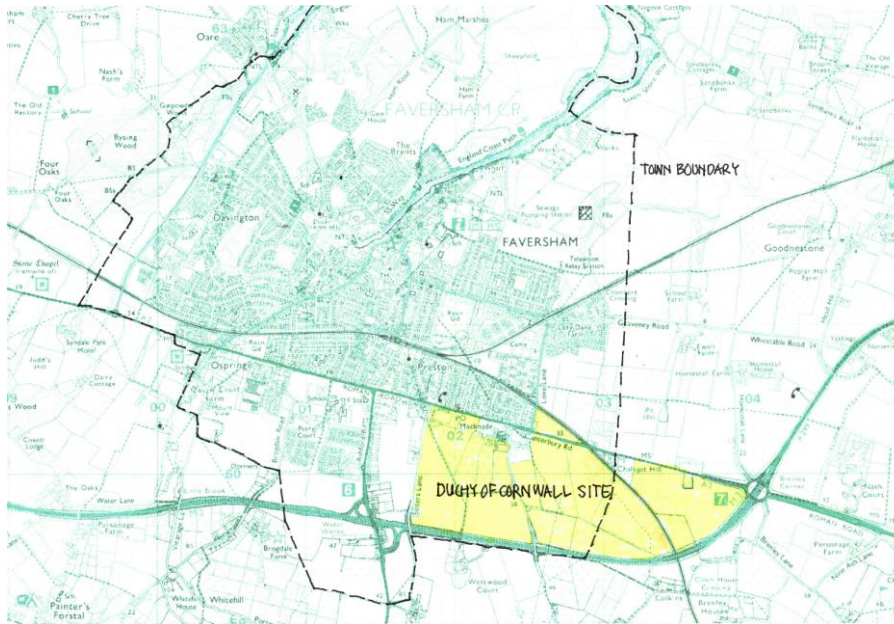


Proposed Development of Land to the South-East of Faversham by the Duchy of Cornwall: Review of Development Implications



Map 1: Faversham town boundary, with Duchy site in yellow

The Duchy of Cornwall submitted a planning application to Swale Borough Council on 26/02/2024 for the development of 2,500 homes and associated facilities on 130.7 hectares (323 acres) of land owned by the Duchy south-east of Faversham. The bulk of the site lies within the Faversham town boundary – see Map 1.

This application raises important issues concerning development within the Borough and more specifically around Faversham. The purpose of this document is to explain the context of the development application and to raise issues of concern.

Duchy of Cornwall Planning Application

1. The applications seek outline planning permission for development of the entire site, and detailed planning permission for Phase 1 (261 homes). The following details are derived from the planning applications and from material submitted by the Duchy of Cornwall (DoC) in support of the applications.

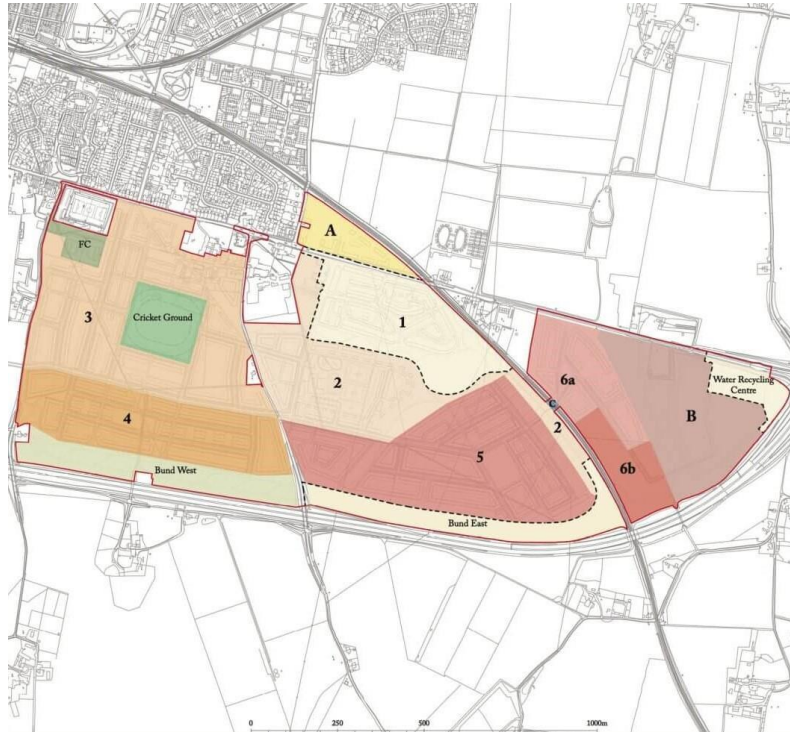
Phasing

2. Implementation is planned in phases over 20 years (see map 2):

- Phase 1 to start in 2027 - 261 homes, site for local centre, water recycling centre and Bund East (noise baffle along the north side of M2).
- Phase 2 (including site for primary school) - in 2030.
- Phase 3 - in 2030
- Phase 4 - in 2036
- Phase 5 - in 2040
- Phase 6a/6b - in 2042
- Site B (housing & commercial buildings, relocation of cricket ground and football club improvements) - in 2027.
- Site A housing - in 2029

- Bund West - in 2031.

3. The application does not state the number of homes to be constructed in phases 2-6, but the total number of homes spread over 20 years suggests an average of 100/150 homes per year.



Map 2: Phasing of the development (source: Railton Report)

Affordable Housing

4. 400 homes will be for social rent, and 475 will be affordable or shared ownership – 35% of the total number of homes. It is not stated in which Phases these will be built.

Schools and Health Facilities

5. A primary school site (3-form entry, 630 pupils) is allocated in Phase 2; also sites for health and social care facilities, but with no clear indication of location or phasing.

Transport & Circulation

6. The developer will fund an additional lane on the A2 approach to Brenley Corner and a new road link connecting the western boundary of the development with the A251. Footpaths and cycle routes will connect communities within the new development and with the existing town. Community bus services are mentioned to serve the town and other local destinations – but there are no details of how these will be provided.

Agricultural Land

7. The development site is a mix of grades 1, 2 and 3 agricultural lands.

Green Space and Biodiversity

8. Half the site area will be dedicated to green space, including parks, gardens, allotments and natural landscape areas.

Wastewater & Electricity

9. A state-of-the-art facility close to Branley Corner will treat and reuse wastewater from the development. Electricity will be generated on site and a Smart Grid will manage electricity

usage. It is claimed buildings will be constructed to high environmental standards with minimal carbon emissions during construction and through their lifetime.

Planning Context

10. The DoC proposals are to be viewed in the context of two statutory planning documents: the Faversham Neighbourhood Plan and the Swale Borough Council (SBC) Local Plan.

Faversham Neighbourhood Plan 2023-2038

11. The Faversham Neighbourhood Plan (FNP) was prepared by Faversham Town Council (FTC) with the aim of providing an effective and consistent planning framework across the FTC area. The FNP was endorsed by a large majority in a November 2024 referendum

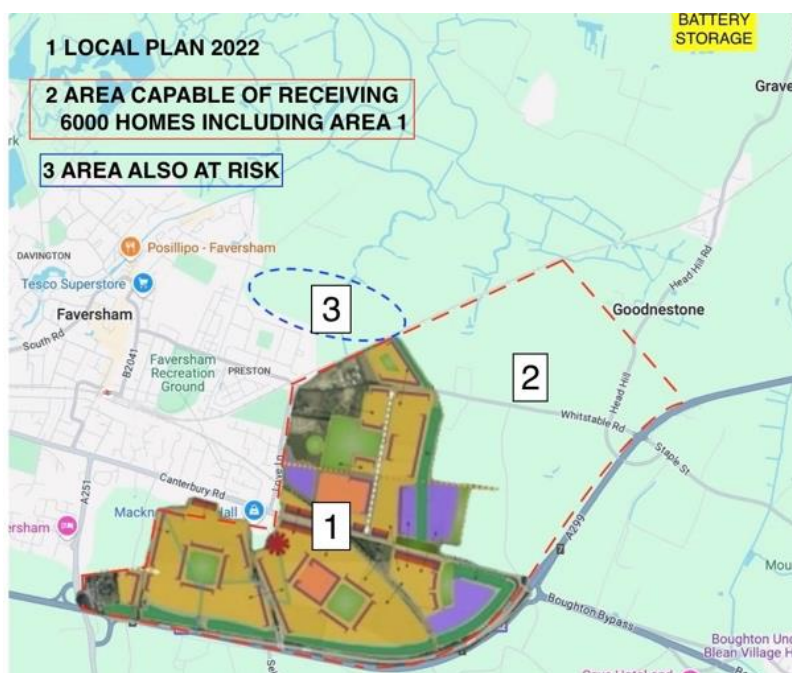
12. The FNP identifies sites for some 250 homes to meet assessed local housing needs; this exceeds the 219 homes that SBC indicated should be included in the FTC housing growth strategy. The identified sites do not include any DOC land within the town boundary.

Swale Borough Council Local Plan

13. The SBC Local Plan was adopted in July 2017. The Council is required to review the Local Plan every five years and this review is currently in progress. The Local Plan Review will set out the planning framework for the borough for the period to 2038 and will cover issues such as: housing provision, the economy, retail and town centres; infrastructure provision and the environment. It will also set out policies by which planning applications will be determined, in addition to allocating land for housing, employment and other uses.

14. The review timetable has been affected by changing central Government regulations, and it was also interrupted by Covid. The current review timetable envisages consultation in the last quarter 2024 and the first quarter 2025, with a view to submission of the Local Plan in mid-2025 and it becoming operational in 2026.

15. The DOC site was not designated for housing development in the 2017 Local Plan. However, the February 2021 Local Plan Review Pre-Submission Document (Section 5) sets out land allocations for new development throughout the borough “necessary to meet ... development targets ... to 2038.”



Map 3: Picture 5.5.1 (source SBC)

16. Policy MU1 refers specifically to expansion east of Faversham. Picture 5.5.1 (see Map 3) shows outline proposals for development of housing and associated facilities either side of

the A2, incorporating the DOC site, the subject of the current planning application. It is reasonable to suppose that this scale and pattern of development, possibly with some modifications, will be incorporated into the forthcoming Local Plan consultation.

Planning Issues

Distribution of Ministry of Housing, Communities and Local Government housing allocation

17. The Ministry of Housing, Communities and Local Government (MHCLG) has allocated 7,990 homes to be built within the borough over a 5-year period. This is understood to be a mandatory allocation and non-negotiable. This figure compares with SBC's March 2024 housing needs estimate of 5,240 homes over a similar period.

18. The SBC Planning & Transportation Policy Working Group meeting (8th August 2024) reviewed a series of six housing development options to be used for the Local Plan consultation exercise. These were forwarded to the meeting of Policy & Resources Committee on 11th September 2024.

19. This Committee recommended that all six options be assessed at the Regulation 18 consultation stage, as the local authority is "required to assess all reasonable options. Option 6 is recommended as the authority's preferred Option for the consultation." (11th September Committee report pack, para.4.3, p.168).

20. Growth Option 6 is described as: a "very large strategic site in east of the Borough/settlement hierarchy hybrid. ...A site large enough to provide the dwellings and space for a new secondary school. (This) would significantly reduce the onus on other settlements to accommodate need." (*ibid*, Table 2, p.177).

21. This preferred strategy envisages "more of the overall local plan requirement at the eastern end of the borough" (*ibid*, Option D, Table 1, p.176), so as to reduce pressure on the western part which has accommodated the bulk of development over recent years.

22. The Faversham Community Land Trust (FCLT) made representations to the Council in a letter dated 25th November 2024 (*a copy of the letter is available [here](#)*) arguing for a more balanced distribution of new homes between east and west. FCLT suggests a "balanced allocation" of 2,887 homes in the east (36%) and 5,103 homes in the west (64%).

23. The Council will in due course decide on the distribution of new homes between east and west. Whatever figures are decided on, the scale, i.e. the number of homes involved, means that urban expansion of Faversham is likely to be the preferred mechanism to absorb the bulk of the increase in the east of the borough, rather than scattering development throughout smaller settlements.

Expansion of Faversham

24. This raises the question: how is the expansion of Faversham to be accommodated most efficiently and satisfactorily? Expansion to the north is undesirable on environmental grounds, with sensitive estuarine aquatic habitats along Faversham and Oare Creeks, and land liable to flooding. Options do exist east and west, north of the A2; and south, south-east and south-west between the A2 and M2 and beyond (*see Map 4*).



Map 4: Indicative potential expansion areas

25. Policy MU1 in the 2021 Pre-Submission Document sets out a comprehensive list of planning requirements “for landowners and developers”, as pre-conditions to be approved by the Council prior to submission of any planning applications for parts of the borough. These requirements point to the Council’s view of the importance of a comprehensive masterplan to address expansion of the town. It is reasonable to assume that the Council stands by these planning requirements.

26. The DOC application covers only part of the land identified in Policy MU1, illustrated in Picture 5.5.1. More significantly, the proposed 2,500 homes represent only a proportion of the total number of homes which the Local Plan may eventually designate for the eastern part of the borough.

27. It is therefore contended that:

- **There is a need for a comprehensive town expansion plan to evaluate all options for the anticipated scale of development – to be consistent with the stated SBC methodology set out in Policy MU1.**
- **Approval of the DOC application in the absence of an approved town expansion plan for Faversham would be premature.**

Concerns Raised by the Outline Planning Application

28. It is recognised that SBC may be minded to approve the DOC application since approval would deliver a significant proportion of the SBC’s total housing target: 2,500 homes would represent more than 30% of the total borough-wide allocation and possibly more than 50% of the allocation for the eastern part of the borough.

29. Concerns about the DOC outline planning application and the Masterplan shown in Map 5, are set out below. (*comments on the Phase 1 detailed proposals follow*).



Map 5: Illustrative Masterplan (source: DOC)

Traffic and Circulation

30. A transport assessment carried out by the Arup Group was submitted by DOC as part of their application. A transport and highways review commissioned by FTC from transport consultants Railton TPC Ltd, raised the following concerns:

- The A2 is a very busy road carrying significant numbers of heavy vehicles and presents a threatening, noisy and unpleasant environment for pedestrians.
- The vast majority of Faversham is located to the north of the A2 and the road constitutes a very significant barrier to movement. The presence of the A2 will be particularly threatening to parents with children and other vulnerable highway users.
- The A2 through Faversham is only used by the most determined of cyclists since there is insufficient width for vehicles to overtake while staying within their lane. The application proposes a shared footway/cycleway along the A2 but it is concluded that the proposed shared footway/cycleway, over much of its length, falls well short of current standards and is likely to be unacceptable for highway safety reasons.
- There are no direct, safe and convenient cycle routes between the site and the town centre and it is therefore unreasonable to assume that any significant proportion of trips between the site and the town centre would be made by bicycle.
- The site has extremely high accessibility to the M2 providing access to Canterbury, Chatham, Rochester, Gillingham and Maidstone. In addition, the A251 provides a direct route to Ashford, the A2 provides a direct route to Sittingbourne and the A299 provides access to Whitstable, Herne Bay, Margate, Ramsgate and Broadstairs. The convenience of vehicle use will attract both residents and businesses seeking easy road accessibility and any consideration of travel patterns needs to acknowledge this.
- In relation to existing and proposed junctions to the A2, there have been no individual junction operational assessments to demonstrate that the proposed development in combination with the proposed mitigation measures will not lead to unacceptable highway impacts.

31. Other related concerns:

- The significant air and noise pollution generated by the A2 and the M2 will need to be mitigated within the development especially with regard to housing.
- Although the Selling Road which divides the development, is not a major road it connects Selling and other villages to the south of Faversham to the town and carries a substantial amount of traffic. Without traffic calming measures it will form a barrier between phases 1, 2 and 5 and phases 3 and 4.
- Three road connections appear to be proposed into Salters Lane which is at the present a single-lane road with passing places and widening it will be difficult.
- The proposed link to the A251 from the western boundary of Phase 4 could encourage rat-runs through the development for drivers heading from Love Lane and the A2 towards junction 6 of the M2, in order to avoid Branley Corner and the signalled junction of the A2 with the A251.

Integration with the Town

32. Concerns regarding integration:

- Integration of the development into the life of the town will be difficult given its distance from the town centre and other facilities and the barrier formed by the A2. None of the site is within a 10-minute walking distance of the centre of town and only the occupants of those dwellings at the extreme west of the development are likely to walk into town or even to the nearest supermarket (which is the Aldi on the A251).
- Supermarkets, shops, primary schools (at least during the first phase) and secondary schools will have to be accessed by car which seems incompatible with the stated 20% reduction in car use compared to similar developments.
- Car use will probably not be reduced unless there are frequent reliable bus services to the town, railway station, supermarkets and schools. Details are not given of how the proposed community bus service will work or be funded and the present bus service provider has stated that services will not be provided within the development.

Development Layout

33. Concerns regarding the overall layout:

- The general layout consists of blocks of housing, some of them very long, surrounded by roads and there are no real neighbourhoods, little variation in character, not much landscape structure and little sense of place.
- There are few pedestrian routes apart from footpaths along roads. There are no direct pedestrian or cycle routes (or short cuts) linking the housing areas to the local centre, the primary school, etc and pedestrians and cyclists and children walking to the primary school, will have to cross multiple roads.
- The site is divided into 3 parts by the Selling Road and the railway and both of which create barriers to pedestrians and cyclists
- The proposed local centre is not within 10 minutes walking distance of much of the housing. A more central location would be on the Selling Road south of the Macnade site and opposite the proposed primary school. It would then be more accessible to housing on both the western and eastern parts of the site (apart from Site B).
- Little or no consideration seems to have been given to the orientation of the houses and how this could help reduce energy demands by reducing solar gains in summer and optimising them in winter.

- There are areas of communal green space between Phases 1, 2 and 5 and there is a small park in Phase 5 but there are no large communal green spaces in Phases 3 and 4.
- Few of the housing areas open directly onto communal green spaces either at the front or the rear (most have a road at the front) and there are few green routes connecting housing areas, other facilities and communal green spaces.
- Site B must be heavily polluted by the A2, M2 and Brenley Junction and it is cut off from the main site by the railway line. A better use would be as deciduous woodland which would provide environmental gain and absorb much of the CO² produced by the nearby traffic, together with allotments for the use of the residents (access by foot or bike could be by the proposed pedestrian bridge over the railway).

Social and Affordable Housing

34. The Faversham Housing Needs Survey report, produced in August 2020, concluded that Faversham needs a significant additional supply of affordable housing to meet the requirements of its existing households and households that are likely to form over the next five years. It highlights the fact that entry level market housing in Faversham is not affordable for many households, and that average house prices in Faversham are higher than in the rest of Swale.

35. The DOC proposals for 400 dwellings for social rent and 475 dwellings that will be affordable or for shared ownership raise some concerns:

- The FNP states that 20% of the residents of the town do not have a car and if these residents, who are probably among those most in need, are relocated to the site, it will be difficult for them to access any facilities off the site.
- The generally recognised definition of 'affordable' housing is that the maximum cost should be 80% of commercially available rented housing or housing for sale and renting or buying houses at these prices is likely to prove difficult to those most in need in the town.
- There are a number of issues with regard to cost pertaining to shared ownership, at least in the long-term. Analysis of its 2022 cost of living survey by the Joseph Rowntree Foundation found that low-income shared owners were experiencing among the highest levels of hardship across all tenures, with 44% having gone without three or more essentials and 45% having low or no savings. The report said that too much emphasis is placed on initial access and far too little on longer-term outcomes and impact for entrants to the scheme. Shared ownership will therefore probably not be an option for those residents of the town who are most in need.
- This would appear to indicate that what is required is a larger amount of social rent accommodation rather than 'affordable' or shared ownership accommodation if the accommodation provided is to be truly affordable.

Employment

36. Concerns regarding Site B employment sites:

- The sites are only really accessible by car, especially from housing at the western end of the main site.
- Further junctions on the A2 will be required to serve these sites.
- If sites are to be provided for employment, they would be better integrated into the main development possibly around the local centre.
- There is the possibility that such sites will attract existing businesses away from Faversham Town.

Phasing

37. Concerns regarding proposed phasing:

- The first and second phases would be better placed at the western end of the development closer to the town and other facilities.
- The phasing of the development over 20 years means that its viability in terms of sustainability will take many years during most of which time residents will have to use cars to access shops, services, jobs, schools, etc.

Concerns Raised by Proposals for Phase 1

38. Map 6 shows the detailed planning application for Phase 1:



Map 6: Phase 1 layout (source: DOC)

Location

39. Phase 1 is located at the eastern end of the main site but a more logical position would be at the western end closer to the town centre.

Layout

40. Concerns regarding the Phase 1 layout:

- It is accessed off two new junctions on the A2, one into the housing area and one giving access to the local centre.
- Although the road layout is not as rectilinear as in the other phases, roads still predominate and there are blocks of housing (terraced, semi-detached and detached) surrounded by roads.

- There are no separate neighbourhoods, little variation in character and little sense of place. 261 houses are proposed and these would have been better divided into two neighbourhoods with their own communal open spaces and sense of identity and place.
- There is little about the street layout to encourage walking or cycling and there are few pedestrian routes apart from footpaths along roads and around the perimeter; few cycle routes and no direct pedestrian routes linking the housing to the local centre.
- There are some bends in the road layout but the main traffic calming measures seem to be speed bumps.
- Car parking is either in front of, at the sides of or at the rear of houses or in parking courts and there is little or no overlooking or supervision of the latter which could lead to problems.
- A large amount of parking has been provided for the local centre and as the centre is only supposed to be serving the new development this seems to be excessive.
- There are few communal green spaces although there are some around the periphery.
- Very few of the housing areas open on to or look on to communal green spaces and there is no real structure to the landscaping.

Design Concerns

41. Design Guidance and Codes were prepared by AECOM as an integral part of the Faversham Neighbourhood Plan endorsed in November 2024 (the Design Guidance and Codes are available [here](#)). Although the FNP applies only to land within the town boundary and part of the DoC site lies outside the boundary, it is firmly contended that these design principles should be applied to the entire DoC development.

42. Key points regarding the design guidance:

- *Be well integrated into the existing settlement pattern and avoid any kind of fragmentation. For that reason, pedestrian, cycle and road connectivity is important to create accessible places and a more cohesive social issue.*
- *Prioritise the creation of a well-connected green system and promote alternative ways of transportation.*
- *Seek to implement passive environmental design principles by firstly considering how the site layout can optimise beneficial solar gains and reduce energy demands.*

43. A system of pedestrian and cycle routes does not seem to have been designed into the site layout and while community bus services have been proposed there is no information on how these would work or be funded.

44. There is little or no attempt to consider how the layout and orientation of the housing can restrict solar gains during the summer months and optimise beneficial solar gains during the winter months.

45. The guidelines state with regard to housing design:

- *Any new design should be a good fit to its surroundings in order to preserve the unique characteristics that are found in the parish. This does not rule out contemporary design. High quality contemporary buildings which, in time, will be recognised as heritage assets are encouraged.*

47. House designs included in the Phase 1 application and in the South-East Faversham Housing Manual (prepared by DoC to support their application), are all based upon

traditional house models within the town. The possibility of producing new, contemporary and possibly more relevant models does not seem to have been considered.

48. Drawings included in the Phase 1 application, suggest DoC has tried to capture the randomness of a traditional settlement such as Faversham through the use of traditional models seemingly without recognising that such settlements have taken centuries to develop. Trying to produce an imitation within a short period of time will inevitably result in an unconvincing pastiche of the real thing. There seems to be no good reason to do this as the site is not close to the town centre and therefore any housing does not have to 'fit in' to its surroundings.

49. The use of traditional housing models itself raises issues such as:

- Given the proposed road layout, these models will not provide much privacy to most dwellings and there will be problems with overlooking.
- Traditional models are much loved and one of the reasons for this are their large rooms and circulation areas that provide flexibility in layout and use over the years. Unfortunately, current building costs do not allow for such generous spaces and the use of similar models will therefore not provide sufficient flexibility in use today or for changing patterns of use over time.
- It is unlikely that traditional models will be able to cope with climate change. Temperatures are rising quickly and there will soon be a very real need to protect rooms, windows and walls from the sun. It will be necessary to reduce the effects of solar radiation through the orientation of buildings and shading of south and west walls will become.

50. With regards to construction, it appears that the houses will be constructed using traditional materials and techniques. It is unlikely that traditional construction will provide the wholesale reduction in carbon emissions that is urgently required. Modern homes need to be heavily insulated, have triple-glazing, heat recovery systems, draught lobbies, etc as well as being properly orientated and shaded.

51. Given current high construction costs caused by skilled labour shortages and the cost of building materials, it is doubtful whether traditional construction can provide housing at an acceptable cost for a broad section of society. It would be more cost-effective to use some prefabrication and off-site production combined with non-traditional materials in order to increase efficiency in the construction process and reduce costs.

52. Heat pumps and solar panels for hot water and electricity are mentioned but while air-source heat pumps might be an appropriate solution for heating detached and semi-detached houses, it is unlikely that they are appropriate for more dense housing solutions such as terraced housing and low-carbon, district heating should be considered as is normal in such developments in Scandinavian countries.