

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 further representations on the above planning applications. This additional representation should be read together with those previously submitted by Faversham Town Council. Again, 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 the application 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 We are aware that Swale Borough Council had previously proposed the site in a Regulation 19 Local Plan that was withdrawn.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 Faversham Neighbourhood Plan is now made and therefore, it policies now form part of the statutory development plan which the applications will now be tested against.

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 continue to 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 and note these have not yet been provided in the revised and amended documents.

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 still appears to be incompatible with the phasing which includes creation of the new pitch and redevelopment of the exiting 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 still 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. 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. This is made clear in the Faversham Neighbourhood Plan. 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. It is disappointing that this information has yet to be updated. This should form part of the Biodiversity Net Gain monitoring strategy and conditioned accordingly.

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 and has not yet been included. Similarly, we continue to request 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. Please see our previous representation for details.

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.

Battery Storage

Members have received conflicting information regarding battery storage on site. In the proposal and at previous presentations they have been referenced. However, during the Open Sessions at the Alexander Centre, members were informed they are not proposed.

The Town Council requests confirmation on this point. Permission should not be given for the development of the site until full details on Battery Storage are submitted and considered, including safety protocols.

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.

Additionally, we note that there are proposals to include P.V's on the roofs of the new development as shown in the 'illustrative roof plan'. We support this being conditioned appropriately as it is only indicative at this stage.

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 now detailed information on the affordable homes provision including a plan reference 'phase 1 affordable housing plan' that shows the proposed mix of units pepper potted across the site. The Town Council strongly support a tenure blind development and this would accord with the design and housing policies in the Faversham Neighbourhood Plan. We also support the provision of mid-sized homes that come forward to attract both newly forming households on lower budgets and older households with substantial equity from their existing larger homes.

This plan is underpinned and informed by the 'Affordable Housing Tenure Statement, May 2025'. It is disappointing that whilst it references the Faversham Neighbourhood Plan it has not used the most recent housing needs analysis from the AECOM Housing Needs Assessment to inform the final mix.

However, the Town Council welcomes the commitment to delivering social rented accommodation as part of the mix.

Whilst the document acknowledges the split on the type of affordable homes to be delivered included in policy FAV3 in the Faversham Neighbourhood Plan it fails to meet the policy requirements.

FAV3.1 Affordable Housing provision (35% DM8) should include:

- a. 66% affordable rents
- b. 34% affordable ownership.

Boughton and Dunkirk NHP stipulates 40% Affordable Housing which is only met in the later stages of development.

This is by virtue that the application proposes 52% affordable rent (as social rent) and 48% units as affordable ownership (shared ownership). The Town Council requests that the split in FAV3 is met in this ambitious development.

Paragraph 7.10 of the statement seek to justify this by reasoning that the registered providers have confirmed they would not be prepared to take the affordable housing should the tenure split be as defined in the development plan documents.

Clearly to rely on this statement alone without being able to demonstrate other methods of delivering affordable housing such as the Faversham Community Land Trust or other community housing delivery mechanisms does not provide sufficient justification to depart from the policies in the statutory development plan.

Therefore, the proposed mix is contrary that specified in policy FAV3 Residential Mix and Standards which makes clear the split should be 66% affordable rent and 34% affordable ownership.

To be compliant with the policy requirements the mix must be revised and that affordable rent (which can include social and affordable rent properties) is increased to meet the policy requirements.

There is no justification in the report to depart from policy.

Should the applicant wish to discuss housing delivery vehicles other than the registered providers listed in the report, they are encouraged to contact Faversham Town Council who can provide support in this matter.

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.

We note that there are now proposals to include P.V's on the roofs of the new development as shown in the 'illustrative roof plan'. We support this being conditioned appropriately as it is only indicative at this stage. 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.

Active Travel

The Town Council commissioned Railton TPC Ltd to produce *South East Faversham (23/505553): Transport and Highway Review* in July 2024 which should be read in conjunction with this representation. Chapter 9 provides a summary and conclusion.

The report highlighted that non car journeys were not tenable with the vast majority of the site lying further from the town centre of Faversham than any other existing parts of the town. Further the routes from the site to Faversham Town Centre are problematic because of the A2 and the railway line. The obvious desire line from the site to Faversham Town Centre is over the two railway bridges and onto the recreation ground. There are no proposals for the necessary improvements, such as access points and ramps. The proposed shared footway/cycleway along the A2 created by narrowing the road was considered sub-standard and potentially hazardous for both cyclist and pedestrians. The slowing of traffic will cause localised jams and increase the air pollution in the vicinity. Consideration needs to be given to present street furniture in the vicinity.

The Active Travel Committee will submitting a sperate representation.