

**APPENDIX 1**

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Approval of reserved matters (scale, design, layout and landscaping being sought) for the erection of 231 dwellings (houses and apartments, C3 Use Class) with landscaping, associated highway works, including car parking and open space, pursuant to 16/508602/OUT for - Outline application for erection of up to 250 dwellings with all matters reserved except for access. Land At Preston Fields Salters Lane Faversham Kent ME13 8YD

Application Reference: 23/501167/REM

#### Bearing Fruits Adopted Local Plan

The site is identified as a strategic allocation in the adopted Local Plan.

#### SHLAA April 2020

The SHLAA identifies this site as reference SLA18/178. In the assessment it classifies the current land use as agricultural and the site type as greenfield.

#### Reserved Matters

Faversham Town Council expected that the following outcomes to be achieved as a part of the reserved matters application. Where appropriate these were conditioned in the application 16/508602/OUT. This representation deals with each matter in turn in respect of the amended details submitted in July 2023 and should be considered alongside previous representations made on this application:

#### Climate Resilient Development and Carbon Reduction

*Include superior energy performance and demonstrate BREEAM 'excellence' in design. It should be noted that from the 15<sup>th</sup> June 2022 there are revised building regulation commitments that seek to further achieve net zero development. Consideration for these measures should be integrated as part of any scheme.*

All surface and storm water should be collected and discharged to at least one cellular soak away of appropriate such as is sufficient to ensure zero off-site discharge of storm water, and such as to ensure discharge is to the aquifer.

As a greenfield site the design does include the scope for green design features to be incorporated. Furthermore, there is no attempt at including any other features such as integrated P.V panels, or other elements that reduce carbon use, or contribute to superior energy performance. This is a

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standard design that does not exceed building standards and makes no positive contribution to reducing carbon on site or creating a climate resilient development. This element remains unchanged in the revised documents.

Whilst the principle of residential development is supported, the lack of design consideration for green design features and creating a climate resilient development requires a reconsideration. The Town Council made this clear in the representation of the consented outline application and in our previous representation to this current application. We would recommend either the application is withdrawn and amended or is refused.

Considering the Borough Council has declared a climate emergency, it would be inappropriate to grant permission for development on a greenfield site that fails to demonstrate how the design mitigates impact of climate change or creates a climate resilient development. National policy and guidance, Local Plan policy and emerging Neighbourhood Plan policy all make clear this should be an integral part of new development.

*Address local surface water flooding originating from the application site through development on greenfield, agricultural land.*

Conditions 33 and 34 of the outline consent made clear further details to be submitted and agreed. Having considered the revised documents, the Planning Layout plan reference A-1002 001-F includes all hard landscaped area details as either non-permeable asphalt or Marshalls Keyblock. Having confirmed with Marshalls, Keyblock is non-permeable. Any proposed hard landscaped areas must be permeable. The plans should be amended to include details of permeable hard-landscape surface materials to be provided throughout the development. It is disappointing that this revision has not been addressed.

### Natural Environment

*Consider Green corridors and significant tree planting, a detailed landscaping proposal should be submitted, demonstrating how it delivers 20% biodiversity net gain.*

The addition of the Biodiversity Mitigation report, July 2023 is supported. However, it does not demonstrate how the scheme delivers any Biodiversity Net Gain (BNG). Whilst it acknowledges mitigation measures, it fails to apply the BNG metric, provide a score for the current site and then test the proposed mitigation measures to demonstrate what BNG percentage these actually deliver.

The report is a positive step, however, remains inadequate in terms of demonstrating any BNG provision. The mitigation measures proposed relate to protected species identified in the Protected Species Survey, July 2023.

Given that all major applications must demonstrate a minimum of 10% biodiversity by November 2023 we strongly advise the application to provide evidence of a minimum 10% BNG. If this is not possible then the applicant must calculate the BNG credits and make a financial contribution. The Town Council would welcome a discussion on where these could be best utilised to improve BNG in the area, as we have a strong commitment to protecting and enhancing the natural environment.

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## Other Urban Design Matters

*Create a site-specific design that responds to the site character and locality, providing a soft transition to the open countryside and edges of development.*

The Town Council support the principle of the design code in trying to identify the character of the area and respond through the proposed design. However, fundamentally the proposed development fails to take into consideration carbon reduction, green design or creating climate resilient communities. This remains unchanged in the revised documents.

*Take opportunities to create and enhance active travel routes.*

To support active travel the development should also include adequate secure, covered cycle storage as part of the development. The Town Council supports the linear traffic free active travel route that forms part of the SuDS system in the development.

Improvement to the A2/A251 junctions were noted providing improving access to the centre of town via Forbes Road. Members invite the developers to liaise with the Town Council to further improve active travel to the station and centre of town.

To improve active travel members request cycle/pedestrian access onto Salters Lane.

To improve active travel into the town centre provision should be made via Preston Park, Preston Land and St. Catherines Drive.

Crossing points on the A2 should be provided for both cyclists and walkers to promote a north to south route.

#### *Public Transport*

An operational bus stop is needed in the vicinity to serve this development.

## Housing

*Development should be tenure blind.*

The Town Council support the distribution of proposed affordable homes across the site. It is important that the proposed development has a tenure blind layout. This has still not been addressed in the revised details. The homes identified for affordable rent should be integrated within the development to create a tenure blind scheme. Members are still disappointed that the proposed layout includes all affordable units adjacent to the existing refuse site at Salter Lane.

*Where there is an affordable housing element this should be made for affordable rent on the open market and by social landlords.*

The Town Council support the provision of affordable homes. Again, we recommend that affordable housing mix is revised to reflect the AECOM Housing Needs Assessment for the Neighbourhood Plan, which shows a requirement of 66% affordable rent not the proposed 90% and a 34% affordable ownership need. For more information on the Housing Need Assessment please visit: <https://favershamtowncouncil.gov.uk/wp-content/uploads/2022/12/HSN-FINAL.pdf>

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Infrastructure

Provide increased capacity to deliver local GP services. The importance of adequate infrastructure for schools, health, shops for the residents of these houses should be noted.

Summary

The Town Council has considered the revised documents. We note the applicants covering letter suggests a planning committee date in August 2023. This would not allow sufficient time for the applicant to positively address the comments raised on the revised submission documents.

If Officers are minded to take this to Planning Committee in August 2023, we would recommend refusal on the basis that the proposed design, layout and materials are of a standard layout and construction and fail to make a positive contribution to delivering climate resilient development. There are no details of BNG and therefore it is not possible to determine if the 10% can be achieved.

The applicant has made limited changes to the proposed scheme. We would strongly recommend the application is withdrawn and amended to take account of the representation.