

Consultee Comments for Planning Application 21/506465/HYBRID

Application Summary

Application Number: 21/506465/HYBRID

Address: Land At Lady Dane Farm Love Lane Faversham Kent ME13 8YN

Proposal: Hybrid Planning Application consisting of a: Full planning application for 84 residential dwellings, 3 no commercial units for Class E uses, access off Love Lane, and site infrastructure.

Outline planning application (with all matters reserved) for 70 residential dwellings, enterprise land development (including Class E uses), a Day Nursery, a Care Home and land reserved for 2 FE Primary School, together with open space, sports provision and associated works.

Case Officer: Paul Gregory

Consultee Details

Name: . Faversham Town Council

Address: 12 Market Place, Faversham, Kent ME13 7AE

Email: Not Available

On Behalf Of: Faversham Parish Council

Comments

Recommendation: Object

Comments:

1) Consultation:

The Design and Access Statement makes reference to a series of pre-app discussions with FTC. At these meetings we raised the points made in this representation.

Given the application makes reference to consultation with FTC we are surprised that none of the supporting documents including the planning statement and the design and access statement acknowledge or make reference to the emerging neighbourhood plan or its evidence base.

This demonstrates how the scheme is generic and fails to make a site-specific response based on local evidence. While there are references to national design standards, and an attempt to create character areas, these are not representative of the design, locality or matters important to the community, evidenced through the neighbourhood plan process.

For information the extensive evidence base can be viewed at:

<https://favershamtowncouncil.gov.uk/neighbourhood-plan/>

2) Climate Resilient Communities:

FTC is committed to reducing carbon use and ensuring through emerging policy of the NP that all new development positively address climate change, creating climate resilient communities. For more information, please visit the neighbourhood plan page to view the Faversham Net Zero Carbon Toolkit: <https://favershamtowncouncil.gov.uk/neighbourhood-plan/net-zero-carbon-toolkit/>

It is noted in the design and access statement the commitment to delivering some sustainable design principles such as all new home will be provided with an EV charging point. However, when

APPENDIX 1

translating these concepts to the detailed plans it is not clear on any plans for either the proposed housing or detached garages where these EV points are.

The incorporation of the SuDS system into the open space strategy is welcomed. These can make a positive contribution to the soft landscape setting if they are well designed. Within the drainage strategy it does also identify other water management design features including resin and permeable surfaces. These should be conditioned to ensure they are delivered as part of any future scheme.

Overall, the actual development makes limited contributions to delivering carbon zero development. Whilst it is appreciated that part of the application is outline, the element relating to the reserved matters shows a limited response above building regulations commitment.

The public realm and landscaping strategy does make a more positive contribution. But again, could go further with wildlife friendly fence panels where required or providing more hedging as a boundary treatment over more traditional walls and fence panels.

The established mature hedgerow parallel to Love Lane should also be retained to provide some natural screening to the new development, maintaining green and natural wildlife corridors enabling continued north-south movement on the periphery of the site. The hedgerow will also contribute to managing surface water flooding on Love Lane as a natural method contributing to the overall surface water management.

Where any existing mature hedgerows or trees are to be removed, other than the identified hedgerow on Love Lane, as recommended in paragraph 10.7 of the ecological appraisal these should be used to enhance foraging and nesting sites.

3) Hybrid Application:

As it is shown, this hybrid application includes a significant proportion of the proposed planning gain and associated community infrastructure within the outline application. Our concern is that should the outline element be granted consent it is foreseeable that without sufficient condition and S106 these elements may fall to the wayside in the reserved matters. It should not be the case that the outline application is granted on the principal of the level of infrastructure. Indeed, given FTC support these elements should the application be withdrawn to address the wider points raised it could be resubmitted as a full application, ensuring the community infrastructure is an integral part of the permission.

Should the hybrid application be granted without suitable conditions our concern is that the 2 applications are developed in piecemeal. There is currently no certainty on when the trigger for building the proposed infrastructure elements would be. These are clearly marked in a phasing strategy plan within the Design and Access Statement however, it does not that make clear when they are to be delivered as part of the development, ie after X number of units are completed.

4) Employment Land:

Having considered the supporting document Commercial Market Assessment Report (CMAR) it fails to make clear the planning case for reducing the current strategic site allocation commitment for the level of employment land. The argument put forward suggests there is no current demand with Swale and Faversham for employment land. This is at odds with the evidence base of the emerging local plan.

The CMAR failed to take into account the previous section of the employment land review 2018,

APPENDIX 1

which makes clear under development opportunities how important sites such as this are without complex land mitigation required to make the development viable.

In fact, paragraph 4.135 makes clear that: There is limited opportunity for the development of traditional offices in any area of the Borough. Small purpose-built offices in the Borough are unviable which makes it challenging to bring development forward. Our evidence shows that occupiers are prepared to be flexible in how they use their accommodation through using good quality light industrial units as offices, part or in whole. Smaller, more industrial style units have cheaper build costs and more affordable rents/capital values to occupiers. units can be fitted out dependant on the occupier. This can include building industrial units with the option of a mezzanine first floor and windows in higher up the buildings. This format of development is generally viable.

It also goes on to identify that: Generally, office occupiers prefer to be in the urban areas with good amenities so any development in this quasi light industrial format should be targeted around Sittingbourne, Faversham and Sheerness/Queenborough.

Further supported by: Faversham is seen as a substitutable location for some Canterbury demand including small flexible offices.

On balance there is no clear planning argument to depart from the adopted local plan policy MU6 in relating to this site allocation and the proportion of employment land to be delivered.

5) Design and Layout:

The proposed layout concentrates the affordable housing together. National Model Design Code part 2 states development should deliver: The mix and integration of housing tenures and achieving tenure-blind development.

This is a significant design issue in the layout of the site. While we have the opportunity the applicant should reconsider the tenure layout and ensure the development is tenure blind to meet BFL12 standards, national design code and good urban design principles. The applicant has demonstrated how they have considered and responded to the design code in other aspects of the scheme. This is another opportunity to address a fundamental design principal through a revised layout.

The proposed garage dimensions do not appear to accommodate a parked vehicle and enable the occupants to exit within the structure. Put simply these are not designed fit for purpose given the size of modern vehicles. Although these may meet building regulations minimum space, they are not functional for the intended purpose. The proposed commitment to cycle storage is welcomed and it is suggested that this also makes provision for charging electric cycles.

The design concept to face building fronting the public realm towards the natural landscape features such as the green corridor is a strong design feature and makes a positive contribution to the overall development.

In relation to the apartments, it is also requested that all letterboxes are accessible from public entrances to enable deliveries and post to be made easily.

The proposed houses are standard in design and proposed materials. There is not a site-specific response within the design. Nor do the proposed dwellings include design features that address climate change.

It is noted in the design and access statement that the applicant is exploring ways to enhance

APPENDIX 1

sustainability including through PV and air source heat pumps. However, there is no commitment to this in the overall design.

The evidence base gathered for the emerging neighbourhood plan makes clear that this is a water stressed area. There are no proposed features to address this such as rainwater harvesting within the buildings or how the development is climate resilient.