along the A2" I describe this outline in detail in comparison to page 8. 2 Local Context 2.1 Faversham, that is effectively a description of the town rather than the parish boundary.	
	Purpose	<p>By stating that the purpose is to create an effective and consistent planning framework, it omits other purposes.</p> <p>It effectively omits any explicit reference to indicative housing targets of 3400 that the suspended draft Local Plan has imposed because 2017 Local Plan was changed.</p> <p>No discussion is had about overall numbers including Abbeyfield and The Duchy as potential applications.</p>	<p>The representation does not suggest 'other purposes' and the stated purpose reflects planning legislation and policy. No change.</p> <p>The Neighbourhood Plan addresses housing need within the Neighbourhood Area in the rationale to the housing policy, which refers to external evidence documents. No change needed.</p> <p>This appears to relate to a planning application and also a potential strategic site allocation in the emerging local plan.</p>
		<p>There is no explanation of why the plan runs to 2038.</p> <p>Neither is there detail of the 2017 Local Plan requirement for development and numbers across Faversham.</p>	<p>The Plan covers a 15-year period, which is fairly typical for Neighbourhood Plans.</p> <p>The policy rationales refer to relevant local plan policies.</p>

		<p>Equally there is no explanation of the change and increase in numbers to 3425 in the Emerging Local Plan Regulation 19, or the reason for it being paused, and implications of this to the NP. Legally the NP must make reference to the paused Local Plan Review 2021 Pre Submission Document, the SHLAA sites, and provide sufficient detail of individual sites to ensure transparency. This has not been undertaken.</p> <p>Thus the proposed NP additional sites have not included any examination of the new estates along The Graveney Road, Oare, off the Western Link, Love Lane or Perry Court, neither Abbey Fields nor the landholding The Duchy Estate has within the area of the parish.</p>	<p>Application of the basic conditions requires general conformity with adopted strategic local policy. However, the evidence base to the emerging local plan including the SHLAA, has also formed part of the evidence base for the Neighbourhood Plan. Swale Borough Council has provided a figure for growth for Faversham, taking account of strategic sites in the adopted and emerging local plans. The AECOM site assessment report is part of the evidence base and publicly available.</p> <p>The Neighbourhood Plan allocates small and medium sites for housing and employment and other purposes. Larger strategic sites would be a matter for the emerging local plan. This includes the sites mentioned, some of which are partially outside of the Neighbourhood Area. No change.</p>
	Monitoring and Review	Who will do this, with what frequency and what will be necessary to require a regular report?	The regularity will depend on various factors including those set out in the Plan. So, it is difficult to predict the timeframe.
	Maps	Designated Neighbourhood Area map lacks detail and there is no scale.	Added 'not to scale' to maps where a scale bar not included.
	Local Context	<p>2.1 Some odd phraseology, whether the motorway passes south of the built up area or whether the M2 runs along the SW to SE boarder of the area?</p> <p>2.2 The penultimate paragraph describes "a wide array of shops" this is at variance from similar phrases later in the text.</p> <p>Figure 2 2011 Census Data -no comparison between this data and Swale or England wide, thus what does it signify?</p>	<p>Section 2.1 and 2.2 updated.</p> <p>Intention is to provide some baseline data rather than to make comparisons. Updated with the latest census data from 2021.</p>

		<p>The largest employing industries omit a further 50.1 %. So what is the other half?</p> <p>Car or van availability shows that the omission of 30% must have two or more vehicles, Household data reveals an omission of 11.9%. Are these boats, caravans or agricultural dwellings?</p>	<p>Figure 2 is sets out the four biggest employers, rather than being a breakdown of all employment. A link is included on the page for those that want to see more details.</p> <p>Updated with the latest census data from 2021.</p>
	Engagement	<p>The detail on pages 10 and 11 do not appear adequate of the communities they represent. There are over 600 businesses in Faversham thus a sample of 34 is inadequate The residents' survey with no indication of numbers suggests that there needs to be greater provision for cyclists and walkers. But the evidence for each of those is not shown nor are definitions provided. The same is true of page 12, where no data is given. Mention is made of engagement but this is again not evidenced.</p>	<p>Community engagement section updated to combine the surveys into a general summary and included a link to more detailed analysis.</p>
	Aims	<p>How these aims were constructed and the evidence for them is unclear.</p> <p>Page 13, Number 3, given the configuration of Faversham seems unrealistic as there is no indication of where currently residents work, although it is common knowledge that a high proportion work outside the town in Canterbury, Ashford, Medway and some 2000 commute to London.</p>	<p>Introductory sentence to 2.3 amended slightly for clarity.</p> <p>This is why it is important to have this as an aim. The policies then address this aim in various ways including creation of local economic opportunity. No change.</p>

		A major omission is that of support to agriculture given that 48% of the parish area landmass is devoted to that.	Agriculture as a land use falls outside of the scope of normal planning control. However, FAV7 has been amended to address the loss of the best and most versatile agricultural land.
	Planning Strategy 2.4 and list of policies 3.1	<p>Again there is not mention of the overall target of 3400 for the area. My understanding is that the current Community led housing initiative has ceased, and there are no figures for how many self builds there have been since 2017 or planned policies.</p> <p>The list of policies does not include anything specific about the rural area, Ospringe or cooperation with local social housing associations.</p>	<p>This is an overall summary of the planning strategy. Further detail on matters like housing need is in the rationales to the policies.</p> <p>FAV7 deals explicitly with the natural environment and landscape and many of the other policies are also relevant to the rural area. Similarly, most of the general policies apply to Ospringe and to other areas outside of the town centre. Specific projects may involve registered housing providers or other community organisations. This is already recognised in the interpretation to FAV3. No change.</p>
	FAV1	<p>Within the hierarchy of established policies there are a number of conflicts. The overriding aim of the Local Plan 2017 was to ensure that the town centre was the focus for retail, thus other policies especially "neighbourhood zones" conflict with that as does any out of town development.</p> <p>I am not clear how evidenced that Government High Street Task Force priorities accord to the key issues on Page 23, whilst the image of Abbey Street does not convey "use of upper floors".</p> <p>This effectively is a catch all, with some confusion about "multi-use". Apart from very minor other uses</p>	<p>The policy accords with NPPF policy. It also recognises that the success of town centres is based on the mix of retail, food and drink, personal services, leisure, recreation, entertainment, culture, performance and other community uses. A narrow retail only approach would lead to the decline of the town. No change.</p> <p>There is clearly a massive body of evidence behind High Street Task Force priorities. This has informed policy FAV1. No change.</p> <p>Policy amended to allow developer to demonstrate that there is sufficient capacity in the remaining car parks. Central Car Park is</p>

		in the Central Car Park, all other car parks are used only for parking. So unless alternatives are found, for example a multi-story, there could never be any alternative provision within the town centre.	used for Hop Festival and Festival of Transport. Queens Hall Car Park is used to form the parade on Remembrance Sunday and St Georges day.
	FAV2	<p>Pages 26-29 do not show the scale of residential development as set out in the Local Plan Review 2021, i.e. 3400 units, nor does it explain the problem facing Faversham Town Council that is avoided in the draft NP.</p> <p>Misleadingly the Draft NP sets down the growth strategy as 219, which is ONLY the NP requirement and not the real amount. The Duchy proposals 2400c and Abbeyfield 180c units are not mentioned. FAV2 Housing Development on page 30 This is frankly tinkering at the edges.</p>	<p>The Neighbourhood Plan addresses housing need within the Neighbourhood Area. The Neighbourhood Plan achieves the housing need figure agreed with the Local Planning Authority. The policy rationale has been clarified slightly.</p> <p>Likely strategic site allocations and planning permissions have informed the local need figure of 219. This figure has been provided by the Local Planning Authority in line with the NPPF.</p>
	FAV3	<p>Surprisingly there is no mention of existing social housing landlords within Faversham. As such this draft policy is a statement of theoretical intent because the 66% and 34% referred to, only applies in certain sized developments under certain conditions.</p> <p>Tenure blind is an aspiration rather than a policy.</p>	<p>The policy applies to all development that triggers the need for affordable housing. It is not a policy specifically focused on development by registered housing providers.</p> <p>The requirement for Tenure Blind development is drafted as policy, not an aspiration. No change.</p>
	FAV4	Some of this is spurious for example the national estimate data of pedal cycles 3.5 billion miles. All of the four sets of transport data and trends are of marginal and conflicting value.	The infographic on national statistics has been deleted to avoid misinterpretation. However, benefits of active travel to health, well-being, reducing congestion and improving air quality are widely recognised.

		<p>The LCWIP, and 20 Plenty initiative show no data about the changes in cycling and walking. From observation it would appear that over the time of the NP there has been little change in local cycle habits that can be measured.</p> <p>Again the concept of "Liveable neighbourhoods" appears, this has no supporting evidence, and given even the increase in the scale of housing development it would seem unrealistic.</p> <p>Policy 1 on page 37 including "overreliance on cars" would seem quite unrealistic as this is a theoretical construct. As the previous data shows 30% of Faversham residents have two or more cars, but there is no data that shows if residents generally have bikes, scooters [currently illegal] etc.</p> <p>The policy 4 on page 37 of ensuring secure and covered storage for cycles and scooters omits to include other vehicles.</p> <p>Number 5 on page 37 seems unrealistic if it includes a range of rural and tourist related employments or micro businesses.</p>	<p>Policies FAV4, FAV6 and FAV10 seek to ensure that opportunities for active travel are an integral part of the design and layout of development. No change.</p> <p>Reference to liveable neighbourhood deleted, to avoid misinterpretation.</p> <p>Policies FAV4, FAV6 and FAV10 seek to ensure that opportunities for active travel are an integral part of the design and layout of development. No change.</p> <p>Reference to other personal vehicles added in.</p> <p>The policy only applies to new housing or new employment space. No change.</p>
	FAV5	<p>Page 38 Critical Road Junctions There seem to be some omissions, Salter's Lane, The Selling Road at Macknade The Mutton Lane/Water Lane junction at Ospringe School The Whitstable Road Abbey Fields entry Interpretation of this definition requires further modelling</p>	<p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Court street, Abbey Street, Quay Lane is already in the policy. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p>

	FAV6	<p>Page 39. I am surprised so little has been included about this. Firstly to delineate footpaths, from bridleways and cycleways. Then to provide some data as to estimated numbers.</p> <p>There is a glaring omission of focus on the Natural Coastal Footpath that is the most significant footpath through Faversham.</p> <p>The phrase on 3 "including between the Town Centre and surrounding countryside" is very odd. Accessibility would seem very good.</p> <p>There seems to be no local data or plans to manage this policy.</p> <p>The concept of not supporting high fences or walls seems at variance with many existing footpaths, for example Cross Lane and Gatefield Lane, and those footpaths running alongside many gardens. The issue of the areas "lost or hidden footpaths and pathways" is not included nor any statement about re-establishing them.</p>	<p>The policy has been sufficiently evidenced including by the Definitive Map, LCWIP, ROWIP, and the PJA Faversham Critical Junctions report (which included reference to PRoW). No change.</p> <p>Additional text added to make reference to national footpaths including the coastal footpath. Wording adjusted slightly for clarity.</p> <p>See previous comment on evidence base.</p> <p>The policy is about creating safe and accessible environments for all the community including vulnerable people in new development. Suggestions for future footpaths projects noted. This could be something the use of infrastructure monies mentioned in clause 3 to address. No change.</p>
	Environment Chapter Rationale	<p>Pages 41 and 44 excludes from specific mention the Ospringe AQA, and elsewhere in the text this specific area is never delineated.</p> <p>The rural area between the A2 and M2 through the parish to the Tin Bridge provides a now fragmented but important biodiversity and habitat link.</p> <p>Flood Risk Data, there is no flood risk map.</p>	<p>The AQMA is noted in the rationale in reference to the adopted local plan and separately later in the rationale.</p> <p>Comment noted.</p>

		<p>The phrase Surface water flooding etc. in page 41, makes little sense. When it rains the rain falls on the land surface.</p> <p>The picture on 43 is unclear, does it actually show flood prevention by having uninhabited ground floors?</p> <p>Water Quality, there is no mention of increased housing development and the requirement for increased sewage provision.</p> <p>Habitat corridors page 44, omission of the names of the "other chalk streams"</p> <p>Natural Habitats, Priority Habitats, and Green and Blue Spaces on page 45 The sentence "arable land around the parish is flagged as a low priority habitat, one must question why this is as this is part of the natural landscape with hedges, trees, copses etc.</p> <p>There is a spelling error "axes"?? But this again omits agricultural land that is habitat for hares, rabbits, foxes, badgers, weasels and stoats.</p> <p>In the Green and Blue section, what are the multiple use areas/?</p> <p>Pages 46 - 55 the maps, these are confusing and do not show specific details especially of the fruit belt area. RAMSAR and SSSI sites are not delineated.</p>	<p>Link added to the Environment Agency Flood Risk Mapping Data.</p> <p>Surface water run-off is an issue which policy FAV8 seeks to address.</p> <p>Image removed.</p> <p>This would be a matter for the utility provider to address, in discussion with the developer. No change.</p> <p>Policy amended to include names of other chalk streams.</p> <p>The Town Council understands that arable land is flagged a low priority habitat because it is typically low in biodiversity compared to other features in the landscape including hedges, woodland, ponds, etc. Clause added to the policy to protect the 'best and most versatile' agricultural land.</p> <p>Typo corrected.</p> <p>Explained in the previous sentence.</p> <p>Plans amended to show designated landscapes.</p>
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	FAV7	<p>Pages 40 55. Almost 50% Of Faversham parish is agricultural land, much of it grade 1 and grade2 including fruit. This has been omitted as has the relevant central government planning policies now in place .</p> <p>There is an assumption that only blue, green and and habitat areas are a priority. But given Faversham's rural landscape the other rural areas are also significant.</p> <p>Page 56 Surprised that there is not mention of pond creation that gives considerable support to insect life.</p>	<p>Agriculture as a land use falls outside of the scope of normal planning control. However, FAV7 has been amended to address the loss of the best and most versatile agricultural land.</p> <p>FAV7 addresses a wide range of landscape and habitat types and designations.</p> <p>Reference to ponds added to interpretation.</p>
	FAV8	<p>Existing development changes to existing hard standing are not encouraged.</p>	<p>FAV8 clause 4 deals with hardstanding.</p>
	FAV9	<p>Page 57 the use of plural in AQMA is incorrect as there is only Ospringe.</p> <p>I do not understand odour and dust; does this refer to Shepherd Neame Brewery or agriculture such as harvesting?</p>	<p>'S' deleted.</p> <p>Wording of interpretation amended for clarity. The policy relates to impacts of new development, not existing activities such as those raised.</p>

	FAV10	<p>There are some sentences that have been wrongly transposed between page 58 and 59. This does not read well and is jumbled.</p> <p>Pages 61 to 62. Policy 10 number 3 needs a rewrite, how could public transport connect to the Creek?</p> <p>Page 62 second sentence appears to be advertising.</p> <p>How would badger routes be supported, and would they be the same as fox routes?</p>	<p>Comment unclear. No change.</p> <p>Missing comma added to after 'public transport routes'.</p> <p>The comment highlights the importance of selecting a skilled design team, but clearly does not promote any specific architectural, landscape, urban design or other kind of practice.</p> <p>The list is not intended to be comprehensive, but to give some examples. No change.</p>
	FAV11	<p>3. 7 Historic Buildings and Places pages 63-69 Confusion exists within these pages in that mention is made of 4 Conservation Areas but these are not described.</p> <p>And the FAV11 policy only relates to the town centre rather than the parish. The only site line mentioned is in the town centre. The Archaeological Zone is for Faversham Urban area, without mention of Ospringe or the Roman Villas along the old Watling Street [A2]. Thus FAV 11 does not comprehensively cover the whole parish area. My understanding is that there are over 450 Grade 1 and 2 listed buildings across the parish this is not included.</p> <p>Festivals however good cannot surely be part of Planning Heritage Policy?</p>	<p>Rationale updated to list the Conservation Areas in full.</p> <p>The policy relates to the whole of the Parish except for where specific reference is made to the town centre. Comment on the scope of archaeological zones passed to Kent County Council. Parts of this policy have been redrafted in response to other comments.</p> <p>Planning rationale updated to reflect listed buildings.</p>

			The reference in the rationale is to emerging local plan contents. Policy FAV11 does not include any reference to festivals.
	FAV12	<p>Overall, there seems to be confusion about what should be included within this policy and how should it be described. Previously Swale Borough Council has produced a large report on community and sports facilities and future needs across the borough. The Faversham Town Action Plan paragraph seems obsolete.</p> <p>The NP community survey appears to concentrate on physical spaces.</p> <p>There is confusion on page 72 about both promoting new community services, however undefined, and protecting existing ones.</p> <p>The Policy FAV12 on page 73 is a confusing mishmash of ideas. How can health facilities be in easy walking distance from all parts of the parish?</p> <p>Why is the Post Office included as a community facility of value but not The Emergency Treatment Clinic?</p> <p>Should every development support active travel, even residential care?</p> <p>The example of Dead Man's Comer Whitstable seems very strange example to include.</p>	<p>Title of policy amended. Faversham Town Action Plan paragraphs deleted from the rationale.</p> <p>The point being made is unclear.</p> <p>The policy and interpretation provides detail.</p> <p>The reference to easy walking distance relates to housing not all parts of the Parish.</p> <p>The Plan would have little influence over health facilities where decisions would be made under health legislation and policy.</p> <p>Active travel should be supported wherever possible, including for visitors to residential care homes. No change.</p> <p>Paragraph that includes Dead Man's Corner, Whitstable deleted.</p>

	FAV13	<p>The map on page 75 contains 18 Green Spaces but these are not listed in the text on page 74.</p> <p>Data ranldngs and data questions on page 78 are not included so it is not possible to understand those examples that are included. Exceptional cases for development seem exceptionally weak.</p> <p>The Green Space Former play area off Waller Road is inaccurate in that the end piece of land at South Road butting onto the terraced houses is privately owned.</p> <p>As the new Green Spaces proposed are in the town, I am not clear if others across the parish should be included, and if any more have been considered, for example the Macknade cricket ground?</p> <p>Overall a question must be that the maps do not sufficiently describe where the existing and proposed Green Spaces fit into the habit protection and Green areas, nor if there are others that should be designated across the parish.</p>	<p>List of the Local Green Spaces already designated by Swale Borough Council added to rationale.</p> <p>It is unclear what this means. The policy sets out requirements for development that encroaches onto the space or is adjacent to the space.</p> <p>Plan amended.</p> <p>Disagree – the spaces selected are from different parts of the Parish. Local Green Space designation may be too restrictive for the cricket ground.</p> <p>The purpose of the Plan is to show the boundary of the designated space. The analysis of the Local Green Space being designated and other spaces considered is in the Local Green Spaces report.</p>
	FAV14	District heat networks and micro generating features need further explanation, also policy DM3 and DM4.	Sentence on micro-generation added to interpretation. The Neighbourhood Plan has been drafted to be in general conformity with strategic local policies including DM3 and DM4.
	FAV15	The date of the Creek Neighbourhood Plan should be included.	The referendum version does not state the date. However, the referendum date has been added in brackets after the title. Also, additional paragraphs on the Faversham Creek Neighbourhood Plan have been added.

		<p>No mention is made of the Creek Bridge, not The Creeks cape the consultation proposals within the Creek NP that support additional spaces, walkways and squares along the creek.</p> <p>The top image on page 91 states bringing vacant buildings back into use. But the picture is of Ordnance Wharf that housed no buildings only oil storage containers that were demolished some 15 years ago.</p> <p>The Natural England Coastal path is not mentioned. But only referenced in the last bullet point of page 94.</p>	<p>This refers to infrastructure projects, rather than matters for development management policy. Reference to the bridge and sluice gates added to the rationale for information.</p> <p>Images throughout the document have been revised.</p> <p>As recognised it has already been referenced in the 'issues to address' list. Also it has been added to rationale in Chapter 3.4 movement and sustainable transport.</p>
	FAV16	<p>This appears to be a new phrase encompassing Iron Wharf. Considerable concern over the years has been expressed about Iron Wharfs encroachment onto the marsh with possible dry dock facilities that are specifically against SBC planning regulations and the RAMSAR site. It is not clear why the Maritime Gateway is distinct from The Creek?</p> <p>Creek footpaths require more consideration and specifically named within a clear policy.</p> <p>Faversham Creek is not the only creek within the parish boundary. Oare Creek south side is also within it, but there is no policy about Oare Creek?</p>	<p>We assume this refers to the Maritime Gateway Heritage Regeneration Area. The relationship between FAV15 and FAV16 is explained in the policy. Any proposal for new drydock facilities would be considered against these policies, FAV7 and other relevant local and national policy. National legislation sets out circumstances where Environmental Impact Assessment is required. No change.</p> <p>Footpaths are dealt with in FAV6. No change.</p> <p>Reference to Oare Creek is already made in the rationale to the environment policies. Oare Creek would already be covered by FAV7 explicit reference to Oare Creek has been added to clause 1 of FAV7.</p>

	Site Allocations	Although not included in the Questionnaire's comment schedule these pages include SHLAA that is critical to the formation of the NP, but unlike the Boughton and Dunlark NP provides no comment other than on NP gain. Within this number of 219, no sites provisionally allocated give actual numbers per site. There is also no in depth indication of what and how the NP consultation and timeframe was conducted, who was consulted nor and a sound analysis of data. The consultancy AECOM is involved but what it has actually done is not described.	Paragraph added to the growth strategy section to clarify the housing numbers. The AECOM Site Assessment report makes clear the methodology used.
	FAV17	There is no mention of the Creekscape no of public walkways. The timber historic shed is not detailed on the plan. The existing slipway is not in public use.	Public footpaths dealt with in FAV4. FAV15 deals with the wider Faversham Creek area. FAV17 and FAV23 have been integrated into FAV16 in response to other representations.
	FAV18	This is the most contentious site as it is within the Ospringe Conservation area. It is opposite the primary school and as I write is waterlogged because it was a channel for the old Water Lane Stream. The comment about flood defences in the area is not evidenced. Hence it cannot be described as a dry river bed. Its south aspect border at Mutton Lane is the site of an existing long standing timber business. As the curtilage is bounded by roads I see little point in introducing a footpath across the site.	<p>Conservation Area status should not be seen as a barrier to development, providing that development meets the requirements of planning policy. Special statutory duties also apply to Conservation Areas.</p> <p>The site allocation has been deleted in response to other representations. Policy FAV2 would support the redevelopment of existing buildings, excluding heritage assets. For clarity, the interpretation to FAV2 has been amended to clarify that heritage assets would not include buildings that have a neutral or negative impact on Conservation Areas. This makes clear that the policy would support the redevelopment of the functional agricultural buildings within this site.</p>
	FAV19	The former coach offices themselves are an interesting small building. Public walkways are too be commended.	Reference to the former coach offices added to the interpretation.

		I note on page 108 the reference to Lapwings etc, but I doubt if Lapwings have been on this site for 200 years.	The reference to Lapwings is taken from the DEFRA mapping system.
	FAV20	I do not consider a public walkway around the site to be realistic as it would require a bridge from the Purifier curtilage that would impede the statutory small navigation channel. I query why this is the only site to have a site line plan?	Access to the water frontage would still be desirable for all development even if it did not link up. Sight lines were included due to the specific views to Davington Priory and St Mary Magdalen Church.
	FAV21	The comment about the access road, given the potential small number of units on the site, seems not accurate given existing KCC Highways stipulations.	The AECOM Site Assessment identified the comment about the road junction at Abbey Road and New Creek Road. KCC did not comment on this site.
	FAV22	I believe this is already being developed. Mention is made of Flood Zone 3, nowhere in the document shows flood zones. No reason for glazing or an acoustic fence is given.	The site has not been developed. Flood zone information is available on the Environment Agency website. The policy makes explicit the need to mitigate noise and vibration from the railway. The glazing and acoustic fence are given as examples in the interpretation. No change.
	FAV23	This is a sensitive site and demands something of significance. Not in the curtilage but nearby are the old bridge keepers' buildings, now in a sorry state, these should be preserved as of considerable historic value.	Comments noted. FAV23 has now been merged into FAV16, together with FAV17 and FAV28. No change.
	FAV24	No comment other than clearly a Lapwing site!	Interpretation already mentions Lapwings.
	FAV25	Given the need for affordable housing, an imaginative and holistic scheme for the site would be useful.	Affordable housing requirements are set out in the Local Plan. Policy FAV3 sets out how affordable housing should be provided. We agree with the need for imaginative and holistic schemes for

			this and other sites and this is encouraged in FAV10 which includes an emphasis on green design. No change.
	FAV26	Whether the main At Deco Building can be converted is an issue. The site itself is one of the most prestigious in Faversham and clearly requires sensitive and excellent design for perhaps no more than 6 units of unique and high quality that would complement the Priory, and surrounding 18th century buildings ...	Interpretation amended for accuracy (the building is of interest but has no Art Deco detailing). Comments on excellent design noted. Design is dealt with in more detail in FAV 10 and FAV11. Any proposal to demolish the building would be considered against NPPF criteria.
	FAV27	This area has been almost derelict for some time. Clearly it could meet the needs of affordability with some unique small terraced designed units of possibly up to 50 in number.	Comment noted. Site is currently a car park.
	FAV28	Given the scale of this site, an imaginative design and recreation is required to deliver its full potential for integrated residential and work based units.	Agree with the need for an imaginative design which is encouraged by FAV10. The policy would support integrated residential and work-based units.
	FAV29	Kiln and Osborne Court, named after the Rev Osborne vicar of Front Brents, are combined, of a large size and potentially of value. Beaumont Davey Close is in the property of KCC Fire and Rescue and might deliver no more than 4 units. A minor detail is that the tarmaced comer between Quay Hotel and the Boxing Club is in fact part of KCC highway curtilage that has been encroached upon over several years.	The allocation for Kiln and Osborne has been amended to residential, including Use Class C2 and C3. Comment noted and passed on to KCC. Beaumont Davey Close has been moved to a separate policy, in response to other representations.
	Conclusion	Given that the actual announcement of the start of the consultation was four days later than the official date, and postal leaflets were distributed a week or	The consultation was widely publicised from the start, including posters, online on the Town Council website, social media, pop-up events, zoom session and hard copies in various locations around

		<p>more later, there is a strong case for extending the consultation period to ensure full transparency.</p> <p>In the ZOOM consultation meeting of 19th January it was stated that "Faversham Town Council opposed further development other than the 219 units outlined in The NP". Nowhere in the Consultation Document does this appear. However, these 219 units have been described in the draft as additional.</p>	<p>the town. This was augmented by leaflets which were delivered in the first week.</p> <p>This comment related to current speculative planning applications, which the Town Council has objected to. In addition, the Town Council will monitor strategic site allocations through the emerging local plan.</p>
	General Comments	<p>Whilst the basic principles of the plan seem sound, there is too much focus on development and not enough focus on protecting the rural character of Faversham.</p> <p>Some of the sources used are questionable, Swale Landscape Sensitivity Assessment reads as largely the author's personal opinion of aesthetics with highly subjective descriptions (as well as containing inaccuracies. Habitat corridor maps don't fully reflect local naturalists' observations, ignoring major routes - it's unclear whether these have been produced solely based on maps and predicted species movement or observation, if it's observation it certainly doesn't reflect normal patterns of movement or migration. Whilst habitat distinctiveness maps may reflect the south east as a whole, distinctiveness within the context of the Neighbourhood is not considered which seems an</p>	<p>The Plan places a great deal of emphasis on environmental protection including heritage, natural environment, blue and green infrastructure and Local Green Space designations. The Plan has met the Basic Condition relating to achieving sustainable development by striking a balance and synergy between growth and protection.</p> <p>The Plan has used a wide evidence base including the documents mentioned but also a variety of other documents, including some commissioned specifically for the Neighbourhood Plan. We are satisfied that the policies are evidenced based.</p>

		<p>important consideration, considering this a Neighbourhood plan. Natural habitat seems to include orchards, grazing marsh and other farmed areas but inexplicably excludes arable farmland - why? It's important habitat for many birds, particularly the Bunting family and Wagtails.</p> <p>Context showing the additional planned Development under Local Plan Allocations would be useful in assessing the combined impact of development on Faversham's rural character.</p> <p>There is no consideration for what is happening to the area immediately surrounding Faversham, and how that will impact the Town's drive towards biodiversity.</p> <p>What happens to sites identified but not included in the plan, particularly if some of the sites included in the plan don't go forward to development? Are they opposed by the Town Council as not being in the plan? Some of those sites are likely to be highly controversial and are very problematic. What is the appropriate method of giving our views on those sites?</p>	<p>These are available on the Swale Borough Council interactive planning map. The AECOM Site Assessment and Housing Needs Assessment reports took full account of strategic site allocations. It could be confusing to include Local Plan site allocations in the Neighbourhood Plan.</p> <p>FAV7 deals with biodiversity and the protection of the natural environment and landscape within the Neighbourhood Area. FAV10 deals with green infrastructure. The Plan was subject to SEA and HRA which considered environmental impacts.</p> <p>The sites supported by the Town Council are those allocated in the Neighbourhood Plan. If other sites are selected in the emerging Local Plan, the Town Council will make representations.</p>
	FAV1	Development of upper stories of commercial properties for residential use should be encouraged, not merely supported.	This is planning policy so has to be worded so that it can be used in the development management process. The Town Council would encourage the re-use of upper floors. No change.
	FAV2	Loss of agricultural land should be avoided.	A clause has been added to FAV7 to address the best and most versatile agricultural land.

	FAV7	<p>Habitat corridor maps omit two major routes for wildlife and don't seem to be based on observations. The main route for waders and passerines from Thorn Creek is across the farmland north of Ham Road Farm buildings to Oare Marshes and Castle Coote. Wildfowl and waders cross the fields south of the farm buildings to the gravel pits off Ham Road. Most bird movement is east-west or west-east across the open fields rather than the more tortuous routes the maps suggest.</p> <p>There appears to be no recognition of the importance of arable farmland to local biodiversity. Much of the farmland within the parish has already been lost, and farmland bird species are the most threatened. There is no recognition of the impact on bird life with the loss of a large swathe of farmland under the forthcoming solar plant across from protected area to the north of the parish. Both Abbeyfields and the land to the south of Ham Road farm support important numbers of Red Listed Yellowhammer. The Abbeyfields area is one of the few remaining sites for Turtle Dove. The Southern half of Ham Road Farm supports Red Listed Yellow Wagtail and Skylark in significant numbers, as well as providing winter roosting sites for Lapwing (a priority species) and summer feeding for Corn Bunting (again a priority species). Ham Road farm is one of the few areas within the parish where Hare can still occasionally be seen. Sparrowhawk, Buzzard and Kestrel regularly roost in the Old Goat pen area behind Upper Brents, and the field margins provide</p>	<p>The maps have been produced by Kent Wildlife Trust. Comments passed to Kent Wildlife Trust for information.</p> <p>Clause added to address the best and most versatile agricultural land. Also, the later site allocations are all on brownfield sites.</p>
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		a corridor for Foxes, Rabbits hedgehogs and reptiles linking with Ham Road Pits.	
	FAV8 and Site Assessments	<p>Site Assessments seem to be based on current flood risk not projected flood risk in the near future - for example FNP14 suggests the southern most part of the future -for example FNP14 suggests the southern most part of the "site is at low risk of fluvial/tidal flooding." yet most predictions show the South Eastern corner at significant risk within the next 40 years.</p> <p>Currently the farmland acts as a water store for heavy rain, slowing the release into the creek. The south eastern corner is already subject to significant surface water flooding, particularly over winter. Any development of the land risks increasing this surface flooding.</p>	<p>The AECOM Site Assessment Report used Environment Agency flood risk mapping data. Site FNP14 was not selected as a site allocation.</p> <p>A clause has been added to FAV7 to address the best and most versatile agricultural land.</p>
	FAV9	Developments increasing traffic past Davington Primary school and along West Street will have a negative impact on air quality in these already congested areas.	Comment noted.
	FAV10	In general, I am supportive of this part of the plan, however I do consider any development of existing green space will go against "CP4 Conserve landscape, biodiversity and local environments."	The policy deals with design. Protection of landscape and green spaces would be dealt with under FAV7 and FAV13. Also, the later site allocations are all on brownfield sites. In general, the Plan has been drafted so as to be in general conformity with adopted strategic local policy.
	FAV11	In general I am supportive of this part of the plan, however I do consider any development of existing green space will go against "a. The rural setting of	FAV11 has been partly re-drafted in response to other representations. Protection of landscape and green spaces would

		Faversham Town Centre and Syndale, Ospringe, Preston-next Faversham, and Faversham Conservation Areas, including the open land between the Ham marshes and Bysingwood;" particularly FNP14. Development at Ham Road will also have a negative impact on the conservation area, severing the views and historic links between the 19th Century brick workers cottages and the former brickfields.	be dealt with under FAV7 and FAV13. Site FNP14 was not selected as a site allocation.
	FAV12	Supportive but must recognise the recreation and health benefits of existing undeveloped open space and avoid additional pressure on the natural environment.	Natural environment and open space are dealt with in FAV7 and FAV13.
	FAV13	<p>LGS04 Crab Island - should include the grass banks behind the site.</p> <p>LGS05 Fields from Upper Brents towards Faversham Creek, Faversham - the map appears to have been redrawn since this site was submitted with a small corner of the site excluded. The proposed map now fails to connect with Upper Brents and limits the views it was designed to protect. The western most boundary should continue straight down along the western boundary of the old goat pen, joining at the playpark. This maintains the view towards the marshes and creek, preserves the landscape feature of the old goat pen and connects it with the conservation area. In it's current form it fails to connect directly to the community, fails to ensure that views are fully maintained, fails to connect with the conservation area and fails to protect the</p>	<p>The grass banks are a Local Green Space designated in the adopted Local Plan. No change.</p> <p>The proposed LGS boundary has not been amended.</p>

		important landscape feature of the trees at the old goat pen site. The exclusion of this small corner is inexplicable - including it still gives a clear boundary to the site with the old goat pen forming a corner, and still keeps the area modest in size.	
	FAV14	Supportive	Comment noted.
	FAV15	Supportive of the approach - development north of the town would have a negative impact on the creek and fall under "Harm to public access to the Creek could include encroachment onto footpaths, but also loss of other landscape or public realm that is used by the public."	Comment noted.
	FAV16	Supportive	Comment noted.
	FAV17-FAV28	I've commented on these generally positive with provisos- largely brownfield conversions that if sensitively done are possibly the least worst option to meeting the targets - you may disagree!	The Plan positively addresses heritage-led and brownfield site regeneration. This is not just about meeting targets, but about achieving the best economic, social, cultural and environmental outcomes.
	FAV29	Kiln Court and Osbourne are eminently suitable. Not enough information provided to assess Beaumont Davey.	This has now been separated into 2 policies. The AECOM Site Assessment report considers each site in detail.
	SHLAA Sites and FNP14	18/167, 18/107, 18/068, 18/078, 18/065, FNP14 unsuitable for development (quite detailed information was provided on FNP14).	This applies to SHLAA sites rather than sites allocated in the Neighbourhood Plan which focuses on brownfield sites. Site FNP14 was not selected as a site allocation.
Resident 5			
	Night Economy	It is suggested that "Strengthening night economy" is a policy to be aimed at. What does this mean? Does town need night clubs which attract non-	The viability and vitality of the Town Centre relies on a mix of activities, including retail, food and drink, entertainment, community facilities and cultural uses. Survival of the town

		<p>residents? or less rowdy restaurants which attract residents and discerning diners? Do we wish to return to the days when "Saturation policing" was needed on Saturday nights?</p>	<p>depends on a strong daytime and night-time offer. The Town Council would share concerns over anti-social behaviour but this is outside of the scope of the Neighbourhood Plan.</p>
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4.4 Landowners and Developers

Page No	Policy/Site Ref	Representation	Response
Esquire Developments			
	Site Allocations	<p>Have concerns over the deliverability of the site allocations. Insufficient information in the proposed allocations with regard to housing numbers. The Neighbourhood Plan aims to deliver 219 new homes over the plan period (2023-2038). This has been proposed through 12 Site allocations (FAV17-FAV28) along with 2 sites within FAV29 Other Sites. It also identifies 2 policy areas where development is supported (FA 15 Faversham Creek Policy Area and FAV 16 Maritime Gateway Heritage Regeneration Area). The allocations do not identify the number of units proposed or size of the site however they are mapped.</p> <p>Consideration should be given to larger proposals / alternative sites that could deliver wider objectives -such as Affordable Housing.</p>	<p>The AECOM Site Assessment report did consider site constraints and capacity. Site allocation evidence document has been updated to also include site capacity, taking account of constraints.</p> <p>Several of the sites are above the threshold for affordable housing to be provided. In addition, the LPA would be responsible for strategic site allocations, which would trigger a significant requirement for affordable housing.</p>
	Land at Perry Court Farm London Road	Unclear on the reason for excluding the sites from the proposed allocations for Land at Perry Court Farmhouse and Land at Perry Court Farm. The sites should be allocated.	<p>There are 2 sites forming Land at Perry Court.</p> <p>The first, Land at Perry Court Farmhouse 18/068 as green in the AECOM assessment, but amber by the Town Council's site selection criteria, based on mature trees, heritage constraints and part of the site being greenfield. Also, it was concluded that "Redevelopment of existing buildings may be permitted under Policy FAV 02</p>

			<p>providing there is no adverse impact on heritage assets so allocation un-necessary.” No change necessary.</p> <p>The second site, Land at Perry Court Farm 18/235 was identified as green in the AECOM assessment, but red by the Town Council’s site selection criteria, based on a brownfield first approach. The suggested site allocation has not been accepted.</p> <p>It should be noted that the addition of any site to the allocations at this stage would be likely to require the SEA and HRA to be updated and Regulation-14 consultation to be repeated.</p>
	<p>Policies FAV17-FAV29</p> <p>Employment</p>	<p>The proposed allocations at policies FAV17-FAV29 would result in the loss of employment sites through development for residential dwellings.</p> <p>The aims of the Faversham Neighbourhood Plan include, 'To create more sustainable live-work patterns, based on neighbourhoods with residential, employment and community facilities in easy walking distance'</p> <p>The Neighbourhood Plan does not have a policy covering employment land.</p>	<p>The neighbourhood plan took full account of the changing nature of employment. Several of the site allocations are for mixed-use development including residential and and/or employment. This recognises the reality of changing live work patterns post Covid.</p> <p>In addition, FAV15 and FAV16 deal with area-based regeneration, including employment. It should be noted that FAV1 deals with the town centre economy, whilst FAV11 deals with heritage-led regeneration.</p> <p>In terms of strategic employment land, this is a matter for the local plan.</p> <p>No change necessary.</p>
	Land at Ham Road	<p>Gladman are promoting land at Ham Road for development within the neighbourhood plan and a site submission is included within the representation. We would welcome the opportunity to continue discussions with the Town Council around the promotion of this land.</p>	<p>The site was considered in the AECOM site assessment. This concluded an amber rating and made clear the site was greenfield and predominantly grade 2 with small parts of grade 4 agricultural land.</p>

		Many of the issues identified as constraints could be overcome with the more refined development proposal that Gladman are proposing. We would welcome further investigation of this option through the SEA as the neighbourhood plan progresses as this presents updated evidence that should be considered.	<p>The site selection process included sites already allocated in the FCNP and took a brownfield first approach to additional sites and a dispersed pattern of growth, but especially sites adjacent to the town centre.</p> <p>Please note, an additional site could not be added at this post-screening and consultation stage.</p>
	NPPF Consultation	The Town Council should be mindful of these changes and the potential impact to the FNP and the potential need to undertake a review of the neighbourhood plan following the Plan's adoption.	The independent examination will consider the Neighbourhood Plan against national policy at that time. The Neighbourhood Plan includes proposals for monitoring and review in the future.
	Housing Growth Figure	Through the previous Regulation 19 consultation the Council were requesting for Faversham to accommodate an additional 200 dwellings. As this strategy is currently under review ahead of the next stage of consultation it could be subject to change, including the Council requesting Faversham to accommodate further growth. There is a chance that Faversham will need to plan for an additional level of need beyond that currently set. Gladman suggest that the FNP includes sufficient flexibility to allow adjustment to changes in circumstances.	<p>The current Plan is evidence-based, against the context of current national and local policy. Any changes in the future will need to be accommodated by a future Neighbourhood Plan or local plan.</p> <p>The Plan accommodates in excess of current need.</p>
	FAV2	<p>Policy FAV2 focuses on infill development and redevelopment of brownfield sites. This is a restrictive approach which does not accord with national policy, which sets out a presumption in favour of sustainable development. Flexibility should be added to this policy to include instances where development of greenfield opportunities would be supported.</p> <p>Gladman suggested amended wording.</p>	<p>The suggested wording repeats elements of national policy unnecessarily. Also, it would allow development in unsustainable and harmful locations. The Neighbourhood Plan makes site allocations in addition to supporting housing in the locations identified in FAV2. No change.</p>

	FAV3	Supports Policy FAV3 and its intention to provide a range of housing types to meet local housing needs. It is important to recognise that housing mix should be driven by local need, evidenced robustly.	Comment noted.
	FAV4	Supports Policy FAV4. Land east of Ham Road is seen to comply with all levels of transport planning policy, including public transport and pedestrian infrastructure.	See previous comments on Gladmans' suggested allocation of Land at Ham Road. No change.
	FAV5	We note the Councils list of critical road junctions where safety/capacity issues are highlighted. It will be at the discretion of the Highways Authority whether these junctions should be scoped in to any Transport Assessment and considered as part of future development proposals. In accordance with the NPPF development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	Comments noted.
	FAV6	This policy states that development should not have a significant adverse impact on the setting. This approach goes further than national policy which seeks for planning policies to protect and enhance public rights of way and access. This sets a more restrictive policy than national policy and suggest deletion.	Amended clause 1 to remove 'setting'.
	FAV7	Gladman object to the policy requirement for new development to create an overall net gain of 20%. This is seeking to go above and beyond emerging national requirements which seek for an overall net gain of 10% on new developments from November 2022.	Policy amended to require biodiversity net gain of 20% for greenfield and 10% for brownfield sites.

		<p>In addition, as currently drafted, only brownfield and infill development opportunities would be supported which sets an incredibly high bar for these development opportunities likely to render many unviable.</p> <p>Gladman consider this element of the policy strategic in nature and best dealt with through the emerging Local Plan Review. As such Gladman recommend deletion of point 2 of this policy.</p>	
	FAV9	<p>The development is not located within an Air Quality Management Area (AQMA); the closest AQMA is located on London Road approximately 1.7 km to the south west of the site. Therefore, users of the development are unlikely to be exposed to levels of NO2 or PM10 above their relevant air quality objectives.</p>	Comment noted.
	FAV13	<p>Gladman contend that the Local Green Space and Protected Open Space -Background Paper does not provide proportionate or robust evidence as required by the PPG to designate such land.</p> <p>The Town Council is aware that Gladman has interests in the site proposed (in this Regulation 14 plan) as of 'LGS00S Fields from Upper Brents towards Faversham Creek. The evidence base supporting this designation indicates that this site is demonstrably special to the community due to the recreational value and views to Oyster Bay. However, Glad man contend that at 4.6 hectares the site does not meet the test of not constituting an extensive tract of land. Examiner's reports from across the country hold a consensus that anything greater than 2 hectares fails this test.</p>	<p>Rationale updated to list the LGS that are designated in the adopted Local Plan (a plan of these spaces had already been included).</p> <p>See previous comments on Gladmans' proposed site allocation of land east of Ham Road.</p> <p>In comparison with LGS already designated in the Local Plan this is space is of comparable size. There are a number of larger spaces already designated.</p>

	FAV17-29 Site allocations	Each site comes with its own development constraints whether that be in relation to flood risk, heritage or existing uses and Gladman question the certainty around the deliverability of a number of these sites.	AECOM site assessment report considered each site in context and its constraints. The SEA considered the site allocations in terms of environmental impacts. The site selection criteria and process also considered constraints, impacts and deliverability. No change.
	FAV2	The policy should specify that it relates to small-scale development.	Whilst it would be expected that infill development would be small-scale, building refurbishment could be larger scale. No change.
	FAV3	<p>Paragraph 1 a should specify that the housing size of 3+ bedrooms should be the predominant part of housing mix, as 4- and 5-bedroom homes also make an important contribution towards meeting family housing needs, and are needed in the local area in addition to much needed 2 or less bedroom homes.</p> <p>At Paragraph 2, rather than proposing fixed percentages within the policy text, our suggested wording to refer to SBC's HN will enable a more flexible approach.</p>	<p>The policy reflects the AECOM Housing Needs Assessment. The policy would not preclude some 4–5-bedroom houses, but the focus should be on 1,2 and 3-bedroom. No change.</p> <p>The mix for affordable housing reflects the AECOM HNA. The whole point for the Neighbourhood Plan is that it meets Faversham's needs. No change.</p>
	FAV4	Part 6 could be added to identify specific sustainable travel schemes that will be of wider benefit to the residents of Faversham. Both of those listed are proposed as part of SEF, and this list could be expanded.	The suggested wording appears to relate to infrastructure projects, with a specific example, rather than requirements for development. Also, the wording is vague and confusing. No change.
	FAV5	The inclusion of a list of junctions raises concerns with regards to the evidence base which has supported decisions on the inclusion or exclusion of a junction on this list. A policy area of interest should be used rather than a list of junctions.	Specific junctions have been evidenced in the PJA Faversham Critical Road Junctions report, May 2022.
	FAV6	As currently drafted, Policy FAV6 is overly restrictive and does not allow for situations where footpaths need to be diverted to achieve strategic development aims.	Paragraph on diversion added to the interpretation.

FAV7 FAV8 FAV9	In principle, the Duchy supports the aims of draft Policies FAV7-9; however, the proposed additional wording is important to bring the policies in line with the NPPF and ensure reasonable flexibility for ecology mitigation, landscape, surface water management, and air quality mitigation strategies of future development.	<p>FAV7: Addition of “unless appropriately mitigated” appears to make this a first resort, rather than last resort. Example of positive features are already given in the interpretation. The reference to off-site gains is already mentioned in the interpretation, though the starting point should be on-site gains. Addition of “where practical” makes the policy more imprecise – it would be for the developer to make the case for a departure from the policy. To respond to the comments the word ‘must’ has been amended to ‘should’ in clauses 1-4. Clause 5 has been updated to refer to native species or other species with high wildlife value.</p> <p>FAV8: Addition of “unless otherwise mitigated” is unnecessary as such mitigation would presumably mean that it would not compromise infrastructure. No change. Clause 4 amended to change ‘must’ to ‘should’.</p> <p>FAV9: Addition of “Unless appropriately” mitigated is unnecessary as such mitigation would presumably mean that there was no significant adverse impact. Promoting alternative means of travel is already dealt with in FAV4. No change.</p>
FAV11	FAV11 goes beyond NPPF guidelines on the protection of heritage assets, particularly that of non-designated heritage assets. It is also considered that the policy could be better defined, as the spatial extent of areas such as the town centre, its 'rural setting' and other settlements are not designated, meaning the land that this element of the policy refers to is not clear. Amended wording proposed.	The suggested wording for clause 3 would appear to encourage harm and mitigation rather than avoiding harm. However, wording amended from ‘must’ to ‘should’.
FAV13	As part of the Local Plan Review, in a reflection of SBC's support for SEF and the strategic need for the development, SBC have proposed the de-designation of	FAV13 designated additional Local Green Spaces to those in the Local Plan. For clarity a full list of Local Green Spaces designated in the Local Plan has been added to the rationale for FAV13. A

		<p>Faversham Cricket Club as Local Green Space. To help facilitate SEF, the Cricket Club are planning to relocate to new grounds with a pavilion within the development. This is presumably why the Cricket Club Local Green Space is not included in the list in Policy FAV13.</p> <p>Text suggested for clause 2, to allow for replacement Local Green Space.</p>	<p>statement has been added to make clear that the list in FAV13 is additional to the already designated Local Green Spaces. It is unnecessary to add the local plan designated Local Green Space into the list in FAV13.</p> <p>The suggested additional text for clause 2 would be contrary to national policy. No change.</p>
	Figure 10 NEL1 Green and Blue Infrastructure	<p>Inconsistencies in mapping data. Suggest amending plan with their local data in relation to their site.</p>	<p>Where possible maps have been amended and updated for clarity. However, where an external source such as Kent Wildlife Trust has provided the mapping data we are unable to amend.</p>
	FAV7	<p>FAV7 can't introduce competing land-uses for sites allocated in the local plan including the Anderson Group sites.</p> <p>The mapping data in the green and blue spaces plan over washes part of our site.</p> <p>Inconsistencies in all mapping data. The plans supporting the policy should be revised to reflect the status of the land at Faversham Lakes, removing the incorrect and non-existent designations that have been applied to them, as described.</p> <p>Plans are duplicated in policy and rationale.</p>	<p>The Neighbourhood Plan identifies landscape and other natural features. This would not retrospectively amend any exiting planning permissions or modify strategic site allocations in the adopted local plan.</p> <p>The interpretation has been updated to recognise that the policy can't undermine development and capacity of allocated strategic sites.</p> <p>Where possible maps have been amended and updated for clarity. However, where an external source such as Kent Wildlife Trust has provided the mapping data we are unable to amend.</p> <p>Duplicate plans deleted.</p>

	FAV2 FAV3	<p>FAV2, by ignoring the true scale of residential development in the town, the policy provides no mechanism for larger schemes to be supported.</p> <p>Larger scale development is likely to deliver the affordable housing envisaged in FAV3.</p>	<p>FAV2 accommodates small-scale development in addition to site allocations made in the Neighbourhood Plan and Local Plan. There is no suggestion that FAV2 in isolation would accommodate housing need. The representation misinterprets FAV2.</p> <p>Comment on affordable housing noted. This is likely to apply to allocated sites rather than the small-scale schemes covered by FAV2. No change.</p>
Pg28		The statement in the Meeting Housing Need section is misleading as the adopted Local Plan also includes strategic allocations which exceed the 200 figure.	Text amended to clarify growth requirement.
	FAV13	<p>an extract from page 189 of the draft local plan is used as Figure 15: Local Green Space Designations, confirming that the designation of green and blue infrastructure at Faversham Lakes is incorrect.</p> <p>Although the figure in the neighbourhood plan is almost unreadable and should be replaced with a clearer version, the original shows that draft Policy DM28 does not apply and that, at borough level, Faversham Lakes is not required to be protected as a Local Green Space.</p> <p>However, when the scheme at Faversham Lakes is complete, Anderson Group will support the inclusion of the new country park and the Heritage Greenway as Local Green Space to be protected in a future version of the neighbourhood plan.</p>	<p>Figure 15 relates to Local Green Space designations rather than other green and blue infrastructure. No change.</p> <p>Figure 15 plan replaced with a list of the Local Green Spaces designated by the Local Plan.</p> <p>Comment noted.</p>
	Additional Growth	As an expansion upon the strategic allocation in the adopted local plan, should the town council wish to include the additional homes, community facility and open space	Additional policies can't be added at this stage – this would set the Plan back to a pre-screening stage.

		as an allocation in the neighbourhood plan to follow Policies FAY 17 to FAY29 in Section 3.12, Anderson Group would be happy to work with the town council.	
	FAV17	<p>It is of note that Swan Quay is to form part of the Maritime Gateway Heritage Regeneration Area (Policy FAV 16) alongside The Chaff House (see policy FAV 23). The Chaff House has been allocated similar policies to Swan Quay but with the additional use of CI being Hotel or Visitor accommodation. Given that the Swan Quay site already accommodates a hotel/bar /restaurant adjacent to open shed on Swan Quay, the 'extension' of the potential for a tourist/hotel use would provide for a more appropriate mixed-use of the site and potentially expand the tourism offer in the Creek area.</p> <p>The interpretation is restrictive. Suggest re-wording 'The existing buildings might be used/converted and potentially, sensitively altered for various uses specified in the policy.'</p>	Inconsistencies between FAV16, FAV17 and FAV23 are noted. FAV17, FAV23 and FAV28 have been merged into FAV16.
	FAV28	<p>In this regard, the Policy should acknowledge that opportunities exist to significantly improve this part of the site and enhance the character and appearance of this part of the Conservation Area in line with the over-arching heritage policies of both the Framework and Borough Development Plan. A failure to acknowledge that No's 12 and 14 do nothing to contribute to the heritage value of the Creek would run contrary to the holistic approach to regeneration that the Plan promotes.</p> <p>Furthermore, this part of the Plan Area is not renowned for its "maritime" uses but for those associated with brewing</p>	<p>It is not possible for the Plan to identify all opportunities for enhancement. However, the policies would support schemes to address negative elements in the Conservation Area. For example, design and heritage impacts are dealt with in FAV10 and FAV11. No change.</p> <p>The interpretation has been updated to add 'brewing'.</p>

		and joinery works. A minor amendment to the policy, acknowledge this fact is requested.	
	Perry Court (Policy MU7 of the Adopted Local Plan).	Perry Court is identified as a mixed use allocation at Policy MU7 in the adopted Local Plan. The Swale Local Plan was adopted in 2017, is now more than 5 years old, and is currently the subject of a Review. An additional allocation for mixed use Class E development at Perry Court would supplement those allocations and provide a wider opportunity to achieve employment generating uses and to support the community's aspirations for Perry Court to be completed.	The Neighbourhood Plan has to meet the Basic Conditions set out in planning legislation. One of these relates to general conformity with strategic local policy. It would not be appropriate for the Neighbourhood Plan to modify a strategic site allocation. This is something for the local plan process to address, or for a planning application. No change.
	Site allocations	The consultation document proposes a number of allocations for mixed use development including Class E (FAV17, FAV19, FAV20, FAV23, FAV27, FAV28). These are the sites which the Faversham Creek Neighbourhood Plan identified for redevelopment previously and comprise previously developed land that is either in current use or vacant and in need of remediation and subject to heritage or flood risk constraints. The Council's online planning register does not indicate that these sites have been brought forward for development despite having been identified by the Neighbourhood Plan over five years ago. The viability of these schemes proposed does not appear to have been considered, the significance of which is referred to in the Strategic Environmental Assessment.	Comment noted on sites previously allocated in the Faversham Creek Neighbourhood Plan. However, this 5-year period has included the Covid pandemic, implementation of Brexit and a period of continuing economic instability. This is clearly an atypical set of circumstances. The AECOM site assessment report considered site constraints, as did the AECOM Strategic Environmental Assessment. No change.
	Site West of Western Link Faversham	This representation focuses on land to the west of the Western Link, Faversham. Whilst WTL's land interests have previously concerned residential development, their focus has altered in response to the climate emergency. They have proposals relating to renewable and zero/low carbon	Comment noted. The Town Council recognises the need for improved infrastructure to support electric vehicles. This is a strategic matter and probably best dealt with through the local plan and through the infrastructure planning by the highways authority.

		energy and essential roadside infrastructure to support low and zero emissions transportation. Consequently, this representation focuses on the opportunity on land to the west of the Western Link, to accommodate an electric vehicle forecourt, which would be powered from a solar farm located to the north of the existing Railway Line.	There has been no analysis of sites for electric vehicle forecourts, so the Neighbourhood Plan lacks the evidence base to allocate any sites for this purpose. No change.
	Climate Emergency	The emerging Neighbourhood Plan does not provide an adequate response to the climate and ecological emergency which has been declared for Swale Borough. They consider that given the limited opportunities provided by national planning policy and guidance to improve residential development's sustainability credentials, including in relation to renewable energy, there is a need for the neighbourhood plan to identify a site or sites to provide a town-scale renewable energy scheme. That proposal could be physically connected to other infrastructure necessary to help the move towards zero emissions vehicles. Such an approach would provide a strong fit with Swale Borough's Climate and Ecological Action Plan.	Carbon-use, sustainability and biodiversity are addressed in policies FAV1, FAV2, FAV3, FAV4, FAV6, FAV7, FAV8, FAV8, FAV9, FAV10, FAV11, FAV12, FAV13, FAV14, FAV15, FAV16 and various site allocations. No change.
	Aims	Only Aims 3 and 4 of Section 2.3 of the emerging Neighbourhood Plan relate to sustainability and carbon reduction.	All 7 of the aims have fundamental implications for carbon-use and sustainability, in addition to biodiversity. Reference to active travel has been added to aim 4.
	Basic Conditions	There is a danger that the emerging Neighbourhood Plan may not be in general conformity with the emerging Local Plan, against the context of the climate emergency action plan. This could result in Basic Condition (e) not being met.	Consideration of general conformity with strategic local policy is made against the adopted local plan. Sustainability is a key theme running through the aims and policies of the Neighbourhood Plan. This is based not just on travel and energy, but a holistic approach encompassing use, movement, design, environmental protection and other planning matters. The Town Council has the view that the Plan meets all of the basic conditions.

		<p>If the conflict occurs after the Neighbourhood Plan is made, then, Section 38(5) of the Planning and Compulsory Purchase Act 2004 instructs that the conflict should be resolved in favour of the policy which is contained in the last document to be adopted, approved or published, which in this case would be the Local Plan Review.</p>	<p>It is recognised that future changes to national policy or local plan policy could have implications for the application of Section 38 of the Planning and Compulsory Purchase Act 2004.</p>
	Overall Planning Strategy	<p>Section 2.4 of the emerging Neighbourhood Plan establishes the overall planning strategy for the area. The only element of the section that concerns sustainability is limb (3), which focuses on sustainability and innovative design and also high-energy performance and low carbon. For the reasons set out previously sustainability improvements to individual dwellings and the level of renewable energy production policy requires each unit to have, is limited by national planning policy and guidance.</p> <p>We suggest the Town Council allocates at least one site for a town-scale renewable energy scheme. As described within this representation, land to the west of the Western Link provides one such opportunity.</p>	<p>Sustainability is a key theme running through the aims and policies of the Neighbourhood Plan. This is based not just on travel and energy, but a holistic approach encompassing use, movement, design, environmental protection and other planning matters.</p> <p>There has been no analysis of sites for electric vehicle forecourts, so the Neighbourhood Plan lacks the evidence base to allocate any sites for this purpose. No change.</p>
	FAV4	<p>The requirements for electric vehicle charging points in new developments is now established by Part S of the Building Regulations. The policy duplicates Building Regulations.</p> <p>Consideration should be given to Policy FAV4, either allocating land for an electric only vehicle forecourt, or providing a criterion-based approach for such development.</p>	<p>As pointed out in the representation, the building regulation only applies to certain kinds of development.</p> <p>There has been no analysis of sites for electric vehicle forecourts, so the Neighbourhood Plan lacks the evidence base to allocate any sites for this purpose or set criteria. No change.</p>

	FAV7	<p>We have concerns that clause 2 requirement is higher than the minimum 10% and results in a conflict with the Environment Act. Should a higher level be advocated, it would lead to a situation where planning applications could be refused on the grounds of the local policy framework, despite according with national legislation. It should also be noted that the mandatory net gain requirement proposed by the Environment Act is expressed as a minimum.</p> <p>A net gain requirement of 20% will have direct and indirect impacts on development viability. Work undertaken by Swale Borough Council has demonstrated that a 20% net gain requirement would add c.19% to the net gain costs.</p>	Policy amended to require biodiversity net gain of 20% for greenfield and 10% for brownfield sites.
	FAV9	The emerging Policy again does not recognise the role that certain forms of development could have on improving air quality in the area, through the use of decentralised electricity production and the necessary supporting infrastructure to help the transition from combustion engine vehicles, to low and no emission vehicles.	Policy FAV4 already supports electric charging points as part of development and FAV4, FAV5, FAV6 and FAV10 address active travel as do several of the site allocations. This is a strategic matter and probably best dealt with through the local plan and through the infrastructure planning by the highways authority. No change.
	FAV10	Policy FAV10 supports development that results in superior environmental performance, particularly in terms of a reduction in carbon impact. By not setting mandatory levels for environmental performance and carbon reduction, the emerging Policy responds to the guidance provided in national planning policy in relation to climate change and sustainability which places a limit on how far a policy an emerging development plan can go in terms of carbon reduction. The proportion of a new residential dwelling's energy from renewable sources also has to be reasonable.	The policy addresses urban design requirements, so considers sustainability from that perspective rather than building performance or energy, the latter being dealt with by FAV14. However, the policy interpretation does give various of how carbon reduction can be achieved. The policy takes account of the National Design Guide 2021 in addition to other standards such as Building for a Healthy Life. So the focus is on urban design and placemaking rather than use of a specific metric. No change.

		<p>The Climate and Ecological Emergency Declaration issued by Swale Borough Council seeks to make the Borough carbon neutral by 2030. It is unlikely that FAV10 alone will provide an adequate level of mitigation to ensure that Faversham makes its proportionate contribution to achieving this Borough wide strategic objective, for it only relates to new development proposals, which will be a small proportion of the total building stock within the town.</p> <p>The development proposed by WTL, which would generate an adequate quantum of electricity to power approximately 21,000 dwellings, together with the proposed electric vehicle forecourt, would go some way to delivering Faversham's contribution to delivering this strategic objective.</p>	<p>The Neighbourhood Plan provides policy for development. FAV10 would be applied to all relevant planning applications. Upgrading of old building stock would be outside of the scope of the Neighbourhood Plan, unless such works needed planning permission. Obviously FAV10 will not achieve Swale Borough Councils climate and ecological emergency declaration. However, this and other policies collectively should contribute.</p> <p>Comment noted.</p>
	FAV11	<p>Concerned with limb (3)(a) of emerging Policy 3, which seemingly: (1) identifies Faversham Town Centre as a heritage asset (as opposed to any specific conservation area); (2) establishes its setting; and (3) identifies the significance of the setting on the Town Centre. However, it does not appear that any evidence has been put forward to justify these conclusions and consequently, the test should be re-written.</p> <p>Also have significant concerns relating to emerging Policy (3)(b), which appears to conflict with para. 203 of the NPPF. It would also therefore conflict with Basic Condition (a).</p>	<p>Rationale updated to refer to the Faversham Design Code (May 2021, AECOM) which forms part of the evidence base.</p> <p>Policy partly redrafted for clarity.</p>
	FAV14	<p>The Town Council should give strong consideration to the allocation of one or more sites for renewable energy proposals.</p>	<p>Policy FAV14 supports local energy schemes subject to impacts. There has been no analysis of sites for energy generation, so the</p>

			Neighbourhood Plan lacks the evidence base to allocate any sites for this purpose. No change.
	Site Allocations FAV17-FAV29	WTL have no comments relating to any of these emerging allocations but note that none of the allocations require a commitment to any decentralised energy production, making it more important, in the context provided by Swale Borough Council in their Climate and Ecological Emergency Declaration, to allocate a site or sites for decentralised energy production.	Policy FAV14 supports local energy schemes subject to impacts. The interpretation to FAV10 encourages micro-energy generation. No change.
	General Comments	<p>The vision of Faversham Town Council is to preserve the Creek for its historical interest and the associated economic development this would bring. The economic benefits will come indirectly from the Creek - not directly. i.e. it is not envisaged that commercial vessels will suddenly begin using the Creek.</p> <p>The hope is that the land adjoining the Creek can be redeveloped and therefore attract inward investment. Faversham Town Council (in conjunction with Swale Borough Council) should consider the additional value which the relevant landowners will derive when seeking to establish who should pay for the costs associated with the Creek.</p> <p>PoS has engaged with Kent County Council, Swale Borough Council, Faversham Town Council and local MPs over many years to find a way to allow landowners, and the local community to achieve their desired outcome in relation to the redevelopment of the Creek. We remain willing to continue this collaborative engagement to explore and deliver a mutually beneficial outcome.</p>	<p>Comment noted.</p> <p>It would be for Swale Borough Council to decide how to use infrastructure monies, but the Town Council would support its use for improvements around the Creek.</p> <p>Comment noted. The Town Council would be keen to continue a constructive dialogue to achieve beneficial outcomes.</p>

	Plan of Neighbourhood Area	It should be noted that the OS Base in Figure 1 above, which is taken from page 6 of the Draft Neighbourhood Plan and should be updated to reflect the existing development to the north and south of Graveney Road as built out by Bellway and Crest Nicholson recently at Lady Dane Farm.	The map of the Neighbourhood Area is taken from an OS base plan, and we have no means to update it. No change.
	Vision and Objectives	<p>The vision and overall planning strategy is supported in principle, being both aspirational but deliverable, recognising that new development is needed to meet the diverse needs of the community, whilst ensuring such development is sustainable and respects the character and heritage of Faversham, in order to deliver tangible economic, social and environmental benefits, which is to be commended.</p> <p>The Neighbourhood Plan objectives are similarly supported and align with PACL's aspirations to deliver high-quality and sustainably designed and constructed buildings and homes to provide a range of private market and affordable accommodation types and tenures in response to identified local housing needs, alongside green infrastructure improvements.</p>	<p>Comment noted.</p> <p>Comment noted.</p>
	Residential Development	<p>The Growth Strategy for Faversham is supported in principle. However, the Neighbourhood Plan doesn't seek to define and 'plan period' but should do so in order to ensure that key objectives can be monitored and action taken where shortcomings are noted, to ensure development comes forward as expected to address local needs for the benefit of the community.</p> <p>Additionally, it is clear from the accompanying evidence base that local housing needs far exceed the proposed 219 homes identified in the Neighbourhood Plan. As set out</p>	<p>Plan period is specified in 1.2 and monitoring and review are in 1.3. No change.</p> <p>The Faversham Neighbourhood Plan deals with small and medium sites. The figure of 219 has been provided by the Local Planning Authority and is additional to strategic sites, as recognised.</p>

		<p>above, the Growth Strategy is supported as the Neighbourhood Plan recognises the wider context and does not seek to frustrate additional growth which would come forward through strategic allocations within the emerging Swale Local Plan.</p> <p>Indeed, the currently identified housing need for Swale Borough stands at 1,150 dwellings per annum (dpa) between 2022-2038 (i.e. 18,400), representing a significant increase above adopted Local Plan (2017) housing requirements which identified need for 776dpa between 2014-2031. Moreover, the Neighbourhood Plan evidence base rightly highlights the key role that Faversham is set to play in addressing this broader need, with the town anticipated to accommodate circa 3,500 new homes over the next plan period as part of the 'East of Faversham Expansion'. PACLs Land North of Graveney Road, part of which falls within the Neighbourhood Plan boundary, is identified within the emerging Local Plan (Policy MUI) as contributing a minimum of 240 new homes towards the growth of the town as part of the East of Faversham Expansion.</p>	
	FAV2	<p>Policy FAV2 is supported in principle. There is a clear focus on previously developed (brownfield) land, however, it should be recognised that existing allocations with the Swale Local Plan (2017) should also be supported and that this will include existing greenfield sites allocated for development, such as PACLs adopted allocation (reference Policy A6, Site ST 4).</p> <p>Whilst the brownfield first approach is supported in principle, in line with Government policy, the Neighbourhood Plan should also recognise the difficulties</p>	<p>FAV2 has no implications for existing strategic sites. It supports additional housing development outside of such sites.</p> <p>This is an issue more for strategic site allocations through the Local Plan process. However, some of the sites allocated in the</p>

		<p>in delivering affordable housing on previously developed sites and as such, if the Neighbourhood Plan is to meet the significant needs identified, then it is anticipated this will rely on greenfield land being released for major development which can viably support affordable housing delivery, alongside additional social and green infrastructure improvements.</p> <p>PACL confirms that the development of Land North of Graveney Road represents a viable prospect and evidently the development of the site for approximately 240 new homes would yield circa. 72 affordable units in line with emerging Local Plan policy requirements, thereby making a very significant and positive contribution towards addressing locally identified housing needs.</p> <p>The linked requirement of Policy FAV2 to ensure proper regard to the environmental and design criteria set out in Policies FAV7 and FAV10 respectively is similarly supported.</p>	<p>Faversham Neighbourhood Plan would trigger affordable housing thresholds. Other policies deal with green infrastructure.</p> <p>Comments noted. However this appears to relate to strategic site allocations at local plan level.</p> <p>Comment noted.</p>
	FAV3	<p>The provisions of Policy FAV3 are supported, particularly given the focus of the Neighbourhood Plan on brownfield sites which are evidently more suitable to deliver smaller unit sizes (focusing on 1, 2 & 3 bed properties).</p> <p>The proposed housing mix is supported, but greenfield sites allocated within the Swale Local Plan (2017) and within the Neighbourhood Plan boundary, such as PACLs Land North of Graveney Road are suitable to deliver a wide range of housing types and tenures and whilst it is agreed that the focus should remain on 3 bed properties, there will be a requirement for 1, 2, 3 & 4+ properties at this location to meet the diverse housing needs of the community.</p>	<p>Comment noted.</p> <p>Comment noted. The policy does support a mix provision.</p>

		<p>The requirement for developers to provide affordable housing and First Homes is entirely supported and as noted above it is anticipated that greenfield sites will do the 'heavy lifting' in respect of affordable housing and first homes delivery given the viability constraints associated with brownfield land. Moreover, the requirement for affordable housing to be provided as an integral part of housing schemes and as tenure blind is supported as necessary to ensure the achievement of mixed and balanced communities consistent with the objectives of the National Planning Policy Framework.</p> <p>The additional measures to provide super-fast broadband within new housing development is supported and is in reality now a commercial necessity in order to sell modern homes in the 'digital age'.</p> <p>As noted above, the policy reference to require design and landscaping to reduce developments carbon impact and promote biodiversity in line with Policies FAV7 and FAV10 is supported.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>
	FAV4	<p>Land North of Graveney Road is sustainably located within walking and cycling distance of key services and facilities within Faversham, including public transport and health services, schools and employment opportunities, and benefits from safe access and egress onto Graveney Road with suitable visibility splays.</p> <p>PACL supports the policy objectives to reduce the impact of development on the local road network and the development of Land North of Graveney Road would be</p>	<p>Comment noted.</p> <p>Comment noted.</p>

	<p>supported by a Travel Plan to identify measures to encourage residents to use sustainable modes of travel.</p> <p>The need for cycle storage is supported to encourage sustainable modes of travel. The policy also makes reference to storage for 'scooters' in all new dwellings, however there is no material in the evidence base or Neighbourhood Plan text to explain this point and it is considered that this would benefit from further clarification.</p> <p>The policy requirement for electric charging points for motor vehicles in all new homes is supported in principle, however it is considered that following the emerging Local Plan policy is appropriate whereby electric charging points should be installed in all new homes with dedicated off-street parking, but where communal car parks are required a more flexible approach should be taken as it may simply not be appropriate or possible to provide 100% charging points in such circumstances.</p> <p>Whilst not referenced within the policy, the supporting text refers to the 'Faversham 20's Plenty Initiative'. PACL is pleased to lend their support to such proposals, particularly along Graveney Road. Along with the other sites within the expansion area, it can be reasonably anticipated that development of greenfield sites would further assist in creating the critical mass required to support more frequent bus services in addition to being required to make appropriate contributions towards local transport infrastructure improvements. This is likely to include contributions to public transport services to enhance the sustainability of development and reduce pressure on the local road network through encouraging greater use of</p>	<p>Reference to “scooters” replaced by reference to “other personal vehicles”.</p> <p>Clarification added to interpretation.</p> <p>Comment noted.</p>
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		public transport. Accordingly, the provisions of transport policies within the Neighbourhood Plan are supported.	
	FAV5	PACL support the emerging policy objective to ensure development does not lead to severe impact including at the junction of Love Lane, Whitstable Road and Graveney Road. PACL has commissioned independent transport consultants to assess the proposals on Graveney Road and confirms that any significant impact arising from the development on the transport network in terms of capacity and congestion, or on highway safety, can be cost-effectively mitigated.	Comment noted.
	FAV6	PACL supports the provisions of Policy FAV6 and the objective to improve the setting, amenity and safety of existing footpaths, bridleways and cycleways to encourage a modal shift towards more sustainable modes of travel. The development of Land North of Graveney Road benefits from existing public rights of way connections linking the site with the town centre and would reasonably be expected to make appropriate contributions towards improvements to public rights of way to encourage greater usage.	Comment noted.
	FAV7	The provisions of Policy FAV7 are supported in principle and PACL agrees it is essential that development does not result in adverse harm to the local landscape or ecological assets. The requirement to deliver 20% biodiversity net gain is supported in principle, however the minimum legal requirement is set at 10% and it is questioned whether the previously developed (brownfield) sites identified within the Neighbourhood Plan will be able to achieve these ambitious targets.	Plan amended to set 20% BNG on greenfield and 10% BNG on brownfield sites.

		<p>Future growth of Faversham can clearly only be accommodated to the east and south of the town and Land North of Graveney Road is evidently capable of protecting and enhancing existing ecological corridors. Indeed, with the retention and enhancement of boundary vegetation and the provision of species-rich habitats within green corridors, linked to the proposed Landscape Strategy for the site, there exists scope to deliver significant enhancements compared to the existing situation. Given the existing baseline (i.e. an agricultural bio-monoculture), it is considered that the emerging development proposals will fully accord with draft policy and legislation relating to Biodiversity Net Gain, including the proposed minimum 20% increase.</p>	<p>Comment noted. This would be a matter for the Local Planning Authority to consider as part of any planning application.</p>
	FAV8	<p>The provisions of Policy FAV8 are supported. In reference to Land North of Graveney Road, the site is located within Flood Zone 1.</p>	<p>Comment noted.</p>
	FAV9	<p>The provisions of policy FAV9 are supported. In respect of Land North of Graveney Road, PACL has undertaken detailed investigations confirming the site is unconstrained in air quality terms.</p>	<p>Comment noted.</p>
	FAV10	<p>PACL supports the policy criteria set out in Policy FAV10 as key to delivering good place-making. The accompanying Faversham Design Code provides an excellent guidance of the key design principles, specific to the local area which Applicants will be required to follow. The Design Code reflects the broader Government priority towards delivering 'beautiful buildings and places' and the guidance will ably assist applicants to ensure proposals respond positively to local character and context; assess</p>	<p>Comment noted.</p>

		<p>the site constraints and opportunities appropriately; and develop key design principles in partnership with local stakeholders.</p> <p>PACL has assessed the constraints and opportunities of Land North of Graveney Road and has undertaken detailed contextual analysis of the wider area to inform a masterplan for the site.</p>	<p>Comment noted. This would be a matter for the Local Planning Authority to consider as part of any planning application.</p>
	<p>FAV11 FAV12 FAV13 FAV15 FAV16 Site allocation Policies</p>	<p>Policies FAV11 (Heritage), FAV12 (Health, Recreation and Community), FAV 13 (Local Green Space), FAV14 (Local Renewable Energy Schemes) and FAV15 (Faversham Creek Policy Area) and FAV16 (Maritime Gateway Heritage Regeneration Area) are all supported insofar as these policies will make a positive contribution towards delivering the overall objectives of the Neighbourhood Plan.</p> <p>PACL has no comments to make on any site-specific allocations proposed within the Neighbourhood Plan.</p>	<p>Comment noted.</p> <p>Comment noted.</p>
	<p>Conclusion</p>	<p>PACL would welcome engagement with the Neighbourhood Plan Committee/ Town Council at the appropriate time to better understand the priorities of the local community, to seek opportunities to deliver these priorities and unlock the development of Land North of Graveney Road.</p>	<p>Comment noted. The Town Council would be keen to have a constructive dialogue to achieve beneficial outcomes.</p>
	<p>Sites at Milfield, Ospringe and Lion Field, Ospringe</p>	<p>The College is a major UK landholder. In Faversham, the College own a number of properties and land in and around the town and in this regard, we fully support the submission of Land at Lion Field by Esquire Developments who have submitted the site on the College's behalf (please see attached Location Plan for further information). The College also owns land at Millfield located to the south of</p>	<p>The AECOM Site Assessment report considered the larger site. However, it states <i>"The northern part of the site has been submitted separately to the NP Call for Sites. There is existing development on three sides of this section of the site, and it is considered to be the most suitable part of the site for development, whereas the remainder of the site to the south would extend into more open countryside and is further away from local services."</i> The northern</p>

		<p>London Road and comprises both greenfield and brownfield land. Land at Millfield, extends to approximately 11 hectares and could accommodate in the region of 200 dwellings. These sites were also submitted to the Neighbourhood Plan Call for Sites which was carried out in January 2021. There was then an assessment carried out by Aecom which assessed these sites as amber. However, the Neighbourhood Plan assessment concludes that they are red, and it is not clear how this assessment was reached. According to the Long List Feb 2022 assessment carried out by the Neighbourhood Plan, the Millfield site has been assessed as one large site (18/028) whereas the site put forward by St John's College is referenced as 18/028a in the Aecom report which is much smaller as detailed above. It is not clear that the Neighbourhood Plan has assessed this smaller site and therefore we would request that the site selection process is revisited in this context.</p>	<p>part of the site is greenfield, so didn't meet the site selection criteria, even if considered separately to the southern part of the site.</p> <p>The Swale Importance of Local Countryside Gaps report January 2021 also identified the entire site as part of a green gap to prevent coalescence of Ospringe with Faversham. Development of the site would clearly compromise this. The Town Council does not intend to re-visit the site selection process.</p>
	FAV2 and site allocations	<p>St John's College are generally supportive but would like to raise concerns over the allocation process. Whilst brownfield sites are top of the hierarchy when considering potential development sites, they have significant issues when considering re-development. When assessing the proposed allocations within the Faversham Neighbourhood Plan (Policy FAV17-FAV28), there are a number of constraints on these proposed allocations. Firstly, priority has not been given to sites located within Flood Zone 1. The majority of the proposed allocations sit within Flood Zone 3 of the Flood Map for Planning, and therefore are considered to be at high risk of flooding in the future. This is contradictory to the National Planning Policy Framework Paragraph 154, part (a).</p>	<p>The Neighbourhood Plan policies and interpretations have addressed flood risk issues. All sites within flood zone 3 are 3a(i), this means that that development comprising vulnerable uses above the ground floor may be appropriate. Site allocations had to consider flood risk together with a range of other issues also covered by national policy. This includes regeneration of brownfield sites, sustainable locations for development, and impacts on the historic and natural environments. In addition, some sites had already been allocated in the Faversham Creek Neighbourhood Plan.</p>

	<p>We note reference to the Swale Strategic Flood Risk Assessment (2020) within the Aecom Site Options and Assessment Report, highlighting Paragraph 3.77: "This assessment has therefore assessed sites on previously developed land within the Faversham Creek Neighbourhood Plan on the basis that any residential development can only take place above the ground floor, and that ground floor uses should be restricted to commercial/employment space, servicing (including parking) or other less vulnerable uses. This is likely to result in reduced residential capacities on sites within Flood Zone 3a(i)."</p> <p>The sites promoted on behalf of St John's College are sequentially preferable as they are located within flood zone 1 (low risk) and their capacity would not be restricted in design as the Aecom report describes for all of the proposed allocations that lie within Flood Zone 3.</p> <p>Additionally given the constraints associated with brownfield development, the Neighbourhood Plan should promote greenfield sites to ensure the Neighbourhood Plan is flexible and sustainable and can deliver housing sites consistently throughout the plan period.</p> <p>Another point to consider is the Neighbourhood Plan does not associate a number of dwellings per allocation. The Neighbourhood Plan should include accurate figures for each sites intended delivery to ensure the proposed 219 homes over the plan period (2023-2038) are accounted. When counting the proposed capacity of each site within the AECOM report there is a deficit of 28 units. This</p>	<p>The sites referred to would be preferable if flood risk was the only criteria. But it is not. Site allocations had to consider flood risk together with a range of other issues also covered by national policy. This includes regeneration of brownfield sites, sustainable locations for development, and impacts on the historic and natural environments.</p> <p>All the site allocated are available, deliverable and achievable in the Plan period. It should be noted that strategic site allocations are a matter for the Local Plan.</p> <p>The AECOM Site Assessment report calculated site capacity. So, this was fully considered. The site allocations rationale has been amended for clarity. In addition, the background housing paper has been amended for clarity. The deficit of 28 units is in fact covered. FAV2 allows residential development in addition to the allocated sites. Also Kiln Court and Osbourne Court (FAV29 in the Regulation</p>
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		<p>shortfall should be met through alternative sites, such as the Land at Millfield which will also promote a more sustainable plan which has both brownfield and greenfield allocations.</p>	<p>14 Plan) can accommodate more development than the figures suggest.</p>
	FAV3	<p>FAV3 Disagree - Whilst St John's College is supportive of the aspirations of Policy FAV3, to seek to ensure that new development directly relates to the local needs in Faversham, housing mix determined within the neighbourhood plan should be used as a guide. The housing mix for future schemes should be determined at the point of application, to ensure the mix is suitable for the location and the circumstances in which the application is submitted.</p> <p>St John's College seeks to support the provision of affordable homes, however the mix must contribute "to the objective of creating mixed and balanced communities" (Paragraph 63 NPPF).</p>	<p>The actual requirement is to include a mix of accommodation to meet local housing need, so this could take account of the latest evidence. The policy does set out the mix of properties, but without proportions, so is flexible. The mix identified is based on the AECOM Housing Needs Assessment report.</p> <p>The percentages for affordable homes is based on the AECOM Housing Needs Assessment report.</p>
	FAV6	<p>FAV6 Disagree- Whilst St John's College supports the aspirations of Policy FAV6, it wishes to make the following comments. This policy does not allow for the diversion of public rights of way, which may form legitimate parts of development. This is contradictory to the adopted Bearing Fruits 2031: The Swale Local Plan 2017, Policy DM6: managing transport demand and impact 3. b. "existing public rights of way are retained, or exceptionally diverted, and new routes created in appropriate locations;".</p> <p>If the diversion of a public right of way will enhance its recreational value then the neighbourhood plan policy should be altered to allow this.</p>	<p>Paragraph on diversion added to the interpretation of FAV6. We note that policy DM6 of the Local Plan refers to "exceptionally diverted".</p>

	FAV7	<p>Disagree, whilst St John's College supports the aspirations of Policy FAV7, it wants to ensure that highest quality and most accessible natural environments and landscapes are accessible for all.</p> <p>Figure 6, shows the orchard south of London Road (Millfield) as a greenspace. St John's College wishes to highlight that this open space is currently of poor quality, and is used for general grazing purposes. It does not contribute towards the green space in the local area. There is repetition on Figures 6, 7, 8 and 9 as Figure 10, 11, 12 and 13.</p> <p>Finally, Policy FAV7 part 2 establishes a net gain in biodiversity of 20%. The requirement should be a minimum of 10% and subject to viability of the specific scheme. A 10% requirement is suitable as relevant as defined within the Environment Act 2021 section 2 part 3</p>	<p>The plans were created by Kent Wildlife Trust based on their mapping data sources. The site also includes priority habitat traditional orchard identified on the DEFRA mapping source. The map also includes a mix of grade 1 and 3a agricultural land 'best and most versatile'. The Swale Importance of Local Countryside Gaps report January 2021 also identified the entire site as part of a green gap to prevent coalescence of Ospringe with Faversham. Duplicated plans removed.</p> <p>BNG amended to require 10% on brownfield sites and 20% on greenfield.</p>
	FAV13	<p>FAV13: Local Green Space - Disagree</p> <p>Whilst St John's College supports the designations of Local Green Spaces. It is therefore essential that, when seeking to designate local green space, plan-makers clearly demonstrate, through compelling evidence, that the requirements for its designation are met in full.</p> <p>Figure 15: Local Green Space Designations, Swale Borough Council, should be removed from the neighbourhood plan as it is unnecessary and misleading. It shows sites on it that are not relevant and have no cross reference to the list of proposed Local Green Spaces in Policy FAV13.</p>	<p>Local Green Spaces were assessed against NPPF criteria, and this forms a background evidence document. No change.</p> <p>We agree figure 15 is not particularly clear and it has been removed. It is clearly important to recognise the spaces already designated as Local Green Space in the Local Plan, so figure 15 has been replaced by a written list.</p>

4.5 Response Forms

Page No	Policy/ Site Ref	Representation	Response
	General	<p>Page 13.The Plan needs an overall aim: To Improve The Urban Quality of Life for ALL</p> <p>It is NOT acceptable that the plan uses out dated information or that the surveys have not been carried out by professionals using appropriately cross referenced questions to gain the most accurate feed back possible. The plan is therefore seriously undermined.</p> <p>Even though many vital services such as Education and Health are excluded by the process every effort should be made to overcome this obvious defect in this plan. As it stands it is not a fully co-ordinated plan without which it is harmful leading to serious problems in the provision of essential services of all kinds. With Covid, Climate Change and Conflicts threatening our food security and therefore national security, land for food should be protected. The lack of any attention to this enormous public concern again reduces the worth of the plan.</p> <p>Provision of new and reinforcement of existing infrastructure</p> <p>Language of plan is unnecessarily verbose - enough to put off all but the most determined reader. (Did you really want a wide consultation?)</p>	<p>The suggested additional aim is vague and doesn't add any substance to the existing aims. No change.</p> <p>It is unclear which information or surveys are being referred to. The Plan is based on relevant evidence including reports commissioned specifically for the Neighbourhood Plan. The programme of community engagement was varied and included activities at different stages of the process. Section 2.2 has been amended to give a clearer summary of engagement undertaken.</p> <p>The Neighbourhood Plan can deal with the land use dimensions of the issues mentioned. Climate change and sustainable development underpins all of the policies. A clause has been added to FAV7 to protect the 'best and most versatile' agricultural land. The Plan supports community facilities in FAV12.</p> <p>The Plan addresses transport and community infrastructure in policies FAV4, FAV5, FAV6, FAV10, FAV12 and various site allocations and area-based policies.</p> <p>It is unclear which parts of the Plan the refers to. Some parts of the Plan have been amended for clarity.</p>

		<p>General thrust of plan on redeveloping brownfield sites and getting first floor flats back into use is mostly good, provided there is a balance between housing and work spaces.</p> <p>The national and local demand for housing of all kinds means a few brownfield sites are unlikely to be enough to provide sufficient housing, particularly genuinely affordable housing. As it is likely greenfield site housing development will also be necessary, the Duchy of Cornwall plan with mixed housing, shops, school, workplaces etc would seem to be far preferable to another Barratt or Costain development of 'executive' houses with no facilities or transport links to town centre. If the Duchy of Cornwall site is developed, Brenley corner would need to be redesigned and the A2 from Brenley corner to town centre would need widening and several roundabouts added.</p> <p>I am very concerned that the NP does not make clear that if a site is not approved it is assumed that development is not required/acceptable. The NP says nothing about part of the Duchy land and this will be interpreted as acceptance by some (possibly many) and it is also likely to be used to campaign against the NP. Quite possibly very effectively.</p> <p>Could the point not be made that, for example, no new site can be brought forward on the Ham Rd, and this would threaten London Rd and that Abbeyfields would not be threatened</p> <p>Typo of upper floors + affordable rent and purchase accommodation</p>	<p>The policies address housing and employment and also vitality of the Town Centre. In addition the site allocations and area based policies promote regeneration including employment, housing and tourism.</p> <p>The Neighbourhood Plan makes small and medium sized site allocations. Strategic allocations are a matter for the Local Plan.</p> <p>The Neighbourhood Plan makes small and medium sized site allocations. Strategic allocations are a matter for the Local Plan.</p> <p>The Neighbourhood Plan does set constraints for development including through the protection of the natural and historic environments and green spaces.</p> <p>Typo corrected.</p>
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	<p>Additional housing in Faversham is to be welcome from the perspective of benefiting the local economy and helping to ensure that housing stock is available for future generations. The sites identified in the plan are all relatively small scale and should be straight forward to integrate.</p> <p>Attention should be given to pedestrian links, connection to the railway for public transport and ideally car-free development</p> <p>FAV28 - I write to inform you of my concerns regarding this site. The position is in a pinch-point in Belverdere Road, where parking is of prime importance. Any development, in my opinion, must include parking on site. There is not enough space to service the site with parking in the street. Any development should have height restricted to the current level to maintain the roof line in keeping with the street, and to allow light into the area in front of the buildings. Utilising most of the existing buildings would seem sensible.</p> <p>I would like to congratulate the TC and the team on an excellent draft Neighbourhood Plan. As a general comment all of the sites along the creek should include walkways along the creek for the general public and access to moorings. Also, where possible there should be wildlife corridors.</p> <p>Monitoring and Review (p.5) Whilst there is reference to the Neighbourhood Plan being reviewed should there be a change in local policy, given Swale Borough Council's emerging Local Plan, we request that explicit reference to "an early review" is included at p.5. This will then ensure the Neighbourhood Plan is in general conformity with strategic policies as required</p>	<p>Comment noted.</p> <p>Policies FAV4, FAV6, FAV10 and various site allocations address this issue directly.</p> <p>The AECOM Site Assessment report took account of access and highways issues. For sites in general, development would need to meet Local Plan parking standards. Development of this site would be likely to involve refurbishment of historic buildings with very selective demolition, rather than comprehensive redevelopment. In the interests of clarity, this site has been subsumed into the FAV16 area-based policy.</p> <p>Comment noted. Wildlife habitats are addressed in FAV7.</p> <p>The regularity will depend on various factors including those set out in the Plan. So, it is difficult to predict the timeframe.</p>
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	<p>through footnote 18 of the National Planning Policy Framework ('NPPF').</p> <p>On behalf of our client, John A Bensted & Partners LLP, we submitted details of land south of Junction 6 of the M2 that extends to approximately 26 hectares ('ha') to the Town Council in March 2022. Whilst the Neighbourhood Plan focuses on housing development, to ensure a robust vision that is able to deliver a strong, responsive and competitive economy (NPPF, paragraph 8), it is vital that employment development plays a more significant role throughout. The Site has been promoted as a high-quality strategic warehouse development (through Swale Borough Council's emerging Local Plan)</p> <p>I feel as a Faversham resident we have had far too much house building in town building on important agricultural land that is needed for food .</p> <p>We do not have schools or roadies to cope with the influx of building making some of our roads extremely dangerous .Faversham is a small historical town which roads were not built to take the increase in traffic that we are seeing now ,west street for example the road is full of areas that are dipped on the odd time that I have driven along it it's like being off road .</p> <p>Housing that is proposed for water lane Ospringe is ridiculous often vehicles have to mount the pavement to get past each other, then have to get out on to A2.</p> <p>The housing being built are not for local people ,local people are cannot even afford to rent in town now let alone buy</p>	<p>The site was submitted in response to an engagement exercise on site allocations. The developer was informed that the size of the site and scale of the development would be a matter for strategic site allocations through the Local Plan process. Note, the Neighbourhood Plan does include employment and mixed-use site allocations, but for small and medium sites. No change.</p> <p>Additional clause added to FAV7 on 'best and most versatile' agricultural land.</p> <p>The Town Council agrees with the need for adequate schools and this would be something for the Local Education Authority and other education providers to address. FAV4 deals with transport including sustainable transport and active travel. FAV5 identifies critical road junctions where there is evidence of congestion. Planning applications would be considered against these policies and also the policies in the Local Plan and NPPF.</p> <p>Site allocation policy FAV18 has been deleted on the basis that FAV2 would allow redevelopment of existing buildings whilst further development of the site would remove a green gap.</p> <p>Agree the AECOM Housing Needs Assessment demonstrated issues relating to housing affordability. The Neighbourhood Plan seeks to</p>
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	<p>property, the new houses being built are targeted to people who want to move out of London. The town is losing its community and small town feeling.</p> <p>Excellent document. Well done to all concerned.</p> <p>There is no plan for the impending climate emergency and all the flooding, heating, economic and social chaos that young people will be left to deal with. Please consider the facts e.g. Sir David King (former Chief Scientific Advisor to UK Government) "We have to move rapidly. What we do over the next 3 to 4 years I believe is going to determine the future of humanity". The 'we' here is all of including you dear reader.</p> <p>The town of Faversham needs to put people first to help reduce pollution and increase footfall.</p> <p>The local plan looks to have been well thought out and will hopefully head off Faversham being turned into a suburb of Sittingbourne with all the building that the government wants.</p> <p>As Faversham expands as the result of new housing developments, the parish boundaries look more and more constraining. It makes no sense for parts of the town to be located increasingly in other parishes, which is already the case with Ospringe and will happen with Boughton and Dunkirk if the proposed Southeast Faversham development goes ahead. As a result, expanding the parish boundaries should be a top priority for the town in coming years.</p> <p>The Abbey Neighbourhood Association represents some 350 dwellings and their Residents within the area north of Quay</p>	<p>shape affordable housing but does not modify Local Plan policy on affordable housing in terms of proportions and thresholds.</p> <p>Comment noted.</p> <p>The Town Council agrees on the importance of addressing the climate emergency. Climate change and sustainable development underpins all of the policies. For example, the Plan addresses mixed-use, active travel, green design, regeneration of brownfield sites, Local Green Space designations, protection of built and natural environments, local food growing and other matters.</p> <p>The Neighbourhood Plan includes policies on the Town Centre and air quality.</p> <p>Comment noted.</p> <p>Neighbourhood Plan policies can only apply to the Neighbourhood Area, which covers all of the Parish of Faversham. Adjustment to parish boundaries would be a matter for the boundary commission and falls outside of the scope of the Neighbourhood Plan.</p> <p>Comment noted.</p>
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	<p>Lane, Faversham down to Standard Quay. The Association has therefore concentrated their comments to those matters within their geographical area</p> <p>Given the importance of this consultation, and recognising the hard work that has gone into it, I'm concerned at how hard it is to find one's way around the documentation online. In particular identifying which document is the plan and how to access the consultation is not straightforward, couched as the former is in technical language and concealed as the latter is in the small print. This should be more user friendly with clear signposting.</p> <p>Thank you for all the work that has gone into this.</p> <p>I support the proposed Neighbourhood Plan but wish to suggestion an addition - Need 2 bedroom affordable housing- strongly agree.</p> <p>Key areas identified during previous consultation or already legislated for under regulations appear to be addressed. Overall an excellent plan which provides a very positive blueprint for our town and the local environment .</p> <p>Local Context. Mention should be made, if not here then somewhere, in the documentation that the meagre health and social care available in Faversham, also supports the residents of Boughton under Blean and many of the other small villages and communities surrounding Faversham as far out as Dunkirk and Teynham. This necessitates many journeys via both private and public transport into the centre of Faversham. Health and social care encompasses GP surgeries, cottage hospital, dental practices, chemists, allied healthcare</p>	<p>Comment noted. The SEA and HRA and other evidence were included on the website to support the Neighbourhood Plan.</p> <p>Comment noted.</p> <p>This is already included in FAV3. No change.</p> <p>It is unclear what this refers to.</p> <p>Comment noted.</p> <p>The Town Council agrees with the need for health care facilities, schools and other community facilities to improve to meet local need. The Town Council will continue to make this case to health and education providers. The Neighbourhood Plan cannot address areas outside of the Parish (designated Neighbourhood Area).</p>
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	<p>such as NHS physiotherapy. As above, but for primary and secondary schooling for many neighbouring villages. Housing policies should bear these constraints in mind and ensure that provision for rural villages is not factored out by growth in the numbers of houses in Faversham.</p> <p>The portion of Upper Brents backing onto the fields was built in 1875 and forms part of the conservation area.</p> <p>Habitat corridor maps don't fully reflect local naturalists' observations, ignoring major routes - it's unclear whether these have been produced solely based on maps and predicted species movement or observation, if it's observation it certainly doesn't reflect normal patterns of movement or migration. Whilst habitat distinctiveness maps may reflect the south east as a whole, distinctiveness within the context of the Neighbourhood is not considered which seems an important consideration, considering this a Neighbourhood plan. Natural habitat seems to include orchards, grazing marsh and other farmed areas but inexplicably excludes arable farmland - why? It's important habitat for many birds, particularly the Bunting family and Wagtails.</p> <p>Context showing the additional planned Development under Local Plan Allocations would be useful in assessing the combined impact of development on Faversham's rural character.</p> <p>There is no consideration for what is happening to the area immediately surrounding Faversham, and how that will impact the Town's drive towards biodiversity.</p>	<p>Comment noted.</p> <p>Comment passed to Kent Wildlife Trust. Clause added to FAV7 to protect 'best and most versatile' agricultural land.</p> <p>These are available on the Swale Borough Council interactive planning map. The AECOM Site Assessment and Housing Needs Assessment reports took full account of strategic site allocations. It could be confusing to include Local Plan site allocations in the Neighbourhood Plan.</p> <p>FAV7 deals with biodiversity and the protection of the natural environment and landscape within the Neighbourhood Area. FAV10 deals with green infrastructure. The Plan was subject to SEA and HRA which considered environmental impacts.</p>
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	<p>What happens to sites identified but not included in the plan, particularly if some of the sites included in the plan don't go forward to development? Are they opposed by the Town Council as not being in the plan? Some of those sites are likely to be highly controversial and are very problematic. What is the appropriate method of giving our views on those sites?</p> <p>I wish to start this response by thanking all of the Faversham Neighbourhood Plan volunteers for the work that has been done to date on the Neighbourhood Plan and for the future of our lovely town. I particularly welcome all the references to the Westbrook within the Plan. All comments below follow on from these words of thanks and seek to improve the plan where possible.</p> <p>General comments: My view is that the Neighbourhood Plan is not currently ambitious enough with regard the Climate and Ecological Emergency. Indeed, I can find no mention of the Town Council's Environmental, Climate Change and Biodiversity Emergency nor their Climate and Biodiversity Action Plan. The Neighbourhood Plan is an opportunity to embed net zero into policy into neighbourhood plan making and this omission should be rectified.</p> <p>Internal hyperlinks would make the document much easier and quicker to navigate.</p> <p>What viability testing has been undertaken to inform the Neighbourhood Plan?</p>	<p>The sites supported by the Town Council are those allocated in the Neighbourhood Plan. If other sites are selected in the emerging Local Plan, the Town Council will make representations.</p> <p>Comment noted.</p> <p>The Town Council agrees on the importance of addressing the climate emergency. Climate change and sustainable development underpins all of the policies. For example, the Plan addresses mixed-use, active travel, green design, regeneration of brownfield sites, Local Green Space designations, protection of built and natural environments, local food growing and other matters.</p> <p>Internal hyperlinks have been added to the contents page.</p> <p>Viability has been considered in line with Planning Practice Guidance. The land and property market in Faversham is stronger than in other parts of Swale. The AECOM Site Assessment report and the Neighbourhood Plan has taken account of site constraints that could affect viability.</p>
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	<p>It is all very well planting thousands of trees but where will any wildlife feel secure to nest and roost or live especially hedgehogs. And folk grow bee friendly shrubs or plants. No space for any of these or children/families grow vegetables. Programs on TV encourage this, please make space in Faversham</p> <p>It appears there is a strategic and logical incongruity built into the draft NP from the beginning. The emphasis in the early pages of the text is on the Town Centre and the built heritage. The omission of explicit reference to Faversham's significant maritime heritage is compounded in the early quotes extracted from the Swale Plan and Local Plan – see supporting points below. The draft Plan comes across as a plan for the Town Centre with other areas tacked on, almost as afterthoughts. Given the scope and potential for regeneration and development offered by the designation of Faversham as a Heritage Harbour (see F&OHHG's submission), omitting to note Faversham's maritime heritage upfront is a significant omission. It may be that this incongruity is created by wording, an issue of semantics rather than intent. Nonetheless, this emphasis is significant in that the structure and wording of the document belays the frame implicit in the minds of the creators, a frame which will inform the focus of attention for decision-making, allocation of resources and communications.</p> <p>It is suggested that the Plan is stated to have the overall aim of promoting the vitality and viability of Faversham Town, with Priority 1 being the Town Centre, Priority 2 being the built and maritime heritage (this being Priority 7 re-ordered and expanded to note for emphasis both aspects of heritage).</p>	<p>Protection of existing trees are dealt with in FAV7. Interpretation of FAV10 amended to place greater emphasis on tree planting within development. Some of the Local Green Space previously designated in the Local Plan include allotments.</p> <p>Disagree. The site allocation policies deal with sites mainly outside of the Town Centre. FAV1 is specific to the town centre. FAV13 relates to Local Green Space designations in various locations. FAV15 is related to Faversham Creek and FAV16 the Maritime Heritage Gateway area. Other policies of the Neighbourhood Plan apply to the whole Neighbourhood Area. Faversham's Maritime heritage is addressed in FAV11, FAV15 and FAV16.</p> <p>The word 'diverse' added into aim 7. Agreed that maritime heritage is important, but so are medieval, Georgian, Victorian, industrial, ecclesiastical and other aspects of heritage.</p>
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	<p>It is also proposed that section 3.11 Faversham Creek is re-ordered to be section 3.8 and placed after section 3.7 – hence both elements of heritage are given logical consistency by virtue of their grouping and the reference to the National Planning Policy Framework.</p> <p>Supporting points: P5: The NP is deemed to cover the administrative boundary of Faversham (see p. 5, also Fig 1), yet in Section 2.3, preference is given in Priority 1 to “promote the viability and vitality of Faversham Town Centre” rather than Faversham Town as a whole. Hence emphasis on areas outside of this narrow designation is missed (even when expanded to include the additions noted by the Faversham Society).</p> <p>Pgs 18-19: It would be assumed that Creek-side sites and endeavours would be covered by Priority 7, preserving and enhancing Faversham’s heritage and promoting heritage-led economic development, yet in the text, the built heritage is noted, not the maritime heritage. This omission is compounded by the selected sections quoted from the existing Swale plan, Bearing Fruits: 2031 – Swale Local Plan (2017) and the local plan review (2021) which focuses on the Town Centre and its built heritage rather than the Town’s heritage as a whole.</p> <p>Whilst the basic principals of the plan seem sound, there is too much focus on development and not enough focus on protecting the rural character of Faversham.</p>	<p>The Plan is structured to include general policies, then area-based regeneration policies and then site allocations. The suggested restructuring would make the Plan more difficult to use. No change.</p> <p>There are 7 Plan aims, all of which have a similar emphasis. No change.</p> <p>The Faversham Creek sites are important to heritage, but also to delivering the other aims of the Plan and achieving sustainable development. The Local Plan is repeated referenced in the rationale to various policies. The Plan has been written so as to be in general conformity with strategic Local Plan policy in addition to meeting the other Basic Conditions.</p> <p>A Neighbourhood Plan relates to the use and development of land including consideration of social, economic and environmental impacts. Sustainability is addressed throughout the policies. Environmental protection is addressed in FAV7, FAV10, FAV13 and various area based and site allocation policies. The Plan was subject to SEA and HRA.</p>
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	<p>Some of the sources used are questionable - the Swale Landscape Sensitivity Assessment reads as largely the author's personal opinion of aesthetics with highly subjective descriptions (personally open fields leading to a row of old oak trees and the marshes beyond does not meet my definition of 'limited scenic character') 'as well as containing inaccuracies ('low-rise 20th century housing along Springhead Road and Upper Brents' - the portion of Upper Brents backing onto the fields was built in 1875 and forms part of the conservation area'). Habitat corridor maps don't fully reflect local naturalists observations, ignoring major routes - it's unclear whether these have been produced solely based on maps and predicted species movement or observation, if it's observation it certainly doesn't reflect normal patterns of movement or migration. Whilst habitat distinctiveness maps may reflect the south east as a whole, distinctiveness within the context of the Neighbourhood is not considered which seems an important consideration, considering this a Neighbourhood plan. Natural habitat seems to include orchards, grazing marsh and other farmed areas but inexplicably excludes arable farmland - why? It's important habitat for many birds, particularly the Bunting family and Wagtails.</p> <p>Context showing the additional planned Development under Local Plan Allocations would be useful in assessing the combined impact of development on Faversham's rural character. There is no consideration for what is happening to the area immediately surrounding Faversham, and how that will impact the Town's drive towards biodiversity.</p> <p>What happens to sites identified but not included in the plan, particularly if some of the sites included in the plan don't go</p>	<p>The Plan has used a wide evidence base including the documents mentioned but also a variety of other documents, including some commissioned specifically for the Neighbourhood Plan. We are satisfied that the policies are evidenced based.</p> <p>These are available on the Swale Borough Council interactive planning map. The AECOM Site Assessment and Housing Needs Assessment reports took full account of strategic site allocations. It could be confusing to include Local Plan site allocations in the Neighbourhood Plan.</p> <p>The sites supported by the Town Council are those allocated in the Neighbourhood Plan. If other sites are selected in the emerging Local Plan, the Town Council will make representations.</p>
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	<p>forward to development? Are they opposed by the Town Council as not being in the plan? Some of those sites are likely to be highly controversial and are very problematic. What is the appropriate method of giving our views on those sites?</p> <p>Is there anything that can be done to pursue development of long vacant buildings as an alternative to new builds- e.g. the large building opposite the Jubilee centre and the former Cains amusement building.</p> <p>Generally support except for detailed comments following. It is positive that :</p> <ul style="list-style-type: none"> - the plan has an aim to protect and enhance the diversity, character, and appearance of the area's historic assets (page 19 paragraph 16) -green spaces are identified and protected. It is essential that quality agricultural land is retained for food security. -infill and brownfield sites are prioritised <p>Please ensure that :</p> <ul style="list-style-type: none"> -pedestrian and cycle access to development sites is protected and enhanced, and any new developments do not reduce or have an adverse impact on pedestrian and cycle access to existing homes. Promotes a better quality environment, sustainable transport, reduces pollution and traffic congestion - <p>An excellent and comprehensive tool to manage development in the town. Congratulations to the team who have evidently put a lot of hard work in formulating the plan.</p> <p>Sorry to be a pedant however I am uncomfortable with the word 'Development' implying new build in the caption on the Abbey St housing picture. These are historic buildings and were renovated and rescued many years ago. I suggest that</p>	<p>Reuse of buildings is supported in FAV1, FAV2, FAV11 and various area based and site allocation policies. The Plan places particular emphasis on heritage-led regeneration.</p> <p>Comments noted. Clause added to FAV7 to protect the 'best and most versatile' agricultural land. Pedestrian and cycle facilities are addressed in FAV4, FAV6, FAV10. Waterfront access in Faversham Creek is dealt with in FAV15 and some site allocation policies.</p> <p>Comment noted.</p> <p>Images and captions reviewed and updated in latest version.</p>
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	<p>'Property' should be used rather than Development (irrespective of the definition in the Plan).</p> <p>Flood data whilst reflecting current guidance is out of date. The increase in Sea level by 2100 reported is informed by data published in 2017 and does not reflect the rising levels from the acceleration of ice cap melt or overtopping from waves generated by the increasing incidence and intensity of storms forecast. New research (Sayers -Future Flood Risk 1922) examines the local lowering of the foreshore platform due to increased wave- driven sea- bed erosion in shallow waters. A condition prevailing in the Swale Estuary. The publication of the Sayer report lead to headlines in the Guardian highlighting the risk to Faversham. Swale is the 3rd most LA area at risk in England. These circumstances have resonance on the 70th anniversary of the Great Storm. At present schemes likely to flood are measured on the exception test hence the flooding of the development illustrated in the Plan. Government aspirational, but undeliverable housing targets, enable the exception test to be proven enabling unsuitable development. Is it possible/feasible to introduce caveats in the plan to modify the flood defence criteria in the light of evidence-based amendments? Are we reliant on the aging EA Flood maps and unsuitable exception test - doesn't seem like a valid exception test to me where most pass.</p> <p>Southern Water is the statutory wastewater undertaker for Faversham. In accordance with this, once housing numbers are allocated to site policies within the Neighbourhood Plan, we can then undertake capacity assessments of our infrastructure and its ability to meet the forecast demands. New Policy to support the provision of infrastructure -</p>	<p>Comment noted. This is clearly a very valid concern. The flood risk mapping data is taken from the Environment Agency. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space. Any change to Environment Agency data could inform a future review of the Neighbourhood Plan.</p> <p>Comment noted. Obviously, the Neighbourhood Plan cannot set policies to control service and infrastructure provision by the utility provider. The interpretation to FAV8 already refers to the need for sufficient drainage infrastructure capacity. Additional sentence added on encouraging early engagement with the utility provider.</p>
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	<p>Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward in order to deliver or maintain necessary infrastructure. We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2021) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'. Although the Parish Council is not the planning authority in relation to water or wastewater development proposals, support for essential infrastructure is required at all levels of the planning system. To ensure consistency with the NPPF and facilitate sustainable development, we therefore propose an additional policy as follows: "New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan."</p> <p>I am pleased and relieved that Faversham Neighbourhood Plan is a sensible minimum and absorbable amount of development.</p> <p>Social rented housing stock far too low. Need to restart building council houses. Manufacturing industry almost non-existent & will motor car & motorcycle repair fall off with pressure from climate change & rise in electric vehicles? Need</p>	<p>Comment noted. The Plan meets the housing figure provided by the Local Planning Authority.</p> <p>Comment noted. Some of these issues fall outside of the scope of the Neighbourhood Plan. A key part of the Plan is to create sustainable neighbourhoods with a range of facilities in walking distance.</p>
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	<p>to live & work locally to cut carbon footprint & avoid becoming just a dormitory town.</p> <p>Overall, we think that the plan to redevelop brownfield spaces is excellent, and developing the greenfield spaces for use of recreation for children and young people would be welcomed. The buildings to put up in these brownfield sites could be multi-occupier dwellings, i.e. a number of low rise buildings with flats. Everything should be planned in such a way to reduce or not add to road traffic that exists already. Overall a great plan and a lot of work has clearly gone into it. Thank you,</p> <p>Why use the 2011 census. It is 12years out of date? Wat are the comparative results from 2021 census? That should have been used instead as more recent and more useful.</p> <p>Faversham does better than other towns because high number of independent business and arts. Need more arts facilities i.e. civic art gallery, lecture theatre, study centre. Tourism. The town remains successful within its medieval footprint. The pedestrian experience needs attention, road services, puddles, traffic etc. Building anywhere below the 25' contour is foolish - due to tidal flooding which is predicted to increase. (5m is a good modern equivalent). We lack banking facilities - the town could consider a banking hub to be offered to banks to start, could be in any suitable shop building. We would greatly benefit from a Civic (publicly owned) art gallery (as at Hastings or Margate). This is a town of makers and creatives who could all too easily be squeezed out. Much depends on a renewed opening bridge to the basin to be rejuvenated as a regional asset for tourism, employment, heritage, apprenticeships. The space over the</p>	<p>Comment noted. The Plan encourages a mix of accommodation types.</p> <p>At the time of undertaking Regulation 14 consultation only the 2011 data was available at Parish level. The Plan has been updated to the 2021 data now available.</p> <p>Agreed that the independent businesses and arts are an important part of the local offer. The Plan places considerable emphasis on active travel, including pedestrian permeability and connectivity. Flood risk has been taken into account in the site allocations. The Neighbourhood Plan cannot control the activities of banks. Many towns around England have used art galleries to attract visitors and support economic development. The Town Council will discuss this issue with Swale Borough Council and other stakeholders.</p>
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	<p>library could and should be deployed as a learning centre. Recent suburban sprawls are to deplored, not least because they are effectively cut off from the pedestrian nature of the town by very poor planning arrangements and detail.</p> <p>Is anyone, Faversham or Swale looking into the increased light pollution from the new build business and private homes?</p> <p>(24) "Town Centre" is not defined by description or map showing the exact area. " Faversham High Street" does not exist. (75) Fig 15 Map too small, colours do not stand out. LGS numbers on map do not correspond to maps on pages following. EG LGS001 on Fig15 Map points to the recreation Ground, whereas on P78 LGS001 shows filed at Windermere. (19) I suggest the SVC retail and leisure needs assessment so out of date and the town in 2023 is not so vibrant and viable with Iceland standing empty and recent closures of cafe/restaurants, closure of banks has affected retailers and people who cannot/ choose not to bank online. (46-49) Maps out of date - do not show houses built on e.g. Perry Court, Kingsmead, Faversham Lakes, Davington Fields, Ospringe Gardens, Nova. (p46) Green linear features need to be added to east side of Love Lane, footpath from Love Lane to Homestall Lane also a nature corridor</p> <p>Congratulations and thanks to all concerned for this very comprehensive plan. We support the vision of Faversham Town council.</p> <p>I find the ideas about preservation and the idea to keep what makes faversham unique rather cynical when there has been so much building already in and around faversham. I strongly object to any further house building unless it's on brown field</p>	<p>Clause 8 of FAV10 addresses intrusive, excessive or poorly designed lighting.</p> <p>Map added to define Town Centre. Plan amended to remove reference to Faversham High Street. Figure 15 deleted and replaced with a text list of the Local Green Spaces designated by the Local Plan. Local Green Space reference numbers updated so as to avoid confusion with existing Local Green Spaces in the Local Plan. Policy FAV1 deals with the Town Centre and takes account of recent impacts, changes and trends. Maps are created on latest OS Mapping data. Comment on green linear features and nature corridors sent to Kent Wildlife Trust.</p> <p>Comment noted.</p> <p>The Neighbourhood Plan has allocated sites based on a brownfield first approach. By meeting then housing need figure provided by Swale Borough Council, the Neighbourhood Plan should be more effective in preventing housing development in unsustainable locations. The Town</p>
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		<p>areas or converting second floors into accommodation but swale councils ideas for a further 219 , ridiculous. There is no additional services ie GP practices ,schools or indeed no thought about an aging population. So they are going to be on bicycles?</p>	<p>Council agrees that housing development will need to be supported by adequate facilities. The Neighbourhood Plan explicitly recognises different levels of mobility in FAV10.</p>
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	FAV1	<p>Overall good suggestions, particularly getting first floor flats back into use but not much detail on how to force landlords to do this. First floor flats could provide some more affordable housing. There is currently a development on the corner of Preston St. and Stone street which runs counter to plan to keep commercial premises open. This development is turning 3 commercial premises into flats.</p> <p>Pg19 Add map to show the extent of our town centre West as far as Morrisons, South to the Railway Station, North to Quay Lane, East to St Mary's Road</p> <p>Can we add some text about pedestrianisation on market days and to benefit all those with disabilities, not just those with blue badges.</p> <p>Tourism preference for FITs arranging in family and friendship groups rather than coach parties - therefor coach parking our of town with town centre drop off</p> <p>Add definition of Town Centre as: From the Market Place extending out along the lengths of West St, Court St/Abbey St and Preston St plus East St as far as the Recreation Ground</p> <p>3.2 Add Hop Festival alongside Faversham Literary Festival</p> <p>Faversham town centre needs to maintain its historical heritage</p>	<p>The Plan cannot force landlords to change the use of their properties. The Plan cannot prevent the use of permitted development rights relating to change of use from commercial to residential, however harmful the scheme.</p> <p>Map added.</p> <p>Traffic management falls outside of the scope of the Plan. Comments passed to Kent County Council (highways authority).</p> <p>Meaning unclear.</p> <p>Map added.</p> <p>Amended text to add Hop Festival.</p> <p>The entire Town Centre is within the Faversham Conservation area, which is also subject to an Article 4 direction. There are also numerous listed buildings and some scheduled monuments. Heritage is addressed in the policy which also cross-references to FAV10 and FAV11. No change.</p>
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	<p>Pg 24 Need to proactively discourage car use and prioritise sustainable/active transport. More dropped kerbs for disabled access</p> <p>Pg 24 Pg 25 Use of 1st floor etc. above retail outlets. Creative car parking for visitors (park and ride).</p> <p>Pg 24 Agreed</p> <p>Pg 13 With Kent having the highest population growth of all counties a specific strategy is required to ensure The Garden of England is protected. This means a vast reduction in house building to be replaced by apartment blocks offering a high number of quality homes per unit of land used with underground parking and other on site facilities that are all more affordable than a house and offer a higher level of quality urban living. It is sad that some recent developments have already missed such an opportunity.</p> <p>Pg 24 OK. This is important to state.</p> <p>Pg s 18-24 Bizarrely, there is no definition here of what actually constitutes the town centre. Where are its limits? Does it extend all the way down Abbey Street to Standard Quay, and up Preston Street to the railway station?</p> <p>I would like to see the pedestrianisation of the areas where vehicular access is already restricted on market days as a policy for the town in coming years.</p> <p>Special attention is required for Preston Street, which is an important gateway to the town for people arriving by train. The profusion of takeaway food outlets and unoccupied</p>	<p>Sustainable and Active Travel are dealt with in FAV4 and FAV10. Comments passed to Kent County Council (highways authority).</p> <p>Comments passed to Kent County Council (highways authority).</p> <p>Comment noted.</p> <p>Comment relates to planning strategy in 2.4 rather than FAV1. FAV2, FAV3, FAV10 and various area and site allocation policies address housing and design. Many sites would be suitable for apartments, including new build and conversion of historic buildings. Statement on apartments added to interpretation of FAV3.</p> <p>Comment noted.</p> <p>Map added.</p> <p>Comments passed to Kent County Council (highways authority).</p> <p>FAV1 seeks to diversify and improve the town centre offer. Converting disused/underused floor space to residential increases the town centre population which supports high street recovery and regeneration.</p>
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	<p>former Cain Amusement arcade make for an underwhelming, scrappy first impression that is at odds with the rest of the town centre. The short section of Preston Street from the corner with Stone Street up to The Limes public house needs some serious upgrading. It should be a vibrant commercial street, so please, no new housing!</p> <p>Given the importance of this consultation, and recognising the hard work that has gone into it, I'm concerned at how hard it is to find one's way around the documentation online. In particular identifying which document is the plan and how to access the consultation is not straightforward, couched as the former is in technical language and concealed as the latter is in the small print. This should be more user friendly with clear signposting.</p> <p>Pg24 and Pg 28 Agree strongly. One and two bedroom affordable houses/flats and bungalows needed.</p> <p>Pg 24 Support all actions included in the plan</p> <p>Pg s 18-25 The definition of the town centre should include the whole town, from the station to the creek, including East Street and West Street. In particular streets such as Preston Street seem to have been forgotten. A map showing exactly what is included as the town centre should be included and agreed upon. There are many empty properties currently in the wider town centre. There should be NO house building on any empty plots in the town centre, rather these should be developed to improve the amenity.</p>	<p>Comment noted. The SEA and HRA and other evidence were included on the website to support the Neighbourhood Plan.</p> <p>This relates to the housing policies rather than FAV1. Comment noted. FAV3 deals with housing mix and includes 2-bedroom and accommodation suitable for older people and those with limited mobility. Statement on apartments added to interpretation of FAV3.</p> <p>Comment noted.</p> <p>Map added. None of the housing site allocations are within the defined town centre. Converting disused/underused floor space above commercial units to residential increases the town centre population which supports high street recovery and regeneration.</p>
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	<p>Pg 24 Development of upper stories of commercial properties for residential use should be encouraged, not merely supported</p> <p>Would a map of Faversham Town Centre be helpful in the application of this policy? For instance the photograph of Abbey Street on page 22 suggests that this street is included in the 'town centre' but would you want to see Abbey Street diversify from its mainly residential character which is distinctly different from town centre uses eg around the Guildhall area? A map would clarify where this policy applies and if a map is not included perhaps criteria as to what the town centre comprises should be established?</p> <p>Pg 24 Development of upper stories of commercial properties for residential use should be encouraged, not merely supported</p> <p>Pg 2 Town centre is not defined which creates ambiguity in the application of policy. Would a plan marking definitive boundaries not be appropriate? Is this omission intentional?</p> <p>Pg 24 OK as far as it goes but does not address delapidated appearance of so many shops & buildings & how to attract new businesses into empty premises such as the ex-"amusement arcade" in Preston Street. Litter, dog poo & generally poor state of pavements.</p> <p>Residents living above shops need parking spaces - none allowed for in plan . Need more trees.</p>	<p>This is planning policy so has to be worded so that it can be used in the development management process. The Town Council would encourage the re-use of upper floors. No change.</p> <p>Map added.</p> <p>This is planning policy so has to be worded so that it can be used in the development management process. The Town Council would encourage the re-use of upper floors. No change.</p> <p>Map added.</p> <p>FAV1 and various policies support the refurbishment and conversion of existing buildings. FAV1 aims to improve the viability and vitality of the town centre. Litter, dog poo and the state of pavements fall outside of the scope of planning policy.</p> <p>Provision of on-site parking for shops in the town centre is impossible in many instances without demolition of historic buildings. Normal parking local authority parking standards would apply to most of the sites. The</p>
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		<p>Pg24 Think definition of town centre needs to be explained and extended out from Marketplace along East and West Stret, Court Street and Abbey Street. Add other events e.g. Hop Festival, surely the biggest event each year.</p> <p>All Good</p> <p>Pg 24 Remember access for disabled must be met on upper floors. Car parks - space being squeezed by phone mast space. Loss of car parking at Newton Place Surgery.</p> <p>Pg24 Provision must be included for deliveries and collection of goods from Town traders. This cannot be done by bicycles or on foot.</p> <p>I agree that the town centre should remain commercial and community focused at street level and if it helps keep the premises viable then conversion to residential should be supported on the upper floors.</p>	<p>policies relate to development rather than existing uses. FAV7 and FAV10 address trees.</p> <p>Map added.</p> <p>Comment noted.</p> <p>Disabled access within buildings would be dealt with under the Building Regulations. Agree with comment on phone mast but outside of the scope of the Neighbourhood Plan.</p> <p>This appears to relate to existing uses. For new development servicing would be considered as part of any planning application.</p> <p>Comment noted - FAV1 supports this.</p>
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	FAV2	<p>All new housing development now have to stop. The town is being completely ruined by overdevelopment.</p> <p>Infill development good provided it is sympathetically done</p> <p>Infill redevelopment and refurbishment is a good idea provided it fits in with neighbouring buildings</p> <p>Pg30 Need for high density affordable housing and to stop the expensive sprawl of luxury developments,</p> <p>Pg 30 Affordable housing for rental. Adequate parking/transport/access to economic travel/cycling.</p> <p>Pg 24 Agree</p> <p>Pgs26-28 The rational should be qualified to ensure that other important needs such as food security and existing services are not damaged. When calling for sites a criteria should be set so that sites required for other purposes such as food or car sharing parking are protected. The survey should address the recent impact of Covid and the movement of people out of London putting additional pressure on Kent and Faversham with its attractive railway services.</p> <p>Pg 30 developers of any new housing or industrial premises should have to put solar panels on all these buildings as a matter of course . this would help to negate the need for further enlargement of the solar farm which has already been given the go ahead at Graveney. Also all new housing should</p>	<p>This would be contrary to national policy and would make the town vulnerable to speculative development. FAV2, FAV3 and various area and site allocation policies allow for proportionate housing growth including regeneration of Faversham Creek sites.</p> <p>Comment noted – FAV10 deals with design.</p> <p>Comment noted – FAV10 deals with design.</p> <p>Residential mix is dealt with in FAV3.</p> <p>Residential mix is dealt with in FAV3. FAV4 and FAV10 deal with transport and active travel.</p> <p>Comment noted.</p> <p>The site allocation process has already taken place. Criteria for making site allocations were identified and this informed the site allocation policies. Policy FAV7 has been modified to protect the ‘best and most versatile’ agricultural land. The impact of covid was taken into account in the preparation of the Plan, including impacts on the town centre and live/work patterns.</p> <p>The Plan cannot be prescriptive on solar panels. However, FAV10 does require positive design features to reduce carbon use and reference to solar panels has been added to the interpretation as one of the ways of achieving this. FAV4 requires E.V charging points as part of new development. Local Plan parking standards would apply to housing</p>
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	<p>have off street parking as part of the build requirements, and electric charge points. As part of these builds new schools and Drs surgeries with local pharmacies attached need to be considered</p> <p>Pg 30 Ok. Sensitivity to heritage assets very important.</p> <p>Pg 30 As flagged in general comments, as Faversham expands as the result of new housing developments, the parish boundaries look more and more constraining. It makes no sense for parts of the town to be located increasingly in other parishes, which is already the case with Ospringle and will happen with Boughton and Dunkirk if the proposed Southeast Faversham development goes ahead. As a result, expanding the parish boundaries should be a top priority for the town in coming years.</p> <p>The streets in the centre are notable for their lack of trees, as are most streets around Faversham, and the benefits of planting these, in terms of their aesthetic impact, temperature and humidity control and mitigation of pollution, cannot be overstated. Difficulty in siting them along streets because of services underground can be managed by using nibs into the road, with the added benefit of traffic calming. References to preference for native trees needs to keep in mind the impact of global warming and which trees will manage this, possibly necessitating looking wider. An opportunity might be taken to increase the amount of public amenity space, trees, grass and paths, rather than simply requiring no loss. There is no reference to minimising light pollution and this has relevance also in FAV 7.</p>	<p>schemes. The Town Council agrees that new housing needs to be supported by adequate health and education facilities.</p> <p>Comment noted. Heritage is also addressed in FAV11.</p> <p>Neighbourhood Plan policies can only apply to the Neighbourhood Area, which covers all of the Parish of Faversham. Adjustment to parish boundaries would be a matter for the boundary commission and falls outside of the scope of the Neighbourhood Plan.</p> <p>The comment appears to relate to a public realm projects. This is something that the Town Council can investigate, outside of the scope of the Neighbourhood Plan. In terms of new development FAV7 and FAV10 address trees. Light pollution is addressed in FAV10.</p>
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	<p>I am concerned by the amount of developments planned and lack of amenities to support them.</p> <p>Pg 30 Support and applaud principals of infill housing and the use of existing building stock</p> <p>No more houses at all enough is enough</p> <p>Pg 30 Loss of agricultural land should be avoided</p> <p>I understand why the Faversham Neighbourhood Plan will not include policies for the Duchy and Attwood sites but ignoring clearer eference to these potential large (and let's be honest, quite likely) sites seems bizarre and confusing for most people reading the plan. Once adopted, the Faversham Neighbourhood Plan will be policy for any planning applications within Faversham and as such I'd recommend that the NHP addresses the development of these large sites, albeit without encouraging their development.</p> <p>I'm not sure of the value of 2b. Does this mean, for example, that the requirements of FAV3 do not need to be met? It might be helpful to remove this clause and instead have a statement setting out in the early section of the NHP that 'the</p>	<p>The Plan has made small and medium sized site allocations to meet the housing growth figure provided by Swale Borough Council. The Neighbourhood Plan cannot prevent strategic site allocations made in the local plan. The Town Council agrees with the need for amenities and facilities to support growth.</p> <p>Comment noted.</p> <p>The Plan has made small and medium sized site allocations to meet the housing growth figure provided by Swale Borough Council. The Neighbourhood Plan cannot prevent strategic site allocations made in the local plan.</p> <p>Policy FAV7 has been modified to protect the 'best and most versatile' agricultural land.</p> <p>This applies to current or proposed planning applications and possible strategic site allocations in the local plan. The Neighbourhood Plan allocates small and medium sites but not large sites. The Town Council would not agree with allocation of these sites through the Neighbourhood Plan. This would be a matter for the emerging Local Plan to consider, or for decisions on specific planning applications. It should be noted that design and other policies in the Neighbourhood Plan would apply to all sites, once the Neighbourhood Plan is made.</p> <p>Clause 2b amended to clarify design requirements.</p>
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	<p>local plan should be read ‘as a whole’, that is, subject to all other relevant policies in the Local Plan and other material considerations’. This point applies similarly to other policies where similar references are made.</p> <p>Pg 30 Loss of agricultural land should be avoided</p> <p>Pg 3 Key Issues - Fully supported with one exception - Ensure that affordable housing is an integral part of housing schemes to support inclusive communities.</p> <p>Some sites are not appropriate for mixed tenure development. A prime example is FAV26 BMM Weston Ltd (parcel 2) land at Brent Road. (Please note this site is in Brent Hill not Brent Road). This land has a high value profile and current proposals are for non-adopted roads which would present a maintenance burden to RSL's. I suggest that 'where appropriate' is inserted between ‘ensure that’ and ‘affordable homes’. In such circumstances commuted sums should be sought and applied for the development of affordable housing, to be held in perpetuity and located in the parish for the benefit of Faversham residents in housing need.</p> <p>We need to preserve agricultural land for food production.</p> <p>Pg 30 That there should be no loss of public amenity space (grassed areas and trees and paths) in existing areas of housing is extremely important. I hope this will be adhered to.</p>	<p>Policy FAV7 has been modified to protect the ‘best and most versatile’ agricultural land.</p> <p>FAV3 already addresses this issue. No change.</p> <p>Mix is dealt with in FAV3. In addition, FAV3 requires affordable housing provision to be an integral part of the scheme and tenure blind. There is no intention for either FAV2 or FAV3 to modify affordable housing requirements in terms of proportions or thresholds. Adoption standards for roads would be a matter for negotiation with Kent County Council (highways authority). Disagree with suggested change.</p> <p>Policy FAV7 has been modified to protect the ‘best and most versatile’ agricultural land.</p> <p>The Neighbourhood Plan protects green and landscaped areas through FAV7 and FAV13.</p>
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	<p>Some of the "not recommended " sites on the site allocation map are already developed and expanding. Please fight to contain them.</p> <p>Pg 28 The report emphasises then need for more & smaller affordable accomodation especially for younger & less well-off people. Why then, are so many of the recent housing developments in & around Faversham almost totally devoid of such units?</p> <p>Need more buses, including mini services to restrict growth in car use.</p> <p>All good</p> <p>Pg 30 I support and applaud 2a.</p> <p>Seems reasonably Okay</p> <p>Pg 30 Very reassured to read that the needs of the existing local population comes first. i.e. affordable housing, ageing population, disabled, young families.</p> <p>No more unless on brown field sites or above shops etc. already too much building has happened already, it's not of high quality, all have gas boilers so where are your sustainability and green credentials there? It's not like these places were build decades ago.</p>	<p>It is unclear which map this is referring to.</p> <p>The schemes mentioned will have been considered against national and guidance, the adopted local plan and the Faversham Creek Neighbourhood Plan for sites in the Neighbourhood Area. Policies FAV2 and FAV3 will apply once the new Neighbourhood Plan is made.</p> <p>The Town Council agrees with improvement of public transport. Policy FAV4 deals with sustainable transport and active travel.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>The site allocations are based on brownfield sites. FAV1 supports the refurbishment of upper floors in the town centre. Design is dealt with in FAV10. The interpretation to FAV10 addresses green design.</p>
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	FAV3	<p>Planned residential mix about right</p> <p>The proposed residential mix and standards seem about right. Community led affordable/social housing a good idea though not sure what 'community led' means. What's really needed is a return to major council house building.</p> <p>Pg 31 4 b "and within Faversham boundary" too restrictive given shortage of development land - prefer nearby</p> <p>We reaffirm our opposition to inappropriate large-scale housing development, including the Duchy and Abbey Fields and welcome the acknowledgement of housing need that is being exacerbated by the lack of affordable rental and ownership options. We support the principle that priority should be given to genuinely affordable, smaller three-bedroom housing units for low-income families, and to affordable 1-2 bedroom dwellings to accommodate young people starting out, and older people seeking to downsize. We also support the Town Council's indication that prioritisation should be given to schemes which keep rental or ownership property affordable in perpetuity, including social housing or community-led development.</p> <p>We support the policy but are concerned that it does not reflect current policy in the Local Plan. There is no subdivision of affordable rent between tenures and no provision has been made for Lifetime `homes. We would suggest that the proposed tenure mix should be subdivided - Social rent 59.4%, Affordable Rent 6.6%, Lifetime Homes 25%, Shared ownership 9%</p> <p>As Fav2. Restrict car parking and car use.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>It would be unlawful for the Neighbourhood Plan to include policies relating outside of Faversham's parish boundary.</p> <p>This applies to current or proposed planning applications and possible strategic site allocations in the local plan. The Neighbourhood Plan allocates small and medium sites but not large sites. This would be a matter for the emerging Local Plan to consider, or for decisions on specific planning applications.</p> <p>The housing mix in FAV3 is based on the AECOM Housing Needs Assessment report, June 2022. The Plan is in general conformity with strategic Local Plan policy.</p> <p>FAV4 delas with sustainable transport and active travel.</p>
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	<p>Pg 31 Broadband moving to wireless and satellite.</p> <p>Pg 24 Agree</p> <p>Pg 31 Apartment blocks should be given priority over houses in order to provide affordable homes that are with modern technology cheaper to run. Young people putting too much income into housing at the expense of adequate pension provision should be addressed.</p> <p>This is vital to future of our community. Strongly support! Wifi - broadband good to be included.</p> <p>The urgent case for prioritising affordable housing is well made and might best be realised by favouring bids from community housing developers. Given the tendency of commercial developers to reduce their commitments down the line, and the level of need identified, the affordable housing target could be raised to 50%</p> <p>Pg 31 The vital importance of affordable housing and builders being accountable for %.</p> <p>Pg 31 Affordable mix of high standard rental and private ownership critical to retention of young families in the town.</p> <p>What is the threshold for affordable housing provision? How does this policy apply to, for instance, conversion of flats above town centre uses? Is this policy too reliant on adopted Local Plan policy, which is now more than 5 years old?</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Statement on apartments added to interpretation of FAV3.</p> <p>Comment noted.</p> <p>Comment noted. Raising affordable housing requirements to 50% would mean that the Neighbourhood Plan would fail to be in general conformity with strategic Local Plan policy. In addition, it would create viability issues for many sites, including sites with built heritage.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>The Neighbourhood Plan has to be in general conformity with strategic local policy. It does not seek to amend the proportion or threshold for affordable housing. The Neighbourhood Plan policy is based on the AECOM Housing Needs Assessment report, June 2022. Fav1 supports conversion of upper floors in the town centre.</p>
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		<p>Pg 31 Focus should be on multiple small scale infill or repurposing brownfield sites - greatest need is for 2 bedroom homes not 3</p> <p>Pg 4 Fav 3.2 I support the policy but am concerned that it does not reflect current policy in the Local Plan. There is no subdivision of affordable rent between tenures and no provision has been made for Lifetime `homes. I would suggest that the proposed tenure mix should be subdivided - Social rent 59.4%, Affordable Rent 6.6%, Lifetime Homes 25%, Shared ownership 9%.</p> <p>Fav3. 4b There is a paucity of sites suitable for community led homes in Faversham and suggest that this statement is amended to include the words 'or its environs' after Faversham Parish.</p> <p>Much more attention should be given to homes/flats for single people and starter homes and should include solar panels, water butts etc.</p> <p>Pgs 32-33 I was pleased to see mention made of the need for homes suitable for older people, those with physical disability and limited mobility. P28 mentions rented properties for these groups but privately owned properties e.g. bungalows are also needed. P29 mentions this would provide a balanced mix of properties. This is not only what is needed but also provides for a visually and aesthetically more interesting and pleasing appearance of any housing development, whether town centre or outskirts of the town.</p>	<p>This is exactly what the Neighbourhood Plan does through FAV2, FAV3 and site allocation policies.</p> <p>The housing mix in FAV3 is based on the AECOM Housing Needs Assessment report, June 2022. The Plan is in general conformity with strategic Local Plan policy.</p> <p>It would be unlawful for the Neighbourhood Plan to include policies relating outside of Faversham's parish boundary.</p> <p>Statement on apartments added to interpretation of FAV3. Green design features are addressed in the interpretation to FAV10.</p> <p>Comment noted. FAV3 seeks to support a balanced mix of properties. Design is dealt with in FAV10.</p>
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	<p>Pg 31 para6 Building standards for all new housing should include, where possible, photo-voltaic panels as the primary roofing medium. This should be a condition for granting of planning permission for any new developments.</p> <p>Pg 31 Residential sites for new build should also include sewage/waste treatment to treat the waste etc. We've already got sewage in the creek, swale sea - we don't need more. Also stop building garages with new homes. Its hypocrisy when you want to get people walking, cycling, and using the bus.</p> <p>Support the affordable social housing, deal with low income in new households</p> <p>Solar roof panels and high insulation should be required.</p> <p>All good</p> <p>Pg 31 No mention of social rent, which is cheaper than affordable rent. The AECOM Housing Needs Assessment 2022 did not split different size dwellings, between affordable and non-affordable, needs revision.</p> <p>Pg 31 Support Proposals</p>	<p>The Plan cannot be prescriptive on solar panels. However, FAV10 does require positive design features to reduce carbon use and reference to solar panels has been added to the interpretation as one of the ways of achieving this.</p> <p>Waste disposal would be a matter for the Building Regulations and for the local utility company. The Neighbourhood Plan does not include any specific requirement for garages. FAV4 supports sustainable transport and active travel.</p> <p>Comment noted.</p> <p>The Plan cannot be prescriptive on solar panels. However, FAV10 does require positive design features to reduce carbon use and reference to solar panels has been added to the interpretation as one of the ways of achieving this.</p> <p>Comment noted.</p> <p>The AECOM Housing Needs Assessment is based on the agreed approach and methodology based on the data available.</p> <p>Comment noted.</p>
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	FAV4	<p>Ok as far as it goes, As long as there are mainly privately operated bus services, there will never be enough buses to tempt people out of their cars. During the day I use buses to get to Canterbury but cannot in the evenings as they stop running about 6.00pm</p> <p>Pg 33 Please ensure that the FCLT's preapp for access from Windermere with steps and ramp to Longbridge and down tro Rec and Station Rd, is supported by NP.</p> <p>Add to 2. : In particular more fully accessible pedestrian crossings of A2 serving growing population to the south, including locations used heavily as school routes such as near Abbey School and at Mall/Forbes Rd junction and facilitating access between town and Kent Downs AONB</p> <p>Pg 37 Agree with all points. Would add small electric buses, would help from estates like Brents side of town to centre to station and main bus stops.</p> <p>As Fav2. We need to improve bus transport and shelters and dropped kerbs. Stop prioritising private cars.</p> <p>Pg 37 Recognise needs for mobility and ageing population. Also 'family friendly' to encourage not using the car. Ratio of cars to households to be recognised.</p> <p>Pg 37 Agree</p> <p>Pg 34 Faversham has an above average age population and research should be conducted to find out what percentage are able to cycle or would cycle given safe to do so. Likewise</p>	<p>Agreed, but outside of the control of the Neighbourhood Plan. No change.</p> <p>This sounds like a specific infrastructure project. In general, FAV4 would support infrastructure projects to improve accessibility and connectivity. No change.</p> <p>This falls outside of the scope of the Neighbourhood Plan. Comments passed to local highway authority, Kent County Council.</p> <p>This would be a matter for the bus transport providers.</p> <p>Agreed. Comments passed to local highway authority, Kent County Council</p> <p>Paragraph 2.1 includes census data on ratio of cars to households.</p> <p>Comment noted.</p> <p>The background document LCWIP provides data on active travel trends.</p>
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	<p>electric scooters have been introduced with learnings in other parts of the world that might be helpful in Faversham.</p> <p>Pg 32 HGVs should not be allowed to access Faversham town centre via Lower West Street, as the road is constantly suffering from subsidence due to the sewers and water mains being damaged. ideally width restricters should be placed on Oare rd by Seager rd and Bysing wood rd by the Sainsburys roundabout.</p> <p>Pg 32 Tremendous to support for cycling - there will be more e-bikes in the future.</p> <p>Pg37 I wholeheartedly support the proposed policies. However, if they are to be achieved, other actions are required, e.g. in relation to critical road junctions (see comments below) and safe crossings of the A2 for cyclists, mobility scooters, etc. The current crossings in Ospringe and at the junction with the A251 Ashford Road are wildly insufficient, and the bridge to Abbey School totally impractical for pushchairs, bicycles, mobility scooters, etc.</p> <p>The focus on sustainable and active travel options is most welcome. Development gives an opportunity to improve the pedestrian and cycle links through Faversham. I should like to highlight the necessity of not just separating out cars and the rest but also separation of pedestrians and cyclists for their safety. This has implications for width of paths and pavements. The lack of safe places to cross the A2 between the Western Link and the A251 is concerning., especially given the increase in housing south of the A2. The bridge at Abbey School does not accommodate cycles, push chairs or disabled</p>	<p>Outside of the scope of the Neighbourhood Plan. Comments passed to local highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>Comments passed to local highway authority, Kent County Council.</p> <p>This falls outside of the scope of the Neighbourhood Plan. Comments passed to local highway authority, Kent County Council.</p>
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	<p>scooters. Siting electric charging points in bays, street furniture or lampposts should be a requirement for flats and terraced housing.</p> <p>Pg s 32-35 I am unhappy about the blanket application of '20s' plenty and think there should be a ring of roads around Faversham which are excluded to allow for free traffic flow. What about people who cannot walk far? Since the reduction in bus service through Ospringle to go to Sittingbourne/Canterbury. I have to walk 1/2 hour to the town centre for a bus.</p> <p>Support plan</p> <p>Pg 32 The neighbourhood plan does not specifically recognise or mention the possibility or effect of further development occurring on the Duchy of Cornwall land, south east of Faversham. Or the future of Brenley Corner roundabout, which should be considered with regards to any future upgrade on the efficiency of the road network and the effect it would have on travel between Boughton and Faversham.</p> <p>FAV4: Mobility and Sustainable Transport Point 1 - What does 'over-reliance' on cars mean? Is this too open to interpretation? Would it be more appropriate to set out a bedroom/car parking ratio? Perhaps the preamble to the policy should refer to Swale's Parking Standards SPD ?</p> <p>Point 4 – providing 'secure and covered storage for cycles and scooters' is not enough to make bikes and scooters convenient and easy to use. I suggest this is amended to 'Secure, covered and conveniently accessible storage for</p>	<p>'20s' plenty is referenced in the rationale to the policy. The policy takes a balanced approach to transport and would not be "a blanket application of '20s' plenty". Also, comments passed to local highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>This relates to a potential site allocation in the emerging Local Plan. The Neighbourhood Plan does not allocate the site. Comment passed to local planning authority.</p> <p>The term over reliance refers to the need to encourage more sustainable forms of transport and active travel. However, this could be open to interpretation, so sentence deleted from the interpretation in the interest of clarity. Sentence added to interpretation on Swale Borough Council, Parking Standards, April 2020.</p> <p>Policy amended as suggested.</p>
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	<p>I also suggest that a travel plan is a requirement of this policy, for sites above a certain threshold.</p> <p>Pg 32 New housing development should be less than 10 minutes walk from existing bus routes. Bus routes to surrounding villages need to be supported, with a bus service to Oare supported.</p> <p>Faversham's roads get quickly congested at busy times. Housing needs to recognise and plan for this.</p> <p>Need to consider developments and how we manage traffic. At present people have to drive just to get to shops eg wilko, savers, Lidl, Poundland, banks, etc</p> <p>Regarding the promotion of walking, cycling and the use of public transport. This is fine for those for whom walking is not a problem. But please consider these for whom walking has become difficult, very painful and exhausting. Not everyone has someone to push them around in a wheelchair. Indeed some physically disabled like to keep independent and do things for themselves, not relying on others. This group may use mobility scooters, so dropped kerbs, no obstructive bollards or metal barriers are helpful, while other use cars to park near shops, doctors surgeries, amenities so adequate car parking needs to be provided. In the effort to promote walking and cycling for the fit and healthy please do not forget the physically disabled in your review planning proposals. Traffic free is fine for the fit but prevents accessibility and therefore gives less freedom to those with walking problems.</p>	<p>The Neighbourhood Plan can't set submission requirements for travel plans.</p> <p>Site allocation criteria considered proximity to public transport. Service to Oare outside of the scope of the Neighbourhood Plan.</p> <p>Site allocation criteria considered road capacity. In addition, FAV5 recognises critical junctions.</p> <p>The Neighbourhood Plan supports a range of local facilities, reducing the need for car-based travel. Clearly the Plan cannot direct specific businesses to locate in Faversham.</p> <p>FAV4 and FAV10 both refer to considering the needs of people with different levels of mobility. Accessibility would also be addressed through Building Regulations. Comments passed to local highway authority, Kent County Council.</p>
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	<p>As some of the smaller car parks will be used for development we must ensure public transport is sustainable.</p> <p>Pg 33 and Pg 34 Both walking & cycling would be easier, especially for the elderly or less-abled, if the roads & pavements were better maintained. Use of personal cars should be actively discouraged within the town area & replaced by cheap & easily available electric taxis (perhaps owned & run by the council) where walking or cycling are not suitable. 20s plenty would benefit from more obvious road signage & more police enforcement.</p> <p>Support the principles</p> <p>W. extension of Partridge Lance Carpark. Very Awkward - could be developed.</p> <p>All Good</p> <p>Public transport has been badly hit since pandemic. It will encourage more car use.</p> <p>Pg 32 No mention of effect on roads and transport or upgrade of Brenley Corner Roundabout. The effect of more housing development on bus and train capacity; children's school buses. Unsuitability of A2 and Graveney Road for cycling to neighbouring villages; hilly, winding and narrow, fast traffic and HGVs.</p> <p>Better public transport is a must.</p>	<p>FAV1 protects named car parks. FAV4 promotes sustainable forms of transport and active travel.</p> <p>Comments noted and passed to local highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>There are no proposals to develop the car park.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>FAV5 deals with critical road junctions. Site allocation criteria took account of highway capacity.</p> <p>Comment noted.</p>
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		<p>Pg 37 As life long environmentalists we support this scheme, but question the costs to purchase electric vehicles and mobility scooters.</p> <p>Old people can't ride bikes.</p>	<p>Comment noted.</p> <p>The Plan is careful to avoid generalisations. FAV4 and FAV10 both refer to considering the needs of people with different levels of mobility.</p>
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	FAV5	<p>The A2/ A251/ The Mall junction might be better as a large roundabout with traffic light during rush hour</p> <p>Add: London Rd / Ospringe Rd / Water Lane; (confluence of built heritage, pedestrian/school safety and traffic growth) Mall/Forbes Rd; (traffic sight lines and busy schools route) Preston St/Stone St; South Rd/Napleton Rd;</p> <p>Faversham's roads are limited in capacity, ideally development should be car-free given the strength of the railway link to the town.</p> <p>Stop prioritising private cars. Cars are the problem - where they park and how they move about and what they are doing.</p> <p>Pg 38 Reduce the volume of traffic through the town. Enforce 20 limit.</p> <p>Pg 38 Agree</p> <p>Pg 37 Pg 38 Improvements to existing infrastructure should not be conditional to new development but an ongoing strategy to benefit the existing population for improved quality of living. Selling road/A2 junction at Macknade should be added. A policy to disallow any further new road junctions along the A2 should be adopted because it is already congested. Because Faversham has some 20,000 people all needing to use the A2 at some point to travel out of the area no development should</p>	<p>Comment noted and passed to Highways Authority, Kent County Council.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>FAV4 encourages sustainable modes of transport and active travel.</p> <p>FAV4 encourages sustainable modes of transport and active travel.</p> <p>Traffic management falls outside of the scope of the Neighbourhood Plan. Comment noted and passed to Highways Authority, Kent County Council.</p> <p>Comment noted.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p>
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	<p>be allowed making the existing use of this trunk road more difficult for them.</p> <p>Pg 38 Brilliant that this is incorporated into the plan as living in Faversham is great but getting in and out of the town can be a nightmare made impossible when the M2 is closed and the A2 takes the traffic.</p> <p>Pg38 This list of junctions, and the prospect of any actions arising from it, will not be taken seriously in the community if it does not also include a) the junction of Water Lane with the A2 / Watling Street in Ospringe, and b) the staggered junction of Abbeyfields, Whitstable Road and Jubilee Way. They are much more critical to the flow of traffic in the town than the majority of other junctions listed. Under what criteria were they omitted in the first place??</p> <p>Pg 38The Association notes that the Plan recognises the importance of the Quay Lane/Abbey Street/Church Street// Court Street junction which is not fit for purpose in its present configuration. Any proposal in relation to FAV 17,19,21 & 28 must pay regard to this unsatisfactory and dangerous road junction.</p> <p>Pg 38 I should add the Belvedere Road/Quay Lane junction which would become impacted by further development along Belvedere Road/</p> <p>Pg 38 The junction of Watling Street with Ospringe Road and Water Lane should be included as one of the critical junctions, for three reasons:</p>	<p>Comment noted.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>The AECOM Site Assessment report took account of highways access. FAV19 does address pedestrian access. FAV17, FAV23 and FAV28 have been merged into FAV16 which focuses on heritage-led regeneration. FAV4 deals with sustainable transport and active travel.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include</p>
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	<p>1. The conditions for pedestrians are significantly worse than anywhere else in the Town, and fall below the standards that might reasonably be expected by residents who are increasingly being urged to leave their cars at home. On the northern side, where children and parents heading for the primary school on Water Lane queue in order to cross, the footway is substandard: there is inadequate clearance between passing lorries and people waiting in the queue, who are exposed to high levels of noise and exhaust pollution.</p> <p>2. The A2 carriageway width is substandard at this point, so that heavy vehicles cannot pass in opposite directions at the same time: one usually has to stop, which causes braking and acceleration waves that increase the level of noise and atmospheric pollution.</p> <p>3. Vehicles turning in and out of Water Lane often block the A2 for significant periods because like the A2 itself, Water Lane is less than 2 lanes wide, and a vehicle cannot enter while one is waiting to leave.</p> <p>Clearly, conditions are unsatisfactory both for vehicles and pedestrians, and there is a case for</p> <p style="padding-left: 40px;">(a) widening the footways on the A2, and (b) introducing traffic signal controls that reduce road user 'conflicts' and improve the quality of vehicular traffic flow.</p> <p>Pg 38 Why are the junctions of Water Lane and Ospringe Road with the A2, Ospringe Street not on this list?</p> <p>No Comment. Support plan</p>	<p>the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Comment noted.</p>
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	<p>Pgs 36-38 Possibly the very worst junction in the town is not included. The junction at Water Lane, Ospringe/Ospringe Road/A2 is missing. The exit from Water Lane for school traffic is exceptionally difficult and dangerous.</p> <p>The junction at Abbeyfields/Whitstable Road/Jubilee estate should also be included.</p> <p>A critical junction that is missing from this list (and essential if any development on Water Lane is to go ahead) is the Water Lane/A2 junction. This is particularly important due to the existence of the Air Quality Management Area in Ospringe.</p> <p>Preston Avenue/Canterbury Road junction seems to be listed twice once as A2 Canterbury Road/Preston Avenue and once as Preston Avenue with Canterbury Road.</p> <p>Pg 38 West Street/Davington Hill/Dark Hill junction should be considered a critical junction - the junction isn't suitable for current levels of traffic</p> <p>Pg 38 The most critical of all junctions must be on the A2 through Ospringe where it is designated as an AQMA and in view of the ongoing concerns about Air Quality here this impinges on all aspects of growth in the Neighbourhood and Local Plans and sets practical limits on traffic flows through the town both east and west. This critical nature of the road junctions here at Ospringe, as well as the ultimate impossibility and also dangers of increasing the flow rate of</p>	<p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p>
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	<p>traffic through this pinch point on Watling Street objectively have significance for everything that influences traffic numbers on the A2 and the whole analysis of the Neighbourhood and Local Plans. Faversham cannot escape from its geographical and limiting road infrastructure that so primarily runs east-west/west-east.</p> <p>See FAV4</p> <p>Brenley corner, love lane and ashford road</p> <p>Pg 38 Add West Street - South Road - North Lane: has been a congested junction at times over the last year with traffic backing up to Flood Lane and Stonebridge Pond at times. And development that would result in extra traffic would impact on safety and capacity. Its a tricky junction at the best of times. Leslie Smith Drive - South Road,</p> <p>The aim should be to discourage any increase in vehicular traffic into the town centre area rather than altering junction layouts to cope with increased traffic. There is also a need for more pedestrian crossings, e g Solomons Lane/Newton road, Gatefield Lane/Newton Road.</p> <p>Pg 38 You have missed out Canterbury Road (AD) with junction of Selling Road (to Macknade). I walk to bus stop at Love Lane twice a week and this junction can be lethal as cars go to fast.</p>	<p>Comment previously addressed.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>FAV4 deals with sustainable transport and active travel. Traffic management falls outside of the scope of the Neighbourhood Plan. Comment noted and passed to Highways Authority, Kent County Council.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p>
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	<p>Quay Lane - Abbey Street, A2 - A251 the later will need improving for pedestrians.</p> <p>Quay Lane - road markings hopelessly inadequate and ignored. Abbeyfields/Whitstable Road - very dangerous. Pedestrian access to Tesco (by garage) very dangerous.</p> <p>Pg38 Add Whitstable Road/Abbeyfields? Jubilee Way Junction. Add Whitstable Road/Millfield Road/ Add London Road/Ospringe Road/Water Lane. Add Abbey Road/Abbey Street/Standard Quay Access/New Creek Road if additional development occurs e.g. Fentiman and Swan Quay.</p> <p>All good</p> <p>The junction with Abbey Fields and Whitstable Road is a death trap. Car parking along this section of the Whitstable Road must be restricted as a matter of urgency, before there is a serious accident. There should also be a proper pedestrian crossing at this point on the Whitstable Road to enable pedestrians to cross to and from Jubilee Way safely.</p> <p>Larger scale developments (such as the Duchy scheme) is only going to make the traffic situation worst.</p>	<p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Comment noted.</p> <p>FAV4 deals with sustainable transport and active travel. Traffic management falls outside of the scope of the Neighbourhood Plan. Comment noted and passed to Highways Authority, Kent County Council. Although specific issues with specific junctions have been identified in the representation they are not all evidenced in the PJA Faversham Critical Road Junctions report, May 2022. Policy amended to include the full, list from the PJA Faversham Critical Road Junctions report, May 2022, but to remove other junctions not evidenced.</p> <p>Comment noted. This appears to relate to a site in the emerging Local Plan.</p>
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		Pg38 Junction highlighted on page 38 cannot cope now (2023) with traffic levels, some worried that more housing will strangle town further.	Junctions with potential traffic problems were considered in the PJA Faversham Critical Road Junctions report, May 2022.
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	FAV6	<p>Footpaths and cycleways should be protected and extended. The footpath along Standard Quay south side should be restored in front of the newish houses. The waterfront should never be privately owned.</p> <p>Pg39 Support FCLT preapp re pedestrian, cycle and buggy access from the east (Wrinderme) through engine sheds land to the ramps and steps down to Fav Rec and via sidings development to Station Rd.</p> <p>Add 4. : Opportunities should be taken for footpaths, bridleways and cycleways to become corridors for wildlife as well as humans if appropriately planted</p> <p>Pg39 As a cyclist on an electric trike I agree cycle ways need improving and extending,</p> <p>Reinstate water front access, where privatised by developers.</p> <p>Pg39 Improve, maintain and make safe for mixed use. In a perfect world there would be separate cycle and pedestrian routes.</p> <p>Pg39 Agree</p> <p>Pg39 Faversham is unique in having hinterland close to the centre of its population this advantage could further be enhanced to improve quality of living by improving the routes and safety aspects of existing public footpaths. Speed limits should be introduced on country roads.</p>	<p>FAV6 provides protection for the existing network. FAV15 seeks to ensure public access to the waterfront in future development.</p> <p>This sounds like a specific infrastructure project. In general, FAV4 would support infrastructure projects to improve accessibility and connectivity. No change.</p> <p>Agreed. This could form the basis of enhancement projects, outside of the Neighbourhood Plan. Sentence added to interpretation on wildlife value of paths. FAV7 recognises the value of green and blue infrastructure.</p> <p>Comment noted.</p> <p>FAV15 seeks to ensure public access to the waterfront in future development.</p> <p>Sentence added to interpretation on enhancement.</p> <p>Comment noted.</p> <p>Enhancement is encouraged in FAV6. Speed limits fall outside of the scope of the Neighbourhood Plan. Comments noted and passed to local highway authority, Kent County Council.</p>
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		<p>Pg39 These all need to be kept well maintained so they can be used by all and various footpaths need to have a proper base to allow disabled / prams to use them at all times.</p> <p>Pg39 More bridleways to use bikes to access areas would be good news - good selection of footpaths but more would be even better.</p> <p>Pg39 There are two key points missing in the list of policies: first of all the need for more safe crossing points of the A2/Watling Street for pedestrians and cyclists, especially as housing developments multiply south of the A2. Improved crossing points on the A2 are vital too to improve pedestrian access to the Kent Downs Area of Outstanding Natural Beauty (which is hardly mentioned in the draft NP, incidentally) and for pedestrian links to the southeast of Faversham, where the Augustine Camino long-distance footpath provides access to the Blean woodland and Canterbury beyond. Secondly, there is no mention either in the draft NP of the potential for footpaths and bridleways to become corridors for wildlife as well as people. There are some that it may be hard to retrofit in that way, but certainly any new ones should be planned from the outset in such a way that they can have trees, shrubs and other vegetation planted along them so as to encourage wildlife and increase amenity value for the community.</p> <p>Setting the priority for allocation of developer contributions to provide and upgrade footpaths and bridleways is admirable. See FAV4</p> <p>Support plan</p>	<p>Comments noted and passed to local highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>Comments noted and passed to local highway authority, Kent County Council. Sentence added to interpretation on wildlife value of paths.</p> <p>Comment noted.</p> <p>Comment noted.</p>
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	<p>Pg 39 The roads between Boughton under Blean and Faversham are currently unsuited to cycling. This is due to width, HGV use on the Canterbury/London Road/A2, undesignated cycle lanes, winding and narrow rural road to Staplestreet Road, speed limits of 50 and over for part of the routes. Noting that there is also constraint in the A2 route at the pinch points over the railway over the Tin Bridge and at the railway bridge over Love Lane. It is suggested that any efforts to make the cycle/walking network better for active travel should be focused on attaining an improvement to the following: Footpath ZF28 from Love Lane which joins ZR496 to Homestall Lane. This may be a better strategic route for cyclists, avoiding traffic and using a quieter country road to connect Boughton under Blean and Faversham. Perhaps pressure could be brought to bear on developers Fernham Homes who suggest in planning application 21/506465/HYBRID that they would like to build a road part way along the present footpath, removing hedges. This seems the perfect opportunity to use S106 contributions to enhance the public doorway and to provide a cycleway alongside it using developer contributions. The plan should also take full account of the Parishes to Towns active travel project.</p> <p>Has any identification of new footpaths or links been undertaken? This could be a really useful piece of work, especially if the expectation is that these will be provided.</p> <p>Development should be avoided within 3m of a footpath edge, and not block views of open areas.</p> <p>Pg39 Rather than "Opportunities should be taken....." this should read "Efforts should be made....", i.e. a more proactive approach.</p>	<p>Comments noted and passed to local highway authority, Kent County Council.</p> <p>The LCWIP addresses new footpaths and links.</p> <p>FAV6 requires impacts on footpaths to be considered, rather than setting a minimum distance. No change.</p> <p>Current wording is clearer. No change.</p>
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		<p>Pg43 Development has encroached on footpaths and developer have put in temporary fences to keep people out. The Creek in particular does this .</p> <p>Chalk streams are not given sufficient prominence</p> <p>Flood lane, near gate to Morrisons frequently muddy, could be better managed.</p> <p>Pg39 Additional pedestrian crossings needed on A2. Plant new paths with native species on sides.</p> <p>All good</p> <p>Pg39 FA6.1 ZF28/ZR496 Love Lane to Homestall Lane - developer should be advised current plans to make part of the this footpath a pavement and road would contravene this policy - setting, amenity and safety. Perfect opportunity to make a cycle way too.</p> <p>Seems okay as long at they are not over developed.</p> <p>Pg39 No comment - difficult to achieve sage access for all of society.</p>	<p>FAV6 seeks to prevent this.</p> <p>This appears to relate to FAV7. Chalk streams now explicitly mentioned in FAV7.</p> <p>This is outside of the scope of the Neighbourhood Plan.</p> <p>Comments noted and passed to local highway authority, Kent County Council. Sentence added to interpretation on wildlife value of paths.</p> <p>Comment noted.</p> <p>This appears to relate to a potential site allocation in the emerging Local Plan. The Neighbourhood Plan does not allocate the site. Comment passed to local planning authority.</p> <p>Comment noted.</p> <p>Comment noted.</p>
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	FAV7	<p>Generally good policies</p> <p>Modify 1. to replace “and the Westbrook and Cooksditch Chalk Streams, and Thorn Creek” with "chalk streams including the Westbrook, Cooksditch and Thorn Creek".</p> <p>Whilst we support the principle of the policy, we object to the proposed requirement of “an overall net gain in biodiversity of 20%”.</p> <p>The 20% net-gain exceeds the minimum level of 10% that was included in the Environment Act 2021 and which will be a requirement from November 2023. The requirement for a minimum of 20% net gain is therefore contrary to the Environment Act 2021 and in consideration there is no adopted guidance, policy nor robust evidence which supports this position, this cannot be considered sound or justified.</p> <p>We also want to highlight the recent position of the Inspector (October 2022) when examining the Boughton & Dunkirk Neighbourhood Plan (also within the Swale administrative area) which confirmed that there is no proportionate evidence (provided by the Council) to support going over and above national policy (10%). We therefore request reference to 20% is deleted in part 2 of the proposed policy.</p> <p>Pg52 Green linear spaces, rear of Upper Brents and Springfield Road form a linear green space but is also possible development area, This should be enhanced and to extended to join to LGS/076 Fields at Upper Brents towards Faversham Creek. This land tends to flood near to the entrance to Upper Brents and is therefore unsuitable for housing. Enlarge this linear green space and extend,</p>	<p>Comment noted.</p> <p>Comment noted. Wording amended to include these features.</p> <p>Policy modified to require 20% BNG for greenfield sites and 10% BNG for brownfield sites.</p> <p>Policy modified to require 20% BNG for greenfield sites and 10% BNG for brownfield sites.</p> <p>Policy modified to require 20% BNG for greenfield sites and 10% BNG for brownfield sites.</p> <p>The area identified was considered to be of community value.</p>
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	<p>Big changes are coming and big bold actions are needed. More wind and solar farms.</p> <p>Pg51 Flood risk of increased development to be recognised and incorporated onto developments. Separate sewage and surface water. Will take change to improve drainage.</p> <p>Pg51 Agree</p> <p>Pgs 40-41 The existing Macknade Cricket is a natural asset with specimen 3rd generation trees that should be conserved as a protected area for cricket. The importance of land to the south of the A2 for the production of food should be recognised and protected from development.</p> <p>Pg51 No building should be allowed under any circumstances on the green areas around the town .</p> <p>Pg51 Point 1 : So agree. Point 2: Biodiversity again Yes! Trees and hedges must be retained and added to. Good point about the native spp.</p> <p>Pgs43-55 Generally speaking, I think this section is very strong. I particularly like the maps and the habitat corridors out into the surrounding landscape. The only question in my mind is about whether and how they will be enforced and the vision encapsulated in them (notably the links to the Swale Nature Recovery Network, Core Habitat and Recovery Zones) realised.</p>	<p>FAV14 deals with local renewable energy schemes. FAV10 deals with green design, including microgeneration.</p> <p>FAV8 deals with flooding and surface water. Sewerage would be dealt with under building regulations. Site allocations have taken account of flood risk. However, a sentence has been added to the interpretation of FAV15 based on Southern Water's suggestion.</p> <p>Comment noted.</p> <p>FAV7 provides protection for mature trees and has been amended to address local food production including the 'best and most versatile' agricultural land.</p> <p>The site allocations have been based on a brownfield first approach. Key green spaces with community value have been designated Local Green Space in FAV13.</p> <p>Comment noted.</p> <p>FAV7 sets requirements for development, avoiding adverse impacts. The Town Council will make representations on future planning applications to apply the policy and highlight any landscapes or other green features impacted.</p>
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	<p>Page 43, last paragraph: first two sentences need attention, probably with comma replacing full stop at the end of the first one. At the end of the same paragraph and on p45, it should be noted that under storm conditions untreated sewage is discharged from Faversham WWTW into the neighbouring chalk stream, Thorne Creek. Similarly, there is a CSO (Combined Sewage Outlet) off Cyprus Road in the town that discharges directly into another chalk stream -- Cooksditch -- under storm conditions. Urgent action is needed to stop discharges of untreated sewage into chalk streams under ANY conditions.</p> <p>Page 45: the paragraphs headed Natural and Priority Habitats in Faversham and Surrounding Landscape should include specific mention of the Kent Downs AONB. The AONB is under-represented altogether in this section of the draft NP.</p> <p>Page 51: relating to FAV7.1 ("Development must have no adverse impacts on green or blue infrastructure, including designated landscapes, nature recovery networks, habitat distinctiveness, wildlife and nature corridors, ecology, tidal marshes, and the Westbrook and Cooksditch chalk streams, and Thorn Creek") the finding by Aecom in the Habitats Regulations Assessment (para. 4.58) that the pollution of watercourses can be screened out as a possibility because "water quality protection measures must by law be introduced on any scheme that could affect the water quality of the river or coastal environment" simply beggars belief. That might be true for individual schemes, but does not take account of the aggregated impacts that will result from housing developments on the scale that we are now seeing around the town. The HRA also makes no mention of the nutrient neutrality rules governing the increase in nutrients</p>	<p>Suggested amendments made.</p> <p>The Kent Downs AONB is outside of the Neighbourhood Area.</p> <p>The SEA and HRA informed the content of FAV7 and other policies. Faversham is not within a nutrient neutrality area. Responses to climate change and creating climate resilient communities is a thread throughout the Neighbourhood Plan. This includes FAV7, FAV8, FAV10 and various area based and site allocation policies. The Plan explicitly recognises the need for flood risk to be fully considered, for example by avoiding habitable rooms at ground floor levels on certain sites.</p> <p>Clause 1 has been amended to include reference to the named the Chalk Streams.</p> <p>Clause 8 of FAV10 addresses intrusive, excessive or poorly designed lighting.</p>
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		<p>that will be carried into the Swale SPA/SAC/SSSI/Ramsar site from Faversham Creek as a result of increased housing development in Faversham, of the macroalgal mats that result from nutrient overloads and that have been observed in the Swale and Seasalter by the Zoological Society of London, or their impact on the ecology of the SPA/SAC/SSSI/Ramsar site. It is striking in this section that there is no mention whatsoever of the effects of climate change and rising sea levels, or of the potential for nature-based solutions to help mitigate their impacts on the town. Discussions under way between the Environment Agency and Swale Borough Council about raising sea defences along Faversham Creek within the next 10 years (see https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-001655-MEASS Technical Appendix E_BA7.pdf for details) would have enormous consequences for many of the actions proposed in the draft NP, especially developments along the Creek that are already vulnerable to flooding and rising sea levels. Finally, also regarding FAV7.1, I'd like to suggest rewording so that ALL the chalk streams in the parish are covered by this policy, thus: "Development must have no adverse impacts on green or blue infrastructure, including designated landscapes, nature recovery networks, habitat distinctiveness, wildlife and nature corridors, ecology, tidal marshes and all chalk streams in the parish, specifically the Westbrook and Cooksditch and the streams flowing into Thorn Creek from the Clapgate and School Farm springs." The Friends of the Westbrook are currently working to have all the Faversham chalk streams added to the national registry of chalk streams held by Natural England. Once that's done, it might be possible to refer to the registry instead of having to name each stream in the policy.</p>	
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	<p>The need to retain and enhance biodiversity and green infrastructure is well made, (see FAV 2 comments).</p> <p>The lack of reference to light pollution is of concern. Its impact on human health and wildlife is well documented. We have the GIST/Shepherd Neame/Goatham complex on the Western link in sight and the level of light pollution is on a scale to make the mark for Faversham on international maps. These premises are exempt from the rules for safety purposes but the disregard for unnecessary spillage seems blatant.</p> <p>With regard to retroactively placing restrictions on an allocated site, the purpose of Policy FAV7: Natural Environment and Landscape is understood but its use to restrict both ongoing and proposed development at Faversham Lakes is unacceptable. The policy is not acceptable and needs to be revised, with accompanying changes made to the supporting text and figures. This is an area where the general principle of strategic policy is supported and upheld, as confirmed by the pictures of flooding used to illustrate the section, but it is not for the policy to retroactively place designations upon land that is subject to an existing strategic allocation. It is particularly frustrating that the supporting text acknowledges the recreational and biodiversity conservation roles played by the new country park at Faversham Lakes at the same time as applying designations that would prevent the residential development that has created the circumstances in which the country park can be created. Part 1 of Policy FAV7 states that development must have no adverse impacts on green or blue infrastructure, provides examples of such infrastructure and points to Figures 10 to 13. It is taken as read that these figures illustrate the green and blue infrastructure where there can be no adverse impact from development, therefore imposing new designations on</p>	<p>FAV7 would not affect existing planning permissions. Nor would the policy compromise existing strategic site allocations. This and other policies, including FAV10, would seek to shape development, including development on strategic sites. The policy does not “retroactively place designations upon land that is subject to an existing strategic allocation”. The policy makes no designations. These are existing plans, prepared by Kent Wildlife Trust, and reflecting existing landscape designations and conditions.</p> <p>Duplicate plans deleted.</p>
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	<p>the scheme at Faversham Lakes is a cause of concern. The issues raised are:</p> <p>Figure 10: NEL1, Green and Blue Spaces of Faversham, Highlighting Terrestrial and Aquatic Corridors shows the southernmost part of Faversham Lakes as a “green space”, even though it is part of the former gravel works and comprises a former landfill site that is currently being remediated ahead of re-use for residential, community and recreation purposes; it is not existing green space and is not an area of green infrastructure that should be protected. Map 6.6.5 from the allocation in the adopted local plan confirms that there is no borough-level planning policy intention for the land to be used as green space within the redevelopment of the former gravel works. Furthermore, immediately to the north of the incorrect annotation as green space, and within the land where new homes are currently being constructed, land is shown as both “green linear features” and “blue linear features” even though no such features exist. They too are missing from Map 6.6.5 and are not included in the scheme that has been granted planning permission. Figure 11: NEL2, Natural Habitats of Faversham and Surrounding Landscape shows the western side of the residential scheme at Faversham Lakes (currently under construction) as “woodland” and the land to the south (landfill site being remediated) as “neutral grassland”. Neither existed when the site was used as a gravel works and they do not exist now, nor do they form part of the allocation in the local plan or the scheme approved through the planning permission for redevelopment of the site. Figure 12: NEL3 Habitat Corridors Linking Faversham to Swale Recovery Network indicates a “principle habitat corridor” running through the retained lakes on the western side of the residential scheme that is currently under construction. The lakes will remain open and</p>	<p>Where possible maps have been amended and updated for clarity. However, where an external source such as Kent Wildlife Trust has provided the mapping data we are unable to amend.</p>
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	<p>undeveloped in perpetuity, but the designation beneath it as “Swale core habitat zone” and “Swale recovery zone” are not reflected by the approved scheme for the site and do not exist. Figure 13: NEL 4 Priority Habitats for Protection in Faversham and Surrounding Landscape is a difficult plan to read and should be revised to make it legible, but it appears to show that the majority of the residential element of Faversham Lakes is designated as “medium distinctiveness habitat” with an element of “high distinctiveness habitat” towards the north. Neither habitat exists and they are not secured by the planning permission, therefore it is not appropriate to apply the designation to land in residential use. These plans should be revised to reflect the status of the land at Faversham Lakes, removing the incorrect and non-existent designations that have been applied to them, as described above. If this change is made, there is no need to alter the text of Policy FAV7 because it will not point to non-existent green and blue infrastructure. The purpose of status of Figures 6 to 9 also requires clarification: they replicate Figures 10 to 13 that are referenced by Policy FAV7 (albeit in a different order) and are set in the supporting text with different titles, but are not mentioned by the text and do not appear to serve any function. They present the same incorrect assessment of the site at Faversham Lakes; they should be omitted from the neighbourhood plan.</p> <p>Support Plan</p> <p>Pgs 51-55 Habitat corridor maps omit two major routes for wildlife and don't seem be based on observations. The main route for waders and passerines from Thorn Creek is across the farmland north of Ham Road Farm buildings to Oare Marshes and Castle Coote. Wildfowl and waders cross the</p>	<p>Comment noted.</p> <p>Where possible maps have been amended and updated for clarity. However, where an external source such as Kent Wildlife Trust has provided the mapping data we are unable to amend.</p>
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	<p>fields south of the farm buildings to the gravel pits off Ham Road. Most bird movement is east-west or west-east across the open fields rather than the more tortuous routes the maps suggest. There appears to be no recognition of the importance of arable farmland to local biodiversity. Much of the farmland within the parish has already been lost, and farmland bird species are the most threatened. There is no recognition of the impact on bird life with the loss of a large swathe of farmland under the forthcoming solar plant across from protected area to the north of the parish. Both Abbeyfields and the land to the south of Ham Road farm support important numbers of Red Listed Yellowhammer. The Abbeyfields area is one of the few remaining sites for Turtle Dove. ThThe Southern half of Ham Road Farm supports Red Listed Yellow Wagtail and Skylark in significant numbers, as well as providing winter roosting sites for Lapwing (a priority species) and summer feeding for Corn Bunting (again a priority species). Ham Road farm is one of the few areas within the parish where Hare can still occasionally be seen. Sparrowhawk, Buzzard and Kestrel regularly roost in the Old Goat pen area behind Upper Brents, and the field margins provide a corridor for Foxes, Rabbits hedgehogs and reptiles linking with Ham Road Pits.</p> <p>Page 45 - Typo – ‘the Knole’ should be ‘The Knole’</p> <p>Page 45 - What is meant by ‘the priority habitats proposed for protection’? Priority habitats aren’t mentioned as such in FAV7.</p> <p>Page 45 – Typo – ‘axes’ probably should be ‘foxes’? I think Figures 6, 7, 8, 9 are repeated at Figures 10, 11, 12, 13</p>	<p>Clause added to FAV7 to include ‘best and most versatile agricultural land’. Regarding bird life, clause 1 includes habitats. Priority Habitats referenced in planning rationale.</p> <p>Amendment made.</p> <p>Planning rationale amended for clarity.</p> <p>Amendment made and duplicated plans removed.</p>
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	<p>Is the Neighbourhood Plan clear enough on what it means by designated landscapes, nature recovery networks and habitat distinctiveness, etc as set out in this policy. Does it show clearly where the Westbrook, Cooksditch and Thorn Creek are? If these elements are to be referred to in policy I think what they are needs to be clearly set out. The Design Code which accompanies the draft Neighbourhood Plan classifies biodiversity/nature conservation sites as landscape designations, but does not include local landscape designations within the definition. This potential confusion, for instance as to what comprises a landscape designation and what a biodiversity designation/nature conservation site needs to be clarified in the NHP.</p> <p>I would suggest that this policy should be amended to make sure that any 'habitat banking systems' ensures that net gains are kept as local to the site as possible. Some habitat banking systems use credits in other parts of the county/country or even world and this should be avoided.</p> <p>It's probably worth mentioning that net gain should be approached using the Defra metric and also that KCC/Kent Nature Partnership now have a Biodiversity Net Gain Officer who may be able to assist deliver net gain in or near Faversham. It's probably also worth mentioning KCC's 'Viability Assessment of Biodiversity Net Gain in Kent' by SQW https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf</p> <p>Do we want to hear bird song in the future? The way plans are going there will not be any.</p>	<p>The maps included in the rationale identify various landscape designations and other features. Plan added to show the creeks and streams listed in FAV7.</p> <p>The AECOM Design Code is an evidence document rather than forming part of the Plan.</p> <p>The policy can only consider impacts and remediation within the Neighbourhood Area. Development that caused harm and sought to balance this through habitat banking would fail to comply with the policy.</p> <p>Use of the DEFRA metric would make sense. The Neighbourhood Plan does not seek to apply its own metric.</p> <p>FAV7 includes habitat protection.</p>
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	<p>Pg51-55 Habitat corridor maps omit two major routes for wildlife and don't seem to be based on observations. The main route for waders and passerines from Thorn Creek is across the farmland north of Ham Road Farm buildings to Oare Marshes and Castle Coote. Wildfowl and waders cross the fields south of the farm buildings to the gravel pits off Ham Road. Most bird movement is east-west or west-east across the open fields rather than the more tortuous routes the maps suggest.</p> <p>There appears to be no recognition of the importance of arable farmland to local biodiversity. Much of the farmland within the parish has already been lost, and farmland bird species are the most threatened. There is no recognition of the impact on bird life with the loss of a large swathe of farmland under the forthcoming solar plant across from protected area to the north of the parish. Both Abbeyfields and the land to the south of Ham Road farm support important numbers of Red Listed Yellowhammer. The Abbeyfields area is one of the few remaining sites for Turtle Dove. The Southern half of Ham Road Farm supports Red Listed Yellow Wagtail and Skylark in significant numbers, as well as providing winter roosting sites for Lapwing (a priority species) and summer feeding for Corn Bunting (again a priority species). Ham Road farm is one of the few areas within the parish where Hare can still occasionally be seen. Buzzard and Kestrel regularly roost in the Old Goat pen area behind Upper Brents, and the field margins provide a corridor for Foxes, Rabbits hedgehogs and reptiles linking with Ham Road Pits.</p>	<p>Where possible maps have been amended and updated for clarity. However, where an external source such as Kent Wildlife Trust has provided the mapping data we are unable to amend.</p> <p>FAV7 amended to include 'best and most versatile' agricultural land.</p> <p>Where possible maps have been amended and updated for clarity. However, where an external source such as Kent Wildlife Trust has provided the mapping data we are unable to amend.</p>
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	<p>Loss of further farmland will significantly impact the Town's biodiversity yet the plan does nothing to address this issue. The rural nature of the town and wildlife brings in visitors which helps the local economy. The threat to the town's economy through continued urbanisation isn't properly considered.</p> <p>AS many trees, hedges should retained and plenty of new trees is welcomed. Vital in preserving biodiversity.</p> <p>Pgs 40-50 I was interested to read about the habit corridors and see the maps provided p46-49. An incidental comment, I have left gaps between my end fence post and garage on one side and my end fence post and the next door neighbours for the foxes to come through to cross the of my garden as it seems an axis for their movement across the estate.</p> <p>Pg43 Why were developers allowed to build at the edge of the creek when it floods - you are doing the opposite of what you say in the plan. When you give developers the green light, why don't you tell them to put in small/medium water treatment plant in consultation with water company.</p> <p>Pg51 Extend what is said 7.1 to include all Chalk Streams in the parish.</p> <p>All good</p> <p>Pg45 No acknowledgement of farmland surrounding Faversham Town being best and most versatile grade 1-3 agriculture land and therefore some of the rarest farmland and fruit belt in the UK - should be protected and recognised as heritage asset.</p>	<p>FAV7 amended to include 'best and most versatile' agricultural land.</p> <p>FAV7 includes tree protection.</p> <p>Comment noted. A nice example of how wildlife can be supported in a domestic context.</p> <p>Flood risk is addressed in FAV8 and various site allocation policies. Infrastructure is a matter for the utility provider.</p> <p>Clause 1 amended to make reference to chalk streams in general and to highlight key chalk streams.</p> <p>Comment noted.</p> <p>FAV7 amended to include 'best and most versatile' agricultural land and fruit orchards.</p>
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		Pg51 Agree	Comment noted.
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	FAV8	<p>Great care should be taken when building near flood prone areas to keep buildings well clear of possible flooding</p> <p>Add 5. Developments should have no significant adverse impact on water quality in the Creek and chalk streams due to discharge of untreated or partially treated wastewater.</p> <p>Add 6. :Plans by the Environment Agency to raise sea defences along Faversham Creek by 2035 must be taken into consideration for all Creekside developments.</p> <p>As a town with lots of under ground water it is important not to build on anymore open fields ,an example of poor planning permission can be seen on the new houses that built along the Ashford road the Perry court housing estate,where when we have a lot of rain the rain runs of from the estate on to the Ashford Road causing excessive surface water and of course ice when cold ,this is just an accident waiting to happen.</p> <p>Stop dredging rivers. Fine farmers for polluting rivers. Stop urban sprawls. We need to build high density in town,</p> <p>Pg56 Flood risk of increased development to be recognised and incorporated onto developments. Separate sewage and surface water. Will take change to improve drainage.</p> <p>Pg56 Agree</p>	<p>This issue is addressed in FAV8 and various site allocation policies. Flood risk was also considered as part of the site selection criteria.</p> <p>FAV15 requires development to have no adverse impact on water quality in Faversham Creek. FAV7 deals with impact on chalk streams. Wider environmental legislation would deal with unauthorised discharge. FAV15 and all relevant site-specific policies have had their interpretations updated to advise early engagement with the Environment Agency for a site-specific response.</p> <p>FAV8 deals with surface water flooding and flood risk was also considered as part of the site selection criteria.</p> <p>River dredging and agricultural pollution fall outside of the scope of the Neighbourhood Plan. The Plan focuses on regeneration of brownfield sites and seeks to protect sensitive landscapes. Development within existing built areas should be designed to complement the density and other characteristics of the context.</p> <p>This issue is addressed in FAV8 and various site allocation policies. Flood risk was also considered as part of the site selection criteria. Sewerage infrastructure is a matter for the utility provider. Sewers in development would be dealt with under building regulations.</p> <p>Comment noted.</p>
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	<p>No Additional comment</p> <p>Pg56 Unsuitable housing prone to flooding already allowed has failed to sell in the present market, see picture on p43. This is very important issue for future building in creek area of Faversham.</p> <p>Pg56, As flagged above (under FAV7), discussions under way between the Environment Agency and Swale Borough Council about raising sea defences along Faversham Creek within the next 10 years (see https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010085/EN010085-001655-MEASS Technical Appendix E_BA7.pdf for details) would have enormous consequences for many of the actions proposed in the draft NP, especially developments along the Creek that are already vulnerable to flooding and rising sea levels. Those discussions do not seem to be reflected in the draft plan as it stands.</p> <p>Pg56 Development in areas prone to flooding to be discouraged. Flooding will become worse and houses regularly flooded will become uninhabitable.</p> <p>The requirement of sustainable drainage with separation of surface water from sewage is essential. This will not mitigate the additional load of sewage for processing.</p> <p>So vital to have water management especially surface water separate from sewage.</p> <p>Pg56 Why are we seeing North Lane Flooding more often? This needs to be remedied urgently.</p>	<p>No comment noted.</p> <p>Comment noted. FAV8 deals with surface water flooding and flood risk was also considered as part of the site selection criteria.</p> <p>The Neighbourhood Plan cannot predict or pre-empt the outcome of discussions between the Environment Agency and Swale Borough Council. FAV15 and all relevant site-specific policies have had their interpretations updated to advise early engagement with the Environment Agency for a site-specific response.</p> <p>This issue is addressed in FAV8 and various site allocation policies. Flood risk was also considered as part of the site selection criteria.</p> <p>Sewerage infrastructure is a matter for the utility provider. Sewers in development would be dealt with under building regulations.</p> <p>Comment noted.</p> <p>Comment passed to Swale Borough Council.</p>
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	<p>outflow point should be moved further downstream into The Swale, at the same time as the treatment works is expanded or improved.</p> <ul style="list-style-type: none"> • The new garden villages proposed south of Faversham will be equipped with their own local wastewater treatment facilities. However, the treated effluent from these works will require disposal. This can either be done locally if there is a water course able to receive the flows, and which if locally dispersed will require a higher level of treatment, or they will be transferred by trunk sewer to Faversham thus utilising any remaining spare hydraulic capacity at the works. • Faversham still contains a number of mediaeval and later storm overflows. These should be closed off or improved to modern standards. • Faversham Wastewater treatment works is used to treat tankered sewage from cess pools and from other sources. This is currently delivered to a pumping station close to the works in a narrow residential street where over 50 tankers travel on some days. There is opportunity to create a remote tanker discharge point with the development around the town and the building of new sewers. • Flows to the works from new developments can be mitigated by making sure that all new developments include for the latest SUDS enhancements and separation of foul and storm water systems. • Climate change will create more significant rainfall events which will increase the stress on the works and the run off into The Creek. Such changes should be anticipated and designed into the works and the sewers. <p>Sewerage and flooding</p> <ul style="list-style-type: none"> • Local accounts of flooding caused by sewerage does not accord with the records held by Southern Water (not yet 	<p>Sewerage infrastructure is a matter for the utility provider. Sewers in development would be dealt with under building regulations. Comment passed to the utility provider.</p>
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	<p>authenticated). Sewer flooding is unacceptable and should be remedied by Southern Water.</p> <ul style="list-style-type: none"> • Southern Water and Swale BC, who are responsible for the highway drainage, will be held to account for future flooding. • New developments will increase the flows into the town centre and to the works. Such increases need to be accommodated in new trunk sewers. • Sewer flooding could become a blight upon Faversham. The risk of the combined effect of pluvial flooding from over-loaded sewers unable to discharge due to high tides increases with climate change. This poses a very real risk to the Creek side developments, existing and planned. The risk of increased frequency of high rainfall is increasing, and the risk of higher frequency of extreme tides is increasing. At present sewer capacity is insufficient for the town as it is with bottlenecks in several places. Combined sewer overflows are inadequate and ancient. • Faversham is at risk of tidal flooding, with many instances of the lower part of the town being impassable due to flooding. This occurs now at times of spring tides coupled with any degree of North Sea surge. With increased climate change, increasing events including North Sea storms, rising sea levels and the secular trend of the south east sinking relative to the UK, the standard of defence in terms of levels of protection is decreasing. This will require improvements unless Faversham is to be designated as high risk. • TS Hazard, a listed building is at great risk of flooding damage. Flood water has already reached it on two occasions in 2020, whilst at the same time causing flooding to the area around Town Green. • When heavy rain occurs at the same time as high tides, more of town floods at the present time. As described 	<p>FAV15 and all relevant site-specific policies have had their interpretations updated to advise early engagement with the Environment Agency for a site-specific response. A sentence has been added to the interpretation of FAV15 based on Southern Water's suggestion.</p>
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	<p>above, this will happen more frequently causing major disruption to the town. Investment will be required to mitigate these effects.</p> <p>Pg56 Site Assessments seem to be based on current flood risk not projected flood risk in the near future - for example FNP14 suggests the southern most part of the future - for example FNP14 suggests the southern most part of the "site is at low risk of fluvial/tidal flooding." yet most predictions show the South Eastern corner at significant risk within the next 40 years: https://coastal.climatecentral.org/map/17/0.8904/51.3218/?theme=sea_level_rise&map_type=year&basemap=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2060&pathway=ssp3rcp70&percentile=p50&refresh=true&return_level=return_level_1&rl_model=gtsr&slr_model=ipcc_2021_med</p> <p>Currently the farmland acts as a water store for heavy rain, slowing the release into the creek. The south eastern corner is already subject to significant surface water flooding, particularly over winter. Any development of the land risks increasing this surface flooding.</p> <p>The preamble and wording of FAV 8 seems a little unclear. Eg what does 'development must have no significant adverse impact on risk of flooding' actually mean? The policy should set out the requirements to carry out Flood Risk Assessments and (whether in the preamble or the policy itself) national policy on flood risk. The preamble to the policy should explain the context of the Environment Agency's Medway Estuary and Swale Strategy and consider requiring development (particularly that at flood risk) to contribute to flood risk infrastructure, in consultation with the Environment Agency.</p>	<p>Comment noted. This is clearly a very valid concern. The flood risk mapping data is taken from the Environment Agency. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space. Any change to Environment Agency data could inform a future review of the Neighbourhood Plan. FAV7 has been amended to protect the 'best and most versatile' agricultural land.</p> <p>The Neighbourhood Plan cannot set submission requirements. This is for national policy and guidance and also the local authority's validation criteria. National policy and guidance would also inform the application of the policy. The interpretations to FAV15 and relevant site allocation policies have been amended to encourage early engagement with the Environment Agency. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space.</p>
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	<p>(This would need to be done as part of a viability assessment and in consultation with the EA)</p> <p>https://www.gov.uk/government/publications/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy/medway-estuary-and-swale-flood-and-coastal-risk-management-strategy</p> <p>Pg56 Site Assessments seem to be based on current flood risk not projected flood risk in the near future - for example FNP14 suggests the southern most part of the "site is at low risk of fluvial/tidal flooding." yet most predictions show the South Eastern corner at significant risk within the next 40 years:</p> <p>https://coastal.climatecentral.org/map/17/0.8904/51.3218/?theme=sea_level_rise&map_type=year&basemap=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2060&pathway=ssp3rcp70&percentile=p50&refresh=true&return_level=return_level_1&rl_model=gtsr&slr_model=ipcc_2021_med</p> <p>Currently the farmland acts as a water store for heavy rain, slowing the release into the creek. The south eastern corner is already subject to significant surface water flooding, particularly over winter. Any development of the land risks increasing this surface flooding.</p> <p>Pg5 Please see my comments on Flood defence under general comments.</p> <p>Pgs 44 and 56 Southern Water strongly supports all policy requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. This aligns with our own work to address problems caused by</p>	<p>Comment noted. This is clearly a very valid concern. The flood risk mapping data is taken from the Environment Agency. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space. Any change to Environment Agency data could inform a future review of the Neighbourhood Plan. FAV7 has been amended to protect the 'best and most versatile' agricultural land.</p> <p>Previous comments taken into account.</p> <p>Comment noted. Suggested additional text added to rationale. A sentence has been added to the interpretation of FAV15 based on Southern Water's suggestion.</p>
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	<p>excess surface water in our sewerage network in order to protect water quality in rivers and sea. For more information please see – https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force and https://www.southernwater.co.uk/media/7459/stormoverflows_faq.pdf).</p> <p>Whilst some parts of the sewer network were historically designed to accommodate surface water along with foul flows (the ‘combined’ sewer), in terms of future flood risk, better rainwater management through SuDS is the preferred approach to helping mitigate flood risk and avoid placing additional pressure on drainage networks during heavy rainfall. With this in mind, we would also like to propose the following change to the 1st paragraph at the top of page 44 of the NP: “It is therefore critical to protecting and safeguarding the blue infrastructure, that development does not simply increase the area of impermeable surfaces, thereby increasing surface water run-off to the combined sewer network. Green infrastructure and sustainable drainage measures that slow the flow are increasingly important with the impacts climate change is expected to bring into the future.”</p> <p>Too much building and no provision for flooding. A2 floods along from ashford road to live lane regularly when we have downpours</p> <p>What provision is being made to enlarge and update the town's water treatment centre? Surely this must be financed by any development company.</p>	<p>Comment noted. FAV8 deals with surface water flooding and flood risk was also considered as part of the site selection criteria.</p> <p>Question passed to the utility provider. Given the small-scale of sites allocated in the Neighbourhood Plan it would be unreasonable to expect significant financial contributions to major water treatment infrastructure. In addition, this would be likely to make some or all of the sites unviable.</p>
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	<p>Pg56 Until the Faversham WTW is upgraded so that it can keep up with the increased levels of surface water & sewage from the massive increase in housing developments, then all such developments should cease. Long term, should it not be possible to divert excess surface water into a separate holding system rather than allowing it to overwhelm the WTW. If this water was not suitable for drinking without uneconomical treatment, it could be used for washing cars, watering gardens, flushing toilets & other non critical uses,</p> <p>Pgs 52,53,54,55,56 These maps are repeated on pages 46, 47, 48, 49 - why? Again why allow developers to build anywhere in a flood area?</p> <p>Forbes Road, Whitstable Road, Church Road and many other places suffer from clogged drains and more maintenance by Southern Water. Sewage?/water on pavement by Abbeyfield/Crescent Road. It is incomprehensible that residential permission was ever given for the SECOS site "we told you so". I am glad you include photos of the tidal flooding during construction. All bar one of the houses remain unsold. Tidal flooding is predicted to increase and sites such as Ordance Wharf, BMM Weston Car Park and parts of Belvedere Road (including the sail loft and open barn) remain at high risk and should not be allocated to housing.</p> <p>Pg56 Improve sewage discharges i.e. eliminate, take steps to ensure new development don't impact on water quality.</p>	<p>The suggested moratorium on all development would be unlawful. FAV8 deals with surface water. FAV10 deals with green design, including grey water recycling.</p> <p>Duplicate plans deleted. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space.</p> <p>Comment passed to utility provider and Swale Borough Council. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space.</p> <p>Comment on sewerage passed to utility provider. Impacts of new development on water quality is addressed in FAV15.</p>
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		<p>All good</p> <p>Pg56 FAV 8: 4 - Does this mean that drives on new builds should be semi-permeable in composition. 605 of new developments are typically non-permeable to water, concrete, tarmac, tiles etc.</p> <p>Just plain silly to build more and more houses in areas prone to flooding/flood plains. Avoid.</p> <p>Pg56 As children we traumatised by being in the devastating floods of 1953 and subsequent 1978, this is one of our biggest fears. Please do not allow building on or near flood plains etc.</p> <p>How are you going to stop the creek overtopping by Sheps?</p>	<p>Comment noted.</p> <p>FAV8 deals with permeable hard surfaces.</p> <p>The Neighbourhood Plan has had to take account of national policy and guidance on flood risk. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space.</p> <p>The Neighbourhood Plan has had to take account of national policy and guidance on flood risk. Any site allocations within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. This also requires that ground floor uses must not be vulnerable uses, such as habitable space.</p> <p>Flood management would be the responsibility of the Environment Agency.</p>
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	FAV9	<p>Policies fine</p> <p>Please see response to the General Comments section in respect of missing an opportunity to address the current air quality issues in Ospringe.</p> <p>The amount of traffic passing through Ospringe now is a major concern for air quality, Faversham only has one way in and one way out and that is through Ospringe.</p> <p>Penalise all cars. Electric cars are not the solution. they create pollution when they are produced and powered and the particulate damage from their tyres is not good.</p> <p>Pg57 Traffic management to reduce pollution and improve air quality</p> <p>Pg57 Agree</p> <p>Pgs44-57 The increasing traffic and therefore pollution and noise from the M2 with much blowing towards Faversham is of huge ongoing concern that requires regular monitoring as a policy with no development allowed as a policy that endangers or puts at risk the health of any residents to the area either now or seems probable in the future.</p> <p>Pg57 Tree planting will only help mitigate etc. too much extra development will just mean more cars on the roads and A2 in particular.</p> <p>The requirement of tree planting to compensate for additional car journeys is welcomed. (See FAV2)</p>	<p>Comment noted.</p> <p>Previous comments have been taken into account.</p> <p>Comment noted. FAV9 addresses the A2 AQMA. FAV5 deals with critical road junctions.</p> <p>This falls outside of the scope of the Neighbourhood Plan. Electrical charging points are now a requirement of building regulations.</p> <p>Comment passed to highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>Comment noted. FAV9 addresses the A2 AQMA. FAV5 deals with critical road junctions.</p> <p>Tree planting is addressed in FAV7, FAV9 and FAV10. The Neighbourhood Plan allocates small and medium sites only. FAV9 addresses the A2 AQMA. FAV5 deals with critical road junctions.</p> <p>Comment noted.</p>
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	<p>Anything to reduce the pollution on the A2 is welcomed, including a 20 mph limit and more pedestrian crossings, which may deter some HGVs. This will do nothing to reduce congestion, which can only increase with developments as they are planned. I assume a clean air zone as they have in Bath, charging or otherwise, is not possible.</p> <p>Support Plan</p> <p>Pg 57 Developments increasing traffic past Davington Primary school and along West Street will have a negative impact on air quality in these already congested areas.</p> <p>FAV8 and FAV9 Air Quality I'm not sure why you have policies on Flooding and Surface Water and Air Quality and yet you do not have a policy on Water Quality which is identified as a key issue. Water efficiency targets could also be included within policy (eg as in adopted Swale Local Plan).</p> <p>Is appalling</p> <p>Pg57 Developments increasing traffic past Davington Primary school and along West Street will have a negative impact on air quality in these already congested areas.</p> <p>Pg 57 n nearly all of the reports from Kent Air the pollution levels recorded at Ospringe are categorised as LOW. I think there is ongoing complacency and disregard there from politics, and from SBC acting for local democracy, along with the belief that the situation only gets better with time, which hopefully will be true for nitrogen dioxide. But this is not</p>	<p>Comment passed to highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>There are no sites allocated within close proximity to Davington Primary School or making access onto West Street. Comment passed to highway authority, Kent County Council.</p> <p>Water quality is addressed in FAV15.</p> <p>Meaning of comment unclear. FAV9 seeks to address air quality.</p> <p>There are no sites allocated within close proximity to Davington Primary School or making access onto West Street. Comment passed to highway authority, Kent County Council.</p> <p>Comment noted and passed to Kent Air and Swale Borough Council.</p>
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		<p>necessarily the case concerning particulates. And these levels of pollution even if they cannot be challenged legally must still be of considerable health concerns over time for those regularly exposed to them. They do exist at the moment and have done throughout the planning process of recent times!</p> <p><<< This is a note sent to Faversham Town Council, and to members of the Faversham Society Environment Committee and other interested parties with strong concerns about traffic congestion and air quality at the AQMA on the A2 through Ospringe, along with accompanying evidence: "Just a quick note on Air Quality. The attached compare the automatic monitor data from Kent Air for Maidstone Rural (effectively a 'control' for the county, but only an ideal with which to compare worse case examples) with Ospringe and the worst location in Kent, which must be Upper Stone Street in Maidstone. I've had to compress and expand the graphs on the vertical axis to make them properly comparable, and copy and paste, and it's difficult to make them any clearer just quickly playing with this on the computer. But you can see that Ospringe, whilst not as seriously polluted as Upper Stone Street, does show similar peaks of Nitrogen Dioxide (in 'blue'), just not quite so relentless across the day. What you can also see is the PM10 particulate pollution (in the 'black') is often significantly worse at Ospringe than in Upper Stone Street, with the implication that the same will be true of the more dangerous PM2.5 particulates that are not measured. These are measured in Upper Stone Street (shown in 'green') and there look to be as high or higher than PM10 measures, so must be significant - probably worse - here at Ospringe as well by implication. It's worth noting that if the Automatic Monitor had been placed adjacent to the Mount, where diffusion tubes have consistently shown much higher pollution than even in the lower part of the street (no doubt due to engines</p>	
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	<p>labouring up the hill) then these records for Ospringe would most likely be comparable with Upper Stone Street in severity for nitrogen dioxide, and with higher absolute peaks." >>></p> <p>The impacts of future development in Faversham, in both Neighbourhood and Local Plan analyses should more seriously take into account the fundamental concentration of traffic implied on this major road, the A2 (Watling Street), running directly east-west/west-east through the town and with the very limited, if any, ability to mitigate impacts of congestion and pollution at the AQMA, which has the most seriously compromised air quality of anywhere in the town, and is the gateway and entrance to Faversham from the west. For the significant number of individuals directly affected, which includes schoolchildren walking to Abbey School and the Ospringe Primary School along the A2 every day, there are important health concerns resulting from the freedoms that others have to add to pressures on traffic passing through the AQMA. Arguably this remains, and should remain, one of the most limiting factors on significant growth of the town.</p> <p>Need to reduce need to drive in and around faversham. Provide shops and banks that people need</p> <p>Pg57 What measures have Swale Borough Council taken to address the air quality issue in the A2 corridor? Also see comments for FAV4 & FAV5. New developments should be served by public transport, perhaps in the form of minibuses to reduce the number of car journeys.</p> <p>Electrification of vehicles will help but brake etc pollution still a factor.</p>	<p>Site allocations in the Neighbourhood Plan took account of access and road capacity. Site allocations are focused on regeneration of brownfield sites. FAV5 deals with critical road junctions. FAV9 deals with air quality. Comments passed to highways authority Kent County Council and Swale Borough Council.</p> <p>FAV4 and FAV10 deal with active travel and sustainable transport. FAV1 seeks to enhance the vitality of the town centre.</p> <p>Question passed to Swale Borough Council. Previous comments on FAV4 and FAV5 have been taken into account.</p> <p>Comment noted.</p>
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	<p>Noticeable diesel fumes at many places at rush hour.</p> <p>All good</p> <p>Pg57 Fav 9 1: Should give consideration to installation of wood burning stoves, impact on air quality. Domestic wood burning is the single biggest source of small particle air pollution in the UK, exceeding road traffic.</p> <p>Air quality going down due to growth of housing. Improve public transport so people do not need to use cars might help. Also more trees.</p> <p>Pg57 Again we have first hand experience of this. We had to move in 1979 from our home on the A2 in Ospringle because of our child's asthma. Within a few months of living in Davington this improved.</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. This is outside of the scope of the Neighbourhood Plan.</p> <p>Comment noted. FAV4 seeks to promote sustainable transport and active travel. Trees are addressed in FAV7, FAV9 and FAV10.</p> <p>Comment noted.</p>
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	<p>FAV10</p> <p>All new building should be of the highest insulation possible with installation of solar panels and heat pumps as standard</p> <p>Re use and stop out of town urban sprawl. All these expensive homes need cars etc.</p> <p>Pg61 Access for cycling too! Transit through areas and integrated routes.</p> <p>Pg61 Agree</p> <p>Pg61 All vital to state - no specific mention of use of roofs to carry solar panels but implied in general environmentally sustainable standards.</p> <p>Pg61 Despite all the rhetoric about sustainability elsewhere in this section, the actual policies proposed here are very weak. Use of the green design features listed on p62 should be mandatory, not optional.</p> <p>It is beyond my comprehension how the designs of some of the recent developments have passed muster. In particular those houses to the west of the Western link where the choice of brick, density and repetitious box-like design make them look like the worst kind of prison or barracks – a real abomination. Might an independent panel of lay people and experts scrutinise and vet design proposals before they blight</p>	<p>Insulation standards are dealt with under Part L of Building Regulations. FAV3 and FAV10 promote green development.</p> <p>Site allocations are focused on brownfield sites.</p> <p>Cycling is addressed in FAV4, FAV6 and FAV10.</p> <p>Comment noted.</p> <p>The interpretation to FAV10 has been amended to make reference to photovoltaics.</p> <p>Sustainability is addressed throughout the Plan including mixed-use, pedestrian permeability and connectivity, biodiversity, retention of embodied energy, active travel, regeneration of brownfield sites, protection of trees and the natural environment, local energy generation and a range of other factors. The green design features included in the interpretation could not be made mandatory due to the need for the Plan to meet the basic conditions. However, FAV3, FAV7 and FAV10 refer to the need to reduce carbon-use and promote biodiversity.</p> <p>Comment noted. The Neighbourhood Plan does seek to achieve a step change in the quality of development. The new Neighbourhood Plan has been drafted to set clearer design requirements and will be used as a basis for future representations on planning applications.</p>
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	<p>the landscape? Giving precedence to development with low carbon, high environmental performance is applauded. Will it be enforced? And, at last, a reference to the adverse impact of excessive or poorly designed lighting.</p> <p>Support Plan</p> <p>Pg 61 The few words about water efficiency are totally inadequate.</p> <ul style="list-style-type: none"> • The water companies are required to produce 25-year water resource plans to demonstrate their capacity to provide water for future planned development. Both Southern Water and South East Water impact Faversham, South East as the supplier and Southern Water as the operator of the Belmont Scheme of boreholes in the chalk which has depleted the flow of water in the chalk streams flowing into Faversham. • All new developments should be designed to be water efficient dwellings, fitted with water efficient devices. The pcc targets and standards for every new property should be at the absolute forefront of such standards and not left to developers to decide what is and what is not efficient. • To ensure the chalk stream flows recover and feed the streams that flow into Faversham, The Environment Agency should include reductions in abstraction from the chalk, whilst allowing the development of Broad Oak reservoir to augment water resource availability. • Climate change will have a detrimental effect upon water resources in the Faversham area which is already classified as suffering from water resource shortages yet is allowing unfettered housing developments. • With the new housing comes pressure on the reticulation system for water within the town. South East Water should ensure that the system is modernised along 	<p>Comment noted.</p> <p>The references on page 61 are intended as examples of green design. They do not and cannot direct the activities of the utility provider. Some matters are dealt with under building regulations. Chalk streams are protected in FAV7, and water quality is dealt with in FAV15. The Town Council shares the concern over climate change and water supply. Comment passed to Swale Borough Council.</p>
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	<p>with the developments that are currently being built and not wait until the present system fails.</p> <ul style="list-style-type: none"> Faversham until recently held the record for the highest temperature ever recorded in the UK. It is essential that we are seen as a healthy town with adequate water supplies, not a town noted for being restricted in water use. Flows to the wastewater treatment works from new developments can be mitigated by making sure that all new developments include for the latest SUDS enhancements and separation of foul and storm water systems. <p>This policy is good on design features, but should be more ambitious on sustainable design and construction which contribute to net zero aspirations. It supports superior environmental performance, water efficiency but does not require it. I understand that you may have reservations with regard what can be required, but I would leave it to the Examiner to remove these if they deem necessary and be more ambitious at this stage. We are in a climate and ecological emergency and we need to strive for better. At the very least you should require applicants to set out how plans contribute to net zero and biodiversity net gain targets. I also suggest that it would be worth referencing national, borough and town council net zero targets as well as the Future Homes Standard in the preamble to the policy. This should include DM 3 of the Swale Regulation 19 Plan, 2021: Mitigating and adapting to climate change through sustainable design and construction:</p> <p>https://services.swale.gov.uk/assets/Planning%20Policy%202019/FINAL%20Reg%2019%20(RGB)%20119MB.pdf</p>	<p>Sustainability is addressed throughout the Plan including mixed-use, pedestrian permeability and connectivity, biodiversity, retention of embodied energy, active travel, regeneration of brownfield sites, protection of trees and the natural environment, local energy generation and a range of other factors. The green design features included in the interpretation could not be made mandatory due to the need for the Plan to meet the basic conditions. However, FAV3, FAV7 and FAV10 refer to the need to reduce carbon-use and promote biodiversity. Planning rationale amended to include reference to Future Homes Standard and net zero targets.</p> <p>Site allocations are based on brownfield sites. FAV13 designated Local Green Spaces. The natural environment is protected in FAV7. The Town Council is satisfied that the Plan meets the basic conditions including general conformity with strategic local policy.</p>
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	<p>Pg58 In general I am supportive of this part of the plan, however I do consider any development of existing green space will go against "CP4 Conserve landscape, biodiversity and local environments."</p> <p>Pg62 Building standards for all new housing should include, where possible, photo-voltaic panels as the primary roofing medium. This should be a condition for granting of planning permission for any new developments.</p> <p>While the roofscapes in the Conservation Area are extremely beautiful it should be permitted to mount solar panels on SW Faces to allow owners to reduce relying on electricity from the grid. These would be temporary in the life of the buildings.</p> <p>All good</p> <p>Pgs 61-62 Heights of buildings should reflect the elevation of ground, high buildings should not be built on high ground, sticking out like a sore thumb.</p> <p>Proposals seem mostly subline, No huge blocks of flats please.</p> <p>Pgs 58-61 Agree with all 8 points with emphasis on no 4, 5 and 7 on p61</p>	<p>Photovoltaics added to the list of green design features in the interpretation to the policy.</p> <p>Comment noted and passed to Swale Borough Council.</p> <p>Comment noted.</p> <p>Clause 1 split into 2 clauses adding reference to topography.</p> <p>Comment noted. FAV10 deals with the general scale of development with further guidelines in some site allocation policies.</p> <p>Comment noted.</p>
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	FAV11	<p>Policies on heritage good. The Faversham, Society has thankfull put a stop to poor quality building in the town centre</p> <p>Stop cars coming into town.</p> <p>Reasonable protection for heritage.</p> <p>Pg68 Agree</p> <p>Pg66 Could not find Appendix II ???? </p> <p>Pg68 Faversham has so much heritage , which attracts many visitors to the town . The council need to make sure that no new building or infrastructure damages the historic nature of the town.</p> <p>Pg68 Protecting the rural setting of the town is so important - future generations will thank us.</p> <p>Pg68 Natural features like the Westbrook, which provided the power for all of the town's early gunpowder mills, and Faversham Creek, which provided access to the sea and was the basis for the town's prominence as a port and consequent prosperity, should also be considered as integral parts of Faversham's heritage. I suggest that they be added as a separate sub-category under FAV11.3.</p> <p>A balance needs to be struck between preservation of heritage and the planet. So some leeway might be given to</p>	<p>Comment noted.</p> <p>The Neighbourhood Plan cannot control the traffic management activities of the highway authority. Comment passed to highway authority, Kent County Council.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>This referred to an appendix in the Swale Borough Council Heritage Strategy document, which is confusing. Paragraph amended for clarity.</p> <p>FAV11 together with FAV10, FAV15, FAV16 and various site allocation policies seek to protect and realise the potential of the area's heritage.</p> <p>The rural setting is also protected in FAV7.</p> <p>Westbrook now explicitly mentioned in FAV7. Faversham Creek is dealt with in FAV15. As there are several hundred heritage buildings and sites across the Neighbourhood Area the policy cannot refer to individual heritage assets.</p> <p>Comment noted and passed to Swale Borough Council.</p>
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	<p>the non-intrusive addition of solar panels to heritage buildings and improvements to their insulation.</p> <p>We have such a special town and I am so pleased that what we have is well maintained.</p> <p>Support Plan</p> <p>Page 65 The image of Court Street which is labelled 'Image: Non-designated heritage assets in Faversham Conservation Area' should be checked. I'm pretty sure these are all listed buildings.</p> <p>Pg68 In general I am supportive of this part of the plan, however I do consider any development of existing green space will go against "a. The rural setting of Faversham Town Centre and Syndale, Ospringe, Preston-nextFaversham, and Faversham Conservation Areas, including the open land between the Ham marshes and Bysingwood;" particularly FNP14. Development at Ham Road will also have a negative impact on the conservation area, severing the views and historic links between the 19th Century brick workers cottages and the former brickfields.</p> <p>Pg68 The swing bridge is crucial for the regeneration of the towns maritime heritage allowing the return of the upper pool to nautical activity & increasing tourism.</p> <p>All good</p> <p>Pg66 Buildings such as Faversham Post Office should be eco-retrofitted to conserve energy from ill considered original</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Images updated throughout the Plan.</p> <p>Site allocations are based on brownfield sites. FAV13 designated Local Green Spaces. The natural environment is protected in FAV7. Reference to Ham Road appears to relate to a site considered in the AECOM Site Assessment report, but not taken forward as a site allocation in the Neighbourhood Plan.</p> <p>Reference to this infrastructure project has been added to the rationale to FAV15.</p> <p>Comment noted.</p> <p>Internal retrofit works would normally fall outside of the scope of planning control (excluding listed buildings where listed building</p>
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		<p>design such as single glazed windows. Eyesores e.g. Telephone box in front of it should be dealt with.</p> <p>Views over the marshes towards St Mary of Charity Church (the parish church) should be protected.</p> <p>Pg68 Agree with points on p68 and pleased that the views of St Mary of Magdalene and Davington Priory have been highlighted.</p>	<p>consent may be required). Street furniture falls outside of the scope of the Neighbourhood Plan.</p> <p>Explicit reference to the three high grade listed churches (grade I and grade II*) added to policy.</p> <p>Comment noted. Reference to Davington Priory removed from policy as it is specifically referenced in FAV20.</p>
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	FAV12	<p>There are 2 possible new recreation areas available within Faversham. The first is the woodland between Wildish Road and The Knole. This appears to be currently inaccessible and mainly used by druggies. This is an extraordinary waste of a possible recreation area. If the council were to take it over and put wide paths through it, that would put off the druggies and encourage its use by the people of Faversham.</p> <p>There other potentially valuable recreation space is the lake off Oare Road and Lakeside Avenue. This is currently exclusively used by a handful of anglers who have somehow managed to have the public excluded. This is a beautiful lake full of birdlife but the public can currently only glimpse it through thick hedges. How has the council allowed this to happen? There is no reason why the anglers should not fish in the lake but the path around the lake must be opened up to the public!</p> <p>Pg73 Add Umbrella Cente Faversham Activity Centre Faversham Polls Faversham Cottage Hospital</p> <p>Add under 5. : Town Hall, QEII Jubilee Centre, West Faversham Community Centre, Library, Umbrella Centre, Abbey Physic Garden.</p> <p>5. please include The Town Hall Jubilee Centre Library West Faversham Community Centre</p>	<p>FAV7 protects green and blue infrastructure. Comments on potential enhancement of two recreational spaces will be discussed with the Local Authority, outside of the Neighbourhood Plan process.</p> <p>Suggested facilities added to rationale. We assume Faversham Polls refers to Faversham Pools (indoor and outdoor).</p> <p>Clause 5 has been replaced by a longer list in the interpretation. Suggested facilities added to interpretation.</p> <p>Clause 5 has been replaced by a longer list in the interpretation. Suggested facilities added to interpretation.</p>
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	<p>We have plenty of natural recreation areas around Faversham they are open space and fields ,not man made areas.</p> <p>Pg73 Agree. Community facilities for youth club also needed. Look at ladies Masonic Meeting Hall, Upper Brents wish is soon up for sale.</p> <p>More bikes at schools, more school streets. Walking buses.</p> <p>Pg73 The lack of facilities, doctor, dentist etc. is well known and needs addressing.</p> <p>Pg73 Agree</p> <p>Pgs70-72 The existing Macknade Cricket Ground should be protected from housing development since its existing prime location meets all the associated primary aims of this NP. It is essential to youth and other users that it should not be moved but instead modified for growth and protected. This can be done at minimal waste of land offering a safe place for cricket to be played. A cricket ground in a park would take up more valuable land than the present ground in order to provide the same level of safety from flying cricket balls. It needs to be kept safe from pollution and noise that is present towards the M2 and therefore not moved.</p> <p>Pg73 The regeneration of the Rec has demonstrated how important these spaces are to all in the community.</p>	<p>Comment noted. FAV7 deals with landscape and the natural environment.</p> <p>Comment noted. The Town Council agrees with the need for additional youth facilities. Interpretation amended to make reference to facilities for people of all ages including younger and older people.</p> <p>Comment noted. The Neighbourhood Plan supports active travel including in policies FAV4 and FAV10.</p> <p>The Neighbourhood Plan can't make decisions on behalf of health providers. However, FAV12 supports improvement of facilities or new facilities for healthcare.</p> <p>Comment noted.</p> <p>Policy DM17 of the Local Plan provides protection for existing sports facilities. FAV12 protects community facilities, or requires better facilities where being replaced and this includes sports pitches.</p> <p>Comment noted. Recreation Ground and Pavilion added to list of facilities.</p>
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	<p>Pg73 The list of community facilities under FAV12.5 should be expanded to include Bysing Wood Community Centre, the Library, the Town Hall and the Guildhall.</p> <p>Pg71 Health. Urgent care centre is excellent but need more GPs and NHS dentists as difficult to get appointments. Developers of large sites such as Perry Court and off Graveney Road/Love Lane should be obliged to build a community centre/hall with toilets and kitchen before the houses which is as available for hire at a reasonable cost. Love Lane and Millfield estates have never had community buildings and given the weather they should have. How about a new primary school being required as most of the existing are in old buildings unsuited to modern life.</p> <p>Support Plan</p> <p>Pg73 The Creek is an underused recreational facility, that is no longer used because of serious pollution. the Plan should recognise that developments that feed into the present inadequate wastewater treatment works, exacerbate this. Long term this has to be remedied and this plan should be aspirational in that regards.</p> <p>Other places of note; The Town Hall The Jubilee Centre The Guildhall</p> <p>More housing is reducing places for recreation.</p>	<p>West Faversham Community centre and Guildhall added to list in interpretation.</p> <p>The Neighbourhood Plan cannot take decisions on behalf of health and education providers. However, FAV12 would support in principle applications for health and education facilities. The Neighbourhood Plan only allocates small and medium brownfield sites. These do not include the larger sites mentioned.</p> <p>Comment noted.</p> <p>Wastewater treatment infrastructure falls outside of the scope of the Neighbourhood Plan. Comment passed to water utility provider. Additional community facilities have been added to the interpretation.</p> <p>The Neighbourhood Plan allocates small and medium brownfield sites. None of the sites involve the redevelopment of recreational facilities. In addition, the Neighbourhood Plan makes Local Green Space designations.</p>
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	<p>Pgs70-73 Supportive but must recognise the recreation and health benefits of existing undeveloped open space, and avoid additional pressure on the natural environment.</p> <p>Pg73 KCC is threatening to relocate the St Mary's childrens' centre in Orchard Place to the Bysing Wood Centre on the other side of the town. Exactly how does this square with the Neighbourhood Plan?</p> <p>The rec has been used much more since Covid. Pedestrian experience is not fully coordinated. i.e. no footpath on one side of Graveney Road. Waking and cycling remain randomly hazardous.</p> <p>Pg 73 Several community facilities need adding. Town Hall, library, WFCC, QE, Jubilee Centre, swimming pool, Oare Gunpowder Country Park and recreation ground.</p> <p>All good</p> <p>Pg73 "The loss" - make it clear that closure of community facilities in order to develop the venue/land for housing will only be supported where other facilities equal to or greater than those lost are provided. Non -viability should be put out to public consultation. Especially where trusts gifting to the public are concerned.</p> <p>Seems Okay</p> <p>Pg73 Post Office is very necessary but overworked with long ques. Impossible for disabled, young children and elderly</p>	<p>The Neighbourhood Plan allocates small and medium brownfield sites. None of the sites involve the redevelopment of recreational facilities. In addition, the Neighbourhood Plan makes Local Green Space designations.</p> <p>FAV12 would require replacement facilities to be provided within close proximity. The Neighbourhood Plan cannot influence operational decisions by KCC including the closure of St Mary's Children's centre.</p> <p>Comment noted. Pedestrian and cycle facilities and connectivity are addressed in FAV4, FAV6 and FAV10.</p> <p>Suggested facilities added into interpretation.</p> <p>Comment noted.</p> <p>FAV12 would apply where a planning application for change of use of an existing facility was submitted. The Neighbourhood Plan cannot influence operational decisions by service providers, including the closure of existing facilities. Viability would be considered on the basis of submitted evidence.</p> <p>Comment noted.</p> <p>Comment noted.</p>
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		especially on rain or cold. Need banking hub, see Broadstairs and ATMs.	
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	FAV13	<p>See comments in previous section</p> <p>Pg77 Add green space on Reedlands Crescent</p> <p>LGS/001 potentially conflicts with the preapp for public access by bicycle, buggy wheelchair for the east to the town centre and Faversham rec avoiding Whitstable Rd and A2 If you don't have the preapp on file I can send it to you. add Fav 13 2a) ;or enhance community assets in the locality. 2c) enhance permeability and encourages. cycling, walking and providing safe access for people with buggies/pams or in wheelchairs.</p> <p>Add to 1. Extend LGS/005 to include the grassy meadow immediately adjacent to Faversham Creek from the northern end of the Brents Industrial Estate to the southern limit of the Swale SSSI (as already proposed in the emerging Swale Local Plan)</p> <p>The local green space/playing field at Reedland Crescent known locally as 'Top Park' would appear to be an omission in the list of designated open green spaces.</p> <p>LGS/001 – Playing field and play area at the Windermere Estate Faversham.The Community Land Trust have submitted a pre app to Swale seeking to build an access road across this site to service the landlocked Engine Sheds Heritage at risk site and to facilitate its renovation for community use.</p> <p>Fav13 2a Can we suggest an amendment to adding 'or enhance community assets in the locality.'</p>	<p>Previous comments already considered.</p> <p>The community value of this space has not been evidenced and it can not be added at this late stage.</p> <p>Proposed Local Green Space has been considered against NPPF criteria. Pre-application discussions noted. However, there is no actual planning permission. Provision of a new footpath does not rely on development of this greenspace. No change proposed to LGS/001. So, the suggested FAV13 2a and 2c would not comply with the NPPF.</p> <p>The area was identified as being of community value.</p> <p>The community value of this space has not been evidenced and it can not be added at this late stage.</p> <p>Proposed Local Green Space has been considered against NPPF criteria. Pre-application discussions noted. However, there is no actual planning permission. Provision of a new footpath does not rely on development of this greenspace.</p> <p>The suggested FAV13 2a would not comply with the NPPF.</p>
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	<p>As said before</p> <p>Pg74 Add strip of land at tear of Upper Brents and Springfield Road to local green spaces. It fulfils a, b and c of the requirements for National Planning Policy.</p> <p>Continue to encourage people to understand that huge deserts of nice green grass is not helpful - wild verges.</p> <p>Pg77 The map is not legible. Protect areas that would be annexed for housing. Areas at end of Lower Road.</p> <p>Pg77 Agree</p> <p>Pg77 The Macknade Cricket Ground should be added as protected for the playing of cricket.</p> <p>Pg77 Developers to not be allowed to build on green spaces around the town in any circumstances. planting a couple of trees on what was once a green space is not going to have any benefits for wildlife as they try to quote .</p> <p>Pg77 A pity we can't have more of these areas.</p> <p>Pgs 75-85 I support all the new Local Green Spaces proposed. As the town grows, the number of such spaces set aside to maintain the balance between built and natural</p>	<p>Previous comments have been considered.</p> <p>The community value of this space has not been evidenced and it can not be added at this late stage.</p> <p>Comment noted. Interpretation to FAV7 amended.</p> <p>Map on page75 removed and list of local plan designated Local Green Space added to rationale.</p> <p>Comment noted.</p> <p>Policy DM17 of the Local Plan provides protection for existing sports facilities. FAV12 protects community facilities, or requires better facilities where being replaced and this includes sports pitches.</p> <p>The purpose of Local Green Space designation is to recognise the community value of the space and to provide protection. The Town Council agrees with the comments on tokenistic tree planting. Wildlife habitats are addressed in FAV7.</p> <p>The local plan has already designated Local Green Space. The Neighbourhood Plan makes further designations. FAV7 also provides protection for landscape and natural environment.</p> <p>Comment noted.</p>
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	<p>environments, as well as the relationship between the town and the surrounding landscape, must increase.</p> <p>Pg77 LGS/002 (land adjacent to New Creek Road) must be made accessible to the public. Currently the area is locked and therefore inaccessible.</p> <p>Pg85 Important to maintain provision. Thank you that hole in front of goal posts has been filled in. Also, green area on other side of Lower Road not on your maps.</p> <p>Pg72 Agree. Development should not encroach onto local green space.</p> <p>Support Plan</p> <p>Reference LGS/002 - this designated local space must be made available for public use. It is currently locked.</p> <p>Figure 15 – this is labelled 'Local Green Space Designations, Swale Borough Council. It should be noted that these are proposed and not adopted Local Green Spaces. If the Neighbourhood Plan wants the local green spaces proposed through the Swale Reg 19 document (which I would support) it should designate these itself.</p> <p>A map of the adopted Local Green Spaces from the 2017 Swale Local Plan, would be useful. All maps should be presented at a scale which is readable.</p>	<p>The designation is based on landscape, habitat and heritage setting values. The site is in private ownership with no public access. There could be conflict between public access and habitat value.</p> <p>Comment noted. Maps replaced with list.</p> <p>Comment noted. Clause 2 would allow encroachment only in very specific circumstances where the development is related to the use of the community space and does not compromise the open or green character of the space.</p> <p>Comment noted.</p> <p>The designation is based on landscape, habitat and heritage setting values. The site is in private ownership with no public access. There could be conflict between public access and habitat value.</p> <p>Map on page75 removed and list of local plan designated Local Green Space added to rationale.</p> <p>Map on page75 removed and list of local plan designated Local Green Space added to rationale.</p>
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	<p>There are some words (including street names) missing from the titles of the Local Green Space maps.</p> <p>These too are decreasing - what about everyone's health?</p> <p>Pgs 81-82 LGS04 Crab Island - should include the grass banks behind the site.</p> <p>LGS05 Fields from Upper Brents towards Faversham Creek, Faversham - the map appears to have been redrawn since this site was submitted with a small corner of the site excluded. The proposed map now fails to connect with Upper Brents and limits the views it was designed to protect. The western most boundary should continue straightdown along the western boundary of the old goat pen, joining at the playpark. This maintains the view towards the marshes and creek, preserves the landscape feature of the old goat pen and connects it with the conservation area. In it's current form it fails to connect directly to the community, fails to ensure that views are fully maintained, fails to connect with the conservation area and fails to protect the important landscape feature of the trees at the old goat pen site. The exclusion of this small corner is inexplicable - including it still gives a clear boundary to the site with the old goat pen forming a corner, and still keeps the area modest in size.</p> <p>Pg75 The possible GREEN SPACE marked in Blue in the south part of Preston Fields on the above map is not included in the list of designated GREEN SPACES. But given the expansion of the town to the south of the A2, and the fact that Salters Lane running directly to the east of Preston Fields is a designated</p>	<p>Maps updated.</p> <p>Comment unclear. The Neighbourhood Plan does address health and wellbeing in numerous policies.</p> <p>The grass banks are a Local Green Space designated in the adopted Local Plan. No change.</p> <p>The area was identified as being of community value.</p> <p>Map on page75 removed and list of local plan designated Local Green Space added to rationale. A call for sites for proposed Local Green Space designation was made. The Local Green Space background document includes detailed consideration of potential spaces against NPPF criteria and informed the designations made in the</p>
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	<p>GREEN LANE leading south out of the town and into the AONB, retaining significant GREEN SPACE here on the periphery of town would both emphasise the importance of that GREEN LANE and rural character leading out of the town, as well as environmental gain and an area of recreation lacking as the town now develops to the south and is cut in half by the busy A2 (Watling Street). Furthermore it would retain important and the only significant views of the spires of Preston Church and St Mary of Charity Church from the southern landscape looking north along this shallow valley of Preston Fields. For these reasons I would press for further consideration of designating some or all of this land to the south of the major Gas Pipeline crossing Preston Fields as GREEN SPACE and not for excessive and concentrated development almost completely to the M2 corridor.</p> <p>Pg6 The local green space/playing field adjoining Reedlands Crescent would appear to be an omission in the list of designated open green space.</p> <p>LGS/001 – Playing field and play area at the Windermere Estate Faversham. The Community Land Trust have submitted a pre app to Swale seeking to build an access road across this site to service the landlocked Engine Sheds Heritage at risk site and to facilitate its renovation for community use. Fav13 2a Can I suggest an amendment by adding 'or enhance community assets in the locality.'</p> <p>Pg77 Southern Water understands the desire to protect local green spaces. However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from maintaining and/or delivering essential infrastructure required to serve</p>	<p>Neighbourhood Plan. FAV7 amended to include 'best and most versatile' agricultural land or fruit orchards.</p> <p>The community value of this space has not been evidenced and it can not be added at this late stage.</p> <p>Proposed Local Green Space has been considered against NPPF criteria. Pre-application discussions noted. However, there is no actual planning permission. . Provision of a new footpath does not rely on development of this greenspace. The suggested FAV13 2a would not comply with the NPPF.</p> <p>Comment noted. Local Green Space designation would not prevent maintenance or restrict permitted development rights under part 13 of schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. The proposed additional clause could make Local Green Space vulnerable to harmful</p>
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	<p>existing and planned development. This is of particular concern for the following locations that our infrastructure crosses:</p> <ul style="list-style-type: none"> • LG/S04 Crab Island – a surface water sewer crosses the north eastern end of site • LG/S07 Former play area off Wallers Road - a foul sewer appears to run across the north western corner of this site. The National Planning Policy Framework (NPPF) (2021) sets out the intention to protect the countryside, for which it establishes: <ul style="list-style-type: none"> • The intention in paragraph 147 of ruling out inappropriate development ‘except in very special circumstances’. • In paragraph 148 that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations. • In paragraph 150 that 'certain other forms of development are also not inappropriate' including 'engineering operations'. <p>Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential wastewater infrastructure required to serve new and existing customers. This is because there can be limited options available with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward to deliver necessary water supply and wastewater infrastructure. In line with the NPPF, we recommend that point 2 of the wording be amended within this policy, to read:</p> <p>“2. Development should not encroach onto Local Green Space, unless:</p> <p>a. It is specifically required to support the community use of the space;</p>	<p>development. In exceptional circumstances where Southern Water considered development within a Local Green Space to be necessary and the development would not be covered by permitted development rights, then this would be considered on its merits. The need for such development could be a material consideration that would allow departure from development plan policies.</p>
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	<p>b. It is small in scale and discreetly located so that it would not compromise the open or green character of the space;</p> <p>c. Its design complements the green character of the space.</p> <p>d. in exceptional circumstances, for example where it relates to necessary utilities infrastructure and where no reasonable alternative location is available.”</p> <p>More planting could be done in children's play areas and parks to provide habitat for wildlife and shade.</p> <p>Cricket field must be retained in current location</p> <p>Pg77 Add cricket Ground, Alexander Drive</p> <p>Conncting Green Spaces would be good.</p> <p>Pg77 Suggest add west bank of creek between reach and Swale SSSI.</p> <p>All good</p> <p>Pg77 No plastic grass lawns on any local green space or play surfaces extended beyond that necessary to support wheelchair users to mobilise and enjoy the green space. Unclear which green space potentials were discarded.</p> <p>Why isn't the Faversham rec listed? Its important and used by many people.</p>	<p>Comment noted. This would be a project so outside of the scope of the Neighbourhood Plan. FAV7 addresses habitats.</p> <p>Policy DM17 of the Local Plan provides protection for existing sports facilities. FAV12 protects community facilities, or requires better facilities where being replaced and this includes sports pitches.</p> <p>This is already a local plan Local Green Space designation. No change.</p> <p>The Town Council recognises the importance of green connectivity. Green infrastructure is addressed in FAV7 and FAV10.</p> <p>The community value of this space has not been evidenced and it can not be added at this late stage.</p> <p>Comment noted.</p> <p>The Town Council shares the concern over artificial grass. However, this normally falls outside of the scope of planning control. Reference to artificial grass added to interpretation of FAV10.</p> <p>This is already a local plan Local Green Space designation. No change.</p>
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		Pg77 Preserve existing at all costs as stated but add value were appropriate.	Amended policy clause 3 to add 'should take opportunities to enhance the setting of the space'.
	FAV14	<p>Good</p> <p>Can a policy be inserted that all new development must incorporate roof mounted solar panels where efficient orientation prevails?</p> <p>Pg88 More emphasis is needed on renewable energy. Positive support for industrial buildings to have solar roofs and all new housing schemes to have high quality insulation and solar panels as standard. Relaxation on restriction to conservation areas for solar panels except Abbey Street - tourist attraction.</p> <p>Proactively describe why onshore wind and solar is needed.</p> <p>Pg86 Reflecting needs and enforcing prevailing national regulations.</p> <p>Pg88 Agree</p> <p>Pg87 New designs for solar energy that are more efficient and do not spoil habitat should be policy.</p> <p>Pg86 make all developers incorporate solar panels and electric vehicle charge points in all new builds</p>	<p>Comment noted.</p> <p>FAV14 already deals with microgeneration in residential properties. FAV10 promotes green design and photovoltaic panels are now mentioned explicitly in the interpretation.</p> <p>FAV14 already deals with microgeneration in residential properties. Amended to also relate to new build industrial and employment development. Text added in interpretation on microgeneration schemes involving historic buildings to FAV11 and FAV14.</p> <p>Amended key points to provide clarity.</p> <p>It is unclear what this refers to.</p> <p>Comment noted.</p> <p>FAV14 and various other policies support local and microgeneration, but require impacts to be considered.</p> <p>It would be unreasonable to have binding policy on solar panels. However, FAV10 requires positive design features to reduce carbon use and examples are included in the interpretation.</p> <p>Comment noted.</p>

	<p>Pg88 Community led schemes would be welcome if gas boilers have to be phased out.</p> <p>Pg88 The increased energy efficiency element of this section seems to have got lost. The greatest gains to be had in terms of energy efficiency are in relation to housebuilding and transport, facilitating walking, cycling and use of public transport as opposed to private cars, improved insulation of existing housing and construction of zero-carbon housing. Some of that is included elsewhere but it's nowhere near ambitious enough.</p> <p>Support Plan</p> <p>Page 87 states that 'the policy seeks to encourage energy efficiency as a way of reducing energy demand and consumption'. However, the policy itself does not refer in any way to energy efficiency. I would argue that this should be included, in a retitled energy policy, or in FAV10 'Sustainable Design and Character'.</p> <p>Pgs87-88Supportive</p> <p>Pg7 Can a policy be inserted that all new development must incorporate roof mounted solar panels where efficient orientation prevails?</p> <p>Solar panels on all new bbuidks and incentives for homeowners</p>	<p>Sustainability and carbon reduction is considered throughout the policies. This includes policies on mixed use and local facilities. Active travel is dealt with in policies FAV4, FAV6 and FAV10. Green design is dealt with in FAV10, including positive design features to reduce carbon use and green design guidance in the interpretation. Site allocations are based on brownfield sites. All new development is subject to the amended Part L Building Regulations that requires superior energy performance and insulation.</p> <p>Comment noted.</p> <p>Issue deleted and moved to rationale of FAV10 as suggested.</p> <p>Comment noted.</p> <p>It would be unreasonable to have binding policy on solar panels. However, FAV10 requires positive design features to reduce carbon use and examples are included in the interpretation.</p> <p>It would be unreasonable to have binding policy on solar panels. However, FAV10 requires positive design features to reduce carbon use and examples are included in the interpretation. Incentives for homeowners would be a matter for central government policy. This refers to emerging local plan policy. Representations would need to be made on the emerging local plan. Comment passed to Swale Borough Council.</p>
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		<p>P86 last paragraph, P88 20% far too low, See comments in FAV3.</p> <p>See remarks in Fav 10 above. Solar panels are not permanent fixtures and should be allowed on roofs.</p> <p>All good</p> <p>Pg88 Suggest 1.c be added as follows: (no adverse impact on) best and most versatile agricultural land i.e. grades 1 - 3 inclusive.</p> <p>Seems Okay</p> <p>Pg88 We are in favour of a community led hydro electric style tidal generator using creek basin and sluices at bridge. SEE FTC proposals Ref Mayor Trevor Fentiman. Agree with key issues.</p>	<p>There are some permitted development rights for solar panels. FAV14 deals with microgeneration in residential properties. Amended to also relate to new build industrial and employment development. Text added in interpretation on microgeneration schemes involving historic buildings to FAV11 and FAV14.</p> <p>Comment noted.</p> <p>Loss of the 'best and most versatile land' is added to FAV7. Interpretation amended to cross reference to FAV7 and FAV11.</p> <p>Comment noted.</p> <p>Comment noted. The policy would support local energy schemes subject to impacts.</p>
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	<p>FAV15</p> <p>There is much that can be done to improve Faversham Creek as a community resource. There are buildings that can be restored for commercial, hospitality or heritage uses. Much more should be made of the history of the area. (A small museum, gift shop?) This would attract in people from other parts of Kent and tourists from further afield. There is already too much housing along the Creek so any more should be discouraged. The public footpath from Front Brents must be restored. There is no case for houses having private access to the creek. The bridge on Bridge Road must be replaced with one that can open to allow boats through. The whole creek needs to be dredged and the lock restored at Stonebridge pond so that water from there can regularly sluice out the mud. Without this, talk of encouraging more boats to the area is a lot of hot air.</p> <p>Pages 89-92 add regeneration to purpose upper photo replace with one of the views across Ordnance Wharf to Davington Pieoy etc. (see p.111</p> <p>Add to Purpose – and encouraging public access Note image and caption of Ordnance Wharf are inappropriate Augment final bullet point of Key Issues for Policy to Address to read:</p> <ul style="list-style-type: none"> • Improve public access to Faversham Creek; through walking and cycling, and particularly on the water including to the Creek Basin via an opening Creek Bridge <p>In 5. Change .."predominant 3-storey building height" to ..."maximum 3-storey building height" Add: 9.Plans by the Environment Agency to raise sea defences along Faversham Creek by 2035 must be taken into consideration for all Creekside developments.</p>	<p>The aim of FAV15 is to realise the potential of the Creek, including enhancing the commercial and hospitality offer and realising heritage potential. FAV15, FAV16 and various site allocations in the Creek include a mix of uses, some with residential but as part of a mix. Comment on footpath restoration noted - this could be a future project. The policy requires public access to the Creekside. Reference to the proposed bridge and sluice improvement added to the policy rationale. Comment on dredging and lock restoration noted, but these fall outside of the scope of the Neighbourhood Plan.</p> <p>Purpose re-written to place emphasis on regeneration. Images have been reviewed and replaced throughout the document.</p> <p>Purpose amended to place emphasis on regeneration and community value. FAV15 addresses public access. Images have been reviewed and replaced throughout the document. Access already addressed in the list. Reference to improvements to Creek bridge added to policy rationale.</p> <p>The historic environment does include a mix of heights from 2-storey to 4/5-storey, with 3-storey being the predominant height. 3-storey as an absolute maximum height would not be reasonable, given the presence of taller historic buildings. FAV15 and all relevant site-specific policies</p>
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		<p>Pg89 Agree- no more houses but heritage boat building/servicing/mooring/wharfage to preserve the creek as a working area attractive to visitors.</p> <p>Pg95 Use the Creek to manage flood risk. Fill in the pool above the bridge. Incorporate Stonebridge Ponds in plan.</p> <p>Pg95 Agree</p> <p>Pg89 The council needs to ensure that the money raised by the local community to repair the historic swing bridge on the creek basin is used for this and further money allocated to complete this and to ensure that the basin is usable.</p> <p>Pg 95 Abject failure to protect the creek side for barrack like housing development has been disastrous - no more homes!!! Opening bridge a priority to allow proper use of the water for rowing and sailing.</p> <p>Pg95 I support everything here, but am surprised to see no mention here of the vital importance of replacing the swing bridge in such a way that the redevelopment of land around the tidal basin can proceed. It should be noted somewhere</p>	<p>interpretation updated to advise early engagement with the Environment Agency for a site and design specific response.</p> <p>FAV15, FAV16 and various site allocations promote a mix of uses including commercial, residential and community uses. The policies seek to promote the visitor economy. Moorings and access to the slipway are supported in FAV16 and various site allocations. Policy partly re-drafted for clarity. FAV16 merged with FAV17, FAV23 and FAV28 for clarity.</p> <p>This appears to relate to an infrastructure project. Comments passed to the Environment Agency. Stonebridge Ponds form part of the blue and green infrastructure and are protected by FAV7 which is cross-referenced to FAV15. Policy amended to make explicit reference to Stonebridge Pond and allotments.</p> <p>Comment noted.</p> <p>Reference to the proposed bridge and sluice improvement added to the policy rationale.</p> <p>FAV15, FAV16 and various site allocations promote a mix of uses including commercial, residential and community uses. Reference to the proposed bridge and sluice improvement added to the policy rationale.</p> <p>Reference to the proposed bridge and sluice improvement added to the policy rationale. Relandscaping of Stonebridge Pond would be an infrastructure project and beyond the scope of the Neighbourhood</p>
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	<p>too that redevelopment of the area around the tidal basin should be coordinated with the re-landscaping of the Stonebridge Pond area in order to tackle the problem of siltation and restore the flow of the Westbrook chalk stream.</p> <p>FAV15/16 Statements are made of the need to protect the water quality of the creek and the estuary that it feeds into, a sensitive Ramsar and MCZ site. Linked to this is the need to protect the leisure, maritime and recreational amenities that depend on the creek. What is lacking is a robust statement as to how this might be achieved. The AECOM Habitat Regulations Assessment (4.58) cites the national Environmental Impact Regulations as ensuring water quality as it applies to individual applications. They 'screen out' water quality issues from their assessment on this basis. This is ingenuous as regulations applying to individual applications will take no account of the cumulative impact of developments on water quality. In AECOMs Strategic Environmental Assessment (5.49). the only reference to water quality in the creek is to cite FAV15 in this document. This is a very neat piece of buck passing on a highly sensitive, contentious issue. Swale Borough Council are aware of this and agreed a motion on 12.10.22 including that they:</p> <p>"2. Recognise that there is clear evidence of deterioration of water quality due to cumulative impact of multiple sewage discharge events or 'sewage overload'. 3. Ensure that an evidence base is compiled that assesses the cumulative impact of sewage discharge so that this is factored into decisions made in new iterations of the local plan, including the overall level of future development, if necessary independently from the evidence produced by the utility providers. 4. Seek to better understand the cumulative impact of wastewater discharge including untreated sewage on our</p>	<p>Plan. Relandscaping could have implications for historic character and biodiversity.</p> <p>FAV15 addresses water quality and supports a range of uses to help regenerate the Creek. It is unclear what a 'robust statement' would entail, or what status it would have in the Plan. To be effective the policies themselves need to provide clear parameters for development to meet. FAV15 and FAV16 together with other policies in the Plan seek to achieve this. Comment on cumulative impacts noted. However, the Neighbourhood Plan cannot amend national legislation, policy and guidance. Larger applications would need to be accompanied by Environmental Impact Assessment (EIA). Note, there is a government consultation on possible amendments to national legislation, policy and guidance. Sewerage discharges would be addressed under other public health and environmental legislation and are outside of the scope of the Neighbourhood Plan. Review of the Local Plan would be a matter for Swale Borough Council and falls outside of the scope of this consultation. The Plan makes reference to the need for liaison with Southern Water. Comments passed to the water utility provider Southern Water, Environment Agency and Swale Borough Council.</p>
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	<p>local rivers, estuaries, wildlife and the health of our residents.</p> <p>5. To take a lead on addressing this issue, working constructively with other agencies." SBC seek to engage with Southern Water to monitor the cumulative impact of housing development and new applications. The evidence from the Environment Authority is that, over the last 3 years, raw sewage spills from Combined Sewer Overflows into the Swale have doubled in number and increased in duration by a factor of 5. There are 5 CSOs feeding into Faversham Creek. The Faversham sewage works does not treat for nitrates or phosphates and the last test for E.coli from the outfall by the EA registered 250,000 cfu/100ml,. The increases are a consequence of failing, outdated infrastructure, increases in extreme weather events and housing development. Some reference to the scale of the problem, the failure of AECOM to address it, and the need to factor it into decisions about housing development would seem necessary.</p> <p>Access from sea for boats is limited (tides and distance) so be realistic for these.</p> <p>North Lane has flooded more often in recent years. Action should be taken to stop this flooding and the council should put pressure on those with responsibility to stop this flooding.</p> <p>Support plan with proviso that discharge into the waterways of untreated sewage be stopped.</p> <p>Pg95 There is no reference for the English Costal Path. The path is currently closed on the west side, adj. Provender Walk. The east side is not open adj. Crab Island.</p>	<p>Comment Noted. This Falls outside of the scope of the Neighbourhood Plan.</p> <p>Comment noted and sent to Environment Agency and Swale Borough Council.</p> <p>Comment Noted. This Falls outside of the scope of the Neighbourhood Plan. Comments passed to the water utility provider Southern Water, Environment Agency and Swale Borough Council.</p> <p>Reference to English Coastal Path added to planning rationale in section 3.4 movement and sustainable transport.</p>
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	<p>Pg89-98 Many of my comments apply equally to this section.</p> <ul style="list-style-type: none"> • Faversham is at risk of tidal flooding, with many instances of the lower part of the town being impassable due to flooding. This occurs now at times of spring tides coupled with any degree of North Sea surge. With increased climate change, increasing events including North Sea storms, rising sea levels and the secular trend of the south east sinking relative to the UK, the standard of defence in terms of levels of protection is decreasing. This will require improvements unless Faversham is to be designated as high risk. • TS Hazard, a listed building is at great risk of flooding damage. Flood water has already reached it on two occasions in 2020, whilst at the same time causing flooding to the area around Town Green. • When heavy rain occurs at the same time as high tides, more of town floods at the present time. As described above, this will happen more frequently causing major disruption to the town. Investment will be required to mitigate these effects. <p>Flood protection schemes are required and this has been identified by the EA. when being designed it is essential that they take into account access and public use of the area.</p> <ul style="list-style-type: none"> • Faversham Wastewater treatment works currently discharges in to Faversham Creek 1.4 km away from the Creek bridge in the town centre into the tidal creek, where the plume travels up and down with the tide but eventually disperses into The Swale. The treatment works is close to capacity and will require extensions and/or improved processes to cater for the increasing population. This is an opportunity for a radical change to the arrangement. The outflow point should be moved further downstream into The Swale, at the same time as the treatment works is expanded or improved. 	<p>The Neighbourhood Plan policies and interpretations have addressed flood risk issues. All sites within flood zone 3 are 3a(i), this means that that development comprising vulnerable uses above the ground floor may be appropriate. Site allocations had to consider flood risk together with a range of other issues also covered by national policy. This includes regeneration of brownfield sites, sustainable locations for development, and impacts on the historic and natural environments. In addition, some sites had already been allocated in the Faversham Creek Neighbourhood Plan. Comment on treatment works and water sampling noted. Obviously, the Neighbourhood Plan cannot set policies to control service and infrastructure provision by the utility provider. The interpretation to FAV8 already refers to the need for sufficient drainage infrastructure capacity. Additional sentence added on encouraging early engagement with the utility provider. Comments passed to the water utility provider Southern Water, Environment Agency and Swale Borough Council.</p>
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	<ul style="list-style-type: none"> From samples taken by The Environment Agency over several months in 2019 at the swing bridge, oxygen levels in the water, which indicate the general health of the water and its ability to support life forms, were very variable, ranging from over 80% (good) to below 55% (poor) with an average of 75%. The low levels are unsatisfactory for an amenity water course. Nitrogen levels in the water also varied widely from 0.33mg/l to 1.25mg/l with an average level of 0.55mg/l. This level is too high to allow the water to support any form of fish life (check this). No bacteriological testing was carried out. <p>Page 92 - The image of Ordnance Wharf is labelled 'Image: Redevelopment opportunities within the Creek. Bringing vacant buildings back into use'. I would suggest the second half of this title be removed as the image is of a vacant site, not a vacant building.</p> <p>One of the most positive features of the Faversham Creek Neighbourhood Plan was the requirement for public access along Faversham Creek and indeed this aspiration is coming to fruition. FAV15 needs to replicate this. Clause 4. States 'development must have no adverse impact on public access to the waterfront...'. This needs to be amended to reflect the requirement for public access ALONG the waterfront.</p> <p>3.12 Site Allocations – site allocations should set out the number of units proposed for each site, otherwise it is impossible to comment on the suitability of sites.</p> <p>All sites should pass the Sequential and, where necessary, the Exception Test before they are allocated by the</p>	<p>Images reviewed throughout the document.</p> <p>Policy redrafting makes clearer the need for public access, which had been specified in relevant site allocation policies.</p> <p>Site allocations cannot set a maximum number of units. However, the AECOM Site Assessment report did consider site constraints and capacity. Site allocation evidence document has been updated to also include site capacity, taking account of constraints.</p> <p>The Neighbourhood Plan policies and interpretations have addressed flood risk issues. All sites within flood zone 3 are 3a(i), this means that that development comprising vulnerable uses above the ground floor</p>
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	<p>Neighbourhood Plan, in accordance with para 161 of the NPPF and national guidance.</p> <p>Pg90-94 Re-ordering FAV15 to become section 3.8 (moving subsequent sections down one place) would support this section of the Local Plan Review 2021 which is quoted in the draft NP text: “The emerging local plan recognises Faversham Creek as one of the key characteristics of the Borough, . . . For these reasons, the regeneration of Faversham Creek, whilst protecting the rich maritime, industrial and landscape heritage for economic, environmental, and educational purposes, is the principal objective.” (FCT emphasis in bold)</p> <p>P 94: Conserve and enhance heritage assets – include Ordnance Wharf as a significant heritage asset and of archaeological significance.</p> <p>p.94: Amend as a policy objective: Improve access to and by Faversham Creek - encourage the maintenance of Faversham Creek as a navigable waterway for all types of marine traffic.</p> <p>Pg90-96 Supportive of the approach - development north of the town would have a negative impact on the creek and fall under "Harm to public access to the Creek could include encroachment onto footpaths, but also loss of other landscape or public realm that is used by the public."</p>	<p>may be appropriate. Site allocations had to consider flood risk together with a range of other issues also covered by national policy. This includes regeneration of brownfield sites, sustainable locations for development, and impacts on the historic and natural environments. In addition, some sites had already been allocated in the Faversham Creek Neighbourhood Plan.</p> <p>Comment on section 3.8 unclear.</p> <p>Heritage is addressed in FAV15 and also in FAV11.</p> <p>Purpose amended to place emphasis on regeneration and on community and economic and environmental value. The Town Council agrees it is desirable to maintain the Creek as a navigable waterway (outside of the scope of the Neighbourhood Plan).</p> <p>Comment noted.</p>
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	<p>My comments under this head additionally embrace Fav 16. My career as a Chartered Surveyor (Development and planning) was spent specialising in the development of brownfield mixed use regeneration sites. I have extensive experience undertaking development appraisals of tidal waterfront sites. Fav 16.2 Residential development will be supported, only where it is part of a mixed-use scheme which includes predominantly the uses set out in clause 1 of this policy. Whilst understanding the sentiment behind this policy my professional opinion is that the use of the word predominately is a recipe for inertia. Less than 50% residential would not generate sufficient income to support development viability on these highly constrained and complex, brownfield, flood prone sites. It begs the question as to whether this is intentional - surely not! I suggest that predominantly is replaced by significantly. Infrastructure Development viability is also impaired by the loss of the lifting bridge and water retention/slucing structures. Faversham Creek is silting up and the long-term consequence is that Faversham will become landlocked. The basin mudflats at low tide are unsightly and malodorous from tide driven storm sewage overflow. These conditions are not conducive to regeneration. Can the plan put down a marker in relation to these matters enabling CIL to be levied? I appreciate that this will compound viability issues however my experience tells me that the Creek vision will not be realised without this infrastructure.</p> <p>Pg95 Southern Water supports all policy requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. This aligns with our own work to address problems caused by excess surface water in our</p>	<p>FAV15 and in particular FAV16 have been amended to incorporate FAV17 and FAV23. FAV16 now specifies residential use at upper floors and only where it is part of a mixed-use scheme. The word predominantly has been removed. Reference to the proposed bridge and sluice improvement added to the policy rationale. Comment on silting up noted. Planning infrastructure monies including a CIL would be a matter for Swale Borough Council. Comments passed to Swale Borough Council.</p> <p>Comments noted. Water quality already dealt with in the policy. Comments on combined sewer network added to interpretation.</p>
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		<p>sewerage network in order to protect water quality in rivers and sea. For more information please see – https://www.southernwater.co.uk/our-performance/storm-overflows/storm-overflow-task-force and https://www.southernwater.co.uk/media/7459/stormoverflows_faq.pdf). Whilst some parts of the sewer network were historically designed to accommodate surface water along with foul flows (the ‘combined’ sewer), in terms of future flood risk, better rainwater management through SuDS is the preferred approach to avoid placing added pressure on drainage networks during heavy rainfall, as well as helping mitigate flood risk. Unless or until Schedule 3 of the Flood and Water Management Act 2010 is enacted, we cannot refuse developer applications to connect surface water to the combined network. We would therefore strongly support the inclusion of wording that recognises the drainage hierarchy, and that connections to a combined sewer will only be possible where agreed in advance with Southern Water, and where there is robust evidence to show there are absolutely no other options. With this in mind, we propose the following addition to point 7 of the policy: “Development must have no adverse impact on the water quality of the Creek, including impacts from surface water or other water discharge, and considering impacts on protected sites downstream. No surface water will be allowed to connect to the foul or combined sewer networks.”</p> <p>Creek needs to enhance the leisure and recreational life of the town, It's an asset that is being ignored and smothered with suburban housing.</p>	<p>FAV15, FAV16 and various site allocations promote a mix of uses including commercial, residential and community uses.</p>
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	<p>Pg95 Not one mention of the need for the swing bridge which is vital to the regeneration of the upper pool & the creek as a whole. Does "Development" mean more unsuitable housing?</p> <p>Pg95 Developers have already restricted public access to waterfront so you have allowed them to do this when giving "green light" yet it is against your plan. Why have the plan and not implement it.</p> <p>Open up footpaths both sides of the creek and be alert to flood risk.</p> <p>We are all waiting for a new opening bridge. KCC and Peel Ports, along with the Govt should expect this to allow for the development of the basin as a regional recreational and heritage asset, bringing employment and other benefits.</p> <p>Pgs89, 94, 95 Add " and encouraging public access" to end of "purpose statement" on page 89. Add to key issues (page 94) access via the water to Creek basin, utilising an opening creek bridge. Replace "predominantly 3 storey" with "maximum 3 storey".</p> <p>All good</p>	<p>Reference to the proposed bridge and sluice improvement added to the policy rationale. The term 'development' is defined in Section 55 of the Town and Country Planning Act 1990. The mix of uses are defined in FAV15 and FAV16. FAV2, FAV3, FAV10 and various site allocation policies seeks to ensure that housing is built to an appropriate standard.</p> <p>The Town Council shares concern over development that has blocked public access to the waterfront. FAV15 has been drafted to clarify the need for public access. This cannot be retrospectively applied to existing development.</p> <p>Both issues are addressed in FAV8, FAV15, FAV16 and various site allocation policies.</p> <p>Reference to the proposed bridge and sluice improvement added to the policy rationale.</p> <p>Purpose amended to place emphasis on regeneration and on community and economic and environmental value. Public access in list of key issues. FAV15 redrafted to make public access requirement clearer. Reference to the proposed bridge and sluice improvement added to the policy rationale. The historic environment does include a mix of heights from 2-storey to 4/5-storey, with 3-storey being the predominant height. 3-storey as an absolute maximum height would not be reasonable, given the presence of taller historic buildings.</p> <p>Comment noted.</p>
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	<p>Pg95 Consider adverse impacts on both quality on creek, water quality, of flooding to properties, of rubbish collection to new developments further down Abbey Street, of traffic (motorised) on Abbey Street, across the creek bridge and from all development going out of town</p> <p>What about getting the swing bridge done at last.</p> <p>Pg95 Agree with proposals. See Faversham Creek Trusts proposals, Faversham Community Boat Build, Faversham Rowing Club, Access for boats not just people</p>	<p>FAV15 addresses water quality impact of development. Flooding addressed in FAV8 and FAV16 and various site allocation policies. Critical road junctions are dealt with in FAV5.</p> <p>Reference to the proposed bridge and sluice improvement added to the policy rationale.</p> <p>Comment noted.</p>
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	FAV16	<p>See comments in previous section</p> <p>Pg97 (Check) FTC is negotiating with Swale Borough Council to take back ownership of Town Quay, the C15th Rown Warbouse and 1911 Pump House (both listed) to create a maritime and natural heritage attraction for visitors and residents and an educational facility for lcol schools to act as a magnet attraction fro the upper creek and assist with regeneration</p> <p>Town living that doesn't have areas for car parking or encourage car movements. "Affordable Housing" - for who? Not most of our children or people on low incomes.</p> <p>Make accessible from landside. Resign ourselves to the creek being a creek and not easily acceptable as a boating stop off. In all areas avoid the 'parking' of residential boats.</p> <p>Pg97 agree</p> <p>Pg97 Building on the potential for tourism is vital</p> <p>Pg97 I support the proposed policy</p> <p>As in 15</p> <p>Support Plan</p> <p>Pg97-98 Supportive</p> <p>Pg9 See FAV15 comment</p>	<p>Comments previously addressed.</p> <p>Comment noted.</p> <p>The emphasis of the Plan is on creating walkable neighbourhoods. Development of the FAV16 area is likely to have reduced car parking provision due to site and heritage constraints. The policy does not address affordable housing. Affordable housing is addressed in FAV3 and in the Local Plan.</p> <p>Accessibility of the Creekside is dealt with in FAV15 which includes the area covered in FAV16. Boat mooring is beyond the scope of the Neighbourhood Plan.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comments previously addressed.</p>
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		<p>Pg97 No residential development should be supported in this area. It is far better suited to the regeneration of maritime & associated industry & activity.</p> <p>This needs updating</p> <p>Housing should be allowed only above the 5m contour. TS Hazard a wasted opportunity could be elevated.</p> <p>All good</p> <p>Seems ok</p> <p>Pg97 Emphasis maritime history, boats and boat building, repair, training. Not just an area for waling and cycling please.</p>	<p>The policy has been amended by merging in FAV17 and FAV23. The policy would allow residential use, but only on upper floors as part of a mixed-use development. The main emphasis is on business, hospitality, leisure, assembly, recreation, tourism and community uses, workshops, studios and exhibition space.</p> <p>It is unclear what this refers to. However, the policy has been amended by merging in FAV17 and FAV23.</p> <p>The policy has been amended by merging in FAV17 and FAV23. The policy would allow residential use, but only on upper floors as part of a mixed-use development. Comment on TS Hazard is unclear.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>The main emphasis of FAV16 is on heritage-led regeneration including, business, hospitality, leisure, assembly, recreation, tourism and community uses, workshops, studios and exhibition space.</p>
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	FAV17	<p>Workshops good. Not too much housing.</p> <p>Modify 3. To read: Development should create a continuous public walkway and boat moorings, and ensure good connectivity with Town Quay and Belvedere Road</p> <p>To include to create a continuous creek walkway for the public</p> <p>Pg102 agree</p> <p>Pg102 Access to the slipway is very important- should not be closed at present. There is little or no public access to the creek via slipways - shocking oversight in the past.</p> <p>Pg102 I support the proposed policy.</p> <p>Pg102 Overall, the Association supports the approach taken in the Plan. With regard to the existing slipway, the Association hopes that the facility can be made available to the thriving Faversham Rowing Club.</p> <p>Pg102 There is strong demand for launching facilities on the creek, not presently provided. The existing slipway could play an important part in development of the creek and should be retained/improved.</p> <p>Next comment is FAV 29</p>	<p>FAV17 and FAV23 are now merged into FAV16. The main emphasis is on business, hospitality, leisure, assembly, recreation, tourism and community uses, workshops, studios and exhibition space. The policy would allow residential use, but only on upper floors as part of a mixed-use development.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. Clause 4 of FAV16 now deals with connectivity at Town Quay and Belvedere Road. Moorings are dealt with in FAV15.</p> <p>FAV15 and FAV16 require public access to the Creek.</p> <p>Comment noted.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. The merged policy includes the retention of the existing slipway.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. The merged policy includes the retention of the existing slipway.</p> <p>Noted.</p>
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	<p>Redevelopment must include the English Coastal path for public access.</p> <p>This policy should secure public access along Faversham Creek and to adjacent sites, contributing to a continuous Creekside walk.</p> <p>The Exception Test should be satisfied before this site is allocated.</p> <p>Pg103 Appropriate if sensitively done</p> <p>Pg102 Southern Water is the statutory wastewater undertaker for Faversham. In accordance with this, we have undertaken an initial assessment of the proximity of sites in the Plan to our existing assets, in particular wastewater treatment works and pumping stations. This assessment showed the site boundary of Policy FAV17 was approximately 10m from Quay Lane Faversham pumping station, which is located south west of the site boundary for Policy FAV17. This needs to be taken into account when designing the layout of any proposed development, to ensure an area of adequate separation exists between the pumping and any 'sensitive' development such as housing, schools or recreational areas. No habitable rooms should be located within 15 metres of the boundary of an existing water/wastewater pumping station, due to the vibration and noise generated by all types of pumping stations and the potential at times for odour. Accordingly, we propose</p>	<p>Reference to the English Coastal Path added to 3.4 of the Plan (movement and Sustainable Transport).</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. FAV15 and FAV16 require public access to the Creek.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. FAV16 only allows residential development at upper floors. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>Comment noted.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. Clause added to policy along the line suggested. Interpretation amended to make reference to Quay Lane Pumping Station.</p>
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		<p>the following additional criteria for the Design and layout of Policy FAV17: “Layout of the development must be planned to ensure no habitable rooms are located within a minimum 15m of the boundary of the existing wastewater pumping station.”</p> <p>Pg102 No residential development in this area. See comments in FAV16</p> <p>Pg 102-103 There does not appear to be any space for yet more houses in Belvedere Road. Also your map seems to highlight the area where Posilipo's restaurant is. Are you going to demolish it? Why? It is very good/popular and an asset to the town. Also Faversham Creek Hotel doesn't exist! Do you move the quay? Your map dated 1/2/22. Surely it should include current buildings, not obsolete ones.</p> <p>Tidal flooding is the main consideration. Should be restricted to maritime facilities as during last 800 years.</p>	<p>FAV17, FAV23 and FAV28 are now merged into FAV16. The main emphasis is on business, hospitality, leisure, assembly, recreation, tourism and community uses, workshops, studios and exhibition space. The policy would allow residential use, but only on upper floors as part of a mixed-use development.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. The emphasis of FAV16 is on heritage-led regeneration, rather than clearance and housebuilding. The main emphasis is on business, hospitality, leisure, assembly, recreation, tourism and community uses, workshops, studios and exhibition space. The policy would allow residential use, but only on upper floors as part of a mixed-use development. The warehouse building that contains Posilipo's restaurant is not in the FAV16 area, but is in the Conservation Area and is also a listed building. The map is taken from an OS base plan, and we have no means to update it.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. FAV16 only allows residential development at upper floors. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. The emphasis of FAV16 is on heritage-led regeneration. The restriction on use suggested would prevent investment in the sites, including the heritage assets. This would be harmful economically and would be likely to lead to the loss of historic buildings.</p>
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	<p>Pg102 Add to point 3 the need for a continuous public walkway and moorings with town quay and Belvedere Road.</p> <p>Compared with 30 years ago the loss of texture and interest in Belvedere Road has been tragic. There should be no further loss at all, no new building an additional traffic.</p> <p>All good</p> <p>Pg 102 Agree but flooding</p> <p>Pg102 Retain waterfront for mooring linked to Town Quay. Retain exiting slipway and assess as there is no slipway at head of creek.</p>	<p>FAV17, FAV23 and FAV28 are now merged into FAV16. FAV15 and FAV16 require public access to the Creek.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. The emphasis on FAV16 is on heritage-led regeneration, though there will also be some redevelopment of poorer quality buildings.</p> <p>Comment noted.</p> <p>Comment noted. FAV16 only allows residential development at upper floors. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>FAV17, FAV23 and FAV28 are now merged into FAV16. FAV15 and FAV16 require public access to the Creek. The merged policy includes the retention of the existing slipway.</p>
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	FAV18	<p>Plans for mixed use redevelopment in this and the following sites are good on the whole provided developers are not allowed to squeeze in extra housing. Places to work are just as important as places to live</p> <p>Support: Shepherd Neame Ltd (landowners) are fully in agreement with the proposed policy wording and interpretation. Shepherd Neame Ltd can confirm that current planning application proposals for residential development on site are not located within the flood plain.</p> <p>This should not be happening as said before water lane is not built for the increase traffic flow ,frequently walk water lane and are met with cars mounting the pavement to get past on coming traffic as a pedestrian at time you feel unsafe.Water lane on to A2 is a very tight junction school is dangerous to either turn left or right you have to come out and onto the A2 to even see if it's clear to pull out .</p> <p>See Fav16</p> <p>Disaster for access. Traffic past the school.</p> <p>Pg 104 agree</p> <p>Pg 104 Interesting to add a footpath.</p> <p>Pg104 I support the proposed policy.</p>	<p>Comment noted. Policy FAV10 deals with design, so would help to ensure that sites were developed sensitively. Note FAV18 has been deleted and FAV17 , FAV23 and FAV28 have been merged into FAV16.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings whilst further development of the site would remove a green gap.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings whilst further development of the site would remove a green gap. Redevelopment of existing buildings would have a largely neutral impact on traffic.</p> <p>Comments previously addressed.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings whilst further development of the site would remove a green gap. Redevelopment of existing buildings would have a largely neutral impact on traffic.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>
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	<p>Pg104 Believe housing should be similar in style to Dawsons Row, Water Lane adjacent to site. i.e. small terraced suitable for agriculture workers in 1800s.</p> <p>The majority of this site lies largely within Flood zone 3 and is likely to be unsuitable for significant development. For information it is also the (now dry) former course of the Westbrook, which used to run from Painter's Forstal to Faversham Creek.</p> <p>Traffic from this site will also impact on the junction of Water Lane and the A2 as well as the AQMA in Ospringe. Depending on the number of units proposed I would suggest this site is unsuitable for development.</p> <p>The Exception Test should be satisfied before this site is allocated.</p> <p>Pg106 Appropriate if sensitively done</p> <p>Retain as agricultural land</p> <p>Pg104 The junction of Water Lane with London Road will have to be modified/improved if there is to be more residential traffic.</p>	<p>FAV3 deals with the type and mix of homes. FAV10 deals with design. FAV18 has been deleted in response to other representations. FAV2 would allow redevelopment of existing buildings.</p> <p>Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. FAV18 has been deleted in response to other representations. FAV2 would allow redevelopment of existing buildings.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings. Redevelopment of existing buildings, which would have a largely neutral impact on traffic and air quality.</p> <p>Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. FAV18 has been deleted in response to other representations. FAV2 would allow redevelopment of existing buildings.</p> <p>Comment noted.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings. FAV7 amended to protect 'best and most versatile' agricultural land.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings. Redevelopment of existing buildings, which would have a largely neutral impact on traffic.</p>
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		<p>Pg104 A new footpath should be encouraged. However you should check developers to not build "too high" while development is ongoing - not leave it until finished when the damage is done. If so, you should not sign off the development until they have put it right.</p> <p>This gorgeous open space should be retained as curtilage to the farm, as at Abbey Farm.</p> <p>All good, though less new builds please</p> <p>Pg104 Water lane should not take traffic from extra housing. Can the school cope? There is air pollution issue to consider AQMA on Ospringe Street. If you allow development here you open up development opportunities opposite in the field across Water Lane.</p> <p>Pg104 Having lived for 10 years in Ospringe with children at the school we agree but with concern about more traffic in this very busy and dangerous route to and from the A2.</p>	<p>Comment noted on footpath. Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings. FAV10 deals with design.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings whilst further development of the site would remove a green gap.</p> <p>Comment noted.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings. Redevelopment of existing buildings, which would have a largely neutral impact on traffic and air quality.</p> <p>Site allocation policy FAV18 has been deleted in response to other representations on the basis that FAV2 would allow redevelopment of existing buildings. Redevelopment of existing buildings, which would have a largely neutral impact on traffic.</p>
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	FAV19	<p>See comments above</p> <p>Add to 6. ...and boat moorings</p> <p>To include a continuous walkway/access along the creek & moorings</p> <p>Again a road and junction not built for the volume of traffic ,increased traffic will make the junction of abbey street into court street a dangerous one due to lack of visibility.</p> <p>See FAV16</p> <p>Pg107 agree</p> <p>Pg107 It tall 3 storey housing is allowed there will be no more view north from the Anchor Pub. More housing along here is disastrous and will add to the ghastly barrack effect of tall houses either side of the creek already allowed.</p> <p>Pg107 I support the proposed policy. For all sites along Faversham Creek, provision should be made for continuous public access along the creekside.</p> <p>Pg107 The Association supports the Plan in respect of this site. Particular emphasis must be made to pedestrian access and the adequacy of the on site parking in order not to put further pressure on the residents parking in Abbey Street.</p> <p>Pg109 Plan recognises the need for adequate on site parking, it makes no reference to the increase in commercial and private traffic Abbey Street, which already is a major problem.</p>	<p>Comments previously addressed.</p> <p>FAV15 now deals with moorings.</p> <p>FAV15 deals with access to the waterside and moorings.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions, including the junction mentioned.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Already allocated in the Faversham Creek Neighbourhood Plan for mixed-use development including residential. FAV19 amended to limit the height of new development to 3-storey, given the proximity to listed buildings.</p> <p>Comment noted. FAV15 deals with public access to the waterside.</p> <p>Comment noted. FAV15 deals with public access to the waterside. FAV4 deals with pedestrian connectivity. Parking standards are contained in the Local Plan and the Neighbourhood Plan does not modify these.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p>
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		<p>I welcome the requirement for a public walkway along the Creek edge as part of this policy.</p> <p>The Exception Test should be satisfied before this site is allocated.</p> <p>Pg109 Suitable if most of the development work is carried out during summer to limit disturbance to Redshank</p> <p>Access to this site is via Abbey Street and the junction between Abbey Street and Abbey Road. Access along Abbey Street is narrow and two-way traffic is not possible along the length of this road due to residents' parking and the road width. Increased traffic flows along Abbey street due to more residential building along New Creek Road and the developments at Standard Quay can make access difficult at particular times of the week/day (eg weekends, school arrival/departure times)</p> <p>-The Abbey Street/ Abbey Road junction layout outside The Anchor is narrow and restricted further by residents' car parking making vehicular access to CP3 (coach depot site) difficult. As noted in the plan, there is no pedestrian walkway turning left in front of The Anchor from Abbey Road to Standard Quay, access is shared with cars</p>	<p>Comment noted.</p> <p>Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>The Neighbourhood Plan could not control the period of construction. It would be for the Local Planning Authority to consider whether to impose conditions relating to impacts during the construction period.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions, which includes the junction mentioned.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions, which includes the junction mentioned. The policy requires safe and convenient access. Wording adjusted for clarity.</p>
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	<p>-Please ensure that the character of the unique an historic creek side is protected and it's visual amenity is not eroded further by the building of tall residential buildings</p> <p>The impact of more housing here would have a very seriously detrimental effect on Abbey Street</p> <p>Pg107 Development should be restricted to 2 story buildings only.</p> <p>Pg107 Please ensure developer does not "block" access to Creekside like they have on the other side of the creek.</p> <p>Tidal Flooding!! Leave it alone, maritime or carwash purposes. Development is greedy madness.</p> <p>The single storey brick building (probably 1930's) is interesting and unusual for Faversham and should be preserved. Pedestrian access should be by creek frontage. Traffic and parking is already excessive.</p> <p>All good, though less new builds please</p> <p>Pg107 Too much traffic along Abbey Street can nearest schools cope?</p>	<p>FAV19 already makes reference to historic context and has been amended to limit the height of new development to 3-storey, given the proximity to listed buildings.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p> <p>FAV19 already makes reference to historic context and has been amended to limit the height of new development to 3-storey, given the proximity to listed buildings.</p> <p>FAV15 deals with public access to the waterfront.</p> <p>Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>The policy interpretation now makes reference to this building. FAV15 deals with public access to the waterfront. Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p> <p>Comment noted.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p> <p>Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject</p>
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		<p>Pg107 No more residential properties in flood areas. This will create more congestion and danger to Abbey street residents with increased traffic pollution.</p>	<p>to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p>
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	FAV20	<p>Ditto</p> <p>Sight lines from the back of Morrisons to the Priory should not be obstructed under any circumstances this is a Historic view.</p> <p>See FAV16</p> <p>Pg110 Agree in part, Ordance Wharf - no to residential development.</p> <p>Pg110 Totally unsuitable for housing as out of scale to avoid flood risk. Should be used for maritime leisure only.</p> <p>Pg110 I support the proposed policy. On this site in particular, it is vital to adhere to the three-storey limit for new developments in view of the sightlines towards Davington Priory.</p> <p>I welcome the requirement for a public walkway along the Creek edge as part of this policy. The Exception Test should be satisfied before this site is allocated.</p> <p>Pg112 Aproprate for redevelopment, but care needs to be taken to preserve historic nature. Again any development</p>	<p>Comment noted.</p> <p>The policy already makes reference to sight lines. Small adjustments made to wording for clarity.</p> <p>Comments previously addressed.</p> <p>Already allocated in the Faversham Creek Neighbourhood Plan for mixed-use development including residential.</p> <p>Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. Already allocated in the Faversham Creek Neighbourhood Plan for mixed-use development including residential.</p> <p>The policy addresses sight lines rather than placing a height limit.</p> <p>FAV15 now deals with public access to the waterfront. Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>FAV10 deals with design and FAV11 deals with heritage. FAV7 protects the natural environment and priority species.</p>
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	<p>work affecting the creek needs to consider wintering Redshank.</p> <p>Pg110 Southern Water is the statutory wastewater undertaker for Faversham. Our initial assessment indicates that Southern Water's infrastructure crosses this site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting. With regard to this, Southern Water proposes the following addition to site policy: “Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.”</p> <p>This land has been assessed as polluted. It also appears to be seriously unstable. It is very close to the the Purifier Building, where boat building and other trades are carried out, This may lead to disputes over noise etc. It is unsuitable for residential development.</p> <p>Pg110 Absolutely no residential development should be allowed here. Maritime, associated light industry & recreational facilities only to enhance & take advantage of a revitalised upper pool.</p> <p>Should be preserved for waterside heritage activities.</p>	<p>Interpretation amended to include these comments.</p> <p>The AECOM Site Assessment report took account of site constraints. The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development. Mention of land contamination added to interpretation. Policy amended to make reference to take account of nearby industrial uses.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development, including residential.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development, including residential.</p>
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	<p>Pg110 Same as Fav19 - Developers should not be allowed to block footpaths and if they are going to provide footpaths in the plans, you should check to make sure they do and not rely on trust.</p> <p>This wharf is of national and international significance and should be left undeveloped but repaired and restored. A gunpowder wharfs - leave it alone. Tidal flooding! As established in the previous application any development would require piling which would penetrate the aquifers feeding the brewery just 300' distant. The present owner acquired this speculatively some years ago; its development would interrupt sight lines dating back to the Norman period and would seriously diminish the maritime facilities available for re-rejuvenated basin once we get our opening bridge back. As recently discovered mills behind the allotment wall reveal the wharf was the immediate dispatch point for powder which helped shape the British Empire, and affected the history of the world. Archaeology of the entire area essential.</p> <p>Residential use would be very unlikely to be suitable architecturally as the building here needs to be low (also small)</p> <p>All good, though less new builds please</p> <p>Pg110 Leave as brownfield green space for wildlife, building will disturb nesting/feeding waterfowl along the mudflats. Impact adversely on Purifier setting.</p>	<p>FAV15 now deals with public access to the waterfront. FAV4 and FAV10 deal with pedestrian connectivity and permeability. FAV6 deals with impacts on existing footpaths.</p> <p>The Wharf is within Faversham Conservation Area, but has no other heritage designation. However, comment on international significance noted. The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development, including residential. FAV15 now deals with public access to the waterfront. Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk. The policy addresses sight lines. FAV11 deals with impacts on urban archaeological zones.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development, including residential. The policy takes account of sight line rather than building heights.</p> <p>Comment noted.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development, including residential. FAV7 already deals with protection of mudflats and habitats. Impacts on Purifier addressed by the policy.</p>
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		<p>Pg110 No residential building should be allowed. This wharf must be for maritime use only, linked to community, work of Faversham Creek trust and training apprenticeships etc at Purifier workshops.</p>	<p>The site is already allocated in the Faversham Creek Neighbourhood Plan for mixed use development, including residential.</p>
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	FAV21	<p>Ditto</p> <p>See FAV16</p> <p>Agree</p> <p>Pg113 Parking provision is vital if this goes ahead. Abbey Street is now much busier than 30 years ago when I first bought my house so any further development here is not ideal.</p> <p>Pg113 I support the proposed policy.</p> <p>Pg113 The site must be sensitively designed so as not to be detrimental to the Conservation area and adjacent listed buildings. The proposed new entrance in New Creek Road must be consulted with the Residents prior to consent.</p> <p>Pg113 Similar comments as above. No reference is made to the obvious increase in traffic in Abbey Street which is already above capacity and not fit for purpose.</p> <p>Pg114 If sympathetic to surrounding buildings</p> <p>Access to this site is along Abbey Street, and via the junction between Abbey Street and Abbey Road. Access through Abbey Street is narrow and two-way traffic is not possible along the length of this road due to residents' parking and the road width. Increased traffic flows along Abbey Street due to more residential building along New Creek Road and the</p>	<p>Comment noted.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>FAV4 deals with pedestrian connectivity. Parking is addressed in the policy and parking standards are contained in the Local Plan and the Neighbourhood Plan does not modify these.</p> <p>Comment noted.</p> <p>Design and heritage impacts are dealt with in FAV10 and FAV11, in addition to this policy. Policy adjusted to allow greater flexibility in uses, to better integrate with historic buildings and surrounding land uses.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p> <p>Design and heritage impacts are dealt with in FAV10 and FAV11, in addition to this policy.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions. Design and heritage impacts are dealt with in FAV10 and FAV11, in addition to this policy. Policy adjusted to allow greater flexibility in uses, to better integrate with historic buildings and surrounding land uses. Policy amended to place 3-storey limit on new development.</p>
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	<p>developments at Standard Quay can make access difficult at particular times of the week/day (eg weekends, school arrival/departure times) access to the New Creek Road site is via the Abbey Street/Abbey Road junction outside the Anchor. Access is narrow and restricted through this junction and at the junction turning right out of New Creek Road into Abbey Road. access to New Creek Road site- via Abbey Road and New Creek Road-these are both un-adopted roads. Ownership, access and maintenance of these access roads would require clarification for any new building any new developments on this site need to ensure that pedestrian and cycle access to homes along New Creek Road is protected and enhanced to ensure the safety and ease of pedestrian access due to increased traffic flow associated with new building please ensure that any building on the land off New Creek Road (Fentiman's yard) is restricted in height (2 storeys or less) to avoid crowding an impacting upon the old granary and other historic buildings on Standard Quay which back onto this site.</p> <p>It is unsuitable for residential development.</p> <p>Pg113 No objection to residential development here but perhaps the houses could be of better construction quality & appearance than those recently erected fronting New Creek Road.</p> <p>Development should include sufficient parking to avoid additional street parking in vicinity of site.</p>	<p>The AECOM Site Assessment report and Strategic Environmental Assessment make clear that residential use would be acceptable. However, policy adjusted to allow greater flexibility in uses, to better integrate with historic buildings and surrounding land uses.</p> <p>FAV10 deals with design. The intention is to create a significant improvement in design quality.</p> <p>FAV4 deals with pedestrian connectivity. Parking is addressed in the policy and parking standards are contained in the Local Plan and the Neighbourhood Plan does not modify these.</p>
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		<p>New housing should have immaculate standards of insulation and solar panels and water management. Site only on higher ground.</p> <p>Pg113 Point 1 change "should" to "must". New Access into New Creek Road raises issues as the road is unadopted.</p> <p>All good, though less new builds please</p> <p>Pg113 As before - access via Abbey Street is limited, too much traffic</p> <p>Pg113 Against residential for same reasons as FAV14 p107.</p>	<p>FAV10 deals with design. The intention is to create a significant improvement in design quality.</p> <p>Use of the word 'must' is problematic having regard to national planning policy.</p> <p>Comment noted.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions.</p> <p>Policy adjusted to allow greater flexibility in uses, to better integrate with historic buildings and surrounding land uses.</p>
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	FAV22	<p>Ditto</p> <p>Pg115 Mention FCLT preapp engine sheds and community-led housing?</p> <p>See FAV16</p> <p>Agree especially 4</p> <p>Pg115 No problems with this assessment of the site,</p> <p>Pg115 I support the proposed policy.</p> <p>Pg116 Suitable with pedestrian access</p> <p>Housing should not be permitted so close to the Rec.</p> <p>Pg115 The access/junction with Station Road/St Mary's road will have to be modified to clarify priority right of way. This is already a dangerous junction.</p> <p>Developing this crucial green area would have devastating consequences for the green corridor - the loss of trees and undisturbed ground out proportion the benefits. We all know people like cutting down trees which are older then their buildings. Leave tree strop alone. Particularly where it border the Rec and the raised embankment.</p>	<p>Comment noted.</p> <p>The Neighbourhood Plan should not refer to specific pre-application discussions or current planning applications.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Pedestrian permeability and connectivity are dealt with in this policy and FAV4 and FAV10. Policy amended to refer to pedestrian connections to the recreation ground.</p> <p>The Recreation Ground is already flanked by residential development. Overlooking by residential properties helps to create a safer environment. No change.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions. The highways authority would be consulted as part of any planning application.</p> <p>This is a brownfield site. FAV7 protects existing trees. As the site is entirely within the Faversham Conservation Area an application would need to be made to fell any trees.</p>
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		<p>All good, though less new builds please</p> <p>Pg115 A policy should be introduced to ensure a nature corridor is provided between the recreation ground and the old sheds between the London' Whitstable Line and London/Dover railway line and the cemetery at Love Lane. This would enhance biodiversity, especially if older trees and existing bushes/shrub is conserved.</p> <p>Care needs to be taken that this does not prove detrimental to the recreation ground. I have been told that this is valuable for wildlife. Should more care be taken as to whether this should be developed at all.</p> <p>Pg115 Not familiar enough with site to comment.</p>	<p>Comment noted.</p> <p>FAV7 protects existing trees and deals with green and blue infrastructure, including biodiversity net gain and wildlife corridors. FAV10 deals with design. Interpretation amended to make reference to landscape design as part of the development.</p> <p>This is a brownfield site. FAV7 protects existing trees and deals with green and blue infrastructure, including biodiversity net gain and wildlife corridors. FAV10 deals with design. Interpretation amended to make reference to landscape design as part of the development.</p> <p>Noted.</p>
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	FAV23	<p>Ditto</p> <p>Pg117 Strengthen public access to creek side?</p> <p>Add to 3.: e. provide a continuous public walkway and boat moorings along the Creekside</p> <p>Support: Shepherd Neame Ltd are fully in agreement with the proposed policy wording and interpretation.</p> <p>to include creekside access/walkway/ moorings for the public</p> <p>See FAV16</p> <p>Pg117 Agree</p> <p>Pg117 Careful development as TS Hazard is a jewel.</p> <p>Pg117 I support the proposed policy.</p> <p>This policy should secure public access along Faversham Creek and to adjacent sites, contributing to a continuous Creekside walk. The Exception Test should be satisfied before this site is allocated.</p> <p>Pg118 If done sensitively</p>	<p>Comment noted.</p> <p>FAV15 now deals with public access to the waterside.</p> <p>FAV15 now deals with public access to the waterside and moorings.</p> <p>Comment noted. Note FAV23, FAV17 and FAV28 have been merged into FAV16.</p> <p>FAV15 now deals with public access to the waterside and moorings.</p> <p>Comments previously addressed. Note FAV23, FAV17 and FAV28 have been merged into FAV16.</p> <p>Comment noted.</p> <p>Note FAV23, FAV17 and FAV28 have been merged into FAV16. This makes explicit reference to TS Hazard.</p> <p>Comment noted.</p> <p>FAV15 now deals with public access to the waterside. Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>Comment noted.</p>
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	<p>This would detract from Town Quay and TS Hazard.</p> <p>Pg117 Perhaps ground floor spaces could be used for small boat storage which could prove to be vital.</p> <p>Creek access and walkway needed.</p> <p>Tidal Flooding. Maritime use should be priority. i.e. facilities for visiting yachtsmen and crews.</p> <p>Pg117 Add to 3 "continuous public walkway and moorings alongside the creek"</p> <p>All good, though less new builds please</p> <p>Pg117 Don't forget rubbish collection is always at ground level. Protect creek from sewage pollution in all your Creekside development schemes please.</p> <p>Pg117 Flooding again - not suitable for residential or hotels but offices workshops.</p>	<p>Note FAV23, FAV17 and FAV28 have been merged into FAV16. FAV16 focuses on heritage-led regeneration. This makes explicit reference to TS Hazard and connectivity with Town Quay.</p> <p>Note FAV23, FAV17 and FAV28 have been merged into FAV16. The policy could support boat storage, if a suitable scheme was proposed by a local organisation or business.</p> <p>FAV15 now deals with public access to the waterside.</p> <p>Note FAV23, FAV17 and FAV28 have been merged into FAV16. This focuses on heritage-led regeneration. Preventing or restricting the use of historic buildings could threaten their survival. So FAV16 takes a flexible approach, including a focus on the visitor potential of heritage.</p> <p>FAV15 now deals with public access to the waterside and moorings.</p> <p>Comment noted.</p> <p>These would be matters for health and environmental legislation. Reference to bin storage added to FAV3.</p> <p>Note FAV23, FAV17 and FAV28 have been merged into FAV16. This focuses on heritage-led regeneration. Preventing or restricting the use of historic buildings could threaten their survival. So FAV16 takes a flexible approach to use and makes clear that residential uses would only be allowed for upper floors.</p>
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	FAV24	<p>Ditto</p> <p>Support: Shepherd Neame Ltd are fully in agreement with the proposed policy wording and interpretation.</p> <p>See FAV16</p> <p>Pg119 Agree</p> <p>Pg119 Height of housing could be disastrous for existing old houses in West Street.</p> <p>Pg120 I support the proposed policy.</p> <p>Pg120 Appropriate re use</p> <p>Pg119 Southern Water is the statutory wastewater undertaker for Faversham. Our initial assessment indicates that Southern Water's infrastructure crosses this site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting. With regard to this, Southern Water proposes the following addition to site policy: “Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.”</p>	<p>Comment noted.</p> <p>Comment noted.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>The policy refers to the setting of listed buildings and the Faversham Conservation Area, rather than setting a particular height limit.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Interpretation amended to include these comments.</p>
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	<p>Pg119 Vehicle access/exit could be problematic with the supermarket entrance, bus stop & the West Street junction all adjacent to the site.</p> <p>North Lane is not the safest road for pedestrians - this site could be redeveloped at the higher end. Tidal flooding will catch up one day.</p> <p>All good, though less new builds please</p> <p>Pg119 Parking must be integral to the scheme or just allocate the whole site as a public car park, useful for the vets and Chinese</p> <p>Pg119 Agree proposals</p>	<p>Traffic impacts were considered in the AECOM site assessments report. FAV5 deals with critical road junctions. The highways authority would be consulted as part of any planning application.</p> <p>Traffic impacts were considered in the AECOM site assessments report. FAV4 and FAV10 deal with pedestrian connectivity and permeability. Clause 2 removed but Clause 4 retained, to give greater clarity on flood risk.</p> <p>Comment noted.</p> <p>FAV4 deals with transport. Parking standards are contained in the Local Plan. Public car park would fail to realise the potential of the site in terms of town centre regeneration.</p> <p>Comment noted.</p>
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	FAV25	<p>Ditto</p> <p>See FAV16</p> <p>Pg121 Agree</p> <p>Pg121 Access is a problem</p> <p>Pg121 I support the proposed policy again on the understanding that the height of any new housing does not exceed three storeys at the most.</p> <p>Pg122 and 123 No objections</p> <p>Pg121 Many problems with both sites. Perhaps a rethink is needed.</p> <p>It is only really safe to build above the 5m contour (the medieval 25'height which determined safe areas. Tidal flooding remains a threat.</p> <p>All good, though less new builds please</p> <p>Agree</p> <p>Pg 121 to 124, 126 As nearest neighbours to BMM we will be most effected by the three developments. We support the proposals but are naturally concerned about increased traffic issues, access etc.</p>	<p>Comment noted.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Traffic impacts and access was considered in the AECOM site assessments report.</p> <p>The policy refers to the setting of listed buildings, Faversham Conservation Area, and key views, rather than setting a particular height limit.</p> <p>Comment noted.</p> <p>The AECOM site assessment report considered a range of factors. Site allocations are made on a brownfield first approach.</p> <p>The policy requires flood risk mitigation, especially at ground floor level.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Traffic impacts and access was considered in the AECOM site assessments report. The highways authority would be consulted on any planning application. The site is also allocated in the Faversham Creek Neighbourhood Plan.</p>
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	FAV26	<p>Ditto</p> <p>See FAV16</p> <p>Pg124 Agree</p> <p>Pg124 The office building is a rare example of Art Deco architecture in Faversham and care should be taken to not allow developers to mask it from view with new buildings.</p> <p>Pg124 Access is a problem.</p> <p>Pg124 I support the proposed policy as long as any new development does not diminish the historical value of the site, notably structures linked to the gunpowder industry.</p> <p>Agree. Brent Hill is a narrow road and think unsuitable for increase in number of vehicles. Should definitely continue to be one way.</p> <p>Pg125 Suitable for limited development, agreeing with provisos</p> <p>Pg10 Please reference back to my affordable housing comment on this site in Fav 3. In my opinion the site is not suitable for affordable housing. Commuted sums should be sought and applied for the development of perpetual affordable housing in the parish for the benefit of Faversham residents in housing need.</p>	<p>Comment noted.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Interpretation amended for accuracy (the building is of interest but has no Art Deco detailing).</p> <p>Traffic impacts and access were considered in the AECOM site assessments report. The highways authority would be consulted on any planning application. The site is also allocated in the Faversham Creek Neighbourhood Plan.</p> <p>The policy places emphasis on both designated and non-designated heritage assets.</p> <p>Traffic impacts and access were considered in the AECOM site assessments report. The highways authority would be consulted on any planning application. The site is also allocated in the Faversham Creek Neighbourhood Plan.</p> <p>Comment noted.</p> <p>Comments previously considered. Comment on suitability for affordable housing noted. It would be for the developer to make this case in submitting a planning application. Otherwise, FAV3 and local plan policy on affordable housing would need to be applied in a consistent manner.</p>
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	<p>Pg124 OK but needs some form of public transport link to town centre especially for elderly/infirm residents.</p> <p>High quality development would be acceptable with properly managed tree planting and attention to insulation, solar panels etc.</p> <p>There should be no loss of trees</p> <p>All good, though less new builds please</p> <p>If heights of new buildings do not impact on views from other areas of town to this site. Agree but retain existing trees and shrubs as much as possible. Think of traffic management of the Brent Hill.</p> <p>Pg124 See FAV25</p>	<p>FAV4 deals with sustainable transport. The Town Council supports improvements in public transport. However, public transport provision would be a matter for the service provider.</p> <p>FAV10 deals with green design and landscaping. This includes support for tree planting and micro-generation.</p> <p>FAV7 protects existing trees.</p> <p>Comment noted.</p> <p>The policy does not explicitly deal with views, but it does deal with topography and heritage considerations. FAV7 protects existing trees. Traffic impacts and access were considered in the AECOM site assessments report. The highways authority would be consulted on any planning application. The site is also allocated in the Faversham Creek Neighbourhood Plan.</p> <p>Comments previously considered.</p>
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	FAV27	<p>Ditto</p> <p>4-Need to strengthen protection to ensure space alongside PROW. ie prevent building close to path</p> <p>Creekside access for the public, moorings. There is an excellent wildlife corridor there at present this should be taken into consideration.</p> <p>See FAV16</p> <p>Pg127 Agree</p> <p>Pg126 This area currently has a footpath running through it , and has habitat for various birds and other wildlife on the creek . Developers must not be allowed to damage the mudflats or hedges by the footpath as these are used by the birds for feeding and roosting.</p> <p>Pg126 It is vital this area is used for leisure and community purposes as a priority over housing as this is the area of water we still hope will become a basing full of barges and sailing opportunities when we get the lifting/opening bridge.</p> <p>Pg126 I support the proposed policy. The Public Right of Way along the southern edge of the site between Bridge Road and Flood Lane should be maintained in as natural a state as possible, e.g. with trees and shrubs, and should not be bounded by high walls on the landward side that might make it an intimidating place to walk at night.</p> <p>Pg127 Currently used as a car park by BMM Weston staff. Where will the cars park if built on?</p>	<p>Comment noted.</p> <p>Impacts on existing PROW dealt with in this policy and FAV6.</p> <p>FAV15 deals with access to the waterfront and moorings. FAV7 protects wildlife corridors. Interpretation amended to refer to natural environment policy.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Impacts on existing PROW are dealt with in this policy and FAV6. FAV7 protects the natural landscape features including mudflats, habitats and wildlife corridors. Interpretation amended to refer to natural environment policy.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan. Reference to the bridge and sluice project added to planning rationale.</p> <p>Impacts on existing PROW are dealt with in this policy and FAV6. Text added to interpretation as suggested.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan. BMM Weston proposed the site.</p>
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		<p>Welcome reference to the Public Right of Way along the creek-side edge of this site. This PROW should be enhanced as part of a continuous Creekside walk and linked to adjacent sites. The Exception Test should be satisfied before this site is allocated.</p> <p>Pg126,127 No objections providing footpath is maintained along creek bank and tree cover is maintained as this is a much used corridor for small passerines.</p> <p>Pg126 Southern Water is the statutory wastewater undertaker for Faversham. Our initial assessment indicates that Southern Water's infrastructure crosses this site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting. With regard to this, Southern Water proposes the following addition to site policy: “Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.”</p> <p>This i valuable habitat for birds alongside the creek, using the shrubs and grasses. Not suited to residential use would reduce access. More community space.</p>	<p>It is obviously desirable for there to be a continuous walk along the creek edge. However, the developer has no control outside of the site. The site is already allocated in the Faversham Creek Neighbourhood Plan. Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>Comment noted.</p> <p>Interpretation amended to include these comments.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan. Interpretation amended in response to another representation to clarify that the PROW should be maintained in as natural state as possible with trees and shrubs.</p>
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		<p>Pg126 Any development of more than 2 stories would be out of keeping.</p> <p>Pg126 Once again developers must be made to accept rights of way. It's too easy for them to say used to get "green light" and that the finish it's "gated access" private residents only "like the Creekside".</p> <p>In view of very narrow entrance from Quay Lane this site will require parking arrangements within site and to control privacy of adjoining owners sites.</p> <p>Pg127 The walkway by the creek PROW should be kept and set as an open space with views of nature.</p> <p>This should mainly be kept undeveloped. Any building should be only a minor part of the site and should be commercial in nature with very limited apartment above (if at all).</p> <p>All good, though less new builds please</p> <p>Pg126, 127 Building should not impact on mudflats or surrounding scrub and trees to the water's edge or impact on the footpath around the site used for many years, but not formally recognised. I have used this for over 20 years.</p> <p>Pg 126, See Fav 25 and Fav 26</p>	<p>FAV10 deals with design and clause 2 of this policy highlights heritage impacts.</p> <p>Gated access would block the PROW and would fail to comply with the policy.</p> <p>Impacts on surrounding sites would be considered through the development management process.</p> <p>Comment noted.</p> <p>The site is already allocated in the Faversham Creek Neighbourhood Plan. The restriction suggested would make the site non-viable.</p> <p>Comment noted.</p> <p>FAV7 protects the natural environment including trees and the mudflats. Interpretation amended in response to another representation to clarify that the PROW should be maintained in as natural state as possible with trees and shrubs.</p> <p>Comments previously addressed.</p>
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	FAV28	<p>Ditto</p> <p>See FAV16</p> <p>Pg128 Agree</p> <p>Pg128 Existing Creek Creative has been a huge asset for Faversham and generously allowed to get going by present owner of the site. Some housing development understood but important to retain Creek Creative for the future.</p> <p>Pg128 I support the proposed policy.</p> <p>Pg128 Having regard to the recent Planning Application refusal for part of this site, the Association is pleased that the Plan recognises the critical of the parking provision and servicing to this site. The street is extremely narrow in this vicinity and pedestrian movement and safety is of paramount importance.</p> <p>Pg128 Any development must provide adequate off-street parking and safe vehicular and pedestrian access along with wider pavements, with associated and inevitable additional car use, could be be accommodated in this very tight space.</p> <p>Pg128 Any development must include sufficient on site parking. The recent rejected application ignored the parking provision.</p> <p>Pg129 No objections</p>	<p>Comment noted.</p> <p>Comments previously addressed. This policy has now been merged with FAV16.</p> <p>Comment noted.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration.</p> <p>Comment noted.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration. It is unlikely that any significant parking provision could be made within the site.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration. It is unlikely that any significant parking provision could be made within the site.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration. It is unlikely that any significant parking provision could be made within the site.</p> <p>Comment noted.</p>
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	<p>Pg128 No residential development. Arts/crafts/light industrial use only.</p> <p>Pg129 Again the map shows a hotel that doesn't exist yet is dated 01/02/22. Why haven't you used and up to date map?</p> <p>Sadly this is not really suitable or safe for residential development. Street access too narrow and dangerous. Risk of flooding, overlooks gardens in Abbey Street.</p> <p>There should be no new building here whatever as per my earlier note about texture needing to be retained.</p> <p>All good, though less new builds please</p> <p>Pg128 Parking is a must here for any residential uses plus businesses. Bottle neck will worsen with increased traffic. Flooding.</p> <p>Pg128 Support this scheme especially the retention of the creative workshops and studios and space to exhibit and train, Creek Creative work so hard for our community and have supported many locals.</p>	<p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration. FAV16 would allow residential, but only on upper floors and as part of a mixed-use scheme.</p> <p>Maps are created on latest OS Mapping data.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration. FAV16 would allow residential, but only on upper floors and as part of a mixed-use scheme. Flood risk was considered in the AECOM site assessment report and Strategic Environmental Assessment. Any development within the flood zone are 3a(i) which means these are brownfield sites and subject to additional submission requirements for any planning application to demonstrate how the scheme manages the flood risk.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration.</p> <p>This policy has now been merged with FAV16, which has an emphasis on heritage-led regeneration. It is unlikely that any significant parking provision could be made within the site.</p> <p>Comment noted.</p>
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	FAV29	<p>Plans for mixed use redevelopment in this and the previous sites are good on the whole provided developers are not allowed to squeeze in extra housing. Places to work are just as important as places to live</p> <p>Add to Interpretation: Kiln Court and Osborne Court are particularly suited to affordable housing</p> <p>See FAV16</p> <p>Pg130 Agree</p> <p>Pg130 The Macknade Farmyard should be considered as possible conversion to help the Faversham tourist industry.</p> <p>Pg130 Agree with comments</p> <p>Pg130 I support the proposed policy</p> <p>The Faversham Lakes development at the junction of Oare Road and Ham lane originally proposed to leave the undeveloped field bordering both roads as green space. This was important to leave a buffer between Faversham and Oare and not have continuous housing along that corridor. I understand that Anderson are now applying to build on that land. If that is the case I urge that the application should be denied.</p> <p>Kiln Court and Osborne Court - affordable housing really important here.</p>	<p>FAV29 has been amended to separate out the site at Beaumont Davey Close (now in a separate policy). Kiln Court and Osborne Court are larger brownfield sites and are required to achieve housing numbers. Employment could be provided as part of a residential institution or through home working.</p> <p>Interpretation amended to refer to housing mix and affordable housing provision.</p> <p>Comments previously addressed.</p> <p>Comment noted.</p> <p>Comment noted, though outside of the scope of this site allocation policy.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted, though outside of the scope of this site allocation policy.</p> <p>Interpretation amended to refer to housing mix and affordable housing provision.</p>
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	<p>Pg131 Kiln Court and Osborne Court. Present vehicular access via Lower Road only. Development would increase vehicles along what is essentially a residential road unsuitable for lots of traffic.</p> <p>As an expansion upon the strategic allocation in the adopted local plan, should the town council wish to include the additional homes, community facility and open space as an allocation in the neighbourhood plan to follow Policies FAV17 to FAV29 in Section 3.12, Anderson Group would be happy to work with the town council to prepare an extra policy. The site at Faversham Lakes can help to achieve sustainable development in Faversham in the period to 2038 and beyond, therefore the developer would welcome the chance to meet with the town council to discuss the ongoing redevelopment of the former gravel works and the plans for the completion of the scheme, including the additional recreational and community facilities that accompany the proposed uplift to the total number of new homes.</p> <p>Pg130, 132 Kiln Court and Osbourne are eminently suitable. Not enough information provided to assess Beaumont Davey. 18/167 - unsuitable for development, extending the town too far west and having a negative impact on the landscape as well as agricultural land. 18/107 - unsuitable - loss of agricultural land in an area over developed 18/068 - Given this area has already been over-urbanised this small development will have limited negative impact. 18/078 - if the disastrous proposed eastwards expansion goes ahead then this small development will have limited additional negative impact. 18/062 - Less objectionable than 18/065 purely due to it's limited size, but being greenfield land development should be</p>	<p>Traffic impacts were considered in the AECOM Site Assessments report.</p> <p>Additional policies can't be added at this stage – this would set the Plan back to a pre-screening stage.</p> <p>Comment noted. This applies to SHLAA sites rather than sites allocated in the Neighbourhood Plan which focuses on brownfield sites. Site FNP14 was not selected as a site allocation. FAV7 has been amended to protect 'best and most versatile' agricultural land. Comments on Upper Brents and Davington appear to be unrelated to the sites mentioned in the policy.</p>
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		<p>avoided. 18/065 - Appalling loss of farmland, extends the town eastwards, threatens the only breeding spot for the endangered Turtle Doves within Faversham. Adds to the over urbanisation of the town. Has poor access to facilities. Road access is poor. Will put additional recreational pressure on Thorne Creek where protected warblers are already subject to major disturbance from off-lead dogs in the reeds. FNP14 - Completely unsuitable for development. Development would extend the town northwards into unspoilt open countryside, creating a new urban fringe. The land is high grade agricultural land, which should be preserved both to maintain Faverham's historic status as a rural market town, and help with any future food security policies. The south eastern corner of the site is already subject to significant surface water flooding, and this corner is further at risk of flooding from the creek due to projected sea level rises over the next 40 years. The fields support cold weather Lapwing roosts, which are a target species for conservation in this area. Additionally the fields are used by Corn Bunting in Summer (another target species), provide nesting sites for the Red Listed Skylark and Yellow Wagtails. Further Red Listed species using the fields are Yellow Hammer (scrub along field edge) and the rapidly decining House Sparrow. Large numbers of Red Listed Starling form feeding flocks across these fields, whilst winter sees large flocks of multiple Red and Amber listed Gulls using the fields as winter roosts. Red listed Linnet use the hedgerow, and that hedgerow is one of the few remaining sites in the area still to see Red Listed Greenfinch within the local area. The fields form the main feeding area for the Red Listed Swifts that nest towards Davington, sometimes numbering over 60 birds feeding above the crops. Smaller but substantial flocks of the Red Listed and rapidly vanishing House Martins also use the fields to feed. Red Listed Merlin and Hen Harriers haven</p>	
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		<p>recorded using the fields to feed, with the Old Goat Pen behind Upper Brents being a frequent roost for the rapidly decining Amber Listed Sparrowhawk and Kestrel as well as Buzzard. Barn Owls from the adjacent Ham Road Pits have also been seen feeding across the fields. The fields form a migratory stopping off point for large flocks of Meadow Pipits and other migrating passerines. Being flat land sandwiched between the creek and Ham Road pits the fields act as a corridor for waders and wildfowl crossing between the two sites. Mammals such as Fox, Rabbits and Hedgehogs also use the scrub margin at the back of the field as a safe habitat corridor, as do various amphibians, including frogs, toads and newts. Grass snakes are Viparious Lizards are commonly seen. Bats can frequently be seen hunting night flying insects, although their numbers have badly declined with the development of Ham Lakes. It is an area of high biodiversity, that would be subject to significant environmental damage by further development. This land directly encroaches onto the SPA, RAMSAR, SSSI land of Ham Marshes - all of which would be negatively impacted by this development. The proposal to use 23 hectares as a “recreational buffer” shows a ludicrous lack of awareness of the sensitivity of these sites. Currently only Ham Road on the West and the path that diverges to form Saxon Shore Way/England Coast Path and path to the farm have recreational use. If people began to use this land recreationally, damage to biodiversity would be significant, and completely unacceptable. The RAMSAR site is already under increasing pressure from recreational use, with dogs off lead disturbing waders and wildfowl on the creek and passerines in the reed beds. Further development alone would cause problems, but a recreational area would have even more severe consequences. Development would</p>	
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	<p>severely impact the visual landscape, damaging it's open historic characted. Any development behind the conservation area at Upper Brents would break the views across to the marshes and sever the historic link the former Brickworker's cottages have with fields. The view of the town from the north Kent marshes and indeed the entire relationship between the two would be badly impacted by development. Part of the existing footpath route to Ham Farm would lead into the site with housing alongside, affecting the character of the footpath.The site will block multiple heritage views. Access to the site can only be created via Ham Road with traffic causing yet further congestion around Davington Primary School and West Street. With the removal of the Oare bus route, even the limited public transport within a short walk is no longer available. Development of this site will lead to increased car journeys, even to access major bus routes or the railway station, and apart from the over subscribed Davington Primary there are no schools with a reasonable walking distance.</p> <p>Please refuse and fight to cancel anymore large, outlying developments.</p> <p>Pg130 Again, public transport needs to be provided. Minibuses would be suitable</p> <p>Pg130 Abbey Fields floods and should not be included</p>	<p>FAV29 has been amended to separate out the site at Beaumont Davey Close (now in a separate policy). The policy only relates to the named sites. The Neighbourhood Plan only allocates brownfield sites.</p> <p>Comment noted. Public transport services are outside of the influence of developers. Pedestrian and cycle permeability and connectivity and facilities are addressed in the policy and in FAV6 and FAV10.</p> <p>Abbey Fields is not allocated in this or any of the other site allocation policies in the Neighbourhood Plan. The Neighbourhood Plan only allocates brownfield sites.</p>
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	<p>The loss of the social facilities to the town is to be deplored. Delaying development would be a great idea, new policies could reverse the present deposition.</p> <p>All good, though less new builds please</p> <p>Pg130 A Kiln Court and Osborne Court should be developed as housing and a shop at least. B discharge - High biodiversity site on overdeveloped area.</p> <p>Abbey fields must not be developed. Flood plains must be retained.</p>	<p>Comment appears to be unrelated to the policy. FAV1 and FAV12 support community facilities.</p> <p>Comment noted.</p> <p>FAV29 has been amended to separate out the site at Beaumont Davey Close (now in a separate policy). FAV1 supports retail in the town centre. Any proposal for housing and including a shop would need to be considered against national and local plan retail policy. Biodiversity is addressed in FAV7.</p> <p>Abbey Fields is not allocated in this or any of the other site allocation policies in the Neighbourhood Plan. The Neighbourhood Plan only allocates brownfield sites.</p>
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