

Application Reference: 26/502472/HYBRID

Hybrid planning application consisting of a full planning permission for the conversion and extension of a vacant Office building to create 18 apartments, together with the erection of 8 dwellings and other ancillary development (Including demolition); and outline planning permission (All matters Reserved) for the erection of a building comprising of up to 10 dwellings on the first floor and Use Class E(d) floorspace on the ground floor and other ancillary development.

Weston Works Front Brents Faversham Kent ME13 7EB

Faversham Town Council Objects to the application in its present form and considers that further consideration should be given to Highways and access. In principle the Town Council is supportive of development of the site which is an allocated site within the Faversham Neighbourhood Plan, including the retention and conversion of the prominent vacant office building. The applicant sought pre-application advice and consultation with FTC. As part of that engagement, we prepared a site brief to be considered together with the relevant policies in the Faversham Neighbourhood Plan.

The applicant has responded positively to the brief and the relevant policies as discussed below.

Sustainable Development:

The Faversham Neighbourhood Plan includes a number of site allocations. This application seeks permission to deliver residential and mixed-use development on sites allocated in policies:

- FAV22 BMM Weston Ltd (parcel 1c) Land at Brent Road;
- FAV23 BMM Weston Ltd (parcel 2) Land at Brent Road; and
- FAV24 BMM Weston Ltd (parcel 3) Land at Brent Road

These are all brownfield sites, within the main settlement and in a sustainable location. The application also meets Neighbourhood Plan policy FAV2: Housing Development, by virtue that it includes the conversion of the vacant office building and retains the mature trees within the site.

Policy FAV12: Community Facilities supports new facilities within a walkable distance. The proposed new purpose-built Boxing Club accommodation provides an improved local sports facility within easy access of the community it serves, located in Faversham Town Centre.

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.

These sites contribute positively to meeting that housing figure, developing allocated sites in the Neighbourhood Plan. The 'AECOM Faversham Neighbourhood Plan Site Options and Assessment, October 2021' report indicates that combined the sites could deliver around 30 new homes, including the conversion of the office building. The application delivers 36 of which 10 are affordable to be delivered in partnership with Faversham Community Land Trust. It is assumed these will be social rented accommodation and Faversham Town Council would welcome early discussions prior to a reserved matters application with the applicant and Faversham Community Land Trust.

It is noted in the submitted 'Affordable Housing Statement' and the 'Design and Access Statement' that the scheme will deliver a range of accommodation, family homes (4 and 5-bedroom) and a range of apartments (1 and 2-bedroom), all exceeding minimum space standards. It is also noted that the converted office building includes apartments with ground floor access suitable for those with limited mobility. This meets the requirements of Neighbourhood Plan policy FAV3: Residential Mix and Standards. Whilst policy FAV3, clause 4 require affordable housing to be tenure blind, it is understood that it includes a purpose-built community-led housing element, which meets FAV3, clause 3 and it is necessary to depart from that requirement in this instance.

Design and Heritage:

Policy FAV3 requires new development to include discreetly located and screened storage space for bins and recycling. It is noted that the converted office building includes secure covered cycle and bin storage to meet the policy requirements.

Policy FAV10: Sustainable Design and Character makes clear that development must take account of people with limited mobility. The ground floor apartments of the converted office building would be suitable for people with limited mobility. The design proposes the effective re-use of a vacant building and the embodied energy. The new development takes account of sustainable design and includes a range of measures to address climate change, including micro-energy production on the new houses, solar shading and dual aspect apartments.

The application site is within 'Zone 2' of the area of Faversham Urban Archeological Zone. Policy FAV11: Heritage supports the application by virtue that the policy encourages the adaptation and re-use of historic buildings, this would include the vacant office building and

it's landscape setting. The application meets the requirements of the policy and would enhance the character of the Faversham Conservation Area.

The application site is also within the FAV15: Faversham Creek Policy Area. The application positively meets the policy requirements of Clause 1c providing relevant uses specified in the site allocations. It also sets the intention to create new public access to the waterfront as part of the Reserved Matters application.

Landscape Character:

Policies 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 proposes a BNG commitment of 188.05%. This far exceeds the policy requirement and includes the retention of mature trees and landscape setting of the vacant office building which also meets the requirements of clause 4 of the policy.

It is noted that the Kent and Medway Local Nature Recovery Strategy identifies the application area as within the 'Area that Could Become of Particular Importance for Biodiversity'. Any subsequent Reserved Matters application should be conditioned appropriately to take account of the Faversham Creek and it's environs to ensure that no harm is caused to the water quality and features of the creek natural environment. The application provides an opportunity to provide new green infrastructure and soften the hard landscape car park area, creating an attractive, publicly accessible waterfront.

Flood Risk:

It is noted that the Environment Agency has objected to the application in respect of the element relating the outline application area on the surface car park. Faversham Neighbourhood Plan is supported by a range of evidence base documents that underpin all site allocations. The Environment Agency also informed the Neighbourhood Plan through the screening process and formal Regulation-14 consultation.

As the proposal relates to outline with all matters reserved and the principle of residential development on the site has been established through the site allocation, we request that the application is conditioned appropriately to ensure that any Reserved Matters application provides sufficient assessment and mitigation to effectively calculate and mitigate the flood risk of the site. It is noted that at even at this stage the applicant acknowledges that the ground floor will be occupied by the Boxing Club, rather than habitable accommodation taking account of the know floor risks. Indeed, the application creates an opportunity to provide flood mitigation measures which the site currently does not contribute to as an entirely nonpermeable hard surfaced area.

Policy FAV24, Clause 3 makes clear that development must take account of the high risk of flooding and avoid putting uses vulnerable to flood damage or habitable space on the

ground floor. The application makes clear the intention is to include new purpose-built accommodation for the Boxing Club on the ground floor and residential on upper floors. Only at Reserved Matters can the mitigation be assessed and this can be conditioned as part of this application.

Movement and Highways Access:

Members considered that the scheme will increase traffic on Brent Hill with potential residents of the proposed development of 36 dwellings driving down Brent Hill, it should be noted that the hill incorporates the Sustran's Cycle Route. The anticipated increase in traffic poses a safety hazard to pedestrians joining and emerging from both PROW ZF40 and flood lane as there are no pavements in either side for some distance. The increased traffic will also put additional pressure on the junction at the other end of Brent Hill at Davington Hill, where the road and pavement beside it are already narrow and unsafe. It should be noted that this is the main arterial route to and from Davington, and therefore to Davington School with parents accompanying children with prams/buggies.

Consideration should be given to constructing a public kerbed pavement by repositioning the Western Works North Brent Hill wall 2 metres of so North.

It should be noted that pedestrian access to town is via the creek bridge which has a narrow pavement.

There is reference to a publicly accessible water frontage by the creek but it should be noted there already a public footpath (ZF40) so there is already public access and this footpath. Improvements should be made to this footpath by laying a new surface whilst the character (green and lush) is maintained.

Policies FAV10: Sustainable Design and Character and FAV4: Mobility and Sustainable Transport make clear that design and layout should prioritise pedestrian convenience. Members questioned if the pedestrian link to Brent Road from the vacant office building site, is new or is the proposal utilising the existing pedestrian exit from the site.

The detailed site design also includes secure covered cycle storage for all new homes, including the apartments and E.V car charging.

Summary:

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

Approving this application would create a precedent for good design that is locally distinctive and provides a range of homes and facilities that contribute to the local need.

