

<b>Statement No.: WR/SBC/136/1</b>	
<b>SWALE BOROUGH LOCAL PLAN FIRST REVIEW</b>	
<b>STATEMENT BY THE LOCAL PLANNING AUTHORITY</b>	
<b>Subject:</b>	Omission Site – Land off Coronation Drive, Warden Bay
<b>Objector(s):</b>	<i>Mr Brian Nash (0500/2985 &amp; 0500/5966)</i>
<b>Supporter(s):</b>	-

### **Introduction**

1. This statement is intended to address objections into the non-allocation of land off Coronation Drive, Warden Bay for the housing. Matters relating to housing land supply, public open space and countryside gaps are not addressed by this statement.

### **Background**

2. Leysdown, Bay View, and Warden are settlements located at the extreme eastern end of Sheppey. Leysdown has essentially established itself as a service centre in three ways. Firstly, as the nucleus of two satellite settlements – Bay View and Warden, secondly, because of the holiday villages established around the settlement, and, thirdly, because of its isolation that has perhaps led to this settlement having a higher number of facilities than might be expected. Of the holiday park development, much of this occurred in the post-WW2 period, and these commercial chalet parks, together with the holiday amusements and associated businesses, now strongly define the character of Leysdown, Bay View and Warden

3. The Parish (comprising Leysdown and Bayview) 2001 Census figure records a ‘full-time’ population of around 1,250, however, the summer population expands significantly – not surprising given that there are more than 3,500 caravans/chalets in the Leysdown/Warden Bay area.

4. The village contains some essential services that are available all year ‘round, and is served by limited bus services. However, the location is remote from centres of population and major services, with Sheerness town centre approx 11 km distant, and Sittingbourne town centre some 19 km distant.

5. The above characteristics led to the identification of Leysdown as a Local Service Centre in Policy SH1 of the Re-deposit Local Plan. Policy SH1 maintains a focus on development on previously developed land within such Local Service Centres, with limited expansion of villages for services/employment accepted where no harm will be caused to the settlement pattern or surrounding countryside.

### **Site and Location**

6. The subject land has an area of approximately 4.2 hectares situated between Bay View (to the west) and the existing Saddlebrook Holiday Park (to the east). The land is currently open in nature although there is some evidence of previous earthworks/dumping of spoil and/or parking of vehicles. There is an existing open drain running along the northern

boundary. The site is generally free from vegetation apart from some trees and shrubs along the southern and western boundaries.

7. The objector advises that the site is in Warden Bay, but the Council would suggest that the address is Bay View.

**Mr Brian Nash (0500/2985 & 0500/5966)**

**Summary of Objections**

8. Objections have been made at both the first and re-deposit stages of the Local Plan. Mr Nash objects to the plan on the basis that the subject land has not been allocated for housing development. The objection indicates that the site is situated between an existing holiday camp and housing, and would provide for 30-40 low cost homes.

9. The objection argues that the 1996 Kent Structure Plan is now out of date and that demand for housing sites in the south east has grown at an alarming rate. The objection goes on to state that Local Plans and Structure Plans by their very nature are restrictive and have held back housing – creating a situation which is now reaching crisis point. This has not met the housing envisaged by PPG3.

**Omission Site Consultation**

10. The Council has undertaken consultation on all the submitted omission sites. Three objections have been received. These are:

*Francis & Brenda Hardman*

Objection to development of the land on the basis that development would destroy the community of Bay View and join it with Warden Bay, the area suggested for development is very low lying and has already been the subject of flooding and there is a general lack of services at the eastern end of the Island to support additional growth (ie schools, doctors, roads, health services etc).

*Leysdown Parish Council*

Objection to the development of the land on the basis that it is a greenfield site and that its development would cause problems for the eastern end of the island – there is a lack of appropriate road infrastructure in the area as well as over-subscribed schools and a lack of other facilities.

*CPRE*

Object to the allocation of the site for housing on the basis that the site is Greenfield land, is situated outside the built-up area boundary, within the coastal zone and would lead to an intrusion into the countryside. In addition there is no identified additional local need, there is no access to employment and such a development would not be sustainable.

## Local Planning Authority's Response

### Housing Land Supply and Settlement Strategy

11. It is not the Council's intention to repeat its position on housing land supply. This was discussed in detail at the Housing Round Table Session, whilst the Council's position is set out in detail in the Housing Topic Paper (TP5). However, it is the Council's very simple contention that notwithstanding any conclusion reached on the housing land supply issue, it is unlikely that any search for additional housing will lead to the identification of the Bay View/Warden/Leysdown area as a suitable location.

12. The Council has looked to the Structure Plan to see if there is any basis of support for this allocation. It can find little. The site would fall well down the search sequence provided by Policy HP2 of the adopted Kent & Medway Structure Plan.

13. The eastern end of Sheppey, as a location for development, features low down the list of priorities for further development in the Borough. Putting aside the Inspectors views on housing supply, the Council contends that even in the event of a significant shortfall in housing land, it will not be to this area that the Inspector should look.

### Proposed density

14. It is noted that the applicant proposes that up to 40 dwellings could be provided on the site. Based on the site area of approximately 4.2 hectares this equates to a proposed density of around 10 dwellings per hectare. This falls well short of the density requirements set out in Planning Policy Guidance 3 (and emerging PPS3).

15. The Council recognises a dilemma here, as to increase the density in order to achieve Policy requirements would result in a development that would not sit well with the nature and character of existing developments in the area which have a generally lower density. In particular, nearby holiday chalet/caravan parks have a very scattered and open appearance. This adds weight to the argument that the site is simply not suited to residential development.

### Rural Settlement Policy

16. Part (d) of the KMSP Policy SS1 deals with development of rural settlements and states that:

*'(d) development at rural settlements should be concentrated at the Rural Service Centres identified on the Key Diagram. Proposals for development at other rural settlements, identified in Local Development Documents, should demonstrate that such development would be sustainable.'*

17. It is to be noted that no settlement in this locality constitute a 'rural service centre' within the meaning of the Kent & Medway Structure Plan. Secondly, the objector brings little evidence to the Inquiry to indicate that the proposed site is suitable on sustainability terms e.g. no evidence of any new services that would be provided, no support for public transport etc.

18. Policy SS7 of the Kent and Medway Structure Plan states in part (b) that development at rural settlements should be 'small-scale' and have good public transport access and connectivity and have an existing core of community services and employment. The Council does not consider the omission site to be small scale in the context of Bay View. In this

context, it is interesting to note the potential housing yield from this site - the site has an area of 4.2 ha, which at a development density of 30 dph would yield some 126 dwellings. There are an existing 789 households in the Parish (including the three settlements of Bay View, Leysdown and Warden) and this development would therefore represent an increase of approximately 16%. As an extension to Bay View there would be a significantly greater increase – Bay View has 248 existing houses, as such, the proposal would represent an increase of approximately 51%.

19. The Council notes that the final part of SS7 allows for an exception to be justified by reference to 'special local justification that may include the provision of affordable housing, community facilities or the expansion of an existing established business.' However, the test is that development must still be small scale. It will also be noted that this objector brings to the Inquiry no evidence of the need for affordable housing at this settlement. Indeed, the Council would contend that to locate the occupants of affordable housing units, who may be elderly, or without access to a car, at a settlement with little employment base and poor public transport, would represent very poor planning.

20. Finally, for completeness, Policy HP5 of the Structure Plan states that sites allocated for housing development should be consistent with Policy SS8. The Inspector will already be aware that this is an error, confirmed by KCC, and should refer to Policy SS7.

21. The Council is clear that there is no basis for allocating this site in terms of Policies of the adopted Kent and Medway Structure Plan.

#### Flood Risk

22. According to the maps prepared by the Environment Agency, the entirety of the land is subject to flood risk. Under these circumstances the land would be subject to the provisions of PPG25. The Council would contend that there are other sites at lower risk that are available for development in the event of a housing land shortfall.

23. The objector has made no comment as to how the allocation of the land for housing would be affected by the provisions of PPG25.

#### Sustainability (inc. toolkit)

24. The Council's Sustainability consultant Entec, in association with the Council, have prepared a short statement using the appraisal 'toolkit' they have developed. This, in turn is based on the sustainability appraisal framework of objectives used in the Council's own draft integrated SEA/SA. The 'toolkit' was made available to all objectors, although the Council has no record of the objector completing the toolkit for this site. The Council/Entec appraisal is included as Annex 1 to this proof. Its concluding remarks are:

*'The site is situated at Bay View – one of a number of settlements located at the extreme eastern end of Sheppey. The location and nature of development in this area makes any significant housing development unsustainable. Developments should focus on small scale, organic growth to settlements in order to promote additional service provision for the local community.'*

*Social - The proposed development is not well located with regard to existing services and facilities. Although the area is ranked highly on the Index of multiple deprivation (where the addition of affordable housing may have some benefit), it is likely that the lack of many services (education, health, recreation etc) is likely to result in the area being poorly situated for affordable housing.'*

*Environmental - The proposed density on site is far below national guidelines promoting the use of land at appropriate densities. The site is also within an area of coastal flood risk. Therefore it does not score well against environmental sustainability criteria. In addition, the site is distant from many services provided by larger town centres and poor transport links is likely to result in strong dependence on the car.*

*Economic - The proposed development could help support the local tourist industry, providing housing for workers within the tourist industry and providing holiday homes bringing money into the local economy.'*

25. As a general point, settlements on Sheppey become less sustainable as you progress eastwards, becoming increasingly isolated from the transport infrastructure and facilities that serve the larger settlements of Sheerness/Minster, and the Borough's main town at Sittingbourne. Leysdown/Bay View's poor sustainability performance derives mostly as a result of its location, associated lack of public transport and lack of employment opportunities.

26. In 2001 the Council undertook a sustainability study of the rural settlements in Swale (CD34). Although limited in its scope it examined the levels of service and transport provision in the settlements concerned and produced a simple matrix scoring to list settlements in terms of their relative sustainability of location (Table 8 of CD34). In simple terms out of 40 settlements, Leysdown, Warden Bay and Bay View perform poorly (with Bay View and Warden Bay listed within the bottom 5 on the matrix). Whilst such results must be interpreted cautiously, in terms of location the study provides supplementary supporting evidence to the Council's case that the subject land is not situated within a sustainable location.

27. In more detail, the sustainability of Bay View/Warden Bay/Leysdown is severely limited as a result of poor transport links – there is no rail link and limited bus transport. Monday to Friday there is one shoppers service each way to Chatham, and a very occasional (1 every 1 to 2 months) service to Bluewater and Lakeside. The main service is the 360/362, which operates occasionally half hourly, but mostly hourly, Monday to Friday services into Sheerness until 1842 hrs. The last service back to Leysdown is 1811 hrs from Sheerness and there is thus no evening service. The journey is some 40 minutes to Sheerness Town Centre (and with a connecting train the trip to Sittingbourne would be more than an hour). Services reduce during school holidays, whilst a limited Sunday service is operated with public subsidy. The Council understands there to be just two services leaving Leysdown on this day. The costs of return journeys to Sheerness are also high – in excess of £5.00.

28. In the Ward, car ownership is high (80.7%), but a significant proportion of the non-car owners are pensioners. 51% of the working population travel over 10 km for employment – with employed residents currently travel an average of 22.5 kilometres to their place of work (the Borough average is 17 km). Total journeys amount to 72% travelling to work by car, with just 3.6% using the bus.

29. The primary road network is some 11 km from Leysdown.

30. No primary or secondary education facilities are available in Bay View or Leysdown, with the village of Eastchurch (5 km away) providing the nearest primary school. There are three non-selective middle schools located in Minster and Sheerness (between 8 and 11 km away). Many parents send their children to select secondary schools in Sittingbourne, some 19 kilometres away (there are no select secondary schools on the Island).

31. Leysdown has average service provision available locally, including pubs, a post office, a church, village hall, GP, police station, and a number of grocery outlets, off-licences and newsagents – sometimes situated within the same building. However, for more major supermarkets, civic services, and other facilities including health care and entertainment will all require journeys at least to Sheerness, or even Sittingbourne.

32. In addition, there is limited access to local employment with no significant employment opportunities at the eastern end of the Island outside the holiday and service industry sectors. Whilst not wishing to degrade the contribution made by these sectors, they are low skilled, seasonal, low paid, and do not offer a diverse employment base to encourage people to live and work locally or for young persons to stay. 30% of the Ward population is over 55 years of age. Leysdown is in a Ward displaying high levels of deprivation. These development proposals will make no positive contribution toward tackling the issues that these communities face.

33. Limited employment options are something not only faced by communities at the eastern end of the island, but also are common to the Isle of Sheppey as a whole. This results in many residents being forced to travel for employment and it has been previously commented to the Inspector that more than a third of all employed persons living on Sheppey travel off the island for work. However, for residents at Leysdown, this is a settlement that largely functions in a dormitory role.

34. The evidence of this localities poor position to contribute to fostering sustainable patterns of development is, the Council would suggest, overwhelming. Whatever unspecified advantage there may be to the settlement to locating development here, they are overwhelmed by the unsustainable attributes of the locality that would be exacerbated by development.

35. It is the Council's view, that the proposals are contrary to Policy SP1 of the Kent and Medway Structure Plan.

#### Loss of Agricultural Land

36. Policy EP9 of the Kent and Medway Structure Plan looks to protect the long-term productive potential of all agricultural land in Kent unless there is an overriding need. It then seeks to provide guidance in respect of best and most versatile agricultural land. Whilst land on Sheppey is not generally of this quality, if this site is not required to meet housing needs, then the need to protect the resource should not be disregarded.

#### Landscape/Countryside Issues

37. The site is located in open countryside.

38. The Council is concerned that allocation of the site will result in undesirable impacts in terms of encroachment into open countryside and would have a significant impact on the character of the area. At the current time the land forms a significant open area separating Bay View and the Saddlebrook Holiday Camp and Leysdown. Its development is contrary to Policy QL4 of the Kent and Medway Structure Plan.

39. In addition, the Council considers the proposals to offend Policies EN1 and EN3 of the Structure Plan, in that there is no overriding need to put aside policies intended to protect the countryside and areas unspoilt and free from urban intrusion.

#### Highways

40. Kent Highways raise no objection to the allocation although they have commented that the state of nearby roads would limit the development potential of the land leading to a requirement to limit densities/dwelling numbers.

41. There is a dilemma here, as limiting densities for any development on the basis of poor access will result in non-compliance with Policies aimed at ensuring appropriate density and efficient use of land.

### **Conclusions**

42. The Bay View/Leysdown area is not identified as a strategic location for development in KMSP Policy SW1, furthermore it is not an early area of search for development in KMSP Policy HP2. The Council would argue that any search of additional land to meet any identified shortfall in housing supply could be accounted for in other areas of the Borough that are more suited in sustainability terms.

43. The location is not one supported for rural growth by policies of the Kent and Medway Structure Plan (SS1, SS7 and SS8) and does not represent small scale growth as required by these policies.

44. Despite its Local Service Centre status in Policy SH1 of the Re-deposit Local Plan, Leysdown or its environs are not identified for any housing growth outside its built-confines, primarily because of its remote and unsustainable location.

45. The objector brings little evidence to the Inquiry to support the notion that services can be supported or that affordable housing is needed. The Council notes that all major service provision is far afield from Warden Bay/Bay View/Leysdown, that public transport provision is not what it could be, and that, fundamentally, there is no diverse employment base on which to base a strategy of growth.

46. Development here is wholly unsustainable in the Council's view.

### **Change to Policy/Text in the event that the objection is allowed**

47. None offered.

### **Recommendation**

**That no change be made to the Local Plan in response to these objections.**

**Annex 1 – Sustainability Appraisal**