

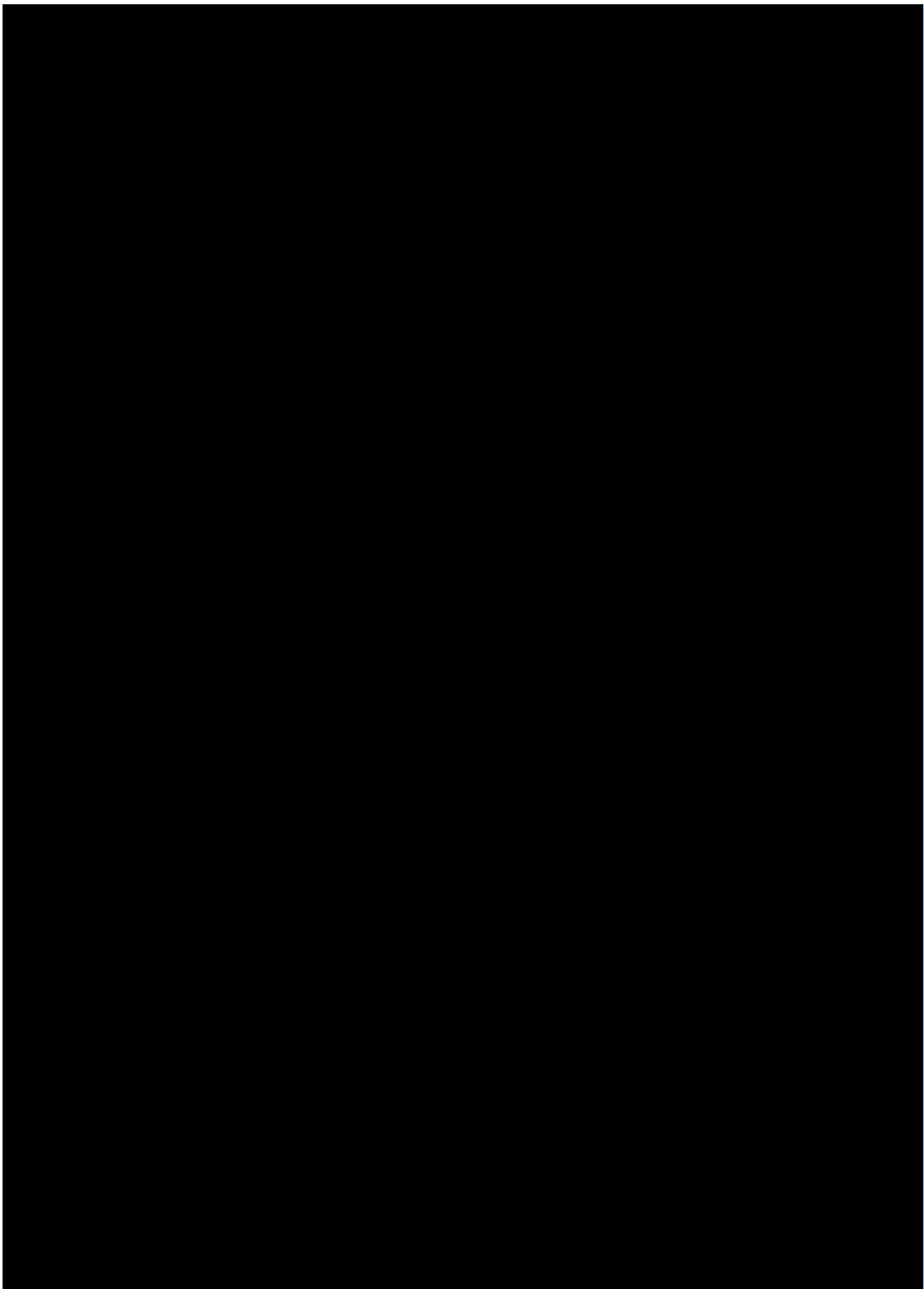
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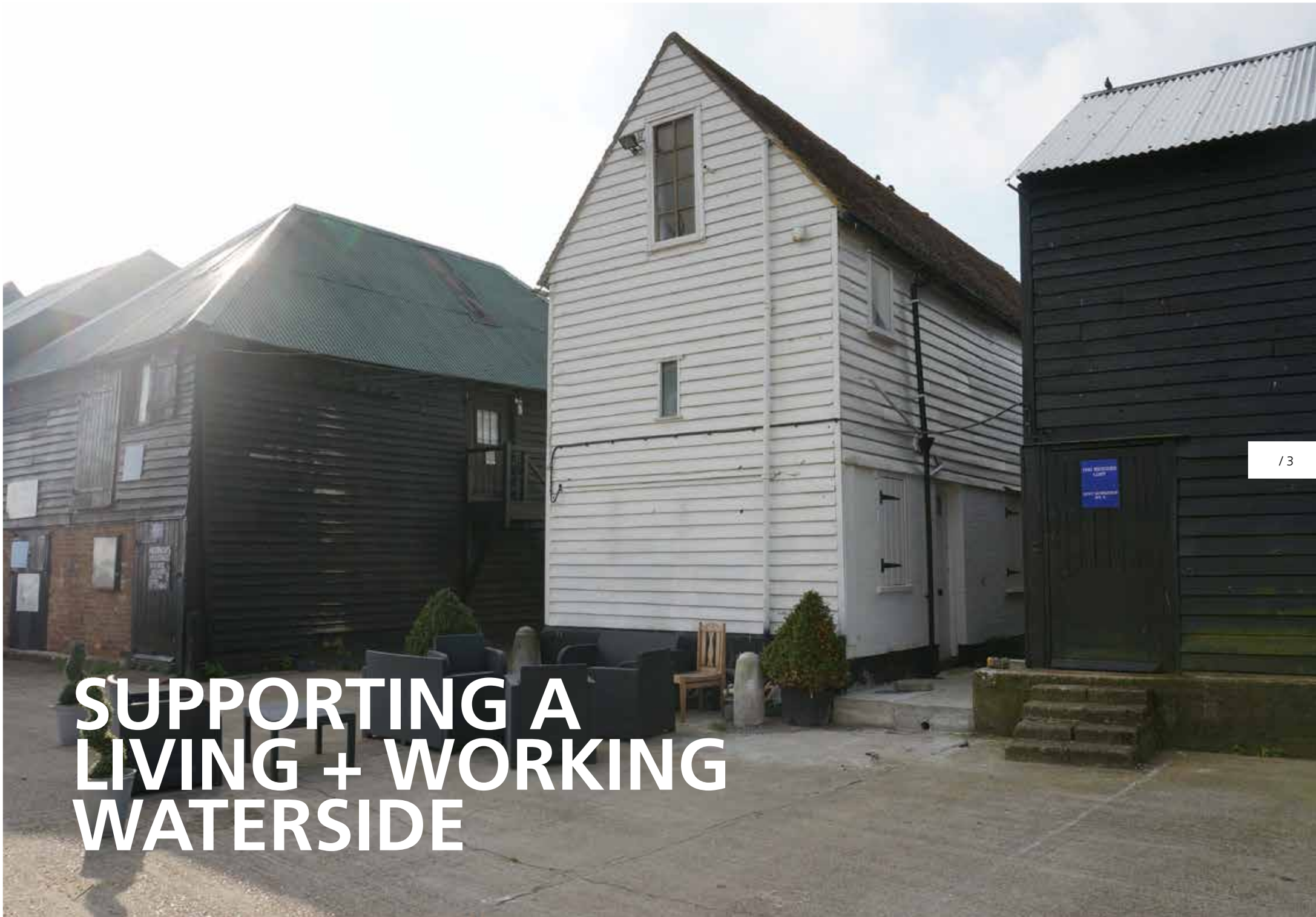


FAVERSHAM CREEK NEIGHBOURHOOD PLAN

CONSULTATION STATEMENT
OCTOBER 2014

**Faversham
Town
Council**





SUPPORTING A LIVING + WORKING WATERSIDE



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Feria Urbanism is a planning and design studio that specialises in neighbourhood strategies, public participation and community engagement. Established in 2007, we have been involved in a diverse range of projects across the UK and have developed key skills in organising community engagement events to inform excellent planning and design.

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MAINTAINING + ENHANCING THE CREEKSIDE CHARACTER

BACKGROUND

THE (REGULATION 14) SIX WEEK PUBLIC CONSULTATION ON THE PRE-SUBMISSION DRAFT OF THE FAVERSHAM CREEK NEIGHBOURHOOD PLAN WAS HELD BETWEEN 19TH MAY AND 30TH JUNE 2014.

THIS CONSULTATION STATEMENT HAS BEEN PREPARED TO ENSURE THAT ALL COMMENTS RECEIVED DURING THAT TIME ARE SUMMARISED AND RECORDED. THIS REPORT PLACES ALL SUMMARISED COMMENTS RECEIVED, INCLUDING THOSE SENT BY EMAIL, IN WRITING AND THROUGH AN ONLINE QUESTIONNAIRE SYSTEM, INTO A SINGLE REPORT.

IT ALSO SETS OUT THE TOWN COUNCIL'S RESPONSE TO THE CONSULTATION AND EXPLAINS HOW THE NEIGHBOURHOOD PLAN HAS BEEN REVISED AS A RESULT.

The Town Council believes that the regeneration of the Creek and the protection of Faversham's maritime heritage could support businesses and tourism opportunities which will do much to revitalise the whole of Faversham.

The Town Council has been working for two years on a neighbourhood plan to achieve these objectives and we need your support to succeed. Over the last 40 years, there have been a number of attempts to regenerate and restore the creek since the pattern of trade changed and traditional commercial creek traffic largely came to an end. The Town Council believes that a robust neighbourhood plan provides the best chance of doing this.

The Town Council set up an online survey system to collate results of the consultation. This online survey received over 200 responses to the 26 different questions, comprising over 2300 individual written statements. The sheer number of individual statements has made it impossible to respond to each one individually so a summary of each set of answers has been prepared, along with a general response from the Town Council. Responses to the consultation were also received by email and in writing. These two have been summarised, in a matrix, with Town Council responses and subsequent revisions to the plan stated.

The Town Council held a series of publicity events during the six week consultation period, to encourage local businesses, residents and community groups to respond to the consultation. These were as follows:

- **Wednesday 21st May**
Drop-in Event at Davington School, for Parents/Guardians of Pupils at the School 6.30pm — 7.30pm
- **Saturday 24th May**
Market Stall Faversham Market 10am — 4pm
- **Friday 30th May**
Drop-in Event, West Faversham Community Centre 4pm — 8pm
- **Saturday 7th June**
Exhibition, Assembly Rooms, Preston Street, Faversham 1.30pm — 5.30pm
- **Wednesday 11th June**
Drop-in Event, The Vaults, Preston Street, Faversham 7pm — 10pm
- **Saturday 21st June**
Market Stall, Faversham Market 10am — 4pm

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THE CONSULTATION PROCESS

This section of the Consultation Statement summarises the series of consultations for the Development Plan Document on which the Faversham Creek Neighbourhood Plan was based (pre-2011) and for the Neighbourhood Plan from August 2011 onwards.

Pre-2011

2006

Formation of the Faversham Creek Consortium.

2007

Draft brief for pre-production of a development plan to engage the local community, specifically local businesses/developers, to ensure their participation in the process.

2008 — 2009

Swale Borough Council designated the creek area as an Action Plan Area within the Swale Local Plan. Urban Initiatives were appointed as consultants and began consultation to prepare a draft development plan document. This included meetings between consultancy Urban Initiatives and councillors, landowners and other stakeholders; a landowner lunch (November 2008) landowner meeting (January 2009) and five workshops of a 'Creek Team' including Swale planners and tourism officers, residents, landowners and their agents, representatives of the Creek Consortium, Creek Creative, Kent Wildlife Trust, Natural England, Faversham Municipal Charities, Faversham Town Council and Swale Borough Council. Workshops were held during the summer and autumn of 2008 and spring of 2009.

The first discussed aspirations for the creek including creation of a distinctive sense of place and providing a mix of uses including employment opportunities and improving connections between the creek, the town and surrounding countryside. The second workshop discussed themes including:

- Provision of new water-based activities
- That the area should be of benefit to new and established communities, local businesses and visitors
- That through the arts, culture and marketing, the area should educate people about the maritime heritage and natural beauty of the creek;
- Good connections between the creek, the town and the countryside;
- That new buildings and public spaces are well-designed.

These themes were summed up in the Visions and Objectives which were worked up collaboratively at the third workshop. The last workshop was an options game intended to place different uses around the creek and identify where there was or was not scope for change.

November 2008, January 2009

Meetings between Swale Borough Council and landowners.

2009 — 2010

Urban Initiatives report published for consultation. This included analysis of the constraints and opportunities offered by the sites around the creek. It used different boundaries as those in the Neighbourhood Plan, but covered all the same buildings and the open land around the creek.

Alternative scenarios for future development were discussed and how these might evolve over a longer period. Urban Initiatives reported to the Faversham Creek Consortium Annual General Meeting in March 2010.

2010

In June 2010, Swale Borough Council appointed a consultant, Tony Fullwood to prepare an Area Action Plan including options for the regeneration of the Faversham Creek area. The draft took into account the Swale Employment Land Review and created a supplement to the Strategic Flood Risk Assessment. Discussions were held with Medway Ports, Kent County Council with regard to archaeology, key landowners and with the Environment Agency with regard to flooding.

The report assessed the character of the area as a series of forces assisting or constraining regeneration. It recommended a mix of uses for some of the sites around the creek including Swan Quay, Frank and Whittome and around Standard Quay including the coach depot. It was not optimistic about the prospects for restoration of the creek bridge and sluices to working order.

March 2011

The Faversham Creek Area Action Plan (Fullwood Report) was reported to the Faversham Creek Consortium Annual General Meeting. A critique of the Fullwood Report was prepared on behalf of the Consortium which commented that the creek bridge and sluices were vital for the maintenance of navigation and they had already (and continue to be) extensively with Medway Ports and Kent County Council.

The Fullwood Report was not up to date or detailed with regard to its discussion of the character of the existing buildings. It also included little detailed discussion of the potential for better-linked walkways around the creek and between the creek and the town and improvement of the public realm. These criticisms are the justification for the preparation of The Faversham Creek Streetscape Strategy and Undesignated Heritage Assets and Values in support of the Neighbourhood Plan. The Faversham Creek Area Action Plan was the subject of more extensive consultation in spring 2010 and responses were considered by Swale Borough Council and by the consultant during the summer of 2011.



2011 onwards

When the Localism Bill was published in early 2011, Swale Borough Council applied for the Faversham Creek Area Action Plan area to become a Neighbourhood Plan across the same geographical area and to work with Faversham Town Council. They were advised in June 2011. A Steering Group was set up.

2011 — 2012

The first few meetings of the Steering Group were largely concerned with discussing the sites and what issues they raised. The landowners of Standard Quay who also own the coach depot were invited to present their intentions including the scale of development and the mix of uses that they preferred. They had already been working on proposals for the re-use of some of the buildings at Standard Quay and minor alterations to them. Most of the minor alterations have now gained planning permission and listed building consent and have been implemented including some sub-division of the black sheds into smaller units.

A similar meeting was held with the agents and architects for Swan Quay and Frank and Whittome, but at the time they had not worked up any detailed proposals for use of the buildings or design of any alterations or redevelopment. They were given advice about the uses and the design of any new buildings

A site meeting was held with the then owner of the oil depot, who explained that he had intended to submit an application for redevelopment for housing with new moorings in 2007 but had not made the application.

A site meeting was also held with the owner of BMM Weston, exploring the extent of the sites and the prominent position of the office site. There had already been a planning permission for housing on the office site and a new office building at the north end of the factory site which had been implemented but neither set of buildings had been constructed.

All of these meetings assisted the Steering Group in consultation through the exhibition in May 2012 and in the Consensus Building workshop in November 2012 by making the Steering Group more aware of what might be possible on each site.

March 2012

The Faversham Creek Area Action Plan 2010 (Fullwood Report) had not included much material about improvements to the public realm, although he had suggested that more guidance would be needed on this. The Faversham Creek Streetscape Strategy (see summaries of documents above) was commissioned by Faversham Town Council and was prepared with the Faversham Joint Public Realm Working Group which includes representatives of Faversham Town Council, Swale Borough Council and Kent County Council.

The study was developed through consultation with a number of landowners and businesses within the creekside area. A period of public consultation commenced with an exhibition of the proposals held in Faversham Market Place on Saturday 10th March 2012 with the opportunity for responses over the next three weeks. The final version published in June 2012 includes at Appendix 2 the comments received at the public exhibition with responses by the consultants and sets out in full the detailed comments from Faversham Creek Trust and the consultant's response to each of points raised by Faversham Creek Trust.

Comments submitted through the three-week consultation period are also listed with responses. All comments from the consultant explain how the comments had or had not been used to inform working up the final strategy. The document has been adopted by the Swale Joint Transportation Board.

April — August 2012

Faversham 2020 public consultation. This was in preparation for a new Town Action Plan and was not directly connected with the Faversham Creek Neighbourhood Plan. There was extensive feedback within this process including on matters related the Faversham creek area which the Town Council and the group preparing the document agreed should be fed into the Neighbourhood Plan. To date, these responses have not been analysed.

May 2012

The first exhibition held by the Steering Group was an all day exhibition on Saturday 5th May 2012 at the Alexander Centre. In parallel with this but not forming part of the Steering Group's exhibition, several landowners had displays of their own proposals including Standard Quay, the coach depot and Ordnance Wharf. The Creek Trust also had a display of their proposals for the Purifier building. The Steering Group exhibition offered consultation on the Vision and Objectives and on a choice of three strategies for each of the twelve identified sites. These were for all housing, all business use or for mixed use. T

he exhibition received over 900 visits. Many respondents favoured mixed use on most of the sites, but a wide variety of additional comments revealed conflicting views on the whole approach to the creek as well as on specific sites.

November 2012

Following discussion about the feedback from the exhibition, the Steering Group decided that they needed additional assistance to build consensus regarding the sites and general strategy for the creek. This was sought from CPRE who were at the time supporting town councils and other Neighbourhood Plan groups and was intended to help the Steering Group to improve consensus on some key points among a variety of stakeholder groups.

A consensus-building event was held on 9th November 2012 at the West Faversham Community Centre facilitated by CPRE. One of the issues discussed was what could be deliverable within the Plan given that a major aim was achieving an opening creek bridge and working sluices. The workshop was attended by representatives of the following organisations:

- Landowners/agents for Ordnance Wharf, Standard Quay, Standard House, BMM Weston, Swan Quay and Frank and Whittome
- Faversham Creek Trust (as an organisation and a leaseholder of the Purifier)
- Faversham Creek Neighbourhood Plan Steering Group
- Faversham Town Council
- Faversham Municipal Charities
- Swale Borough Council councillors
- Swale Borough Council officers
- Faversham Reach Residents Association
- Faversham Society
- Faversham Creek Consortium
- Kent County Council (highways)
- Environment Agency
- Department for Communities and Local Government.

The Environment Agency gave a presentation on flooding in the creek area and wider Swale Estuary. Swale Borough Council planning director gave a presentation on the role of the Neighbourhood Plan in the planning hierarchy taking into account the National Planning Policy Framework and the Local Plan.

The Kent County Council highways officer announced that KCC had allocated £400,000 towards the cost of replacing the creek bridge, (this issue has become the content of ongoing discussions on types of bridges and the amount of finance required to build a new opening bridge)

Four workshops were held, each one run twice so that as many organisations as possible could attend all of them. There was also a questionnaire sent out in advance of the event which was responded to by five organisations. This helped CPRE to identify sites where there was a high level of consensus, some consensus and also the sites and issues within sites where there was little consensus.

- Workshop 1 discussed the BMM Weston sites
- Workshop 2 covered the Brents Industrial Estate and the sites at Swan Quay and Frank and Whittome
- Workshop 3 discussed the oil depot, coach depot, Standard Quay and Fentiman's Yard
- Workshop 4 covered Iron Wharf boatyard, the Purifier and Ordnance Wharf.

All workshops discussed the creek bridge and sluices. The findings of the workshops were set out in a report: Faversham Creek Neighbourhood Plan-post event report, CPRE (see Faversham Creek Neighbourhood Plan website). In general, there was support for an opening bridge and that there is a requirement for a Neighbourhood Plan.

It was recommended that there should be a public exhibition to present back conclusions and recommendations from the workshop and to agree clear targets and objectives for the Plan along with agreeing site specific details where possible within the next five months to enable the Plan to move forward. Policies should be developed for each site, engaging key stakeholders involved with/affected by the particular site, and establishing site specific detail as part of drafting of the Plan. The CPRE would continue to work with the Steering Group to agree the report and what further consultation support is required.

January 2013

Publication of the feedback from the May 2012 exhibition.

March 2013

Publication of the Neighbourhood Plan Consultation and Engagement Report. (See Consultation and Engagement Programme Report, Faversham Creek Neighbourhood Plan website). This sets out a consultation programme and was developed with members of the Faversham Creek Neighbourhood Plan Steering Group. Its aims included building on what has already been achieved by way of consultation and to plug gaps in the consultation process, with a view to engaging as widely as is considered necessary and appropriate to help secure a positive outcome at referendum and to demonstrate effective and meaningful engagement in the Plan's development.

The report recommended an exhibition to engage the wider community on site options and a vision for the creek. This could provide a further opportunity for the community to make comments about what they would like to see for the creek and an opportunity for the Steering Group to 'sell' the benefits of having a Neighbourhood Plan.

The report acknowledged that the Steering Group has established a good level of dialogue with the landowners and their agents, environment agencies, Medway Ports, Swale Borough Council and Kent County Council along with a wide range of key stakeholders with interest in the creek. It needed to bring about wider engagement with the public.

It set out a potential programme of other consultation events as well as the exhibition. For the exhibition itself, the report set out how it should be publicised including setting up a dedicated website for the Neighbourhood Plan. This was set up in time for the exhibition and is now used to post minutes of the Steering Group and associated papers.

The report also sets out how to conduct the statutory consultation on the Pre-Submission Draft of the Plan. An updated version of the latter part of the document has been used by the Communications and Engagement Working Group as guidance towards the preparation of the materials to be exhibited and the programme for the present consultation.

In March 2013, there were also meetings between members of the Steering Group and Faversham Creek Trust to discuss the Trust's view on the Neighbourhood Plan and its plans for use of the Purifier building

June 2013

The Illustrations Exhibition was held on Friday 7th June (evening only) and Saturday 8th June 2013 (all day) in the Sydney and Jubilee Rooms of the Alexander Centre and in the Mayor's Parlour. It received 1000 visitors over the two sessions.

In preparation for the exhibition, the Steering Group worked with an architect, Noel Isherwood, to prepare a series of drawings for sites around the creek. For Swan Quay and Standard Quay, these were worked up in discussion with the landowners. Four alternative buildings were shown for Ordnance Wharf, one including a possible building on the BMM Weston car park.

Other drawings showed standard House and the Standard Quay drawing also showed the coach depot. Other sites where there had not been any detailed discussion on possible buildings were identified by photographs. An indicative master plan showed the proposals in the context of existing buildings around the creek. This also showed potential footpath linkages around the creek area and in and out of the area based on the Faversham Creek Streetscape Strategy.

The exhibition also set out how far the Plan has proceeded to date with a chart showing the history of consultation events since 2008, the Vision and Objectives and what is the intended timetable for preparing the Plan. A map showing the Undesignated Heritage Assets and locations of the origins and directions of important views was presented. All of the exhibition material remains available on the Neighbourhood Plan website including photographs of all the assets and views from Undesignated Heritage Assets and Values.

An online and paper questionnaire prepared by the Steering Group working with Sue Jobbins (previously of CPRE and who had worked on the Consensus Building Workshop and Consultation and Engagement Programme) and Action for Market Towns. Feedback forms were also prepared relating to each of the displayed drawings, most of which covered more than one site together with forms for general comments. The consultation period lasted until 29th June 2013.

The feedback from the questionnaires was assessed statistically by Action for Market Towns and for comments by the Steering Group. The site feedback forms were analysed by the Steering Group. The site feedback forms were presented to the Steering Group in July and the other comments from the AMT report were presented in August. The reports on these consultations have been reported to the Steering Group (see Report on site feedback responses and Summary of the AMT report on the questionnaires, together with Faversham Creek Neighbourhood Plan Survey on the Faversham Creek Neighbourhood Plan website)

Autumn 2013

Since the exhibition, the Steering Group has discussed the feedback received at the exhibition and in the consultation period afterwards and it was used to identify what land uses respondents stated that they preferred on each site and what use classes they fit into. Further discussions have also been held between the Steering Group and the landowners/agents at Standard Quay/coach depot and for Swan Quay/Frank and Whittome, for BMM Weston and for Ordnance Wharf to explain the feedback from public consultation and identify whether any compromises or refinements could be made to their site preferences

October 2013

Site use proposals were presented to the Steering Group and to Faversham Town Council, and following amendment by the Town Council have been used as the basis for the site-by-site policies in the Neighbourhood Plan taking into account feedback from consultation and alternatives which have been agreed to be included by the Town Council.

May — June 2014

The (Regulation 14) six week public consultation on the pre-submission draft of the Faversham Creek Neighbourhood Plan was held between 19th May and 30th June 2014. The Town Council set up an online survey system to collate results of the consultation. This online survey received over 200 responses to the 26 different questions, comprising over 2300 individual written statements.

The Town Council also held a series of publicity events during the six week consultation period, to encourage local businesses, residents and community groups to respond to the consultation.



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**written
COMMENTS RECEIVED**

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
01	Southern Water	GENERAL Require the proposed housing developments to provide a connection to the nearest point of adequate capacity in the sewerage network and support the provision of utility infrastructure.	Noted — plan revised to accommodate new suggested words.
		<p>OBJECTIVE 10 This is welcomed. This text is provided to inform para. 4.18:</p> <p><i>“From Southern Water’s perspective, new development can progress, provided the development does not make the existing situation worse. Where there is limited capacity in the sewerage network to serve a new development, it would need to connect to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</i></p> <p><i>Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is insufficient. Furthermore, Southern Water is not fully funded to provide local sewerage infrastructure as Ofwat, the water industry’s economic regulator, expects the company to recover new development and growth costs from developers. Planning policies and planning conditions, therefore, play an important role in securing the necessary local sewerage infrastructure in parallel with development.”</i></p>	Noted — plan revised to accommodate new suggested words.
		<p>SITE 3 Proposed additional policy text:</p> <p><i>“The redevelopment will need to provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by Southern Water. There should be an adequate gap between the wastewater pumping station and development to allow odour dispersion and help prevent an unacceptable impact from vibration. Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.”</i></p>	Noted — plan revised to accommodate new suggested words.
		<p>SITE 5 Proposed additional policy:</p> <p><i>“The redevelopment will need to provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by Southern Water. There should be an adequate gap between the wastewater pumping station and development to allow odour dispersion and help prevent an unacceptable impact from vibration. Development proposals must ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.”</i></p>	Noted — plan revised to accommodate new suggested words.
		<p>SITE 6 Proposed addition. policy text:</p> <p><i>“The redevelopment will need to provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by Southern Water.”</i></p>	Noted — plan revised to accommodate new suggested words.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
01	Southern Water (cont.)	<p>GENERAL Although the Town Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system. On this basis, we propose the following additional policy provision:</p> <p><i>“New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community. New residential and commercial development will be permitted only if sufficient infrastructure capacity is either available or can be provided in time to serve it.”</i></p>	Noted — plan revised to accommodate new suggested words.
02	South East Water	<p>GENERAL Sensitivity testing has been completed using the housing numbers provided and can assure you that we are able to confirm that our published planned programme will be fully able to satisfy the growth in demands in the zones, assuming the required new resources are in place and demand management measures are encouraged. There is also a buffer within our forecasts to allow for any unforeseen growth should it arise.</p>	Noted.
		<p>GENERAL Support policies to improve water efficiency in existing housing stock. For new homes, as it is in an area of water stress we advise they are built to at least Code Level 4 and will continue to work with you to use the best available water efficiency technology to reduce demand in new homes.</p>	The Town Council welcomes this support.
03	Natural England	<p>GENERAL All comments that encourage Green Infrastructure (GI), open space and natural environment are encouraged. New development can provide opportunities to enhance and increase open/green spaces, provide links to and across existing facilities, through green chains/corridors and support sustainable transport options.</p>	Noted — plan revised to incorporate reference to Green Infrastructure and Green Chains.
		<p>GENERAL References to undertaking a SA and HRA are acknowledged and encouraged. The LPA should be able to assist with this.</p>	Noted — screening opinion on SEA and HRA will be sought by the Town Council.
		<p>OBJECTIVES Objectives broadly supported. 8 and 15 in relation to pedestrian and cycle safety and access/provision can be linked to GI provision, see above comments.</p>	The Town Council welcomes this support.
		<p>GENERAL Identification of gaps in information sources is acknowledged and encourage the town council to continue dialogue with the DC to fill in these gaps.</p>	Noted.
		<p>PARA. 4.27 Refers to the North Kent Marshes SPA, Swale Estuary Ramsar and Ham Marshes SSSI, the former of these will need to be assessed as part of the HRA.</p>	Noted — screening opinion on SEA and HRA will be sought by the Town Council.
		<p>CHAPTER 5 PARA 5.11 Enhancing biodiversity and compliant with the NPPF is welcomed and supported.</p>	The Town Council welcomes this support.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
03	Natural England (cont.)	PARA 5.13 + 5.14 Support of maximizing access, could consider linking Para. 5.11 also as there is the potential for green chains and corridors which would link to Objectives 8, 15, 5 and 7. Whilst supporting access to the natural environment the provision of new and suitable green space provision is welcomed to avoid pressure on existing designated sites.	Noted — plan revised to incorporate reference to Green Infrastructure and Green Chains.
		CHAPTER 6 POLICIES NE1-4 Welcomed and broadly supported. Acknowledged that SBC are still to undertake the HRA which will provide up to date information to their own. Appropriate Assessment screening. It is recommended that the Town Council monitor the Council's progress on this.	Noted — screening opinion on SEA and HRA will be sought by the Town Council.
		CHAPTER 7 No substantive comments however encourage the provision of suitable green infrastructure as part of any development proposals, as well as promoting walking and cycling opportunities.	Noted — plan revised to incorporate reference to Green Infrastructure and Green Chains.
04	Environment Agency	OBJECTIVES 5+ 7 These make reference to wildlife and areas designated for their ecological importance. However, as currently worded fall short of Section 109 in the NPPF. The planning system should contribute to and enhance the natural and local environment. Therefore the objectives should include the active intention to enhance the natural and local environment.	Noted — plan revised to reflect NPPF section 109.
		PARA 6.1 Objective 5 should also be listed here.	Noted.
		PARA 6.5 Whilst this does not compromise the interests of wildlife and natural environment, these principles are supported, particularly so where there is a waterside element.	Noted.
		GENERAL There is no mention of Green Infrastructure, and specifically the improvement of connectivity between existing and the requirement for new GI.	Noted — plan revised to incorporate reference to Green Infrastructure and Green Chains.
		GENERAL The Plan does not refer to the Environment Agency's information and documents about the Water Framework Directive Waterbody. Recommend the following text is included: <i>"The Water Framework Directive (WFD) (The Water Framework Directive (2000/60/EC) December 2000) seeks to improve the local water environment for people and wildlife, and promote the sustainable use of water. The Directive applies to all surface water bodies, including lakes, streams and rivers as well."</i>	Noted — plan revised to accommodate new suggested words.
		GENERAL Impacts of dredging should be assessed as this area is affected by contamination. Suspended silt generated by the dredging will be contaminated and will pose a risk to sensitive receptors. Dredging also may affect the WFD therefore we will need to consulted on any dredging proposals.	Noted.
		PARAS. 6.3, 4.15 + 4.16 Support these policies.	The Town Council welcomes this support.

COMMENTS RECEIVED IN WRITING

Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
05	Swan Quay LLP and Hilary Riva Landowners	SECTION 3 + VISION STATEMENT Comment that the ‘Vision Statement’ should acknowledge that, within the overall Plan Area, there are a number of sites where new development/redevelopment will be proposed during the Plan period. These development proposals may involve uses in addition to ‘new businesses.’	Noted — plan revised to accommodate new suggested words.
		GENERAL New residential and commercial development will be permitted only if sufficient infrastructure capacity is either available or can be provided in time to serve it.	Noted.
		GENERAL Support the principle of Objectives 6 and 9 of finding sustainable futures for buildings within the Conservation Area, but we are concerned at the reference to “business-led focal points”.	Noted — plan revised to talk about “areas of activity” instead of business-led focal points.
		GENERAL New employment may be possible as part of regeneration proposals, however these may not always be “business led” as this may result in vacant sites and buildings, not contributing to the vibrancy of the area.	Noted — plan revised to talk about “areas of activity” instead of business-led focal points.
		OBJECTIVE 11 Support the recognition that redevelopment is needed and that new housing is appropriate.	The Town Council welcomes this support.
		OBJECTIVE 12 Comment that the Creek Area does have a maritime link however many of its current and former uses do not. This objective should be revised to acknowledge more recent history as there has been significant residential development dating from the 20th Century.	Noted.
		GENERAL The wording of the Objective in seeking to “ <i>protect and enhance the Creek... for educational and economic purposes</i> ” is not in accordance with other Objectives, such as Objective 11, nor a number of the site proposals which recognise that new housing can be provided within the Creek Area, as either wholly residential developments or as part of mixed use developments.	The Town Council believes that the stated educational and economic objectives are not at odds with other objectives, including new residential uses or mixed developments.
		OBJECTIVE 14 Comment that within the overall plan area, there are a number of sites where new development/redevelopment will be proposed during the Plan period. The Objective should acknowledge that, through redevelopment, the townscape will change.	Noted — plan revised accordingly.
		INF 3 Wording of this policy should be amended to read: “... <i>and to have regard to the guidance in the Faversham Creek Streetscape Strategy.</i> ”	Noted — plan revised accordingly.
		INF 4 Objection to the low threshold that developments of six units or more require a traffic survey.	Noted — plan revised to include a broader definition, requesting that all planning applications will need to be accompanied by a design/access statement explaining how access, traffic and parking issues are to be addressed.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
05	Swan Quay LLP and Hilary Riva Landowners (cont.)	INF 5 Comment that this is not a matter that should be included in a Local or Neighbourhood Plan. Developers of individual sites are not responsible for providing the wider high speed digital infrastructure.	Noted — plan revised. High speed digital infrastructure now a plan project rather than a plan policy. Policy INF 5 deleted.
		FL1 Re-wording suggestion: <i>“More vulnerable uses such as residential development, are not located on the ground floor (garages would be acceptable).”</i>	Noted — plan revised to accommodate new suggested words, subject to ground floor garages having no negative impact on the street scene.
		GENERAL Suggested new wording: <i>“Developers should consult the Local Planning Authority and The Environment Agency at the earliest stage. Swale Borough Council will also need to consult their Emergency Planners if new development is likely to have implications for emergency planning and the emergency services. Spatial and Emergency Planners should ensure that the additional burden associated with any new development will not compromise their existing ability to manage a flood incident.”</i>	Noted — plan revised to accommodate new suggested words.
		POLICY HE1 As Faversham Streetscape Strategy has not been subject to Independent Examination, it is suggested that policy HE1 is re-worded to: <i>“...and to have regard to the guidance in the Faversham Creek Streetscape Strategy.”</i>	Noted — plan revised to accommodate new suggested words.
		POLICY HE2 Requested that this policy is expanded to make reference to Paragraph 128 of the NPPE.	Noted — appropriate revisions made.
		POLICY HE3 This is a disproportionate requirement. It would not be reasonable to require such an appraisal for relatively modest developments. Swale Borough Council has the power to impose conditions on a planning permission requiring the submission for approval of a Construction Management Plan, where appropriate. It is requested that this policy is deleted.	Noted. However, given the sensitive nature of many heritage assets in the creek area the Town Council wishes to seek such information at the earliest stages. The policy remains in place.
		POLICY BTE1 It is questioned whether this policy is intended to be applied solely to business, tourism and employment proposals. If so, a policy suggested is put forward: <i>“Any new business, tourism or employment development will be required ...”</i> The policy as drafted suggests that all developments would need to comply whereas not all site specific proposals include business, tourism or employment development. Also comment that this policy should be in the design section.	The Town Council believes that well-designed residential and other non-business uses can also enhance the creek as location for business and employment, as the collective impact of such schemes is to create a successful living and working environment. Policy to remain unchanged.
		POLICY BTE2 Unclear what this policy is aiming to achieve. If the Plan is to support the development of businesses which contribute to tourism, etc, this should be expanded to make it clearer.	Noted — text revised to be clearer.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
05	Swan Quay LLP and Hilary Riva Landowners (cont.)	GENERAL Support the recognition that new housing is needed and that residential development could be permitted above ground floor.	The Town Council welcomes this support.
		POLICY HO2 If the Creek Fund requires contributions in addition to the 'standard' contributions, this would impose additional costs to development sites. Therefore, the Creek Fund must be developed in conjunction with Swale BC and KCC so that it does not impose additional burdens on sites.	Noted.
		GENERAL The mentioned Creek Fund is not clear in the draft plan of how it would work. In principle (subject to testing) a Creek Fund may be appropriate however the Creek Fund could not be developed in isolation from other development contributions that may be sought by Swale BC and KCC through S106 or CIL.	Noted.
/ 24		POLICY DPI the wording of the policy should be amended to read: <i>"Any new development shall be required to preserve or enhance the character..."</i> Also, buildings in the Conservation Area are constructed of a wide range of materials and it would not be appropriate to specify stockbrick and weather boarding only. A broader form of wording should be used: <i>"... appropriate to its setting."</i> Object to a height limitation in this general policy. If appropriate, height limitations should be specified within the site specific policies.	While the site specific policies deal with sites under consideration at the present time, the neighbourhood plan needs to have a series of creek-wide design policies that can apply to development sites yet to come forward. Therefore, creek wide design policies remain but have been revised to address the specific comments regarding materials and heights.
		POLICY DP2 Object to the wording of policy and propose it should be deleted as the NPPF already sets the requirements for development proposals to have regard to their setting which includes consideration of views and roofscapes.	Protection of roofscape and views considered important and policy to remain.
		POLICY DP3 As the Streetscape Strategy has not been independently examined and therefore a re-wording or policy is proposed: <i>"... and to have regard to the guidance in the Faversham Creek Streetscape Strategy."</i>	Noted — reference to street scape guidance amended.
		SITE 4 The detailed proposals for the central part of the site, (which were prepared for a planning application for change of use with alterations but not yet submitted), proposes that the self-contained units proposed would have a "dual" use. A flexible planning permission which would allow the units to be used either for residential or for uses within Use Class B1.	Noted.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
05	Swan Quay LLP and Hilary Riva Landowners (cont.)	SITE 4 The accompanying text to the policies for Site 4 suggest that approximately half of the floorspace should be used for Class B1 offices and workshops and half for residential. It is not considered that this form of wording would offer the flexibility to change between residential and business use, as would a flexible/dual use planning permission. Also a substantial part of Site 4 is currently in a non-residential use (i.e. Creek Creative.)	Noted — text revised accordingly.
		SITE 4 It is believed that new uses for the buildings would assist in the regeneration of the area.	The Town Council agrees that new uses for existing buildings will help regenerate the creek area.
		SITE 4 In March 2014, we suggested the following Policy for Site 4: <i>“Planning permission will be granted for alternative uses for the existing buildings on the site, including, if appropriate, alterations, extensions and redevelopment to secure viable new uses which would contribute the regeneration of the area. Alternative uses would include residential and business uses within Use Class B1. Proposals will need to take account of flood risk, the sites location in a Conservation Area and its relationship to nearby Listed Buildings and the relationship with existing residential properties.”</i>	Noted — the Town Council believes that the revised policy wording for Site 4 reflects the aims and ambitions of this suggestion effectively.
		POLICY FW2 The NHP covers a lengthy timeframe and therefore there needs enough flexibility to take account of economic and other factors that may occur during this time. We ask that the text be included: <i>“The retention and/or expansion of creative workshops, studios and exhibition space shall be encouraged.”</i>	Noted — text revised accordingly.
		FW POLICIES The treatment of external spaces will be considered in detail in planning applications, with due regard paid to the overall streetscape strategy, as appropriate. Due regard would need to be paid to the issues of ownership and public realm.	Noted.
		FW POLICIES The overall Faversham Creek Plan boundary as shown on pages 53 and 54 extends beyond the south-eastern boundary of Site 4, and includes residential gardens of a number of properties which front Abbey Street.	Noted. However, the boundary of the neighbourhood plan has been subject to its own consultation period and therefore requests to adjust the boundary cannot be acted upon as part of this consultation.

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COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
		GENERAL Object to the inclusion of Site 4 within the Faversham Creek Neighbourhood Plan Area on the grounds that the site has no physical nor visual connection with the Creek.	Noted. However, the boundary of the neighbourhood plan has been subject to its own consultation period and therefore requests to adjust the boundary cannot be acted upon as part of this consultation.
		GENERAL Object to the inclusion of garden land of residential properties which front Abbey Street within the Plan Area.	Noted. However, the boundary of the neighbourhood plan has been subject to its own consultation period and therefore requests to adjust the boundary cannot be acted upon as part of this consultation.
06	Arthur Percival	GENERAL Plan is under valuing national importance of the history of the area.	The Town Council believes that the plan makes sufficient reference to the history of the creek and balances this against the needs of today and the future.
		VISION + OBJECTIVES “Regeneration” could be replaced with the term “rejuvenation” as most regeneration already taken place.	Noted — Vision text has been edited to be more accurate.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
		<p>VISION STATEMENT Suggested rewording:</p> <p><i>“The Creek is perhaps Faversham’s greatest asset. Without it the town would never have existed. For centuries and probably millennia it has provided the settlement with access to the open sea. Its trade, and the ship building and maintenance facilities which it provided (and now still provides, though to a much smaller extent than may at present be desirable), brought prosperity to the town. To this prosperity it owed its first Borough Charter in 1252 and its membership of the Confederation of Cinque Ports — which in turn brought it privileges envied by many other towns and cities, and which helped it build its prosperity. Fortunately this prosperity is still reflected in the several hundred historic buildings which still grace the town and can only be fully understood and appreciated in the context of the Creek. It also played a key part not just in the development of the town and surrounding area but in the history of the nation. Without the part it played in this, England would be much the poorer today. It remains a huge asset of incalculable value whose maritime potential is now all the greater because opportunities for the maintenance and restoration of historic coastal vessels are now at a premium. To this day fortunately it bears the imprint of its long and distinguished history and in our day it becomes us to ensure that every aspect of this is carefully conserved for the benefit of posterity, and for its educational and visitor potential. It is something in which we should take the greatest pride and for which no care could ever be too great.”</i></p>	<p>Noted — However, this is considered too long and too historic in focus to be a useful vision statement, that by definition, need to be forward-looking. Vision text has been edited to be more accurate.</p>
		<p>BUSINESS, EMPLOYMENT + TOURISM This section does not fully explain what makes Faversham attractive in any detail to enhance the town’s economy and increase employment opportunities. New housing in the town must be to a higher standard than existing new builds. The plan does not indicate the type of housing it proposes. This may decrease the appeal for visitors. It is considered that new housing should not be allocated alongside the Creek as this will decrease the ability of vessels to berth there and will make the area less user-friendly for the owners of historic vessels.</p>	<p>Noted — The plan supports new housing but this must not prevent and/or actively encourage the ability for berthing and repair of historic vessels.</p>
		<p>SITE 8 The plan does not make enough of the maritime function and historic importance. Existing uses and functions around the Creek are unsympathetic and inappropriate to the particular setting. As the Quay is one of the few remaining creeks that has been in continuous maritime uses, this should be celebrated as a unique aspect to the town for heritage and education purposes. The increase in retail in the vicinity generates excessive traffic which is detrimental to the character of the town.</p>	<p>Noted. However, the Town Council believes the mix of uses at Standard Quay will continue to reflect its maritime location and function.</p>

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
06	Arthur Percival (cont.)	CAMBRIA MUSEUM Though welcome in itself, appears intended mainly as a gesture to the past. Far more welcome on the Quay, and much more appropriate than the present range of discordant uses, would be a much broader-based living museum of coastal craft through the ages, with craftsmen to be seen at work on vessels needing maintenance. This would be far more likely to achieve the official accreditation that would be needed to help generate the grants and other contributions that would be needed.	The precise detail of a museum or similar facility and/or use to be developed outside the neighbourhood plan. The intention now is to provide a “policy hook” that future projects of the type described can be attached.
07	Dr. Pat Reynolds, Heritage Crafts Association	GENERAL The existing heritage assets of the creek are key to the local distinctiveness to the area and individual’s identify. Within the Plan, the creek should protect the waterfront areas for cultural activities, such as boat repair and maintenance. Promoting heritage skills should also be supported. A suggestion that any development on the waterfront should include a “... <i>cultural impact appraisal [to] explain how the proposals have taken account of this appraisal</i> ”. A housing-led strategy will decrease the attractiveness of Faversham as a place to live, work and visit.	Appropriate cultural activities are wider than just boat repair and maintenance and arguably, these are better described as economic/employment activities. However, the Town Council acknowledge that cultural activities deserve greater recognition in the plan.
		GENERAL The plan should include specific infrastructure projects to ensure the sustainable future for living heritage at the site.	Noted. However, specific projects will be brought forward through the planning application process.
		GENERAL Opportunities to protect, utilise and sustain living maritime living heritage should therefore be acknowledged in section 5, and reference made to living heritage in all the other sections, where it has a contribution to make.	The Town Council considers that heritage of the creek is referenced sufficiently throughout the plan.
		SITE 2 While agreeing that the proposed housing style would create an urbanising effect, we do not understand why this is true of the community use as “maritime” does not equate to “urban”. It should be acknowledged that the proposed community use has the support of existing community groups/neighbours. It should be acknowledged that the proposed community use is likely to be sustainable and contribute to the sustainability of the area. A main advantage of option B / disadvantage of option A is that the sustainability of the neighbouring Purifier site, which contributes so much to the sustainability of the area, will be endangered if Ordinance Wharf is used for housing.	The text associated with Ordinance Wharf has been revised to reflect a “baseline” position that will allow for either of the two options previously described or indeed, other alternatives. The plan now describes a set of design principles and future planning applications for the site will be judged against them.
		STANDARD QUAY This policy should indicate that retrospective listed building consent will not be granted for works which detract from the heritage value of the individual parts, the whole of the Standard Quay area and Faversham Creek as a whole.	Listed building consent is a matter for planning applications not a neighbourhood plan.
08	Harold Goodwin	HOUSING Housing on the creek has already denied a considerable amount of public access and damaged its visual appeal. Further housing on the creek side would destroy most and possibly all of its heritage value.	The neighbourhood plan is not encouraging more housing directly on the side of the creek.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
08	Harold Goodwin (cont.)	HOUSING Any housing constructed around the Creek should respect the heritage assets on the Creek and in the town — it should not block views of St Mary’s Church nor Davington Priory and the roofs should not be visible from Abbey Street — there must be not any loss of public access to the Creek.	Noted. Text in the plan has been revised accordingly. New Policy HO3 introduced.
		HOUSING Other land has been excluded from the plan — meaning that if the Shepherd Neame bottling plant were relocated the plan would be silent as to the use of the site — a developer may speculate that they would get planning permission for housing...	Noted. The Town Council is considering the inclusion of other sites not currently addressed by the neighbourhood plan (e.g. Morrison’s, Shepherd Neame etc.)
		HERITAGE The Creek has a national heritage value and its importance as it is one of the Cinque Ports. A working Creek is a major asset for employment, sense of place, recreation and nature. There are opportunities for the maintenance and restoration of historic coastal vessels.	Noted. The Town Council considers that heritage of the creek is referenced sufficiently throughout the plan.
09	John Cleaver	SITE 3 Suggested re-wording to include: <i>“The proposal is that, for the frontage of the northern part of the site, approximately two thirds should be used for industrial (Class B1 and/or B2)* purposes, either retaining the existing buildings in the short term or replacement with a new building to provide a factory for the existing user. For the southern part of the site at the Flood Lane end, there should be mixed use including workshops or offices (Class B1) with housing behind, rising up the hill and connected to housing on the office site at Brent Hill.”</i> (*Classes B1 and B2 are relatively flexible)	The policy text has been revised to be more flexible in this respect.
10	Brent Community Association	GENERAL Not enough mix of uses in plan. The focus should be upon regenerating the creek through tourism and community-led projects. Unsure of the viability of the streetscape strategy through s106/CIL funding.	The Town Council considers that the neighbourhood plan encourages a good mix of uses and that community-led and tourism projects both play a prominent role in this mix.
		LAND USE MIX The balance should be between residential, industrial, other commercial uses and - importantly - community benefits. No more waterfront housing. Areas where there are fewer viability issues suitable for affordable housing.	The plan is proposing a balanced mix of uses. The neighbourhood plan is not encouraging more housing directly on the side of the creek.
		LAND USE MIX Using Standard Quay, Coach and Oil Depots, plus Swan Quay and Purifier/ Ordnance Wharves as hubs for boat repair and ancillary businesses.	Neighbourhood plans are unable to restrict land uses classifications to specific types of activity (e.g. boat repair) but does encourage trades and businesses that benefit and/or require access to the water.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
10	Brent Community Association (cont.)	STANDARD QUAY The Monks Granary building to be utilised as a living maritime museum, with visitor facilities such as gift shop, cafe, toilets. This could be linked with the National Maritime Museum, include a Cinque Ports exhibition and attract a variety of funding.	While neighbourhood plans are unable to restrict land uses classifications to specific types of activity, the draft neighbourhood plan does encourage such types of use at Standard Quay.
		SWAN QUAY to become a maritime/cultural/ area, for boats to moor waiting entrance to the basin, craft and artisan workshops and galleries and open spaces. Wilkinson Sails to stay. Slipway to be enhanced.	While neighbourhood plans are unable to restrict land uses classifications to specific types of activity, the draft neighbourhood plan does encourage such types of use at Swan Quay.
		BASIN AREA The Basin must have no residential use and remain industrial and jobs with community facilities and access to the water. Wharves to be reinstated for mooring of barges and other vessels	The neighborhood plan does not consider residential uses to be incompatible with most industrial uses. The Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.
		BRIDGE Welcomes reference to this in the plan this and pleased to note the progress made in the last year.	The Town Council welcomes this support.
		STREETSCAPE STRATEGY Too much money has been put into a streetscape strategy, more money should be put into the Creek and making it work for Faversham with a tourist and employment focussed neighbourhood plan.	Noted.
		INF1 We support the requirement that any new developments should be set well back from the waterfront, but the policy needs to explain what the waterfront area is for (maritime activity and public access) and to justify the 4 metre limit. It should also specify curtilage not buildings.	The Town Council welcomes this support. The waterfront comprises public spaces that could be used for a range of activities, not just access and maritime (e.g. festivals, gatherings etc) and the neighbourhood plan cannot be too prescriptive as regards use of open spaces.
		INF4 Why only developments of 6+ units, and what is meant by a unit? There should be an assessment for the plan overall and for any new development of whatever size. Parking is also an increasing problem on both sides of the creek.	Unit is any type of residential dwelling (i.e. house, flat, apartment, duplex etc.) The plan requires all planning applications be accompanied by a design/ access statement explaining how access, traffic and parking issues are to be addressed.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
10	Brent Community Association (cont.)	FLOODING Our area includes the Front Brents and Church Road, which are particularly vulnerable both to flooding and to drainage problems. We would like to see a full-scale assessment of drainage and sewerage provision and capacity for the whole area (as recommended by Tony Fullwood in 2010) before the Neighbourhood Plan goes any further. We are not confident that it can be proven definitively that new developments will not increase flood risk in our area, bearing in mind that the Swale Flood Risk Assessment of 2009 says that flooding all around the Swale is interconnected, and that developments and defences in one location may have a knock-on effect elsewhere.	No comments or objections with regard to the flooding policies were raised by the Environment Agency in its response to the draft plan. The revised neighbourhood plan therefore continues to reference flooding policies as previously, which are considered sufficient to meet the needs of a neighbourhood plan area. Individual planning applications may be required to provide more detailed flood risk assessments.
		FLOODING We are deeply disappointed that, following the tidal flooding in December 2013, the Council's only action was to seek assurance from the Environment Agency that this would not adversely affect landowners' proposed new housing developments, rather than showing concern for existing residents and seeking action on flood alleviation. In the absence of leadership from the Town Council, our Association has taken the lead on liaison with the Environment Agency, Swale Borough Council, KCC, Southern Water and others on options for a flood alleviation scheme, and we would like to see a much firmer and more active commitment to such a scheme written into the Neighbourhood Plan.	No comments or objections with regard to the flooding policies were raised by the Environment Agency in its response to the draft plan. The revised neighbourhood plan therefore continues to reference flooding policies as previously, which are considered sufficient to meet the needs of a neighbourhood plan area. Individual planning applications may be required to provide more detailed flood risk assessments.
		HERITAGE We have no issue with the policies as stated, but would wish to see stronger protection with clearer references to where definitions of assets can be found and to existing conservation assessments and policies. There should be detailed character assessments for each of the specified sites and for the Creek as a whole, against which the policies can be measured.	Noted. The Town Council considers that heritage of the creek is referenced sufficiently throughout the plan.
		COMMUNITY, LEISURE + RECREATION The principles and projects are acceptable but we would like a firmer commitment to their implementation, through specific enabling policies for the projects, in particular the land use policies for Ordnance Wharf. We do not feel that this plan in general has given enough priority to the needs of our community.	Noted. The Town Council considers that the need for community uses in the plan area are referenced sufficiently throughout the plan.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
10	Brent Community Association (cont.)	BUSINESS, TOURISM + EMPLOYMENT The policies need to address the nature and function of developments, not just their external appearance as in BTE1. For example, a housing development might be built with all the appropriate materials etc., but by its very nature as a private residential area it would not be welcoming to visitors. The intentions for economic and social development are commendable but the policies do not follow through. For example, there should be a stringent requirement for evidence that a site owner/developer has made a genuine effort for an appreciable period of time (e.g. active marketing with reasonable market rates and conditions), to retain a site in employment use, before any permission for change of use will be granted. BTE2 appears to be incomplete.	The Town Council do not consider that residential development in itself will make the creek area any less attractive to visitors and/or tourists. The design text in the plans has been strengthened to ensure high quality designs. BTE2 text has been revised to read more clearly.
		HOUSING There are no policies to promote the stated intention of a range of housing types and tenures, nor to support the provision of housing specifically targeted to our local needs, and to discourage housing designed to attract out-commuters or second-home owners. The 35% affordable housing requirement is unlikely to be achievable in the proposed waterfront developments.	Precise tenures and types will be informed through the planning application process. The 35% target will be set by the plan and the onus is then on developers to demonstrate if this is not achievable.
		POLICY DPI Many people consider that recent creekside developments are poorly designed and do not enhance the area, but these policies would not prevent more of the same. They would all pass the test. We would like to see some commitment to sustainable design (construction materials, building standards, energy-saving/carbon-neutral design, etc.).	The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.
		SITE 2 Objection. We cannot understand why Option A is preferred by the Council when the public is against it. Oppose any development over 2 storeys. We prefer Option B which provides an opportunity to build on the capacity of the apprenticeship scheme at the Purifier, with a community centre and boat yard providing a much needed facility for the North Preston community. The BCA has developed a proposal for the activities that this facility could provide, which is supported by a number of organisations inc. Amicus Horizon. The Brents/North Preston area has no venue for meetings, activities or delivery of employment/outreach services. The development of a Creekside facility in conjunction with the Purifier could provide a more original community centre and more likely to attract funding from donors, for something more interesting and distinctive. Preliminary exploration of potential funding options has been encouraging, and in order to progress the project we would like to see some real commitment from the Town Council to the provision of community facilities within the Neighbourhood Plan.	The text associated with Ordnance Wharf has been revised to reflect a “baseline” position that will allow for either of the two options previously described or indeed, other alternatives still to be considered. The plan now describes a set of design principles and future planning applications for the site will be judged against these principles.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
10	Brent Community Association (cont.)	SITE 4 “Support somewhat” the use of the site by the Creek Creative and would not like to it restrained by residential use or space limitations. Also concerned about the parking implications for any partial residential use.	Policy FW2 has been revised to state that the retention and/or expansion of creative workshops, studios and exhibition space shall be encouraged. The plan requires all planning applications be accompanied by a design/access statement explaining how access, traffic and parking issues are to be addressed.
		SITE 5 Want to see more moorings for boats. Strongly oppose tall residential blocks on the waterfront. Do believe ground floor commercial use are desirable. Unsure of whether enough parking could be provided and concerned about flood risk. Do not want any development to threaten sail making business. Suggestions: to encourage the steering group to pay further attention to the Conservation Area Character appraisal conducted by Ray Harrison. Not all is feasible but this could provide some alternative approaches that would be beneficial socially and economically.	The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this. The plan is proposing a balanced mix of uses. The neighbourhood plan is not encouraging more housing directly on the side of the creek.
		SITES 6 + 7 Objection. Should be for maritime uses.	The plan is proposing a balanced mix of uses for these sites.
		STANDARD QUAY + CAMBRIA MUSEUM The site needs an overall strategy. Since 2011 the site has deteriorated, there is little confidence in the unapproved changes and retrospective planning applications and existing policies. Swale BC could CPO the site and the Faversham TC could support an initiative to bring it back as a boat yard and heritage centre. The museum is not a museum in any meaningful sense. Most attractive uses: Toilets/ showers for boat users. Least attractive: retail, SME, holiday lets, residential on upper floors.	Introduction of new design principle diagrams to place greater emphasis on more coordination between adjacent sites. The precise detail of a museum or similar facility and/or use to be developed outside the neighbourhood plan. The intention is to provide a “policy hook” that future projects of the type described can be attached.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
10	Brent Community Association (cont.)	SITE 9 Residential uses in close proximity to a working quay side would be impractical. The house and adjoining land could make a good hotel/B&B. Also, disagree to the restriction on vehicle access.	The neighborhood plan does not consider residential uses to be incompatible with most industrial uses. The Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.
		SITE 10 "Support somewhat" as we want to assurance that residential development would not be allowed to restrict commercial activity on neighbouring sites.	The neighborhood plan does not consider residential uses to be incompatible with most industrial uses. The Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.
		GENERAL Concerned that nothing is stated about the Shepherd Neame and Morrisons sites. These could be put forward for residential over the time frame of the plan and clear guidance is needed.	Noted. The Town Council is considering the inclusion of other sites not currently addressed by the neighbourhood plan (e.g. Morrison's, Shepherd Neame etc.)
		GENERAL The primary constraint to employment use around the creek is not lack of demand or profitability, it is the possibility of change of use for residential development, and this has been the case for many years. In his comments on the Swale Local Plan 2008, the Inspector notes that in Faversham the supply of land for employment use has suffered because of landowners' expectations of achieving higher land values for alternative uses, and that there is a need for a clear planning framework to be established for the future of the town, so that long-standing uncertainties can be resolved. The Neighbourhood Plan is an opportunity to provide that framework, giving clear and unequivocal protection to employment use.	The Town Council agrees that more employment land is needed in and around Faversham. It considers that the neighbourhood plan as a whole sets out an integrated framework of well-designed, compatible uses that will enhance the creek as location for new businesses and employment, creating a successful living and working environment.
11	Belvedere Creek Management Limited	SITE 4 Support policies FW1 and FW3 as they allow for the appropriate consideration to be made for the use of buildings between Abbey Street and Belvedere Road and along it.	Noted.
		PARA. 2 + 3 Support given relating to the proposed alterations allowed.	Noted.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
11	Belvedere Creek Management Limited (cont.)	FW2 Object. Not considered appropriate for the precise nature and extent of what should be retained or altered in the NHP, should be determined at planning application stage relating to policies FW1 and FW3.	Noted. Policy revised in response to this concern.
		PARA. 4 Object. Should be rephrased to all for the whole group of buildings to be approximately half the floor space for a mixture of B1 offices and workshops, and residential.	Noted. Policy revised in response to this concern.
		GENERAL Reference needs to be made to ensure suitable highway and footway arrangements with Belvedere Road and access into Site 5.	Noted. Policy revised in response to this concern.
		POLICIES SQW1, 2 and 3. Support is given to the wording of para. 2 in regard to Site 5 and residential use of the upper floors and the proposed positioning of such new buildings at right angles to the creek.	Noted.
		OBJECT PARA. 2 The wording should state that the massing of those new buildings to run the full length back to the boundary with the Faversham Creek Hotel and the adjacent 'square'. The ground floor use of the proposed new building closest to Town Quay to be suitable for A3, or A4 or B1 use classes. The ground floor of the proposed new middle building to be for residential parking and storage.	This is description is considered to be too prescriptive and detailed for a neighbourhood plan. This proposal should be demonstrated as suitable/ appropriate through the planning application process.
		OBJECTION to the indicated use of the building between the blue listed building, existing workshop and Belvedere Road for residential use. This part of the site should be only one and a half storeys and for B1 office or workshop use. Residential uses should be confined to the site between the blue listed building and the Town Quay.	This is description is considered to be too prescriptive and detailed for a neighbourhood plan. This proposal should be demonstrated as suitable/ appropriate through the planning application process.
		SITE 4 Appropriate reference should be made to suitable highway and pedestrian access.	Noted. Policy revised in response to this concern.
12	Anonymous Letter	USE OF THE CREEK Putting the Creek back into use by building a tidal barrier to harness tidal energy, with locks for the boats and water driven generators. This could prevent flooding of the surrounding low level, marshes, town and countryside. More effective than wind turbines and other renewable energies. The barrier could connect to the footpaths on either side of the creek. A feasible option that has the advantage of being self-financing over a period.	Noted. This is a significant infrastructure project and as any barrier will lie upstream and outside the boundary of the neighbourhood plan, it will need to be pursued through means other than the neighbourhood plan.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
13	Ray Harrison	SWAN QUAY Disappointed that the Conservation Area Appraisal has not been used. It demonstrates that the wharf and all three historic buildings on Swan Quay were originally connected directly with the shipping trade. The plan fails to treat the 1896-1907 open timber shed as a significant asset and structure to the area. Through the current status within the plan it classes the building as an of no significance and not worthy to be classes as an unregistered heritage asset which has in turn encouraged proposals for the full clearance of Swan Quay. Encourages the use of the Appraisal. A 3.5 storey block will be visually dominating and will be a detrimental alteration to the building scale and surrounding layout and two storey Grade II listed building. Effecting the local historic and architectural character of the conservation area and heritage assets.	Swale BC have not accepted any of the submitted, alternative methodologies regarding the designation of heritage assets in the plan area. Instead, they are supporting the Undesignated Heritage Paper, which involved their conservation officer, as the means to decide on how the neighbourhood plan addresses heritage and conservation matters.
		SWAN QUAY The proposed 3.5 storey block adjacent to Swan Quay's Grade II listed chandlery building will have a similar detrimental effect as above. The Plan proposals around the quay are disappointing as they assume the current low rise and low density wharf buildings are not significant in value and contribute nothing to the architectural and historic character of the Faversham Conservation Area.	The impact of development proposals on heritage assets will need to be determined at the planning application process. Proposals will be assessed against the policies in the neighbourhood plan. The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.
14	Elizabeth Pineau	HOUSING The size of the housing developments proposed for the water purifier building, oil depot, Fentiman's yard and Standard Quay will adversely affect the historic character and maritime use of the area. It is recognised that housing development on Fentiman's yard and the Creek is likely to intrude on the roofscape behind Monks Granary but conflicts with the economic viability of creating too low buildings.	The impact of development proposals on heritage assets will need to be determined at the planning application process. Proposals will be assessed against the policies in the neighbourhood plan.
		MIX OF USES The new housing will also increase traffic and parking issues along Abbey Street. Also, there is a risk that this area will become homogenised as a result of the proposed housing in the Plan.	The Town Council believes that the neighbourhood plan will allow for a successful blending of uses to create a vibrant mix, avoiding homogeneity.
		TRAFFIC Can there be ways to consider to avoid increasing traffic down Abbey Street that will encourage pedestrian access to the Creek? Also, making it more attractive for cyclists, which is a particular issues for pupils cycling to Queen Elizabeth School.	This is noted. However, Abbey Street is outside the boundary of the neighbourhood plan and so cannot be directly addressed by polices within the plan.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
15	Quayside Properties	PARA 7.9 Whilst the draft plan proposes a development fronting onto New Creek Road, there is no specific policy for this within the Plan. It is suggested that this residential development be given a specific site number in Site 13, New Creek Road.	The Town Council do not intend to introduce another site-specific policy to the plan (site 13). Development on New Creek Road can be brought forward within the policy framework already established by the neighbourhood plan.
		GENERAL Comment upon existing uses at Granary Building. Retail, garden centre and cafe. Green sheds are in use as an antique warehouse and car repairer.	Noted.
		GENERAL The Vision and Objectives should acknowledge that there are a number of sites where new development will be proposed during the Plan period, which may include uses in addition to 'new businesses.'	Noted — text revised.
		OBJECTIVES 1 — 4 Support these objectives that seek to improve navigation within the Creek with mooring facilities and the recognition of the Creek's potential as a Visitor Centre. Agree that Standard Quay has a role in providing tourism opportunities.	The Town Council welcomes this support.
		GENERAL Concern that the focus is entirely 'business-led' regeneration which may not result in creating a 'vibrant' area if places are left vacant.	Noted — the plan places emphasis on a range of activities, not just businesses.
		OBJECTIVE 11 Supported.	The Town Council welcomes this support.
		OBJECTIVE 12 + 13 Whilst the Creek has a maritime link, many of its former and current uses do not. Furthermore, this objective should acknowledge the more recent history of the Creek Area. The Plan Area includes significant residential development and buildings dating from the 20th Century and is not an entirely historic/maritime area. Also, the wording of the Objective is not in accordance with Objective 11 which recognises that new housing can be provided within the Creek area, either as entire or mixed use residential development.	The Town Council believes that the stated educational and economic objectives are not at odds with other objectives, including new residential uses or mixed developments.
		OBJECTIVE 11 Suggested that this objective should recognise that through re-development, the townscape will change.	It is accepted that change will happen within the creek area but this Objective does not need to be reworded to reflect this.
		OBJECTIVE 14 Acknowledge this, however comment that it may not be suitable for cyclists.	Noted but no revision needed.
		PARA 4.8 Acknowledge that condition of the Creek is a constraint on navigation and this issue of dredging is yet to be resolved.	This is noted in the "Creek Context" section.
		GENERAL Generally support the NHP which represents a change in direction from Swale Borough Local Plan Policy AAP2.	The Town Council welcomes this support.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
15	Quayside Properties (cont.)	GENERAL Comment that the Plan proposes a change in emphasis in land use within the overall plan area, recognising that not all sites are appropriate for business use.	Noted.
		GENERAL The timescale is lengthy and there needs to be flexibility to recognise economic and other changes that will occur and those determining planning applications will need to recognise these changes.	Noted — the Town Council considers the plan to be sufficiently flexible to accommodate and effectively manage change over time.
		GENERAL Policy aimed at existing and potential future public realm areas may of which are outside of development sites, therefore this would require local authorities to implement hard landscaping.	Noted — the Streetscape Strategy has been designed to deal with this matter.
		INF 2 + INF3 The Streetscape Strategy may not have been subject to detailed assessment. Nor has it been subject to independent Examination and should not be specified as policy requirements in the Creek Plan. Therefore it is suggested the policy should be amended to: “... <i>and to have regard to the guidance in the Faversham Creek Streetscape Strategy.</i> ”	Noted — text revised.
		INF 4 Threshold deemed as being too low. Threshold is usually set by Kent Highways and Swale BC. Not seen as being in line with the NPPF.	Noted — policy INF 4 now revised.
		INF 5 Recommended that digital infrastructure is not the responsibility of the Local or Neighbourhood Plan. Developers are not responsibility for providing high speed digital infrastructure.	Noted — plan revised. High speed digital infrastructure now a plan project rather than a plan policy. Policy INF 5 deleted.
		FLOODING Suggested that the following documents are referenced: Swale BC Strategic Flood Risk Assessment 2008; SBC Strategic flood Risk Assessment for Local Development Framework - Level 1 and 2 - Supplementary Document Oct. 2010.	Noted.
		FLOODING Comment that this policy is in accordance with SBC guidance except that it excludes the first criteria under the redevelopment section of the Swale Policy. Requested that this clause is reinstated: “ <i>More vulnerable uses such as residential development are not located on the ground floor (garages would be acceptable).</i> ”	Noted — plan revised to accommodate new suggested words, subject to ground floor garages having no negative impact on the street scene.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
15	Quayside Properties (cont.)	FLOODING Suggested that this text is included: <i>“Developers should consult the LPA and the Environment Agency at the earliest stage. SBC will also need to consult the Emergency Planners if new development is likely to have implications for emergency planning and the emergency services. Spatial and emergency Planners should ensure that the additional burden associated with any new development will not compromise their existing ability to manage a flood incident. The Environment Agency is likely to object to any application where the FRA concludes that the depth of velocity of flooding are such that an acceptable standard of safety cannot be achieved or where the FRA fails to demonstrate that these standards have been met and approved by the LPA.”</i>	Noted — suggested wording now incorporated.
		FL2, FL3 + FL4 Acknowledged that planning applications will be tested against the NPPF and Technical Guidance in respect of flood risk and drainage issues.	Noted.
		HE1 As the Streetscape Strategy has not been subject to Independent Examination, policy should be amended to: <i>“... and to have regard to the guidance in the Faversham Creek Streetscape Strategy.”</i> The policy should also recognise the scope for contemporary design as stated in the NPPF and Section 4.25 of the FCNP: <i>“Alternatively, it may be an opportunity to agree with developers a more interesting and empathetic design.”</i>	Noted.
		HE2 Suggested that the wording of the policy is expanded to refer to Para. 128 in NPPF: <i>“The level of detail should be proportionate to the Assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”</i>	Noted — appropriate revisions made.
		HE3 It is suggested that the impact appraisal upon Heritage Assets is unreasonable to require appraisals for relatively modest developments. SBC has the power to impose conditions on a planning permission. It is requested that this is deleted.	Noted. However, given the sensitive nature of many heritage assets in the creek area the Town Council wishes to seek such information at the earliest stages. The policy remains in place.
		COMMUNITY, LEISURE + RECREATION Object to the requirement of CLR1 which would require the provision of access for leisure and educational activities.	The Town Council consider access to waterside for leisure and educational purposes very important and intend to retain the provisions of this policy.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
15	Quayside Properties (cont.)	COMMUNITY, LEISURE + RECREATION Object to the requirement for any application to produce an appraisal of options for the provision of public spaces and leisure amenities. It is considered that this requirement is in conflict with site specific policies, where consideration for public space and leisure amenities is developed in relation to the proposed development. Amendment: the second Statement: "Community involvement and consultation..." should be retitled as CLR3. Object to the requirement for public consultation should be in accordance with the NPPF and LPA.	The Town Council consider an assessment of public space by the water important part of the process for evaluating planning applications and intend to retain the provisions of policy CLR2. CLR3 has been renumbered. Requirement for public consultation as part of the preparation of a planning application is essential and also in accordance with the NPF and the requirement as laid out by the LPA.
		SUPPORT the acknowledgement that bringing existing buildings back into use, inc. residential developments, could enable the Creekside to make a greater contribution to Faversham's economy.	The Town Council welcomes this support.
/ 40		BUSINESS, TOURISM + EMPLOYMENT Questioned whether this policy applies solely to business, tourism and employment proposals. If so, a suggested re-wording: " <i>Any new business, tourism or employment development will be required...</i> " Also, suggest that this is a design policy as it does not refer to uses but rather design, scale and materials and should be in the design section.	The Town Council believes that well-designed residential and other non-business uses can also enhance the creek as location for business and employment, as the collective impact of such schemes is to create a successful living and working environment. Policy to remain unchanged.
		BUSINESS, TOURISM + EMPLOYMENT BTE2 Unsure what this policy is trying to achieve, if it is the intention for the Plan to support the development of business for tourism, this should be expanded to make this clear.	BTE2 has been reworded to become clearer.
		BUSINESS, TOURISM + EMPLOYMENT Comment that the development of workshop and studio space for business should be addressed through the Site Specific Policies.	While the site specific policies deal with sites under consideration at the present time, the neighbourhood plan needs to have a series of creek-wide design polices that can apply to development sites yet to come forward. Therefore, creek wide design policies remain but have been revised to address the specific comments regarding materials and heights.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
15	Quayside Properties (cont.)	BUSINESS, TOURISM + EMPLOYMENT Supporting skills and training is not within the remit of a Development Plan.	The plan seeks a broad range of uses and activities and this specific use will remain in the neighbourhood plan as it responds to community concerns. Development plans can deal with education uses e.g. schools and colleges.
		BUSINESS, TOURISM + EMPLOYMENT Marketing the history of the Creek as a tourism destination is an objective rather than a project.	The Town Council consider that this can be both an objective and a project.
		SUPPORT The recognition that new housing is needed and that residential development could be permitted above ground floor.	The Town Council welcomes this support.
		GENERAL The small size of many of the sites is a challenge for creating a mix of development that would best meet local housing need. Some sites may also have access constraints.	Introduction of new design principle diagrams to place greater emphasis on more coordination between adjacent sites.
		HOUSING PROJECTS The mentioned Creek Fund is not clear in the draft plan of how it would work. In principle (subject to testing) a Creek Fund may be appropriate however the Creek Fund could not be developed in isolation from other development contributions that may be sought by Swale BC and KCC through S106 or CIL. If the Creek Fund requires contributions in addition to the 'standard' contributions, this would impose additional costs to development sites. Therefore, the Creek Fund must be developed in conjunction with Swale BC and KCC so that it does not impose additional burdens on sites.	Noted.
		POLICY DP1 <i>"Any new development shall be required to preserve or enhance the character..."</i> Also, more general terms should be applied to the materials used within the Conservation Area. For example, appropriate to its setting.	Noted. DP1 has been revised.
		POLICY DP2 Heritage policies should be in accordance with the NPPF, which include consideration of views and roofscapes. Suggest this should be deleted.	Policy to retained as specific reference to roofscape is required given the local context of the plan area.
		POLICY DP3 The Streetscape Strategy has not been subject to independent Examination yet and therefore the policy should not require external areas of development sites to be in accordance with this strategy. Suggested re-wording: <i>"... and to have regard to the guidance in the Faversham Creek Streetscape Strategy."</i>	Noted — DP3 revised accordingly.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
15	Quayside Properties (cont.)	SITE 8 Support the proposal but it is noted that there is no specific policy on this. Suggested that this site is referred to as Site 13 — New Creek Road — with specific policy allocating the site for residential development for 5 No. houses.	The Town Council do not intend to introduce another site-specific policy to the plan (site 13). Development on New Creek Road can be brought forward within the policy framework already established by the neighbourhood plan.
		Also, seek confirmation that the frontage to New Creek Road would be 2-storey, and 3-storey to the rear due to the change in ground level. Request that alterations for a staircase would also benefit from Listed Building Consent. Request that potential uses of the building should include restaurant use.	Revisions to the supporting text to allow greater flexible over form, scale and massing. Development on New Creek Road can be brought forward within the policy framework already established by the neighbourhood plan without requiring a site-specific policy of its own.
		OBJECT “Workshops associated with maritime trades could be encouraged” Requested that this sentence be deleted as workshop uses fall within either Use Class B1 or B2 and cannot currently be restricted to maritime trades only.	The neighbourhood plan seeks to encourage such uses but does not restrict uses solely to maritime trades.
		STANDARD QUAY Object to the rerouting of the footpath. The NHP cannot require this and is dealt with under different legislation.	The neighbourhood plan can request this is undertaken although it is noted that footpath diversion will be sought through an independent mechanism.
		OBJECT The NHP is not the appropriate place to deal with the maintenance of an appropriate footpath surface. Moorings are already provided along the quayside. Request that ‘must’ be replaced with “... where appropriate and possible.”	Moorings are considered an essential element for the regeneration of this part of the creek. Public realm. Public realm maintenance is considered a reasonable matter to be dealt with by a neighbourhood plan.
		STANDARD QUAY Suggest that an additional Standard Quay Policy should be submitted to indicate appropriate uses for the various buildings: “Industrial, office and storage uses; retail use; uses related to tourism including restaurants and cafe, museum, gallery, etc.” Comment that ensuring new uses for all of the buildings will add to the vitality of the area and assist in regeneration.	Noted. Text revised to reflect the suggestion that new uses for all of the buildings must add to the vitality of the area and assist in regeneration.
16	Ken Whittaker	OBJECT The NHP fails to meet the Basic Conditions	The Town Council believes the neighbourhood plan does meet the basic conditions.

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Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
16	Ken Whittaker (cont.)	OBJECT The NHP proposes negative change to the character of the Conservation Area through the proposed change of uses, causing damage to the significance of designated and non-designated heritage assets	The Town Council believes that the neighbourhood plan will help manage change effectively and therefore prevent damage to designated and non-designated heritage assets. The greater risk comes about if there is no neighbourhood plan.
		OBJECT Plan does not use all available relevant information to assess the heritage significance. The NHP addresses the weaknesses but fails to address this means of historic area assessment techniques outlined by English Heritage.	Swale BC have not accepted any of the submitted, alternative methodologies regarding the designation of heritage assets in the plan area. Instead, they are supporting the Undesignated Heritage Paper, which involved their conservation officer, as the means to decide on how the neighbourhood plan addresses heritage and conservation matters.
		OBJECT The loss of heritage significance is not outweighed by public benefits. The NHP fails to promote employment land uses proven to sustain heritage conservation and add heritage value to the Creek.	The Town Council considers that heritage of the creek is referenced sufficiently throughout the plan. The impact of development proposals on heritage assets will need to be determined at the planning application process. Proposals will be assessed against the policies in the neighbourhood plan.
		OBJECT The NHP does not embrace positive change to secure a sustainable future. The proposals do not preserve the Conservation Area, they erode the character and setting that make a positive contribution do not reveal the significance of the Creek. Rather it promotes residential development.	The Town Council believes that the neighbourhood plan will allow for a successful blending of uses for the future. The impact of development proposals on heritage assets will need to be determined at the planning application process.
17	Marine Management Organisation	GENERAL Published the draft Water Resources Management Plan, May 2013. This takes into account of planning housing growth as well as climate change. Faversham lies within Swale and have responded to the Bearing Fruits Local Plan and are working with Swale BC to ensure there is enough flexibility within the Core Strategy to support any currently unforeseen development.	Noted.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
17	Marine Management Organisation (cont.)	GENERAL Based on the housing development identified in the SBC emerging Local Plan, sensitivity testing has been completed to confirm that our published planned programme will be able to meet the growth in demands in the zones. Support policies that aim to improve water efficiency in existing housing stock. Recommend that new development is built to Code Level 4 standard due to the water stress in the area.	Noted.
18	Mrs. L. Seager (on behalf of residents on Abbeyfields)	GENERAL Concern about the level of traffic on Abbeyfields, an unadopted road close to Standard Quay. Concern that further industrial uses at this end will increase HGV traffic along a narrow route. This routes is unsuitable for boats being delivered by lorry. There is also increased lorry traffic associated with the nearby Southern Water discharge plant.	Noted. The plan seeks a range of uses around Sites 6, 7, 8, 9 and 10 and not just industrial uses. The plan requires all planning applications will need to be accompanied by a design/access statement explaining how access, traffic and parking issues are to be addressed.
19	Mrs. Kirkby	STANDARD HOUSE "All vehicular access to the site shall be from New Creek Road to preserve the appearance of the open area in front of the house as a quayside." The current landowner does not agree with this policy. The landowner strongly objects to isolating Standard House as the only residential unit at that end of Standard Quay. It should enjoy the protection of having neighbours in its own grounds.	Noted. The plan does encourage further residential development within the grounds of Standard House.
		Doubtful if the house dates from the 18th century. This statement should be left vague as to its date. The house was not formerly used as the offices for Faversham Fencing. The house was used by the lorry driver and his family. A separate room, built on the back of the house, was used as the offices.	Noted — text amended.
		Standard House has foot and all vehicular access from Standard Quay at the present time.	Noted — text amended.
		SBC has, in the past, agreed that, to the left of Standard House (facing on), it would be acceptable to have houses of three storeys (with the ground floor as commercial). That is still the current landowner's intention. In practice, they would be happy for there to be only two storeys provided they did not have to provide the commercial element	Noted. The plan allows for flexibility in this area.
		"The buildings on the land fronting the public footpath should be set away from the main building and could include black weatherboarding to echo a sail-loft/workshop formerly on the site." Considered too detailed as regards materials. It is more important the new buildings complement Standard House.	Noted — text amended.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
20	Faversham Society	GENERAL COMMENT The Society believe the Faversham historians could have been consulted for more accurate records of the Creek and its historical role.	Noted.
		GENERAL COMMENT Recognition that trade and transport in and from the Creek have not been viable for some time. However, the Society believes it is still possible to preserve and enhance maritime activity. Enhancing the boat-based activity around the Creek will lead to more enjoyment of the Creek. However, there is a recognition that the Plan must have a commercial gain for land owners and developers through these plans. It is seen however that development on the Creek should be kept to a minimum.	Noted.
		RESIDENTIAL DEVELOPMENT Townscape and vistas should be preserved. There are a number of buildings that form part of the creek scape. Three storey buildings are likely to spoil these views. The parish church spire is an important feature and view across the marshland or flat terrain. Any new development should not spoil this view.	Noted. The plan places great emphasis on maintaining and protecting views.
		RESIDENTIAL DEVELOPMENT The housing numbers allocated along the Creek will not solve the housing shortage, however it will impact upon the area and community. Abbey Street and Belvedere Road are already congested; the area generally has poor access and any development will put pressure on the surrounding infrastructure.	Noted.
		RESIDENTIAL DEVELOPMENT The whole area is covered by an area of high flood risk. Ground floor parking may not be an attractive prospect to potential buyers as flood water is likely to spoil their cars. Building upwards is the only viable prospect, the Society recognises that some residential development may be required to make the plan viable however there is a concern for the environment and it is not proven how attractive the purchase of homes in a high-area flood area is. The option of commercial units on the ground floor may not be attractive. An approved flood protection policy is essential for existing and future residents and businesses.	Noted. The plan contains extensive flood risk policies and advice for how residential development needs to respond to this risk.
		DREDGING + ARCHAEOLOGY The future of the Plan should be linked to a regular dredging plan. Without a viable and usable waterway this jeopardises the entire scheme. Detailed archaeology surveys should be done for any future development due to the rare Saxon remains.	Both issues are dealt with through the revision plan.
		BRIDGE + GATES The sluice gates need to be repaired, this should be a condition of the plan. The bridge should preferably be replaced with a swing bridge. This will enhance access and connectivity for businesses and residents in the Brents.	The replacement/renewal of the bridge features as one of the key plan objectives.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
20	Faversham Society (cont.)	SITE SPECIFIC The Oil Depot, Coach Depot and Ordnance Wharf may all be contaminated. A thorough investigation needs to be done to make the areas safe before any development is agreed.	The plan deals in detail with these sites (Sites 6, 7 and 8) and encourages a comprehensive approach to all three sites.
		HERITAGE Heritage sites need to be preserved. Ordnance Wharf, Swan Quay and Standard Quay need careful consideration.	Heritage issues are dealt with comprehensively throughout the plan.
		BUSINESS TYPES Where possible maritime and business activities should be encouraged and expanded.	There are regular references throughout the plan to these types of business being encouraged.
		GREEN SPACES Access and open space for residents and visitors should be preserved and expanded.	Green spaces will benefit from additional protection (i.e. Local Green Space designation) through the neighbourhood plan.
		PURIFIER BUILDING Support it back in use as a heritage building and as a training and employment opportunity it provides.	Noted. The plan supports this position.
		ORDNANCE WHARF The society has a preference for Option B. A community boatyard is a suitable use and moorings should be provided alongside the basin.	The revised policy for Ordnance Wharf allows for community uses as part of a mixed-use scheme.
		BMM WESTON Concerned that the rest of the site may be used for high density housing. The higher land at the rear may be more suitable for residential use because of concerns about flooding. There is a concern about the use of buildings at Flood Lane end of the car park and factory site but welcome the improvement of existing footpath along the Creek.	Noted. The policies for Site 3 set out principles for how this site can be redeveloped and acknowledge issues such as higher ground.
		FRANK AND WHITTOME We welcome the retention of Creek creative. Workshops are more in keeping with this environment. Any heights of buildings should not exceed those already existing along Belvedere Road.	Noted. The policies for Site 4 reflect these concerns.
		SWAN QUAY The Society is reluctant to see tall buildings blighting one of the most prestigious heritage sites. Against three and a half storey buildings, no building should exceed TS Hazard. The brick structure to the north of TS Hazard should be removed.	Noted. The plan sets out clear policies on height for the whole plan area, including Site 5, Swan Quay.
		PUBLIC ACCESS Supports the improved public access to the Creek and maritime uses and the access between the Creek and the town, including the small piazza in front of the Swan and Harlequin.	Noted. The plan sets out the need for public access to the waterfront and regularly refers to the Faversham Creek Streetscape Strategy.
		OIL DEPOT Residential use is acceptable but design is very important. Against three storey buildings and need reassurance about land contamination and the impact upon the road network. Welcome the walkway to the Creek frontage.	Noted. Policies for Site 6 set out the mix of uses that are to be encouraged here. Design policies have been strengthened throughout the plan.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
		COACH DEPOT Height of building is a concern and parking on the ground floor. Some housing is acceptable but caveat about road access also applies here. Walkway, moorings and boatyard are welcomed.	Noted. Policies for Site 7 set out the mix of uses that are to be encouraged here.
		STANDARD QUAY Encourage maritime use on this site. Business use is more preferable than residential. The buildings are valuable conservation assets, recognised by Swale BC and the planning inspectorate. Do not believe the restaurant should be part of the plan.	Noted. Policies for Site 8 set out the mix of uses that are to be encouraged here. Design policies have been strengthened throughout the plan.
		STANDARD HOUSE Welcome its refurbishment and do not object to the housing proposed.	Noted.
		FENTIMAN'S YARD Accept the proposals but two storey would be more acceptable. Access needs to be carefully managed.	Noted.
		BRENTS INDUSTRIAL ESTATE Support retention for industrial use.	Noted.
21	Faversham Creek Trust	OBJECTIVES Do not support the objectives as are not prioritised nor do they reflect the proposals for individual sites.	The objectives are broad-ranging and are note site specific. They are deliberately not listed in an order of priority to allow the plan to act in a flexible manner over its lifetime.
		CONFORMITY + HERITAGE The plan fails to protect any coherent role for the Creek as a waterway and marginalises the heritage it claims to protect. The neighbourhood plan process of community involvement and engagement has not been adhered to but is based on what landowners want. Also, the plan is not in conformity with the Local Plan.	The Town Council believes that the plan does address the waterway and the heritage of the Creek in a comprehensive manner. Community involvement is a key part of the neighbourhood plan process, as is the involvement of landowners. The Town Council believes that the plan is in conformity with Local Plan.
		ALTERNATIVES The Plan conforms to landowner aspirations and disregards alternative plans which would result in the sustainable regeneration of the Creek. The plan gives waterfront housing priority over businesses, tourism and community uses. This type of housing does not resolve local need. Overall, the Plan should provide sustainable environmental, economic and social benefits to the neighbourhood and town.	Alternative plans have been considered. The plan has been revised in a way to allow all options to come forward through the planning application process. Housing is part of the plan but will be part of a wider environmental, economic and social mix of uses.
		RESIDENTIAL DEVELOPMENT Residential development has little provision for affordable housing. There is no strategic approach to determining need in terms of type and size, nor the impact upon commercial uses in town. There is little detail on ground floor uses and parking provision, commercial provision and impact of traffic.	The plan asks for 35% of all housing developments to be affordable. Details of type and size will be determined through the planning application process.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
21	Faversham Creek Trust (cont.)	HERITAGE Major omission to the plan is the lack of a heritage assessment as the area is within a Conservation Area and has several Grade II listed buildings. A heritage and conservation assessment should have been undertaken earlier. Undesignated heritage asset register is insufficient and incomplete.	The Town Council believes that the process undertaken to determine undesignated heritage assets is robust and thorough. Heritage issues have a prominent role within the plan.
		HOUSING The overall policy intentions are not reflected in the site-specific policies. HO1 is in direct contrast to the feedback from the June 2013 consultation, where the response was overwhelmingly against further waterfront housing, and in the Faversham 20/20 consultation carried out in April 2012, the Town Council admitted that "... there was little enthusiasm for more waterfront housing".	The plan has to reconcile responses from the public with other considerations, such as the desire for mixed-uses development. A limited amount of housing is encouraged by the plan but it does so as past of mixed-use development.
		EMPLOYMENT The emphasis upon the regeneration of the Creek should be through maritime heritage, tourism and a jobs led neighbourhood plan. The neighbourhood plan is not in conformity with the emerging Borough Plan of retaining maritime activities and improvement of wharves and moorings for Thames barges and other traditional vessels.	The BTE Policies encourage a mix of trades, including maritime trades. The Town Council believes that the neighbourhood plan is in conformity with the Local Plan.
		BASIN The basin should be used for boat repair and restoration with rebuilt wharves and moorings for barges and other vessels providing a year-round tourist attraction. A community centre will provide a meeting place for local people in Davington.	The policies that deal with the basin area allow for all thee uses to come forward.
		NATURAL ENVIRONMENT NE1 Policy NE1 needs rewording to "... planning permission will not be granted if proposed development causes significant harm.' As current statement is not meaningful.	Noted. However, it is felt the current wording is strong enough and is in conformity with the NPPF.
		SITE DEVELOPMENTS There is no mention of the examination process nor the remediation of contaminated land as part of redevelopment process.	These matters will be dealt with through the planning application process.
		POLICY INF4 Why does this only apply to 6 units and above? Smaller units also problematic as the effect is cumulative. Should be amended to "all developments".	The plan requires all planning applications be accompanied by a design/access statement explaining how access, traffic and parking issues are to be addressed.
		GREEN SPACES Green space should be itemised and mapped. Those that are not Town Greens should be designated as Local Green Spaces.	Maps and diagrams added. Green spaces will benefit from additional protection (i.e. Local Green Space designation) through the neighbourhood plan.
		DRAINAGE No there are known drainage and sewerage problems, exacerbated by a lack of data and information. Before any new development is considered a comprehensive assessment should be undertaken of the whole area and be adopted as a basis for any future policies.	Water companies have been consulted as part of the consultation process and their views have been sued to inform the revised plan.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
21	Faversham Creek Trust (cont.)	DESIGN POLICIES These policies are superficial and will not improve the area. All of the modern residential developments that have been criticised for poor design quality would meet these criteria. The policies on materials encourage pastiche. Faversham has wonderful buildings of all periods except the 21 st Century. I would prefer a good modern building to a fake Victorian warehouse.	Design policies have been strengthened considerably and diagrams have been added to explain better design principles rather than be too focussed on use of materials.
		ORDNANCE WHARF The Trust has a preference for Option B as this will bring forward community benefits.	The revised policy for Ordnance Wharf allows for community uses as part of a mixed-use scheme.
		SWAN QUAY Again it is not about improvements but how the site is developed. Serious consideration should be given to Ray Harrison's detailed conservation appraisal and proposals for Swan Quay and Town Quay as a gateway to the creek, making better use of existing buildings and exploiting their heritage value and setting.	Mr. Harrison's appraisal work has been considered during the drafting of the neighbourhood plan. However, the Town Council is confident in its approach to heritage assets.
		OIL DEPOT + COACH DEPOT Concern that the narrowness of these sites may affect views of Oyster Bay House and necessitate the need for housing to be close to the waterfront.	Diagrams have been introduced to the plan to set out where key views are and how redevelopment proposals can respect these. The diagrams also set out open spaces close to waterfront.
		STANDARD QUAY is one of the few remaining quaysides in the south east capable of supporting marine activities. Its use as a peripheral shopping village is not supported by a coherent planning strategy and represents a waste of a scarce heritage resource. The rear buildings of the old granary should be developed as a heritage centre with a properly accredited and curated museum. A café and other visitor facilities could be provided. Combined with a living and working quayside as part of the maritime hub it would transform Faversham as a tourist destination and provide incredible benefits to the town and its people.	The neighbourhood plan is seeking to create a mix of uses, as described, on Standard Quay. These uses need to respond to the heritage context of the site and its maritime setting.
		OTHER SITES Whilst the Trust supports the current uses of Shepherd Neame and Morrisons Supermarket sites there should be policies within the plan to cover any change of ownership or use not only at these sites but all sites in the basin.	The Town Council acknowledge that these two sites (both in current productive occupation) have not been addressed directly by the plan through site-specific policies. However, should either site come forward for redevelopment within the plan period, then Creekwide policies will be applied to both sites.
22	Nova UK Limited <i>comments in respect of Site 6</i>	POLICY OD1 The text stating "... the site shall be developed for residential purposes (Class C3)" is supported.	Noted. This text remains in the revised plan.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
22	Nova UK Limited (cont.)	POLICY OD2 The landowners' proposals include the provision of a walkway along the Creek frontage. However, it is submitted that it is not reasonable for the landowner to ensure access to the adjoining sites by negotiation with those landowners as part of a planning application. This requirement goes beyond the planning process.	The Town Council is keen to ensure a series of connected layouts delivered by the redevelopment of the sites around the Creek. It would be unhelpful for ease of access in future if adjacent sites do not connect. The policy requires landowners/developers to create the best possible connections with neighbouring waterfront sites and this is not seen as an unreasonable requirement. The policy wording in this respect remains unchanged.
		POLICY OD3 "Moorings shall be provided to the Creek frontage and inlet suitable for a variety of vessels of different sizes." This is supported by the landowner.	Noted.
23	Quayside Properties (Faversham) Limited <i>comments in respect of Site 7</i>	POLICY CD1 Use Classes description, that the ground floor shall include a mix of class B1 (offices and workshops), Class A1 (retail) and facilities for boat users. The upper floors to be in residential use (Class C3) and holiday lets (Class C1), is supported.	Noted.
		POLICY CD2 It is requested that the policy be reworded to read. "to the Creek frontage... with regard to the Faversham Creek Streetscape Strategy."	Noted. Text amended.
		POLICY CD3 "Moorings shall be provided along the frontage of the site with heavy duty mooring rings suitable for a wide variety of vessels." This is supported by the landowner.	Noted.
24	Ordnance Wharf Limited <i>comments in respect of Site 2</i>	ORDNANCE WHARF SITE The landowner supports Option A in principle.	
		POLICY OW2 "No new buildings shall be more than three-storeys in height." — there is landowner support for this.	Noted.
		POLICY OW3 "Any development of the site shall include a public walkway." — there is landowner support for this.	Noted.

COMMENTS RECEIVED IN WRITING			
Ref.	NAME	SUMMARY OF COMMENTS RECEIVED	RESPONSE FROM THE TOWN COUNCIL
		POLICY OW4 The landowners current proposals include moorings but it is not considered that these should be available to the public	Noted. Policy wording now states: "... public moorings or moorings associated with the activities of the site" to give greater flexibility.
	Swan Quay LLP <i>comments in respect of Site 5</i>	POLICY SWQ1 "The site shall be used for a mix of retail (A1), restaurant (A3), offices and workshops (B1) and a gallery (D2), with residential (C3) on the upper floors." We would ask that specific reference to gallery and Use Class D2 is deleted. Use Class D2 is assembly and leisure. D1 - non-residential institutions includes art galleries. Artists would display items for sale as part of a studio use or through A1 retail.	Noted. Text has been amended.
		MATERIALS We would also comment that buildings in the Conservation Area are constructed of a wide range of materials and that it would not be appropriate to specify yellow stock-brick and weatherboarding or traditional materials only.	Noted. Text amended to provide guidance on use of materials.
		POLICY SWQ2 Object to the requirement "to standards required in the Faversham Creek Streetscape Strategy." It is submitted that the wording should be amended to read: "and with regard to the guidance in the Faversham Creek Streetscape Strategy."	Noted. Text amended.
		POLICY SWQ3 "Moorings shall be provided to the Creek frontage suitable for all sizes of craft up to and including Thames barges or similar." Moorings are already provided along the Creekside edge of Site 5. The moorings can accommodate one Thames Barge or two or three smaller craft. The moorings are, however, private moorings and not public moorings.	Noted.
		LANDSCAPE WORKS We would ask that the references to land at the junction of Quay Lane and Conduit Street is removed from the Site 5 text. The land proposed for re-landscaping in the Streetscape Strategy is not within the Swan Quay ownership and should be discussed elsewhere within the Plan.	The Town Council believes this is an important public realm project and is closely linked to the redevelopment of Swan Quay and therefore considers this to be the right place to include reference to this project. Text remains in place.
25	Sue Smith	RESIDENTIAL CONCERNS Why is there an emphasis on residential uses being permitted in the plan (i.e. attracting new residents) rather than restaurants and shops (i.e. attracting new tourists) helping regenerate the Creek area?	The plan encourages a mix of uses that will appeal to both residents and tourists alike. The Town Council believes the plan will achieve a balanced approach to land use mix.
[ends]			



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**online survey
COMMENTS RECEIVED**

Q2. Do you support the Faversham Creek Neighbourhood Plan as drafted?

Yes	29.80%	59
No	70.20%	139

plus 138 individual written comments received

Key Themes

- A desire to reduce the size, density and spread of housing development
- Support for maintaining and extending trade/industrial activities in the Creek Neighbourhood
- Concern over lack of public space/amenity and opportunities to develop tourism
- Concern over the lack of priorities suggested in the draft plan.
- The plan needs to be drawn up in 2D and 3D. Further drawings are needed in the plan so people can make sense of it.

Proposed Revisions to the Neighbourhood Plan

The Town Council believes that the neighbourhood plan must encourage a balanced range of uses, that includes residential, employment, leisure, community uses, cultural uses and other complementary uses.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Stronger protection for open spaces has been introduced into the revised neighbourhood plan.

Priorities have not been strictly defined and remain flexible to allow the neighbourhood plan to respond to opportunities as they arise in future.

A series of 2-D drawings have been introduced to help make the plan more accessible and the ideas more understandable.

Q3. Do you agree with the balance in the Draft Plan between residential and commercial uses?

Agree Strongly	13.85%	27
Agree Somewhat	17.44%	34
Neutral/No Opinion	2.56%	5
Disagree Somewhat	17.44%	34
Disagree Strongly	48.72%	95

plus 135 individual written comments received

Key Themes

- The balance is too far in favour of residential development in the view of most respondents who made a comment.
- Concerns about proposed height of development restricting views and light.

Proposed Revisions to the Neighbourhood Plan

The Town Council believes that the neighbourhood plan must encourage a balanced range of uses, that includes residential, employment, leisure, community uses, cultural uses and other complementary uses. The Town Council believes that this mix is vital to ensure a vibrant, active and safe mixed-use waterfront into the future. The neighbourhood plan will therefore continue to support new residential uses as part of a broader mix of uses, subject to such proposals being of the right scale, in the right location and of high quality design.

The Town Council acknowledge concerns that the introduction of new residential uses could prevent the development of employment or manufacturing uses on nearby or adjacent sites. However, the Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Q4. What additional businesses and facilities/ amenities would you like to see around the creek area to add to employment and to encourage visitors to the creek?

166 individual written comments received

Key Themes

- Additional mooring facilities for pleasure craft
- Showers and fuel, modelled on many small towns in the Netherlands
- Designs in keeping with nautical history
- Boat restoration businesses
- More opportunities for leisure activities on the water
- Retaining boat yards is vitally important.
- Perhaps a boat tours facility
- Visitors come to the Creek and Faversham because it is medieval market town and port.
- Providing interest for visitors such as different crafts/ jewelry/ interesting things that people will want to part money for.
- Arts and crafts and anything nautical

Proposed Revisions to the Neighbourhood Plan

The Town Council believes that the neighbourhood plan must encourage a balanced range of uses, that includes residential, employment, leisure, community uses, cultural uses and other complementary uses. The Town Council believes that this mix is vital to ensure a vibrant, active and safe mixed-use waterfront into the future. The neighbourhood plan will therefore continue to support new residential uses as part of a broader mix of uses, subject to such proposals being of the right scale, in the right location and of high quality design.

Q5. Do you consider that it is essential to have an opening bridge, gates and working sluices?

Yes	90.86%	179
No	3.55%	7
Unsure	5.58%	11

plus 117 individual written comments received

Key Themes

- The importance of easing the passage along the creek for water craft
- The importance in the view of respondents of maintaining water in the basin.

Proposed Revisions to the Neighbourhood Plan

No change. The revised neighbourhood plan continues to reference the need for a working bridges as an objectives of the plan.

Q6. Do you consider that it is essential to have a continuous walkway around the creek as far as practicable, connecting to the town and to the marshes?

Yes	73.13%	147
No	18.91%	38
Unsure	7.96%	16

plus 115 individual written comments received

Key Themes

- Support and enthusiasm for walkways alongside the creek.
- Acknowledgement that this will be difficult to achieve in some places
- Attractiveness and value of such walkways as a public amenity and practicality for accessing the creekside.

Proposed Revisions to the Neighbourhood Plan

The revised neighbourhood plan continues to reference the need good public access to the waterside, as continuous as possible.

Introduction of new design principle diagrams to make the case for this more clearly and more strongly.

Q7. Do you agree with the policies on the Natural Environment?

Yes	90.86%	179
No	3.55%	7
Unsure	5.58%	11

plus 61 individual written comments received

Key Themes

- Need for Impact Assessment
- Remediation of previously polluted/contaminated land
- Desire for size of green spaces to be maintained and/or increased
- Concern over lack of understanding/awareness of policy position on Natural Environment amongst respondents

Proposed Revisions to the Neighbourhood Plan

No change. The revised neighbourhood plan continues to reference natural environment policies.

The Local Planning Authority is to advise on the need for a Strategic Environmental Assessment (SEA) and/or HRA (Habitats Regulation Assessment). Initial consultation responses from various statutory agencies have suggested these are likely to be required but no formal screening opinion has been received as yet.

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Q8. Do you agree with the policies on infrastructure?

Yes	41.30%	76
No	27.72%	51
Unsure	30.98%	57

plus 76 individual written comments received

Key Themes

- Need for Impact Assessment
- Lack of clarity or understanding of the policy content
- Challenges for parking/access in Abbey Street
- Anticipated issues of congestion in area

Proposed Revisions to the Neighbourhood Plan

No change. The revised neighbourhood plan continues to reference infrastructure policies.

Abbey Street is outside the plan boundary so cannot be addressed directly by policies within the neighbourhood plan.

The Local Planning Authority is to advise on the need for a Strategic Environmental Assessment (SEA) and/or HRA (Habitats Regulation Assessment). Initial consultation responses from various statutory agencies have suggested these are likely to be required but no formal screening opinion has been received as yet.

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Q9. Do you agree with the policies on flooding?

Yes	41.40%	77
No	32.80%	61
Unsure	25.81%	48

plus 102 individual written comments received

Key Themes

- Concerns over the practicality of building in a flood zone and the area's recent re-designation/downgraded flood risk
- Availability of insurance for properties built in the area
- Questions over the compatibility of housing in an area prone to flooding
- Feasibility and effectiveness of draining and flood defences

Proposed Revisions to the Neighbourhood Plan

No change. No comments or objections with regard to the draft flooding policies were raised by the Environment Agency in its response to the draft plan. The revised neighbourhood plan therefore continues to reference flooding policies as previously, which are considered sufficient to meet the needs of the plan area.

Q10. Do you agree with the policies on the historic environment?

Yes	54.59%	101
No	26.49%	49
Unsure	18.92%	35

plus 86 individual written comments received

Key Themes

- Concerns that insufficient weight is being placed on the importance of preserving the historical character of the area
- Questions about how the proposed plan complies with the policies

Proposed Revisions to the Neighbourhood Plan

The Town Council believes that the neighbourhood plan strikes the right balance between preserving and enhancing heritage assets and managing change into the future.

The Town Council acknowledges that some respondents wish to see more undesignated heritage assets within the plan and stronger/more robust heritage policies. However, it believes that the current list of assets and the associated protection policies are sufficient to meet the needs of the creek moving forward.

Therefore, the revised neighbourhood plan continues to reference heritage policies as previously but the introduction of new design principle diagrams will help make the case for them more clearly and more strongly.

Q11. Do you agree with the policies on community, leisure and recreation?

Yes	53.01%	97
No	18.03%	33
Unsure	28.96%	53

plus 87 individual written comments received

Key Themes

- Lack of clarity about how the proposed plan will deliver enhanced community, leisure and recreation facilities
- Concerns about poor facilities available at present
- Support for provision of enhanced facilities, particularly outdoor activities

Proposed Revisions to the Neighbourhood Plan

The Town Council agrees that the level of community facilities is inadequate in certain areas and supports the view that the neighbourhood plan should seek to address this.

The Town Council believes that the neighbourhood plan needs to continue to reference community, leisure and recreation uses as previously to ensure that all new development proposals help deliver such uses within the plan area.

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Q12. Do you agree with the policies on business, tourism and employment?

Yes	48.09%	88
No	27.87%	51
Unsure	24.04%	44

plus 91 individual written comments received

Key Themes

- Concerns that too much emphasis on housing will crowd out other development
- Desire for tourism activities/developments to be balanced with other commercial activities
- Questions over the compatibility of residential/industrial/maritime/retail/restaurant activities in the same area
- Questions about how the plan will deliver on local aspirations

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Proposed Revisions to the Neighbourhood Plan

The Town Council believes that the neighbourhood plan will allow for a successful blending of uses for the future.

The impact of development proposals on local aspirations will need to be determined at the planning application process, assessed against the framework set out in the neighbourhood plan.

Q13. Do you agree with the policies on housing?

Yes	25.52%	49
No	59.38%	114
Unsure	15.10%	29

plus 133 individual written comments received

Key Themes

- Housing/flooding
- Height
- Affordable housing

Proposed Revisions to the Neighbourhood Plan

The Town Council believes that the neighbourhood plan must encourage a balanced range of uses, that includes residential, employment, leisure, community uses, cultural uses and other complementary uses. The Town Council believes that this mix is vital to ensure a vibrant, active and safe mixed-use waterfront into the future. The neighbourhood plan will therefore continue to support new residential uses as part of a broader mix of uses, subject to such proposals being of the right scale, in the right location and of high quality design.

The Town Council acknowledge concerns that the introduction of new residential uses could prevent the development of employment or manufacturing uses on nearby or adjacent sites. However, the Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Q14. Do you agree with the policies on design parameters?

Yes	32.78%	59
No	28.33%	51
Unsure	38.89%	70

plus 78 individual written comments received

Key Themes

- Concerns of height of any new developments
- Contrasting views over the preference for modern/traditional building materials and architectural styles
- Lack of clarity/understanding of policies
- Concern that generic/ordinary architecture will be favoured in developments – mitigating against outstanding/innovative proposals

Proposed Revisions to the Neighbourhood Plan

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Introduction of new design principle diagrams to make the case more strongly for integrated and responsive design.

New design text and policy has been written to strengthen this section, with new DQ4 and DQ5 added.

The policy code has changed to DQ for “Design Quality” – more positive than “Design Parameters” as previously.

A new section on “urban analysis” has been added as this assessment was previously absent. A better understanding of urban form is important as it will give a greater steer to how the individual sites should be developed.

Q15. Which option do you prefer at Site 2, Ordnance Wharf and why?

Option A	13.44%	25
Option B	86.56%	161

plus 132 individual written comments received

Key Themes

- Overwhelming support for Option B: Option B: 2--storey, workshop and community centre with community boat yard.
- Concern that 3 storey development is unsuitable and out of keeping with the area
- Strong view that housing is inappropriate in this location
- Concern over compatibility of industrial and residential in close proximity

Proposed Revisions to the Neighbourhood Plan

The text associated with Ordnance Wharf has been revised to reflect a “baseline” position that will allow for either of the two options previously described or indeed, other alternatives. The plan now describes a set of design principles and future planning applications for the site will be judged against them.

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Q16. Do you support the proposal for Site 4, the former Frank & Whittome site?

Agree Strongly	20.94%	40
Agree Somewhat	41.88%	80
Neutral/No Opinion	11.52%	22
Disagree Somewhat	13.09%	25
Disagree Strongly	12.57%	24

plus 93 individual written comments received

Key Themes

- Broad-based support for the proposal
- Support for continued support of Creek Creative and acknowledgement of its contribution to the cultural life of the town
- Concern that more housing should not be permitted
- Concern over traffic at the junction with Belvedere Road

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Proposed Revisions to the Neighbourhood Plan

The policy text for Site 4 has been adjusted in response to various comments received but remains broadly the same.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Introduction of new design principle diagrams to make the case more strongly for integrated and responsive design.

Q17. What improvements would you like to see around the Swan Quay (Site 5) Area? Please tick all that apply.

Traffic calming
44.00% 77

Plaza/streetscape improvements
47.43% 83

Moorings for boats
90.86% 159

Mixed development including housing/workshops/retail
30.29% 53

plus 99 individual written comments received

Key Themes

- Substantial support for proposed moorings
- Concern for the preservation of the site's historic character
- Concerns over traffic in the area

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 5 has been adjusted in response to various comments received but remains broadly the same.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Introduction of new design principle diagrams to make the case more strongly for integrated and responsive design.

Q18. Do you have any additional suggestions for improvements to the Swan Quay area?

88 individual written comments received

Key Themes

- Idea of workshops and small retail outlets
- Seating, picnic area, a nice park and parking
- Easier access for small vessels, canoes and kayaks would lead to the greater use of the creek for recreation.
- Public access to the creek needs to be maintained and the view across the creek from Front Brents, through Quay Lane the Church
- The historic value of the site must be recognised so that people understand its contribution to the importance and wealth of Faversham in medieval times.
- Ray Harrison's proposals for Swan Quay and Town Quay should be included as an option within the Draft Plan.
- The over development on this site proposed under this plan would be a dreadful eyesore completely destroying the tranquil views of the Town and the lovely church spire from the Brents side.
- Quayside walkway and green grass space to sit at water, maybe a cafe
- Space should be made for access to the slipway which itself could be enlarged; this would encourage use of the creek by small boats and canoes.
- I agree with workshops and other small businesses like retail outlets.
- Cultural/creative activity small museum etc.
- Proper creekside wharf with open air cafe and craft shops
- Boat trips/hire

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 5 has been adjusted in response to various comments received but remains broadly the same. The plan refers to different development options that could be permissible but neighbourhood plan places responsibility firmly upon any applicant to demonstrate the appropriateness and suitability of their proposed design through the formal planning application process. This demonstration must be made with regard to the range of policies in this neighbourhood plan, not just the site-specific ones.

Q19. Do you agree with the proposals for the Oil Depot (Site 6)? If not, what would be your preferred option?

Yes	37.04%	70
No	62.96%	119

??? individual written comments received

Key Themes

- Mixed views on residential, maritime, light industrial and retail
- Concerns over traffic and height of any buildings
- Support for creek frontage to be used for moorings/dry dock

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 5 has been adjusted in response to various comments received but remains broadly the same. The neighbourhood plan places responsibility firmly upon any applicant to demonstrate the appropriateness and suitability of their proposed design through the formal planning application process. This demonstration must be made with regard to the range of policies in this neighbourhood plan, not just the site-specific ones.

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Q20. Do you agree with the proposals for the former coach depot (Site 7)? If not, what would be your preferred option?

Yes	37.16%	68
No	62.84%	115

plus 125 individual written comments received

Key Themes

- Similar views to Site 6 (Oil Depot)
- Support for maritime use given proximity to Standard Quay
- Concern over height of any new buildings

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 6 has been adjusted in response to various comments received but remains broadly the same. The neighbourhood plan places responsibility firmly upon any applicant to demonstrate the appropriateness and suitability of their proposed design through the formal planning application process. This demonstration must be made with regard to the range of policies in this neighbourhood plan, not just the site-specific ones.

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Q21. Do you support continued use of Standard Quay (Site 8) for small businesses and the Cambria Museum?

Agree Strongly	36.98%	71
Agree Somewhat	24.48%	47
Neutral/No Opinion	3.65%	7
Disagree Somewhat	11.46%	22
Disagree Strongly	23.44%	45

plus 104 individual written comments received

Key Themes

- Generally supportive of proposal
- Great concern for the protection of the maritime heritage of this area
- Support for preservation as working maritime area
- Little support for use as retail/restaurant area
- Mixed views on value of Cambria museum

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 8 has been adjusted in response to various comments received but remains broadly the same. The neighbourhood plan places responsibility firmly upon any applicant to demonstrate the appropriateness and suitability of their proposed design through the formal planning application process. This demonstration must be made with regard to the range of policies in this neighbourhood plan, not just the site-specific ones.

Q22. What additional facilities would make the Standard Quay (Site 8) area including the former coach depot (Site 7) more attractive?

Retail	21.15%	33
Small Businesses	46.30%	75
Holiday Lets	9.74%	15
Residential on upper floors at coach depot	12.42%	19
Toilets + showers for boat users	67.82%	118

plus 82 individual written comments received

Key Themes

- Facilities for boat owners seen as most attractive facility
- Residential/Holiday Lets seen as least attractive option
- Questions of compatibility of maritime industries with residential/holiday lets/retail
- Concerns over traffic congestion in Abbey Street
- Support for facilities which promote maritime use of area i.e. businesses serving boating/boat building

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 8 has been adjusted in response to various comments received but remains broadly the same. It now requires that development proposals consider the incorporation of showers and toilet facilities for boat users, responding to the feedback from Q.22

Q23. Do you agree with the proposal for the Standard House area (Site 9)?

Yes	63.49%	120
No	17.99%	34
Unsure	18.52%	35

plus 81 individual written comments received

Key Themes

- Strong support for proposal
- Considerable concern about proposals to change vehicular access to Standard House
- Suggestions of hotel as alternative to residential use

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 9 has been adjusted in response to various comments received but remains broadly the same. The neighbourhood plan places responsibility firmly upon any applicant to demonstrate the appropriateness and suitability of their proposed design through the formal planning application process. This demonstration must be made with regard to the range of policies in this neighbourhood plan, not just the site-specific ones.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Q24. Do you support the proposal for Fentiman’s Yard (Site 10)?

Agree Strongly	27.46%	53
Agree Somewhat	40.41%	78
Neutral/No Opinion	16.58%	32
Disagree Somewhat	8.29%	16
Disagree Strongly	7.25%	14

plus 51 individual written comments received

Key Themes

- Broad support for proposal
- Stronger approval of housing kept to 2 storeys
- Traffic issues of concern

Proposed Revisions to the Neighbourhood Plan

The policy text for Site 10 has been adjusted in response to various comments received but remains broadly the same.

The Town Council acknowledges the concerns about height, scale and massing of new residential uses and has therefore strengthened the design content of the neighbourhood plan to address this.

Q25. What are your top three priorities for additional facilities in North Preston (from the Creek Bridge along to Upper Brents, Reedland Crescent to Broomfield Road, Goldfinch Close, Kennedy Close etc across to Priory Row)?


63 individual written comments received

Key Themes

- A community centre open all the time and welcoming to all
- Family picnic areas along Front Brents
- A multi-functional community centre on the creek waterfront within walking distance
- A landscaping strategy that will bring out the best features of the area
- Flood protection
- Training and employment opportunities for unemployed/younger people

Proposed Revisions to the Neighbourhood Plan

The revised plan includes greater protection (i.e. Local Green Space Designations) for open green space on the Brents side of the creek in accordance with the NPPF.



Q26. Is there any other issue on any site not mentioned about which you would like to make a suggestion?

91 individual written comments received

Key Themes

- Comments regarding the BMM Weston site
- Comments regarding the Purifier Building
- Concern over impact of parallel consultation undertaken by other interested local groups

Proposed Revisions to the Neighbourhood Plan

The introduction of new design principle diagrams to make the case more strongly for integrated and responsive design. This will help address how sites like BMMW, the Purifier can fit into a bigger picture.

The Town Council believes that the neighbourhood plan must encourage a balanced range of uses, that includes residential, employment, leisure, community uses, cultural uses and other complementary uses. The Town Council believes that this mix is vital to ensure a vibrant, active and safe mixed-use waterfront into the future. The neighbourhood plan will therefore continue to support new residential uses as part of a broader mix of uses, subject to such proposals being of the right scale, in the right location and of high quality design.

The Town Council acknowledge concerns that the introduction of new residential uses could prevent the development of employment or manufacturing uses on nearby or adjacent sites. However, the Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.



CONCLUSIONS

Key themes

The Town Council acknowledges that the Regulation 14 consultation period revealed a significant level of public opinion that wants very little or no residential development at all in the creek area. It also appears that there is a strong desire to see land and buildings set aside for specific types of maritime trades and activities, namely those related to heritage boat building and repair.

Town Council response

While the Town Council appreciate and respect these views, it has concluded that if the neighbourhood plan were to be drafted in such a precise and restrictive way, it would not create the type of welcoming and balanced mixed-use place that is required for the long term regeneration of the creek area. The creek needs to be a thriving living and working environment, both night and day, and the plan needs to allow for a mix of uses to be develop over the plan period.

While the drafting of a neighbourhood plan must have regard for public opinion and be developed through extensive public consultation and engagement, the qualifying body (i.e. the body responsible for producing the plan, in this case Faversham Town Council) must balance the views of the public against a range of other factors, including technical advice, best practice in planning and urban design, land owner interests, national and local planning policy and other guidance. A qualifying body is not obliged to revised a neighbourhood plan to be strictly in line with public opinion.

A compatible mix is achievable

Furthermore, the Town Council believes that through carefully planning and design, the desire to see more maritime trades and crafts, as expressed through the Regulation 14 consultation, can indeed be realised as part of a wider package of development. The Town Council does not believe such activities are incompatible with a wider mix of living, working and leisure uses.

When considered as an integrated whole, the redevelopment opportunities to be found in the creek area are varied and extensive. These opportunity sites contain significant space, often outdoor space or on the ground floors, where the types of marine-related trades and crafts as described by many of the respondents can find a home and flourish. A key message of the revised plan is that the neighborhood plan does not consider residential uses to be incompatible with most industrial uses. The Town Council believes that the neighbourhood plan will allow for a successful blending of uses so that no one activity prevents other activities from successfully taking place within the neighbourhood plan area.

Creating a robust plan

There is also the context of the recently adopted National Planning Policy Framework (NPPF) to consider. The Town Council believes that a neighbourhood plan that defines the type of industrial activity very narrowly (e.g. boat repair and/or building) and excludes residential uses completely will not be robust enough to pass examination. If it does not pass examination, it would not be allowed to proceed to referendum and, subject to a vote in favour, become a statutory plan.

The Town Council believes that the biggest risk facing the successful regeneration of the area is for development to proceed in the absence of an adopted plan. Without guidance for each of the opportunity sites and the creek as a whole, there is a risk that none of the non-residential uses and community benefits will be realised. The Town Council therefore believes that an adopted statutory plan in place for the creek area, in the form of a robust neighbourhood plan, embedded into the new Swale Local Plan, is the best way of achieving the balanced mix of uses that the wider community wish to see in the creek area.

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