

## Application Reference 23/505533/EIHYB

### Application Description:

a) Full planning permission for Phase 1 of a mixed-use residential led development of 261 homes and 3,021 sq m of non-residential space, including: local centre with retail, commercial, community, business and/or employment uses (including Class E uses); water recycling centre; open space; earth form bund; landscaping; groundworks; green infrastructure; pedestrian and cycle routes; car and cycle parking; refuse and recycling storage; highways, drainage and infrastructure works including new vehicle access points to the existing network; supporting infrastructure; engineering, utilities, and other associated works.

b) Outline planning permission for the remaining phases of the mixed-use residential led development, including: retail, hotel, commercial, business, employment uses (including Class E uses); Class B2 and/or B8 uses; community and sports provision; primary school; nursery accommodation; health facilities; sheltered and/or other older persons' accommodation; open space; earth form bund; landscaping; groundworks; green infrastructure; pedestrian and cycle routes; car and cycle parking; refuse and recycling storage; highways, drainage and infrastructure works including new vehicle access points to the existing network; temporary access and construction route(s) as required; supporting infrastructure; engineering, utilities, and other associated works including the demolition of buildings and structures. All matters to be reserved.

Land At South East Faversham Between A2 Canterbury/London Road And M2 Faversham  
Kent ME13 9LJ

## Introduction

We wish to make representations on the above planning applications. We have commented first on Part B of the planning application, as this deals with the principle of development. This is followed by comments on Part A.

We note that Swale Borough Council has a published 5-year land supply, and the proposal involves loss of grade 1 agricultural land. We are aware that Swale Borough Council had previously proposed the site in a Regulation 19 Local Plan that was withdrawn. This clearly affects how the proposal will be considered against national and local policies. The reviewed Faversham Neighbourhood Plan is now at a late stage, with the examiner's report having been issued. Therefore, it carries considerable weight. Therefore, we are very concerned over the very limited references to the policies of the emerging Neighbourhood Plan and recent evidence base. This is a very fundamental failing which needs to be addressed through revised plans and supporting statements, before the application is determined.

## Representation on Part B

### Illustrative Masterplan and Landuse

From the indicative layout there appears to be a conflict between residential/commercial areas and the employment areas (B2 and B8) and proximity to the M2 and railway in terms

of noise and amenity. In particular we have concerns over areas 6a and 6b, which lie between the employment areas, railway and motorway.

We note the Environmental Protection Officer's comments about the need for residential units and the external noise levels in gardens and other relevant amenity areas to conform to the standard in BS 8233 2014. This would require closed windows and control of ventilation in a high proportion of properties. For many people, natural ventilation is an essential requirement. This does raise a fundamental issue of whether this is a suitable and sustainable site for residential development. The developer should be invited to provide an amended indicative masterplan to demonstrate that a sustainable solution is possible. Without this the scheme is unsustainable in principle.

We welcome the proposed new school, in a central location within the masterplan area. Evidence is required to demonstrate that capacity and timetable for delivery would be sufficient for the new homes being created in each phase. There is already a need for a primary school on the east side of Faversham.

We support provision of sports pitches in proximity to new and existing communities. However, we share the concerns over adequacy of provision raised by Sports England in their representation and support their request for further information and details of the proposed replacement facilities. There is already an identified need for football facilities. We would highlight the importance of quality of provision for both football and cricket pitches.

It should be noted that a new cricket pitch needs to settle for a period of 3-5 years before it can be used. The existing pitch would need to be retained in use for this period. This appears to be incompatible with the phasing which includes creation of the new pitch and redevelopment of the existing pitch together in phase 2.

### Landscape and Green Infrastructure

We note the landscape and open space plan, which is also reflected on the indicative layout. However, this lacks detail. If planning permission was granted, conditions would need to ensure that green infrastructure would be provided as indicated. Otherwise, there is a danger that incremental phased planning applications would fail to integrate into adjoining phases. We welcome the landscape buffer to mitigate noise from the M2 as part of phase 1. However, from the Environmental Protection Officer's comments, it would appear that this may not be adequate to overcome noise, without the use of closed windows.

We support the sustainable drainage system forming part of the open space strategy but note the lack of detail. The proposed provision of green 'traffic free' routes through the development is welcomed.

A development of this scale on previously undeveloped land would be expected to exceed 20% Biodiversity Net Gain across the development. The commitment in the submission documents is to exceed 20% and also providing a diverse and habitat rich natural environment. This is supported in principle. However, the submission matrix states 12.40%

Biodiversity Net Gain (BNG) on habitat creation and 48.61% BNG on hedgerow creation. So, habitat creation as it is only just above the 10% BNG minimum. We would like to see a more balanced approach with greater emphasis on habitat creation.

### Access and Movement

We would like more clarity on the indicative phasing plan of when the pedestrian and cycle bridge 'c' will be constructed linking Phase 2 across the railway line to Phase 6a. This should be provided as part of the current application. Similarly, we would like to see details of how connectivity to the town is to be addressed, given the inadequacies of existing provision.

The Town Council has sought professional advice on the detailed transport and movement matters. A separate representation will be made in due course.

### Design and Sustainability

We note the submitted plans and supporting statements indicate large areas where the development will parody different historical periods in a fairly generic way. This is at odds with the character of much of the historic town, which is based on architectural diversity and contrasts, reflecting different periods of construction. We would like to see an approach based on a greater level of understanding of the specific town and context.

In addition, we would like to see a much greater emphasis on green design, climate resilient buildings and carbon neutral design (see Faversham Net Zero Carbon Toolkit). We have previously raised concerns over lack of natural ventilation. We note that the design manual part 02-06060391 makes reference to Building Regulation requirements. The proposals don't appear to be very ambitious in terms of exceeding minimum requirements. This is surprising and disappointing for greenfield site development. More emphasis should be made of climate resilient features like microgeneration, use of low embodied energy materials and natural ventilation.

We note proposals for 25 metre 'key landmark buildings' for legibility. This would equate to 6 or 7 storey residential buildings or less if a pitched roof is proposed. There needs to be clarity over the number of storeys across the site, rather than indicative building heights.

We also note that employment development (B2 and B8) would include 20 metre high buildings (big sheds). This adds to our concern over the amenities of sites 6a and 6b which are proposed to include residential development.

The Town Council has concerns regarding safety and efficacy of battery storage so close to built up residential area and would want details on size, storage and safety. It should be noted that lithium iron batteries are potentially lethally dangerous in the event of fire.

When considering the Battery Energy Storage System(s) (BESS) context, hazards should be considered for all stages of the system lifecycle which are applicable to the organisation (either directly or indirectly). Officers should consider the total energy stored in the BESS and the population which may be affected by particular hazards, such as fire risk.

## Representation on Part A

### Site Plan and Landuse

The general layout has many positive features including:

- Provision of mixed-use local centres;
- Inclusion of the water recycling centre;
- The green buffer to the railway;
- The landscape bund parallel to the M2;
- The park which includes the balancing pond (Dew pond);
- The area play park and the green space linking it to the Dew pond park;
- The local food growing areas;
- Good permeability;
- Active building frontages facing streets and spaces.

We have concerns over the following aspects of the layout:

- Predominant use of parking courts, including rear parking courts that are not overlooked;
- Lack of detail on how bins and recycling are accommodated in residential properties;
- Lack of clarity on how servicing and commercial bin storage have been accommodated.

### Type and Mix of Homes

There is a lack of information on affordable homes including whether they would be tenure blind.

Similarly, there is a lack of information on housing mix or how the Faversham Housing Needs Assessment has been taken into account. Should the application be approved, variety should be sought within the mid-sized homes that come forward in future to attract both newly forming households on lower budgets and older households with substantial equity from their existing larger homes. Facilitating downsizing among older households may release those larger homes for use by families who need more bedrooms.

### Design and Sustainability

The detailed design proposals will set the tone for later phases. It is really important to get it right.

The detailed submitted plans and supporting statements indicate the housing area to be predominantly in a Kentish vernacular with elements of formal Georgian and Kent Regency and Victorian generic parodies. This is at odds with the character of much of the historic town, which is based on architectural diversity and contrasts, reflecting different periods of construction. As stated previously, we would like to see an approach based on a far greater level of understanding of the specific town and context.

As also stated previously, we would like to see a much greater emphasis on green design, climate resilient buildings and carbon neutral design. We note that the design manual part 02-06060391 makes reference to Building Regulation requirements. The proposals don't appear to be very ambitious in terms of exceeding minimum requirements. For example, the proposed elevations do not include climate resilient features like photovoltaics, or other microgeneration or ground source heat pumps. The elevations could include a mix of local materials, but also low embodied energy materials and sustainable construction. This is a missed opportunity on a greenfield site.