Application Reference: 26/503377/FULL

Demolition of existing buildings and erection of 46 residential dwellings, comprising 40 houses and 6 flats including affordable housing, with associated access, parking and landscaping.

Former Osborne Court Lower Road Faversham Kent ME13 7NY

Faversham Town Council support the application to develop allocated sites within the Faversham Neighbourhood Plan.

Sustainable Development:

The Faversham Neighbourhood Plan (FNP) includes a number of site allocations. This application seeks permission to deliver residential on the site allocated in Policy FAV25 Kiln Court and Osbourne Court.

The application is a brownfield site, forming part of the allocated site and within the main settlement, in a sustainable location.

Growth Strategy and Housing Need:

The application site is within the Faversham Neighbourhood Area. Swale Borough Council have allocated 219 homes to be delivered within the Neighbourhood Area over the plan period to 2038. The 'made' Faversham Neighbourhood Plan exceeds this figure with potential capacity for in excess of 300 new homes on site allocations within the Plan.

The application contributes positively to meeting that housing figure, developing an allocated site in the FNP. The 'AECOM Faversham Neighbourhood Plan Site Options and Assessment, October 2021' report indicates that the entire allocation which includes land beyond the application area could deliver around 75 dwellings across a site of 2.74Ha or circa 50 dwellings as part of a mixed-use development.

The application seeks to deliver 46 new dwellings on a site of 1.36Ha. The affordable housing delivery includes 16 affordable units, meeting local plan policy requirements. The submitted Planning Statement makes clear that the tenure split has yet to be agreed noting the requirements of FAV3 Residential Mix and Standards, clause 2.

The proposed mix of affordable dwellings includes a range of 1-2-bedroomed and 3-4-bedroomed properties. This mix positively meets the requirements of FAV3, clause 1 and includes homes suitable for older persons and those with limited mobility.

The Planning Statement also notes all dwellings exceed minimum space standards.

Policy FAV3, clause 4 requires affordable housing to be tenure blind. The submitted plan reference 'No. 24_99_12 Rev A', delineates the affordable housing across the site. The Planning Statement makes clear the proposal is tenure blind. However, this statement does not correspond with the submitted plan, which shows affordable housing in groups throughout the site. We would strongly encourage the applicant to revise the affordable housing distribution to ensure a tenure blind approach is implemented.

Design:

Sustainable Design: Policy FAV10: Sustainable Design and Character sets the design parameters for new development. The proposed development in terms of scale, massing and height takes account of local context and the apartment schemes are limited to 3-storey not to appear overly dominant, located on corner plots to provide landmark features within the development.

The submitted house and apartment type plans do not show the details of any sustainable design measures. However, the submitted 'Design and Access Statement' describes how the development would include Solar PV and Air Source Heat Pumps. Clearly the proposed plans should be updated to take account of these features.

FTC also support the representation from the Climate Change Officer requesting further detail on the Energy Statement.

It is also noted that the 'Air Quality Note' also references the measures to reduce impact on air quality, including E.V charging, cycle storage and tree planting as part of the landscape design. These design measures support policy FAV9: Air Quality.

Bins and Cycle Storage: Policy FAV3 requires new development to include discreetly located and screened storage space for bins and recycling. It is noted that this is included together with a garden shed for each residential property and meets the policy requirements. However, the secure cycle storage is not shown for all dwellings on the site plan, this may be incorporated within the proposed sheds.

Furthermore, in respect of refuse collection FTC also note the submitted 'Transport Statement' makes clear that:

> *"Waste storage areas would be sited so that householders do not have to carry refuse more than 30m (excluding vertical distances) to the rubbish store. Operatives from the waste collection authority should not have to walk more than 25m to pick up rubbish from the collection point."*

Refuse collection and the potential 'drag' distances for residents and waste management crews is shown on the plan reference 'Refuse Strategy'. FTC wants to ensure that any future

residents are given care and consideration throughout the earliest possible chance in planning the new development.

BS 5906: 2005 clearly states in section 11 that the 'collector' should not normally be required to move two-wheeled containers for a distance of more than 15m in line with Manual Handling Regulations. The 25m proposed exceeds the distance and for residents it is double at 30m. This matter should be re-considered now it has been brought to the applicant's attention.

Accessibility: Policy FAV10: Sustainable Design and Character makes clear that development must take account of people with limited mobility. The ground floor apartments would be suitable for people with limited mobility. The design proposes the effective use of a brownfield site.

Biodiversity:

Policy FAV7: Natural Environment and Landscape makes clear that development should have no adverse impacts on green and blue infrastructure. It also states that brownfield sites (such as this application) should include a minimum 10% Biodiversity Net Gain (BNG).

The application would result in a BNG loss of habitats units totalling 78.99% and a positive increase of hedgerow units of 227.09%, which on balance exceeds the policy requirement and includes the retention of mature trees meeting the requirements of clause 4 of the policy.

Whilst there is a significant loss of habitat units, this is owing to the development of the amenity space around the existing building. The BNG requirements will be a conditioned part of any consent. FTC recommend the application is conditioned appropriately to ensure the landscaping plan and strategy deliver the proposed net gain.

Protected Species: The submitted 'Ecological Impact Assessment, updated August 2026' site visit was undertaken in November 2025. This was outside of the optimal period of assessment and is currently 10-months old. However, it is noted that in relation to protected species that were potentially identified in November 2025, subsequent surveys have been undertaken, including Bat Surveys in May and June 2026 and mitigation suggested.

The mitigation measures should be suitably conditioned for the protected species identified.

Flood Risk:

It is noted that the site is subject to areas of surface water flooding. The LLFA and the Environment Agency will be able to advise if the proposed drainage strategy and Flood Risk Assessment appropriately mitigate the risk and effectively manage surface water through a SuDS.

FTC suggest the application is appropriately conditioned to enable careful consideration of any drainage strategy together with the proposed landscape strategy. We would also recommend that any hard surfaces are permeable.

Movement and Highways Access:

Policies FAV4: Mobility and Sustainable Transport and FAV10 make clear that design and layout should prioritise pedestrian convenience, the scheme proposes good permeability.

The proposed on-plot parking arrangements are not well designed, often in a linear 2 space arrangement. Whilst these might meet minimum parking standards the proposed arrangement is awkward for any future residents. We note this is the proposed parking arrangement strongly and encourage the applicant to re-consider this layout.

The detailed site design also includes secure cycle storage the apartments, and this is strongly supported. However, there is no secure covered cycle storage for the other dwellings. The scheme should be amended to include secure covered cycle storage for all properties, in line with the submitted 'Transport Statement' that says the intention is to provide 1-cycle space per bedroom.

The provision of E.V charging is also supported, noting this is now a requirement in Building Regulations. However, FTC also support the representation from the Climate Change Officer requesting EV charging is provided for visitor parking, noting a minimum of 10% of the spaces should be provided with a live EV charging point.

Summary:

On balance the proposal positively meets the requirements of the policies of the Faversham Neighbourhood Plan, as set out in this representation.