

24/501929/REM | Section 73 - Application for minor material amendment to approved plans condition 1 (to allow changes to affordable housing tenure, revisions to SDS pond and redesign of public open space) pursuant to 23/501167/REM for - Approval of reserved matters (scale, design, layout and landscaping being sought) for the erection of 231 dwellings (houses and apartments, C3 Use Class) with landscaping, associated highway works, including car parking and open space, pursuant to 16/508602/OUT for - Outline application for erection of up to 250 dwellings with all matters reserved except for access. | Site A Land At Preston Fields Salters Lane Faversham Kent ME13 8YD

The application seeks to vary the type of affordable housing type and mix, but not to reduce the overall provision from 81 units on site. The Town Council strongly supports the provision of affordable homes within the development.

The application also proposes alterations to the Sustainable Drainage system ponds and re-design the public open space.

For clarity each matter has been dealt with in turn below.

#### Affordable Housing:

It is noted that this is supported by the Affordable Housing Justification Statement, September 2024. Within this document it considers relevant policy context. This statement fails to consider the late-stage Faversham Neighbourhood Plan and its relevant policies in relation to housing FAV3 (Residential Mix and Standards). This is clearly an error. The expectations of the NHP are the minimal requirement.

Members questioned if the Housing Officer Supported the proposed tenure and if it meets the demand demonstrated in the Housing Needs Assessment.

Table 2 of the report identifies that the previously consented affordable housing type included a combination of 73 rented and 8 shared ownership (total 81).

This application seeks to revise the proposed type to 41 rented and 40 shared ownership (total 81).

This proposed alteration is more aligned with Policy FAV3, clause 2, of the Neighbourhood Plan which requires a 66% affordable rent and 34% affordable housing ownership mix.

The report states that Redrow Homes has engaged with Registered Providers and Officers at Swale Borough Council to inform the proposed mix. Faversham Town Council suggests that the applicant also considers the AECOM, Housing Needs Assessment, June 2022 to inform the final mix. This can be found on Faversham Town Council website at: <https://favershamtowncouncil.gov.uk/neighbourhood-plan/aecom-final-documents/>

We note that 11 Registered Providers were invited to bid with limited results. We would suggest that the invitation be extended to other providers in Swale. As we are aware of at least a further 6 operating in the area. A comprehensive list of Registered Providers and their relevant registration information can be found at: <https://www.gov.uk/government/publications/registered-providers-of-social-housing>

The Town Council support a wider mix of tenure, reducing the number of 4-bedroomed homes to provide a greater range of homes. Policy FAV3, clause 1 (Residential Mix and Standards) sets the policy context to inform the final mix. It makes clear that there should be a balanced mix of homes, including 3-bedroomed family houses, smaller accommodation suitable for renters and those wishing to downsize as well as accommodation suitable for older people or those with limited mobility.

Any revisions to the type and mix of homes should meet the policy requirements set out in FAV3 (Residential Mix and Standards).

Further the Town Council asks for the Social Housing Providers already active in the town which numbers at least six to be considered.

#### Sustainable Drainage Alterations:

We note the objection by Kent County Council Flood and Water Management team in relation to the proposed changes, their mitigation, capacity and wider impacts on the indicative masterplan layout.

Further to supporting the concerns of the lead Local Flood Authority (LLFA) we would also like to ensure that any revision takes account of policies FAV3 clause 6, FAV7 clause 1, and FAV8 (clauses 1-4 respectively) in the late-stage Faversham Neighbourhood Plan. Any revision should demonstrate how the proposed changes positively meet these policies.

#### Re-design of public Open Space:

The Town Council note and support the comments of Kent County Council Ecology team requesting further information. Any additional information provided should demonstrate how the proposed revisions take account and positively meet the requirements of Neighbourhood Plan policies:

- FAV3 clause 6 (Residential Mix and Standards);
- FAV4 clauses 2 and 3 (Mobility and sustainable transport);
- FAV6 (Public rights of way, national trails, promoted routes and cycleways); and
- FAV7 (Natural Environment and Landscape);

- FAV8, clauses 3 and 4 (Flooding and Surface Water);
- FAV9, clause 3 (Air Quality); and
- FAV10 (Sustainable Design and Character).

### Other Urban Design Matters

It is noted that the enclosure plan reference A1121-08-K proposes hard landscape boundary treatments. This is a missed opportunity to enhance the biodiversity of the site through soft landscape boundaries. Should the proposed close boarded fence be approved, we would recommend that they are amended to at least support hedgehogs with links through each fence. This is a previously undeveloped site and every opportunity should be taken to strengthen and contribute to the natural environment in a positive way.

In previous representations on the outline and reserved matters applications the Town Council has consistently raised that all hard surfaces should be permeable. It is noted that the Planning Layout plan reference A-1002 001-O continues to propose either a non-permeable block pave or black-top/tarmac finish. This should be amended