

Application Reference: 26/500403/REM

Address: Land At Preston Fields (South) Salters Lane Faversham Kent ME13 8YD

Description: Application for approval of reserved matters (access, scale, design, layout and landscaping) for the erection of 70 dwellings (C3 Use Class) with associated landscaping and access for vehicular, pedestrian and cycle routes, car parking, open space and other associated works, pursuant to 21/500766/OUT for -Outline application for the erection of up to 70 dwellings (all matters reserved) and land reserved for a link road connecting the A251 with Salters Lane.

Since the application reference 21/500766/OUT was granted consent the Faversham Neighbourhood Plan has been 'made' and forms part of the Statutory Development Plan.

This representation is informed by our previous representations related to the application reference 21/500766/OUT and testing the development against the Faversham Neighbourhood Plan.

Housing

- Policy FAV3 'Residential Mix and Standards' makes clear that new housing should include a mix of accommodation. The application positively meets Clause 1a; b and c by virtue of delivering housing that meets the needs of families (3-bed), smaller homes (2-bed) and providing adaptable M4-3 units as part of the affordable housing mix.
- FTC support the provision on site of affordable housing, noting the mix of affordable rent and affordable ownership (shared ownership) meeting the requirements of Policy FAV3, clause 2. However, the current proposed 'Affordable Housing Plan, A1166-14-A' does not show a tenure blind layout. FTC suggest this is revised to meet the requirements of Policy FAV3, Clause 4a.

Movement and Sustainable Transport:

- FTC supports the Planning Statement and submitted plans, which set out how the scheme contributes to Policies FAV4 'Mobility and Sustainable Transport' and FAV6 'Public Rights of Way, National Trails, Promoted Routes and Cycleways'. This includes E.V charging, secure cycle storage, and design consideration for people with a range

of mobilities or impaired vision and linking new active travel routes into the wider network.

- However, there is an awkward arrangement for a short section of proposed 3m cycle footway on the northern extent of the development bordering the green space. Given it links to a 2m footway on the southern side and a cycle/footway that changes material and links into another phase of the development, this arrangement needs further design consideration. FTC support linking into the wider traffic free active travel route as shown to the north in 'Site A'.

Environment:

- The Biodiversity Net Gain Assessment concludes that the proposed development will have a net loss of -6.35 habitat units, equivalent to -29.12%; and a net gain of +0.58 hedgerow units, equivalent to +12.90%. Clearly the application on a greenfield site falls significantly short of the 20% BNG requirement to be compliant with Policy FAV7 'Natural Environment and Landscape'.

Furthermore, the submitted Biodiversity Net Gain Assessment, January 2026 does not take account of the 20% requirement and therefore the proposed off-site contributions are also inadequate. Condition 7 of the Outline consent also required biodiversity net gain of not less than 10% will be delivered on the site. Off-site contributions fail to meet the condition requirements.

- FTC supports the inclusion of Wild flower/ Semi natural grassland habitat, native shrub and herbaceous planting and larger native field trees as part of the proposed landscape strategy. It is advised that any soft landscaping also includes climate resilient species.
- Policy FAV8 'Flooding and Surface Water' requires new development to include sustainable drainage systems as an integral part, it is noted that this is provided and links to a SUDS Basin from a previous phase.

However, it is unclear if the 'key components of the surface water drainage strategy' in section 3 of the Drainage Statement, November 2025 are correct as the second bullet point in key components refers to 'Anglian Water', which is not the provider for Faversham.

It is respectfully requested that the proposed surface water drainage is checked to ensure that any of the proposed elements take account of the planning conditions relating to the Outline consent conditions (condition 13) and the applicant makes contact with the correct service provider as suggested in the interpretation to policy FAV8.

Design:

- The Compliance Statement is useful to understand the design rationale for the development. Policy FAV10 'Sustainable Design and Character' seeks to promote and encourage a site-specific design response that is climate resilient and reflects the local vernacular. The following comments are in relation to FAV10 and should be used to inform any amendments as currently the scheme fails to meet the requirements of FAV10.
- Some of the proposed houses types, such as the 'Cambridge' and 'Harrogate' are not a site-specific response and appear far more substantial in terms of height and massing owing to the awkward roof designs that appears disproportionate to the dwelling.

Furthermore, these are not responsive designs to take account of sustainability and climate resilience or creative or innovative designs. There are no details of superior environmental performance, water efficiency, or reduction of carbon impact. The proposed house types do not positively respond positively to Policy FAV10, clauses 1, 7, 10 and 11.

The submitted 'Hard Landscape Specification' includes only details relating to soft landscaping. It is unclear if any of the proposed hard landscape materials are permeable or durable. This is of particular concern where block paving is proposed in the highway, and the importance of durable materials is critical.

- The proposed 'Enclosure Plan' includes a 1.8m boundary treatments between properties to protect neighbour amenity. However, it also includes a 1.8m brick wall fronting the highway, along footpaths with limited or no natural surveillance. Whilst we understand the attempt may be for the amenity of residents this is a balance. All streets and spaces should be well design and safe for all users. In these locations the treatment should be reduced to address this urban design matter.
- FTC do note that in respect of natural surveillance, many of the properties and low boundary treatments provide good levels of natural surveillance. However, again at Plot 24 it includes a 1.8m brick wall and blank elevation of the property to a 5 bay parking area and footway. Similarly, this issue is replicated with plots 13, 17 and 18, providing no immediate natural surveillance and overlooking to another 5 bay parking area and pedestrian route.
- The inclusion of on-street parking areas designed into the streetscape is welcomed. This ensures that parking does not dominate the street. However, the on-plot parking arrangements, are not well designed, often in a linear 3 space arrangement. Whilst these might meet minimum parking standards the proposed arrangement is awkward for any future residents.

We strongly advise the design and layout of parking arrangements on plot are re-considered. Similarly, the proposed garages appear to be designed to standard building regulations for a single garage. These outdated measurements do not take

account of the size of modern vehicles, so are likely to be under used. They are not fit for purpose or reflective of current vehicle widths.

Heritage:

- In the original consent for application reference 21/500766/OUT the Kent County Council archaeology Officer made clear that:

*“Given the archaeological potential of the site and the potential for development works to impact on archaeology I would recommend that in any forthcoming consent provision is made for archaeological evaluation to be followed by further mitigation measures as appropriate and informed by that evaluation. The evaluation should take the form of geophysical survey, trial trenching and Palaeolithic assessment and test pitting. **It should be undertaken at an early stage, in advance of a detailed application, so that archaeology can inform the development of the site masterplan and design.**”*

The decision notice then dealt with this matter through Condition 31. The submitted Reserved Matters Application does not include any archaeological field evaluation work. There is no supporting evidence to address the archaeological potential or how this has informed the application. The Planning Statement relies on paragraph 4.60 which it states:

“The approved Heritage Desk-based Assessment for the OPP (ref: 21/500766/OUT) concluded that the Site has low potential for archaeological remains from the prehistoric, Saxon/Medieval, Post-Medieval and Modern periods. In terms Listed Buildings and Conservation Area, the Assessment also concluded that there will be no impact upon the settings or significance of these designated heritage assets by the development proposals.”

This Desk-based Assessment formed part of the submission to the outline application, not the subsequent condition. Clearly the applicant has failed to take account of Condition 31 related to 21/500766/OUT and the archaeology Officer comments from Kent County Council.

Water:

Policy FAV8 requires that development must have no significant adverse impact on flood risk and should take opportunities to improve flood water disposal. It further states that development will not be supported where it would compromise infrastructure intended to prevent flooding or manage flooding incidents.

The policy requires new-build development to incorporate Sustainable Drainage Systems (SUDS) as an integral part of landscape and green infrastructure and encourages permeable surface treatments where ground conditions allow. It also emphasises that developers must ensure sufficient drainage infrastructure capacity

exists to accommodate the proposed development, advising early engagement with the relevant utility provider.

Concern is raised that insufficient evidence has been provided to demonstrate that the proposed drainage arrangements fully comply with these requirements. In particular, clarification is sought regarding drainage capacity, SUDS integration, and whether the development will improve, rather than add pressure to, the existing drainage network.

Given the policy emphasis on improving flood resilience, including on brownfield sites, it is considered that further detail and assurance are required before the application can be supported.

Summary:

Following consideration of the points raised in this representation Faversham Town Council would welcome discussions with the applicant to inform any necessary design revisions to meet the requirements of the Faversham Neighbourhood Plan policies.

Should the applicant choose not to revise the submission to take account of the representation the application should be refused as it fails to meet the condition requirements of the outline consent and Faversham Neighbourhood Plan Policies FAV7 'Natural Environment and Landscape', FAV10 'Sustainable Design and Character' and the requirements of Condition 31 related to 21/500766/OUT