# APPENDIX I: TABLE OF REPRESENTATIONS, AND THE COUNCIL'S RESPONSE AND RECOMMENDATIONS FOR ANY CHANGES TO THE ASSESSMENT DOCUMENT IN RELATION TO THEM – FOR RE-DESIGNATING FAVERSHAM TOWN C.A.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
1	Local resident	On page 51, there is a reference to Belvedere Mill. To which building does this refer?	Noted and the proposed corrections can be largely accommodated without fundamentally altering the shape of the document.	To make changes to the assessment document as per the schedule of corrections.
2	St Mary of Charity	Tanners Street has an 's' at the end of Tanner, and St Mary of Charity has Saxon origins - the parish boundaries were drawn up in 635 and oldest parts of the existing church date to 1070. Unfortunately, whoever created the Wikipedia entry used a Canterbury newspaper article as a source, and it's incorrect.	Noted and the proposed corrections can be largely accommodated without fundamentally altering the shape of the document.	To make changes to the assessment document as per the schedule of corrections.
3	Local Resident	Objection received for inclusion of the following property in the new area [Faversham Conservation Area Character Appraisal & Management Plan Public Consultation Draft August 2023 (V3.1), Appendix 1 – Boundary Changes, p.82 Athelstan Road, Ethelbert Road, Canute Road, Kingsnorth Road].  Corner House Forbes Road Faversham ME13 8QF		

Rep.	Representation	Summary of Representation		Officer	Recommendation
NO(S).	Ву			Response	
Rep. No(s).	Representation By  Historic England	Figure 1 – Extract from p. 82  The property is on Forbes Road, ME13 8QF not Athelstan Road and therefore the map should be amended with the proposed blue boundary drawn omitting the property on Forbes road from the new conservation area. As shown marked up in red dotted line above in figure 1.  Historic England advice  We note there is a summary of significance within the document, but we recommend you consider placing a copy of this at the beginning	Noted and the proposed concan be large accommodal	Response	To make changes to the assessment document as per
		of the appraisal, so that readers get an instant idea of what is special about the conservation area.  As an overall observation, we consider that the appraisal would benefit from better historic mapping to help illustrate points raised in the appraisal about the area's historic development and throughout the document. For example, in section 3.2, which describes the town's historic development, only 19th century mapping is used, by which point the town was well developed. Introducing earlier maps, would better illustrate the towns overall development, including how it grew dramatically across the 19th century around a medieval core	can be large accommoda fundamental the shape of document.	ted without lly altering	document as per the schedule of corrections.
		which remained largely intact. Using maps to illustrate key features of the conservation area, such as the creek or green spaces, would also help draw out their spatial contribution to the conservation area's historic character.			

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
	•	We also note that the text is not as extensive or descriptive as the previous appraisal which is appended to the updated conservation area appraisal. We understand you need to strike a balance, but it would be useful to know if the appended appraisal, and the detail it contains, would still carry any weight in the planning process? We note that the structure of the appraisal does not seem to follow the guidance set out in Historic England's guidance, Conservation Area Appraisal, Designation and Management. We recommend you review the structure of the document to ensure that it includes all relevant sections as recommended in our guidance.		
		For example, the appraisal is not very strong on spatial analysis, an important component of any appraisal which sets out the conservation area's spatial character. We also cannot see a section on views, which is always helpful in any appraisal and is included as a recommended sub-section in Historic England's guidance. We also question whether a summary of each character area would be a useful addition, so that any reader can instantly understand what is special about the character area and why. Management plans are often underpinned by a condition survey of the conservation area or a SWOT analysis. We cannot see any		
		detailed analysis on conditions, threats and opportunities within the management plan section and we recommend that you consider whether to add such a section, in order to provide an evidence base for your management recommendations. Perhaps some of the detail in the section on harm, could be used?  We also note that some of the recommendations in the Design Principles section (5.2) include recommendations which are often within a management plan and we wonder whether some or all of this section would better sit within the management plan section? We welcome the inclusion of an action plan in the management plan and particularly on reference to individual stakeholders involved in the action. We would encourage you to work closely with the local		

Rep. No(s).	Representation By	Summary of Representation		Officer Response	Recommendation
		community, including key stakeholders along with the wider community, to ensure that delivery of the actions involved as wide an audience as possible and is therefore inclusive.			
5	Local Resident	I have just read through the two Faversham Conservation Area Reviews.  I purchased my property four years ago and was disappointed by the decaying wood sash windows I had, I was quoted £2400 for one window, I have five very large windows and a bay window consisting of three seperate windows, I obviously could not afford to replace these all at that sort of price, so I contacted the planning department at Swale Council and was told my property would need planning permission for new windows (as I lived in a conservation area), my neighbours "apparently" have an Article 4 Direction (which I couldn't find on the interactive map), they ALL have UPVC windows but I was told that I could pay £50 for pre planning advice!!! I presume this would be put into the Christmas bonus pot!!! So I was meant to live with my blinds being blown about due to the rotting wood and having to pack my windows with cling film and on a daily basis, through the colder weather, have so much condensation.  I really don't understand the time wasted on putting together these reviews when the majority of Victorian houses in Faversham have uPVC windows, the roads are atrocious, especially West Street which is particularly bad and uneven, graffiti everywhere, I don't know who thought it was a good idea a few years back to leave a spray painted person who had been shot on the wall and stairs by Faversham Swimming Pool, maybe someone thought it was "art" (I use the word art loosely). The litter and dogs mess around the streets in Faversham is also horrifying, how can you expect people to want	Noted.		No Change to the assessment document.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
-	_	to live in a conservation area and abide by the rules of such an area when it's a tip.  The planning committee is a joke, the councillors that also agree with the ridiculous plans that I have seen online are embarrassing, they should be ashamed of themselves. I will never vote again for any Faversham councillors, who have openly admitted they have no idea and no interest in planning applications, it's obviously been worth their while (and the planning department) to agree on certain plans (plenty of brown envelopes floating around).  I am writing to express my concerns and share my opinion regarding the recent conservation area review being conducted by Swale Borough Council. Specifically, I would like to address the inclusion of Spillett Close in the conservation area designation.  As a lifelong resident of Faversham and someone who has either lived at or near Spillett Close for many years, I have a deep appreciation for the historical significance of our town. However, I believe that in the case of Spillett Close, the conservation area designation may not be entirely warranted.  While I understand that the immediate area surrounding Spillett Close holds historic memories, it is important to consider the physical evidence that supports the need for conservation measures. In this regard, I find it challenging to reconcile the inclusion of Spillett Close within the conservation area. There are no remaining archaeological remains of the original grammar school or air raid shelter, which were once located in the area. The presence of certain structures, such as		

Rep. No(s).	Representation By	Summary of Representation		Officer Response	Recommendation
7	Abbey Neighbourhood	Given the absence of these significant historical structures and the lack of tangible historical value, I strongly advocate for the removal of Spillett Close from the future conservation area plan. Instead, I propose that the focus be redirected towards preserving areas that possess more substantial and visible historical features, ensuring that our efforts align with the preservation of our town's heritage.  I believe that alternative measures should be considered to enhance the environmental friendliness of the area and maintain a connection to the historical context. For instance, promoting the growth of hedges and flowers would not only provide an aesthetically pleasing boundary but also preserve the essence of the conservation area.  I kindly request that the Swale Borough Council reevaluates the conservation area designation for Spillett Close, taking into account the points I have raised. It is crucial to strike a balance between preserving our town's genuine historical treasures and facilitating sustainable development that aligns with the evolving needs of the community.  As Secretary of the Abbey Neighbourhood Association I have been tasked with responding to the document entitled Faversham Town	Noted and the proposed co	ie	To make changes to the assessment
	Association	Council Area Review.  By way of introduction, the Abbey Neighbourhood Association is the community group which represents all of the residents north of the Market Place in Faversham, some 350 dwellings. The area is encompassed within the Town Centre Conservation Area.  The Association wishes to record the following comments	can be large accommoda fundamental the shape of document.	ly ted without ly altering	document as per the schedule of corrections.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
8	Local Resident	1) Page 62 The Association welcomes the clarification on the installation of roof mounted photovoltaic panels. It notes that their provision should be supported for unlisted houses in a conservation area, subject to certain specific conditions.  2) Page 68 Connectivity and permeability is rightly emphasised. However, this aspiration has been sadly overlooked with regard to the continuous east creekside footpath, whereby the walkway, at the new Abbey Wharf development, is closed and requires a detour onto Belvedere Road.  3) Page 70 The Association is particularly concerned at the following statement "The main loss of windows and doors is in the late 19th and early 20th century terrace streets. These changes do harm character, but it could be argued that the more important aspect of character is the urban form of the terraces".  The Association fundamentally disagrees with this assessment and firmly believes that authenticity of the design and choice of material (in respect of doors and windows) is essential in maintaining the heritage integrity of the late Victorian terraces in the Conservation Area. This comment, if allowed to remain, gives the Planning Authorities reduced validity in refusing consent where traditional timber elements are being proposed to be substituted with UPVC alternatives.  Page 74 Under the section entitled Enforcement, there is, correctly, an emphasis on the powers under Article 4 Directive on unauthorised work. However there is no reference to enforcement regarding elements of a planning consent not being implemented by the Applicant. This is illustrated by the numerous aspects of the Abbey Wharf development, completed some 2 years ago, still outstanding.		
	233.1100.3311	I'd like to see if we can expand the conservation area		

Rep.	Representation	Summary of Representation	Officer	Recommendation
No(s).	Ву		Response	
No(s).	Ву	And include the current area that's oddly not incorporated in red.  These roads have a unique character. Have similar historical value as roads on the other side of the railway track. And should be preserved that way.	Response	
	Level Desident	Playtog Field F Sta F Sta P St		
9	Local Resident	P8 Faversham Neighbourhood Plan is at Regulation 16 stage not reg 14 P21Where is Brents banks community garden? P33 St John the Evangelist the Brents is now a house. P61 photo of Waterside Close is out of date. Footpath is ZF43 and land is spreading room for the England Coast Path. P62 support para re pedestrian permeability and connectivity P68 support bullet point re . connectivity and permeability P75 why is 2004 appraisal relied on instead of updating as it is 20 years old? P83 onwards. If the conservation area appraisal is being updated why not this?	These corrections relate to 2004 appraisal included as an appendix in the proposed document. The 2004 appraisal is now being included in the main document.  Noted and the proposed corrections can be largely	To make changes to the assessment document as per the schedule of corrections.

Rep. No(s).				Officer Response	Recommendation
	-	P87 need update on buildings at Abbey Farm P90 Bedlington Square no Beddington P91 former Barclays bank building P92 former Lloyds TSB building Omit sentence about raised kerb and flower boxes- they have been removed. P93 often being (omit gap) P93 sixty five years on not 45 P94 brewery training centre now a house P94 Pyramidal street trees P94. The Maltings built in the 1980's not 1880's P94 church in Abbey Place now converted into flats, omit phrase re brutal doors	accommoda fundamental the shape of document.	Response ted without lly altering	Recommendation
		P94. The Maltings built in the 1980's not 1880's P94 church in Abbey Place now converted into flats, omit phrase re			
		p103 Two Brewers now 2 flats p103 Sites have been redeveloped not being p104 Belvedere Mill has been a restaurant and flats for 20 years p.104 corrugated roofs no longer battered and 17 <sup>th</sup> century warehouse now converted to shops with associated signage. P105 barges and houseboats including Greta. P106 Oyster Bay Warehouse now a house.			

Rep. No(s).	Representation By	Summary of Representation		Officer Response	Recommendation
		P106 Disturbed land to the South west now used for arable crops. P109. No longer any colour coded parking bays P110 Former Gullivers Building 1697 and no flower troughs P113 Alexander Centre now used for hired rooms and offices P113 Assembly Rooms now back in use as a meeting hall p.114 ex Geerings now a clothes shop p115 They also needed (omit gap) p124 Part of the main traffic route (omit gap) p124 Railings of Rec have been reinstated to East Street and Park Road p127 South Road. These front boundaries (omit gap) p129 Public gardens now containing memorial plaques and railings have been replaced p129 excuses the presence of a disused filling station and repair garage p.134 Recreation ground now has railings p135 Flint House now converted to housing p136 has ceased (omit gap) p138 This open space (omit gap) p139 Upper St Ann's Road p139 and each is set (omit gap) p143 heights in excess of four metres (omit gap) motor- cycle shop is no longer there. P146 Orchard now a group of new houses finished in the 2010's			
10	Local Resident	I have read with interest the Faversham Town Conservation Area Appraisal and fully commend its comprehensive and thorough examination of the historic landscape of the town's conservation areas. Having such a document is an important buffer to unsatisfactory and inappropriate development in an historic town.	Noted and the proposed concern be larged accommodation fundamental the shape of document.	orrections ely ated without lly altering	To make changes to the assessment document as per the schedule of corrections.

Ву		Doen		
		Resp	onse	
	However, one comment and minor criticism I would make is that			
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	that it is clearly cited as a 2004 Character Appraisal I would question			
	the value of having an out of date document supporting a forward			
	looking conservation plan. Many of the changes that have taken			
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	Perhaps it would be better to spend a little time updating this			
	appraisal to reflect changes that have taken place since 2004;			
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	document.			
		the value of having an out of date document supporting a forward looking conservation plan. Many of the changes that have taken place are small and easily rectified (there are numerous examples – the reference to the Co-Op supermarket in West Street; the former motorcycle shop and Crown and Anchor pub, now residential, in the Mall; the lack of railings outside the police station, are just a few examples), and I do think that it is unhelpful and detrimental to the strength and import of a document such as this to include material that is already out of date.  Perhaps it would be better to spend a little time updating this	Appendix 2 is somewhat out of date in places. Whilst I appreciate that it is clearly cited as a 2004 Character Appraisal I would question the value of having an out of date document supporting a forward looking conservation plan. Many of the changes that have taken place are small and easily rectified (there are numerous examples – the reference to the Co-Op supermarket in West Street; the former motorcycle shop and Crown and Anchor pub, now residential, in the Mall; the lack of railings outside the police station, are just a few examples), and I do think that it is unhelpful and detrimental to the strength and import of a document such as this to include material that is already out of date.  Perhaps it would be better to spend a little time updating this appraisal to reflect changes that have taken place since 2004; changes which I am glad to say are largely minor and do not significantly impact the heritage to which they allude.  Otherwise, may I commend all involved in producing this invaluable	Appendix 2 is somewhat out of date in places. Whilst I appreciate that it is clearly cited as a 2004 Character Appraisal I would question the value of having an out of date document supporting a forward looking conservation plan. Many of the changes that have taken place are small and easily rectified (there are numerous examples – the reference to the Co-Op supermarket in West Street; the former motorcycle shop and Crown and Anchor pub, now residential, in the Mall; the lack of railings outside the police station, are just a few examples), and I do think that it is unhelpful and detrimental to the strength and import of a document such as this to include material that is already out of date.  Perhaps it would be better to spend a little time updating this appraisal to reflect changes that have taken place since 2004; changes which I am glad to say are largely minor and do not significantly impact the heritage to which they allude.  Otherwise, may I commend all involved in producing this invaluable

No(s). By	Response	
Group  These comments are made on behalf of the Faversham Footpaths Group (FFG), a lo organization that seeks to protect and extend the public footpath network in Faversi surrounding area. As such we only wish to comment on the footpath and public accommend of this review.	ed corrections largely modated without lentally altering pe of the	To make changes to the assessment document as per the schedule of corrections.

Rep. No(s).	Representation By	Summary of Representation		Officer Response	Recommendation
		Appendix 2 - 2004 Character Appraisal.			
		It is disappointing that SBC has not taken the opportunity to update this section. There many changes since this was written twenty years ago, and it would not be that oner update the character appraisal to reflect these.			
		An example of this is Flood Lane, where the 2004 description bears little resemblance current state of public access through the area.			
		In view of the above, it is our hope that the Council will further review this Conservatio Documentation.			
12	Faversham Society	Introduction This 147 page document is presented as an ambitious well-crafted product but unfortunately is a repetitive meander through well documented territory that shows little analysis, partial and subjective opinion, with very scant practical awareness of problems or solutions. It serves up a series of clichés and assertions that attempt to become rational policy drivers. Frankly it is a flawed report. There is no rationale for defining the existing conservation area or analysing whether it should remain, increase or contract.  Statutory Policies  Questions that should be answered include when was the Faversham Conservation Area agreed and have there been any subsequent modifications? Throughout the report pictures seem to be chosen at random, none of which are named. For example what is the significance of the picture on page 10?  Heritage Assets On Page 12 whilst Article 4 directions are in force, how are the	Noted and t proposed co can be large accommoda fundamenta the shape o document.	orrections ely ated without Ily altering	To make changes to the assessment document as per the schedule of corrections.

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		the environment and historic environment. Oare Creek is not within the Conservation Area  Special interest and character  Page 15 surely from Roman rather than Saxon times? A number of significant centuries of development seem to be missing in the descriptions. No mention of railway expansion. Page 17 no inclusion of historical maps before 1864. Page20 omission of Queen Elizabeth School playing fields. Page 25 81 Abbey Street has a very modern extension c 2000 added. Page 28 is Chart Mills Medieval or restored in 1971? Page 28 in many ways Georgian architecture could not etc., so could Victorian be modern? Page 29 is the Anchor Inn Georgian? Page31 Omission of a number of interesting Victorian and Edwardian houses. Page 34 The Macknade Avenue Housing Estate is an interesting late pre-war development and unique Page 39 which post boxes are listed? In the paragraph about Harm, this list simply shows the changes required for 21st century living, together with numerous attempts to synchronise public design. On page40 no evidence is produced to show that buildings are "in reasonably good condition" or a definition of what that is.  The late 20th century did hasten the decline of port related industries but rather than a growth in tourism that remains small scale, it saw a large increase in infill new development.		
		Character areas Whittles Timber Yard Regarding Ordnance Wharf, scant evidence of the features described that may be non-existent. Page 51 Surprisingly there is no mention of the Old Gate in the wall of Old Gate Road DavingtonPage 57 re Love Lane Cemetery, omission of Commonwealth War Graves Whether trees and hedges are of special character is not evidenced. Recent Developments		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Within this paragraph there is an omission of "Pagoda" apartments on London Road that are unique. Presumably The Morrison's Building was agreed by Swale Planners operating within existing heritage guidance. The recently agreed National Coastal walk has enabled walkers access to Creek-side housing development hence there is now pedestrian access to the waterfront.		
		Development and Design Principles Regarding creativity, a number of new buildings seem to be at odds with this ambition. The issue of Photovoltaics skirts around the practical problems of implementation on historic buildings and the affect that may have on		
		the eye.  Management Plan  The statement that "research shows that historic environments supporta higher proportion of independent businesses" is questionable, and dependent on a variety of factors unrelated to that environment.		
		Heritage led Economy This is the most contentious paragraph in the report that again goes over well-trodden ground. The current planning application to develop the old Woolworths site points to the flaw as does the long established key planning policy concerning maintaining a vibrant town centre that goes against this potential "Disneyfication". A small town centre should have a mix of shops that serve the needs of the local population and are economically viable with a regular footfall. Despite large recent growth, Faversham is still small and its tourist offer enables on average a half or a one day visit to the three or four key sites that often include the Shepherd Neame Brewery. Whilst tourism as an economic driver has been encouraged for 20 years, the size, scope and limitations of Faversham prevent its significant		

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		expansion that is shown by for example the decline in visitor numbers to the Faversham Society museum.  The single approach that would support historic Faversham would be morerecouces placedinto the inspection and management of historic buildings and small grants, as previously given, to owners for maintenance, design and colour coordination of buildings. Looking at the many current shopfronts and signage, little is done to ensure historic authenticity.  The chimera of uniform approach to public realm has in my long time in Faversham been attempted at least on four occaisions with scant result and a large waste of public money.  Enforcement  For some time this has been a considerable area of weakness  Listed Buildings  26 Buildings are listed including Queens Court in Ospringe. This part of the stated 349 buildings described in paragraph 2.2.1, but why are not the others included?  Boundary Changes  Some useful points for expansion are included but without clear criteria.		
		High Street Task Force Frankly of little value Character Appraisal This is really a very lengthy expanded repeat of much of the earlier descriptions. Conclusion Whilst a conclusion is absent it would seem that an inherent dilemma exists for this report in that whilst the are considerable historic and		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
13	Local Resident	character aspects of Faversham within the conservation area, their protection, preservation and enforcement is less than adequate in an era when huge pressure for infill development throughout the town is on the increase. Faversham Town Council with its growing precept spends very little on these issues, although whilst not being the statutory planning authority, it could assist. Swale Borough Council finances are declining, and planning staff are in very short supply. A heritage led local economy appears at odds with economic drivers that have increased local hairdressers, nail bars, tattoo parlours, estate agents and fast food outfits. Thus a much more rigorous analysis of priorities and how these can be achieved should be actioned.  1. Origin. The concept of conservation areas was the idea of Jim Doak chairman of the Faversham Society in the early 1960s, when the Society was a campaigning organisation. It was incorporated by Duncan Sands, who was chairman of the Civic Trust, into his private members bill named the Civic Amenities Act 1967 on the suggestion of Arthur Percival secretary of the Faversham Society. It was not intended that designation as a Conservation should be used to obstruct good appropriate development  2. Generally. The document is an interesting description of the buildings and character of Faversham, but it is out of date in several areas some of which I will list together with several inaccuracies. The author needs to take the document onto the ground and ensure that what it contains is accurate and up to date. It would be helpful if the pages of chapter 2 to 11 were numbered. I feel that the document is rather long,	Noted and the proposed corrections can be largely accommodated without fundamentally altering the shape of the document.	To make changes to the assessment document as per the schedule of corrections.

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		covering a large area and range of subjects and may become a rich source of information on which to base objections by the usual NIMBYS. None of the photographs have a caption to inform strangers to the town what they show or where they are taken.		
		Page 17 item 3.2.3. The Brents was incorporated into Faversham Borough in 1935		
		4. The maps on pages 18 and 19 are too small to be readable.		
		5. Page 21 3.3.3 The open spaces between the Front Brents and the creek together with Crab Island at the north end of the Front Brents, are Registered Town Greens not Village greens and are protected by special legislation. The Abbey Physic Community Garden is not a public open space. The garden is owned by the Old Grammar School Charity and is on a short lease to the current management.		
		6. The correct postal address of what has been called the "Masonic Hall" is the Old Grammar School Faversham.		
		7. There is no key to the maps on pages 50, 52 & 54. To explain what they are illustrating.		
		8. Page 21 There is not a problem with housing limiting access to the creek at Faversham Reach and Waterside estates. There is a footpath registered on the County Council Definitive map of footpaths shown running from Crab Island to Ham marshes along the creekside. Currently it is open except for three short lengths which are closed awaiting the carrying out of works to make them safe. In the meantime the		

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	-	creekside path can be accessed through the industrial estate which is open to the public under the coastal margin provisions attached to King Charles III coastal trail. The private notices are misleading.  9. Page 80 Gordon Square was built in the late 20s and early 30s, I can just remember it being completed. It was designed by the then Borough Surveyor the late Percy Andrews M.I.Mun E. IT is not of sufficient architectural or historic interest to warrant inclusion in the Faversham conservation area and its inclusion would only serve to further de-value the coinage. Council housing continued with the building of Macknade Avenue, building in Whitstable Road, Lower Road, Priory Place and Willow Avenue, constructed before the second world war. Council house building recommenced after the War with the building of Millfield Estate, North Preston Estate and Lion Field estate, completed in the late 60s  10. Page 82 The map does not have a key.		Recommendation
		Chapter 4 Creekside The Creek above the Bridge. The Purifier Building is now in active use. The 1976 swing bridge has been removed and replaced by what is thought to be a temporary fixed bridge which obstructs the waterway and prevents the enjoyment of the free right of navigation of the tidal creek. The hydraulic ram for raising the original bridge is now operated by electricity, rather than a hand pump.		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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		North Lane,, Conduit Street and Quay Lane The Swan and		
		Harlequin public house is now called The Quay. The		
		buildings on Swan Quay except for Whittle's office building		
		now described as a chandlery, are modern, the originals		
		having been mainly destroyed in the 1953 flood. The large		
		modern building on the quayside has been built with the long side to the creek contrary to the normal custom of waterside		
		buildings where buildings are erected with the short side to		
		the water to save valuable waterside frontage		
		Standard Quay and Iron Wharf		
		Standard Quay was never used for ship building, but for the		
		storage of grain and fertiliser. I attach a cutting from the		
		Faversham News which explains the history of the Standard		
		and Hucksteps Quays. The traditional smells on the quay		
		were of hot train oil and rats' urine and the sound of shunting		
		trains, not the smell of old rope and Stockholm tar and the		
		sound of timber being sawn. Chambers Dock is now		
		occupied by houseboats. There is no mention of the Charles		
		III Coastal Trail that is routed around the creek in Faversham.		
		Chapter 6 Davington and Stonebridge Pond		
		Davington Priory and Church was purchased by the Central		
		Board of Finance of the Church of England in 1932 on the		
		instigation of Rev J. A. Osborne vicar of the Brents. It is the		
		only church the Board ever owned. Both properties were transferred to the diocese of Canterbury in 1972 who sold the		
		Priory and retained the Church to serve the Parish of the		
		Brents and Davington.		
		Conclusion There are several other inaccuracies in the		
		document, but I have tried to highlight the worst. It would		
		help users of the Report if it were reduced in length and		
		better indexed.		

Rep. No(s).	Representation By	Summary of Representation	Office Respon	
14	Local Resident	The document seems to be directed at telling potential developers what not to do rather adopting a more positive and creative stance to encourage good design. It is unlikely that the various studies mentioned on pages 72 & 73 will be undertaken.  General comments  11. The photographs in the document are very good and	Noted and the proposed corrections can be largely	To make changes to the assessment document as per
		<ul> <li>generally serve to illustrate points well. They enhance the document.</li> <li>12. I like the aspiration that going forward design should be creative.</li> <li>13. Paragraph numbers, photographs, maps etc aren't numbered – this makes document difficult to use and reference.</li> <li>14. Under 3.4 Townscape Character – the first photo references Tanner Street – this is a spelling error. It should read Tanners Street as is used elsewhere in the document.</li> <li>15. There are typos and the document needs proof reading eg page 47 'Abbey farm' and 'intertest'</li> <li>16. There is an inconsistency in whether the document uses capitals letters or not for 'Conservation Area'.</li> </ul>	accommodated witho fundamentally altering the shape of the document.	
		More specific comments  17. 1.1 Purpose of the Document – the text sets out 'the document may be used to inform planning decisions, planning policy-making and proposals to enhance or regenerate the conservation area'. 1.2 sets out that Chapter 3 'seeks to describe the special architectural or historic interest and character of the Conservation Area. This is of key importance in informing planning decisions' Indeed,		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
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		Chapter 3 and Chapter 4 (which augments it) are key elements of the Conservation Area appraisal (CAA)and yet seem to be lacking in the necessary detail. When I heard about the refresh of the CAA for Faversham I imagined it would be an update on the excellent (detailed, historically accurate and beautifully written) CAA of 2004 and would document changes to the CA – good and bad – to inform the Management Plan. I was therefore a bit disappointed to read Chapters 3 and 4 and the lack of detail included – which I think will make informing planning decision (its purpose) tricky. Usefully, the 2004 CA has been included as an Appendix, but whilst the element makes up almost half of the 2023 report it is unclear what the status of this Appendix is.  18. A few minor points to illustrate the lack of detail/accuracy mentioned above:  a. 4.3 'Faversham Creek' makes no mention of Stonebridge Pond and its history and present uses – which are fundamental to the story of the town. It also doesn't seem to mention the basin or the boat yard which feels like an omission. I know Stonebridge Pond is mentioned elsewhere, but the piecemeal approach doesn't make the document easy to use – especially for readers unfamiliar with the town. Also, there is an inconsistency is whether a capital letter is used for 'pond' or not. I think it should be when it's used as a proper noun.  b. Page 48 talks of West Street's 'unbroken rear-of-pavement building frontages' but elsewhere in the document frontage is listed as a detracting feature.		

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	-	amended to say something like 'near unbroken rear- of-pavement'  c. The description of the Post Office on page 48 as having 'its own merits' is a bit vague. Not everyone will read the whole document and know it's mentioned elsewhere.  d. Page 55 – where is Angelo Terrace? Be good to have a street name here.  e. Page 55 – Preston Church is briefly mentioned (does it deserve more detail?), however elsewhere Preston Church is called St Catherine's. I realise that in the 2004 study it is called Preston church but can this inconsistency be ironed out?  19. Section 3.7.1 is very short on 'common forms of harm' – only listing 2 elements. The photographs illustrate more, including street clutter/poorly sited utility infrastructure, low quality boundary treatments and graffiti. Harm also includes poorly designed and fabricated fascias, degrading and unrepaired street surfaces (unsightly and dangerous), unconsented development, litter, unmaintained planted areas (eg intersection of South Road/North Lane/West Street) etc. Whilst some of these harms are included in the next section of the document (3.7.2) I think this section should be tidied up and would be more effective. A full analysis of harm and the reasons behind it (including lack of enforcement/resource pressures) should be included.  20. I like Chapter 5 and the focus on recent development and design principles for future development and the positive view of 'creative' rather than 'imitative' responses. However, this aspiration is not followed through strongly enough in the		Recommendation

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		area status should not be a barrier to innovation and should		
		encourage creativity, rather than imitative design'		
		21. Chapter 5 also needs a bit of tidying up as some of the		
		important text is made up of descriptions of the photographs		
		(which are useful) but not integrated into the body of the		
		text. Also, I think it would be useful to name the locations		
		shown in the photos – in case people not familiar with		
		Faversham want to know where they are. The paragraph on		
		Morrisons is a bit random (a photograph here would help)		
		and the text 'the more important consideration' should be		
		amended as there has been no previous reference to any		
		other considerations.  22. The Management Plan seems to be a list of 'nice to haves'		
		with no prioritisation of actions, lead partner identified,		
		costings, timeframes, resource planning, identification of		
		easy, medium and difficult actions etc. Many of the actions		
		are already being implemented in various forms – with		
		varying success, but some very well. Current good practice		
		needs to be identified, rather than giving the impression that		
		nothing has been done. The Management Plan should build		
		on current good practice and clearly set out a positive		
		roadmap going forward. In its current form, I'm not sure how		
		it is going to be implemented. (Furthermore, terms such a		
		'place leadership' mean nothing to the average reader.)		
		23. Minor points:		
		<ul> <li>a. Eg Action 4 – Regeneration Policies – talks about policies in the Neighbourhood Plan – does this mean</li> </ul>		
		this action is already being implemented?		
		b. Eg Action 5 – please include a hyperlink to section		
		7.3 as without understanding this, this section is		
		impossible to understand.		

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		c. 6.5.2 The sentence 'The main loss of windows and doors is in the later 19 <sup>th</sup> and early 20 <sup>th</sup> century terraced street' is not clear – presumably this is referencing the removal of original timber windows and doors and replacement with non-traditional designs and UPVC/metal as a material?  Furthermore, whilst it cannot be disputed that 'the urban form of terraces' is more significant that the loss of original doors and windows the loss of original doors and windows does have a significant detrimental impact on the quality of the historic environment. The quality of fascia boards has also become poorer in recent years, which has had a degrading effect. Enforcement has clearly not been effective in preventing instances from happening and Faversham's heritage has suffered as a result.		
15	Faversham Town Council	RESOLVED to Support the Conservation Area Review with comments: 1) The Character Appraisal should be updated 2) Brent Banks Community Garden does not exist (p21) 3) There is presently not a Faversham Youth Council (p69)	Noted and the proposed corrections can be largely accommodated without fundamentally altering the shape of the document.	To make changes to the assessment document as per the schedule of corrections.
16	Local resident	Legislative Background and Relevant Policy Guidance The Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990 (as amended) provides a statutory requirement for Local Planning Authorities to undertake periodic appraisals of their Conservation Areas; particularly where development proposals	Noted and the proposed corrections can be largely accommodated without fundamentally altering	To make changes to the assessment document as per the schedule of corrections.

Rep. No(s).	Representation By	Summary of Representation		Officer Response	Recommendation
NO(S).	ву	may have the potential to impact upon, or affect, the relevant designation or significance. Given that the existing Conservation Area Appraisal (2004) is now out-of-date — a fact acknowledged by both Faversham Town Council and the Local Planning Authority1, Swan Quay LLP welcomes the decision of the Borough Planning Authority to review the Faversham Conservation Area Appraisal. 1 Forming background evidence to the Faversham Neighbourhood Plan preparation process  The statutory requirement for Local Planning Authorities to review Conservation Areas is acknowledged by Historic England in its guidance — Historic England: 2019 Conservation Area Appraisal, Designation and Management, second edition, Historic England Advice Note 1. This advice note sets out, in considerable detail, how to appraise Conservation Areas, what Conservation Area Appraisals should contain together with details of how to manage proposals in Conservation Areas as part of Management Plans. It is, therefore, surprising that the Draft Conservation Area Appraisal & Management Plan makes no reference whatsoever, to this pertinent guidance note.  In acknowledging that, once finalised, the Character Appraisal & Management Plan will form a Supplementary Planning Document (SPD) (Section 1.1), the following comments are made. 2 RS/0850 Representation — Swale BC Conservation Area Appraisal & Management Plan — 4th December 2023  Section 1.3 Statutory & Policy Context  It is evident that the Draft Appraisal & Management Plan requires an update in section 1.3 given the references made to the Regulation 14 Consultation Draft of the Faversham Neighbourhood Plan (which has long been superseded) and the fact that the emerging Plan will supersede the Faversham Creek Neighbourhood Plan.	the shape of document.	•	

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Notwithstanding the fact that the Draft Appraisal & Management Plan should, perhaps, have been updated prior to this current consultation, it is surprising that the Regulation 16 Consultation version of the Neighbourhood Plan was not delayed until such a time that it could be informed by an Adopted Conservation Character Appraisal and Management Plan (for both the Faversham & Preston Conservation Areas) given the importance placed upon the protection of the historic environment by the NPPF and the fact that an extremely large area within Faversham (extending to Preston and Ospringe) are within designated Heritage Assets. This is, perhaps, an observation better reserved for any future Examination into the Faversham Neighbourhood Plan. Section 2.4 – Non-Statutory Heritage Designations  It is noted that the Appraisal & Management Plan refers to the fact that Swale Borough Council maintains a "local list" of non-designated Heritage Assets which will provide for a 'material consideration' when considering planning applications. This is, however, not the case given that the link inserted at Section 2.4 simply refers the reader to relevant heritage-related documentation which clearly states, (page 36) that there is no local list. In this regard, the Council may wish to delay the adoption the Character Appraisal & Management Plan until such a time that (i) further consideration and public consultation has been undertaken in devising a local list (particularly as such a list will form a material consideration in planning decisions) and (ii) that the recognition, by the Maritime Heritage Trust, National Historic Ships UK and Historic England, that Faversham and Oare Creeks have been recognised as 'Heritage Harbours' may require assessment as part of any local list (because they can only be categorised as non-designated Heritage Assets).		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
No(s).	Ву	Historic England, in the afore-mentioned Policy Advice Note, advises that in assessing the special character of the subject Conservation Area, an Appraisal document will normally set out inter alia:  • A concise statement defining the special historic or architectural interest of the area and the character of appearance that it is desirable to preserve or enhance so that this can be taken into account in decision making;  • bullet points or a table to identify any individual features or characteristics that contribute positively to the Conservation Area's character or appearance and that,  • It is helpful to set out separate lists or tables detailing issues or vulnerabilities identified as affecting the area's character or appearance, as well as any management proposals that are recommended.  In this regard, it is submitted that there are missed opportunities in so far as the analysis, and proposed future management, of the Faversham Creek Area is concerned. 3 RS/0850 Representation – Swale BC Conservation Area Appraisal & Management Plan – 4th December 2023  Section 3.6 Materials & Detailing  Whilst it is acknowledged that clay tiles and slate are the common local vernacular materials and have been used on/in many historic buildings, this material is not the only roof covering prevalent in the area. Many industrial buildings in and around the Creekside, and within streets close to the Creek, have been finished with metaled roofs and, indeed, this is a traditional material characteristic of many industrial buildings associated with the historic development	Response	

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		of the Creek (particularly the brewing industry). Latterly, the Council has consented a number of developments in the Conservation Area (close to the Creek) finished in zinc.  A recognition later in the Management Plan that 'design codes' should not be so prescriptive as to suggest that only plain tiles and slate would be acceptable would meet with the relevant provisions of NPPF 128.  Section 3.7 – Harm  Harm to a Designated Heritage Asset is not necessarily confined to the loss of historic detail and fabric. Harm to the public realm can include the retention of inappropriate forms of development (particularly some of the more contemporary forms). There is a general absence, within the Appraisal document, to acknowledge that the replacement of harmful built-forms with more sensitively designed and sited developments can offer the potential for enhancements to the character and appearance of conservation areas – NPPF 207.  Section 3.8 – Summary of Special Interest and Character It is of note that the document acknowledges that the historic development of Faversham includes evidence of surviving fabric from the industrial development of the town, listing historic trades and occupations, including gunpowder manufacture. The list fails, however, to mention timber importation or the later associated joinery/milling uses.  Section 4.3 – Faversham Creek  It is noted at Section 3.4 "Townscape Character" that mention is made of surviving industrial buildings flanking the Creek and "whilst some industrial buildings have their ends to the Creek, with main elevations facing along the Creek, more recent housing development encloses and faces directly onto the Creek".  In appreciating that this is simply a factual observation, and one		
		that is well documented in background evidence to the Faversham		

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		Neighbourhood Plan and in Heritage Appraisals accompanying historic planning applications2 this modern 'erosion' of the Creekside character should be acknowledged in the site-specific character appraisal.  2 Character Appraisals as undertaken by Mr Ray Harrison and Lee Evans Partnership LLP Given that buildings at Whittle's Wharf are highlighted in Section 3.5.4 as providing a significant contribution to the Conservation Area, and in consideration of the fact that Swan Quay retains, in part, historic and traditional built-forms (associated with timber exportation and milling, as opposed to the more traditional maritime uses and brewing), the 'rounding-up' of these historic elements with Town Quay and the Training Ship hazard does not, it is submitted, acknowledge the individual characteristics of these very separate quays and land parcels. 4 RS/0850 Representation – Swale BC Conservation Area Appraisal & Management Plan – 4th December 2023  In acknowledging that, in combination, the buildings at Town Quay and some of the buildings at Swan Quay/Whittle's Wharf reflect the more historic industrial areas in general terms, there should be a clear acknowledgment of the different characteristics between the two sites and a recognition that not every building forming part of Whittle's Wharf contributes to the special character of the Conservation Area.  It is, therefore, suggested that "Town Quay" and its assets be separated from "Swan Quay/Whittle's Wharf" with a recognition that timber importation and milling played a historic role in the evolution of this part of the Creek (including Belvedere Road) and that more contemporary forms of development have affected, to the detriment, the interpretation of historic built form in this area. As a	Response	

consequence, opportunities exist to enhance this part of the Conservation Area.  Again, in having regard to the 2004 Conservation Area Appraisal (attached to the Draft document at Appendix 2), there appears to be a missed opportunity to highlight those important features and characteristics that contribute to the character area and importantly; those that do not!  Section 5 - Design  The recognition that the Conservation Area status should encourage creativity rather than presenting itself as a barrier (Section 5.2) is welcomed.  Section 6 - Management Plan  The 9th bullet point in Section 6.1.1 advises of research that shows that historic environments support a higher proportion of independent businesses. There is, however, no evidence to support this research nor any information as to what type of "independent businesses" may benefit from historic environments. Given that many modern SMEs may find historic environments (particularly historic buildings) constraining, it is assumed that this research relates to hospitality/tourist uses as opposed to traditional B Class uses (or many E Class uses).  Section 6.2.2 - Town Centre Regeneration  It is recommended, at "Action 4" that the emerging Faversham Neighbourhood Plan identifies a "Maritime Gateway Heritage Regeneration Area". While the Regulation 16 Draft of the	Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
Neighbourhood Plan was the subject of public consultation some time ago, it is suggested that this suggestion is a case of "tailwagging dog". It really should be the Appraisal and Management Plan's role (as a supplementary planning document) to inform the		•	consequence, opportunities exist to enhance this part of the Conservation Area.  Again, in having regard to the 2004 Conservation Area Appraisal (attached to the Draft document at Appendix 2), there appears to be a missed opportunity to highlight those important features and characteristics that contribute to the character area and importantly; those that do not!  Section 5 – Design  The recognition that the Conservation Area status should encourage creativity rather than presenting itself as a barrier (Section 5.2) is welcomed.  Section 6 – Management Plan  The 9th bullet point in Section 6.1.1 advises of research that shows that historic environments support a higher proportion of independent businesses. There is, however, no evidence to support this research nor any information as to what type of "independent businesses" may benefit from historic environments. Given that many modern SMEs may find historic environments (particularly historic buildings) constraining, it is assumed that this research relates to hospitality/tourist uses as opposed to traditional B Class uses (or many E Class uses).  Section 6.2.2 – Town Centre Regeneration  It is recommended, at "Action 4" that the emerging Faversham Neighbourhood Plan identifies a "Maritime Gateway Heritage Regeneration Area". While the Regulation 16 Draft of the Neighbourhood Plan was the subject of public consultation some time ago, it is suggested that this suggestion is a case of "tailwagging dog". It really should be the Appraisal and Management		Recommendation

Rep. No(s).	Representation By	Summary of Representation	Officer Response	Recommendation
		acknowledgement that such buildings and sites exist, is welcomed. However, it is not known what is meant "meanwhile uses" and with no definition, this Supplementary Policy guidance is neither clear nor precise.  Section 6.6.2 – Positive Planning and Design It is evident that there is a clear emphasis in Section 6.6.2 on heritage preservation, community provision, master planning in general terms and training, but little or no mention of positive planning for economic development. Given that a large proportion of the Conservation Area encompasses the majority of Faversham's Town Centre and the industrial sector of the Creekside, the 'Actions' identified 5 RS/0850 Representation – Swale BC Conservation Area Appraisal & Management Plan – 4th December 2023  to support positive planning may well seek to conserve economic potential planning but ignore the creation of economic potential. It is again submitted that an update to the Conservation Area Appraisal and Management Plan is welcomed but that there does need to be a more prominent understanding and recognition that not every site, building, space or feature in the conservation area contributes to its special character:  "Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance."  NPPF Paragraph 206  We trust that these comments will be taken into consideration in the further preparation of the Council's Conservation Area Appraisal and Management Plan for Faversham Town.		

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110(3).				Response	
17	Local resident	As I'm sure with many people I was keen to see how the town will address the opportunities and take advantage of the lower carbon future and how this fits in with conserving the town. What I see is mainly in the section on sustainability section 6.4 on pages 68 and 69. Overall the section is very wide ranging in terms of what sustainability might mean, and not really specific. What I am concerned about is in the identified Action related to this section i.e 16. This action uses the adjectives, good and safe. Surely these are subjective, safe compared to what? Good compared to what?  My concern is that unless these adjectives can be rationally defined, then initiatives could be put forward that run entirely contrary to the towns history and character, but are deemed somehow safer or better than what exists at the moment?  Surely these 2 subjective words should be removed.			
18	Local Resident	SUGGESTED BOUNDARY CHANGES I welcome the proposed CA extension in Athelstan Road, etc, especially inclusion of the run of well-preserved Victorian properties on the south side of Athelstan Road between Forbes Road and Canute Road.  This proposed extension could also be usefully enlarged to include the Victorian houses near the sharp bend in Forbes Road (both sides), which are largely unspoilt.  ACTIONS Action 25 (guidance). I think that the Council needs to remember, in Article 4 applications relating to windows and doors, that before	Noted and the proposed concan be large accommoda fundamental the shape of document.	orrections ely ted without lly altering	To make changes to the assessment document as per the schedule of corrections.

Rep. No(s).	Representation By	Summary of Representation		Officer Response	Recommendation
19	Shepherd Neame	about 2016 it received planning inspectorate decisions that were very supportive of the strict line that the Council had been taking, with the inspectors' rulings emphasising that each case centres on the property in question and that inappropriate alterations to neighbouring properties do not somehow justify further harm to a road's appearance.  Action 28 (unauthorised works). The proposed action is important, but needs to be actually carried out, including in so far as possible against unauthorised replacement of windows and doors. Is the Council's IT able to include in correspondence (council tax notices etc) a reminder that a property is within the CA / Article 4 area?  Action 29 (deterioration). This could be worthwhile if carried out.  Shepherd Neame welcomes and is pleased to see the work going into the new Faversham Conservation Area Character Appraisal & Management Plan. As a significant part of Faversham's history, and current owner of many buildings within the town, Shepherd Neame is keen to work with the Council to ensure that the brewery's presence continues to enhance the town's significance.  In relation to the Draft document, Shepherd Neame supports the general description of significance in relation to the brewery's collection of buildings. Shepherd Neame would be happy to assist with any queries relating to the history of the brewery and influence on the town.  For Shepherd Neame to continue to positively contribute to the town, understanding the status of its assets is essential. Clarity is therefore sought in relation to Action 21 – Listing, where it is stated that there may be scope for additional listing of buildings or	Noted		No change to the assessment document.

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		upgrading of existing listings, including the "Shepherd Neame buildings in Conduit Street".			