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## Planning Statement

**Dickens Inn, Fourth Avenue, Eastchurch, Sheerness, Kent,  
ME12 4EW**

CLIENT: MR & MRS TRASK

OCTOBER 2023  
PD/32158



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# 1 INTRODUCTION

## 1.1 OVERVIEW

- 1.1.1 This Planning Statement has been prepared by DHA Planning on behalf of Mr and Mrs Trask in respect of a full planning application for the erection of 4no. holiday let cottages, with associated access, parking, and landscaping on the land at Dickens Inn, Fourth Avenue, Eastchurch, Sheerness, Kent, ME12 4EW.



FIGURE 1.1: SITE LOCATION (COURTESY OF GOOGLE EARTH)

## 1.2 SUPPORTING DOCUMENTATION

- 1.2.1 This statement provides an overview of the application site and proposals. It assesses the planning merits of the scheme, having regard to the relevant planning history and the applicable planning policy framework. It concludes that the proposal is appropriate in planning terms and accordingly requests that planning permission be granted.
- 1.2.2 The application is supported by the following documents and plans:

REFERENCE	INFORMATION PROVIDED
APP1	Application Form (completed online)

DHA/PD/32158	Planning Statement (this Document)
23.53-PL02	Site Location Plan
23.53-PL03	Existing Block Plan
23.53-PL04	Proposed Block Plan
23.53-PL05	Proposed Site Layout
23.53-PL05	Proposed Site Layout (coloured)
23.53-PL06	Proposed Plans and Elevations
23.53-PL07	Existing and Proposed Street Elevation
6768	Ecological Habitat Appraisal Report
	Unilateral Undertaking [draft]

TABLE 1.1: SUPPORTING DOCUMENTATION

## 2 SITE CONTEXT

### 2.1 SITE OVERVIEW

- 2.1.1 The application site is situated on the north side of Warden Road and falls entirely within the administrative area of Swale Borough Council (SBC). The site lies outside any built-up area boundary, so is considered countryside in planning terms.
- 2.1.2 We highlight that the site is part of the wider holiday park area, as defined by policy DM4 of the Swale Borough Local Plan 2017.
- 2.1.3 The site measures approximately 0.14ha and comprises an empty plot of flat grassed land to the southwest of the Dickens Inn.



FIGURE 2.1: PROPOSED BLOCK PLAN (DRAWING NO. 23.53-PL04)

- 2.1.4 It is bordered by Sunnymede, a detached bungalow to the southwest, a holiday park to the northwest, a pond and grassed area associated with the Dickens Inn to the northeast and parallel to Warden Road to the south east.
- 2.1.5 A detached dwelling, Berryfield is located to the southeast of Warden Road, opposite the site. The site is generally flat and grassed, with a couple of structures on the site.

- 2.1.6 It is important to note that the site is located entirely within Flood Zone 1 (least likely to flood) and falls within the Swale Special Protection Area 6km Buffer Zone.
- 2.1.7 The site does not fall within the Green Belt or an Area of Outstanding Natural Beauty. There are also no listed buildings within proximity nor are there any Public Rights of Way (PRoW), or Sites of Special Scientific Interest (SSSI) that would be impacted by the proposal.

## 2.2 SURROUNDING AREA

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- 2.2.1 The site is seen within the context of the Hazeldene Chalet Park to the north and lies approximately 1.25km to the north of Eastchurch, where there are a number of local services and facilities. These include, but are not limited to; All Saints Church, Eastchurch Church of England Primary School, Shurland Meadow Cricket Club, Castle Inn, The Shurland Pub, Costcutter, Spar, Eastchurch Village Hall, and Eastchurch Autos. We note that there is a shop within the Holiday Park.
- 2.2.2 In respect of bus access, there are a number of bus stops within Eastchurch Village which provide services (no. 367) between Sheerness and Warden, as well as to Sheerness-on-Sea Train Station.
- 2.2.3 Sheerness Train Station provides an onward service to Sittingbourne Train Station, which provides routes between Dover Priory, Ramsgate, Faversham, London Victoria, and London St Pancras (International).
- 2.2.4 Accordingly, it is submitted that the site is sustainably located for the proposed holiday let use in terms of facilities, services, and open space. This is especially considered given the existing chalet park to the north (Hazeldene) and designation within a holiday park area, as defined by policy DM4 of the Swale Borough Local Plan 2017. Within the Officers Report under refused application 21/504668/FULL the sites sustainability credentials were also not questioned.

## 2.3 PLANNING HISTORY

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- 2.3.1 According to Swale Borough Council's online planning website, the site and the surrounding locality has an extensive planning history, which is shown in full below.

REFERENCE	DESCRIPTION	DECISION (DATE)
APP/V2255/ W/22/3298519	Erection of 6no. holiday let cottages, with associated access, parking and landscaping. (appeal)	Dismissed 03/04/2023
21/504668/FULL	Erection of 6no. holiday let cottages, with associated access, parking and landscaping.	Refused 12/11/2021

SW/14/0284	Erection of a timber sectional building for use as snack bar.	Granted 25/04/2014
SW/13/0902	Erection of a sectional building.	Not shown on website
SW/13/0556	Erection of steel shed for storage of equipment.	Refused 24/07/2013
SW/03/0291	Proposed extensions and garage.	Withdrawn 09/06/2003
SW/89/0044/1	82 Holiday chalets to replace 81 existing caravans and store.	Allowed 10/05/1991
SW/89/0044	82 Holiday chalets to replace 81 existing caravans and store.	Granted 27/04/1990
SW/87/1180	High voltage overhead line upon wooden poles.	Approved 28/10/1987
SW/82/0745	First floor addition to existing clubhouse.	Approved 18/10/1982
SW/80/0719	Extension to clubroom.	Approved 18/08/1980
SW/77/1059	Erection of new club.	Approved 04/01/1978
SW/76/0348	Use of one caravan for residential occupation by site manager.	Refused 26/08/1976
SW/75/1038	Use of one caravan for residential occupation by site manager.	Refused 19/01/1976

TABLE 2.1: PLANNING HISTORY (SWALE BOROUGH COUNCIL)

2.3.2 Application 21/504668/FULL was received by Swale on the 17 September 2021, for the erection of 6no. holiday let cottages, with associated access, parking and landscaping at Dickens Inn, Fourth Avenue, Eastchurch, Sheerness, Kent, ME12 4EW.

2.3.3 The application was later refused planning permission on the 21 November 2021 for the following four reasons for refusal:

- (1) *The proposal would result in the erection of a building of significant scale, size and permanence that would be harmful to the character and appearance of the countryside. Although proposed for holiday accommodation, the design and layout of the units would appear as and be capable of occupation as dwellings and no business case has been provided to demonstrate that there is a clear unmet need and market for such holiday accommodation, with a resultant risk of future pressure to convert to dwellinghouses. Whilst the site is located within a defined Holiday Park area, the design and form of the accommodation is significantly greater in scale and permanence and at odds with existing holiday accommodation. Overall, the proposal represents unjustified and unacceptable development*

*within the countryside and is contrary to policies ST3, DM3 and DM4 of the adopted Swale Borough Local Plan 2017; and the National Planning Policy Framework.*

- (2) *The proposal does not provide adequate off-street parking. As such, the proposal would fail to provide sufficient car parking for its future occupiers and is likely to result in additional pressure for parking in the surrounding area, in a manner significantly harmful to highway convenience. The proposal would therefore be contrary to policies CP4, DM7 and DM14 of "Bearing Fruits 2031: The Swale Borough Local Plan 2017" and the adopted SBC Vehicle Parking Standards Supplementary Planning Document.*
- (3) *No ecological information has been submitted as part of the application, and therefore in the absence of such information, it has not been demonstrated that the development would not unacceptably impact on wildlife or biodiversity, or that the impact can be appropriately mitigated. In the absence of a preliminary ecological appraisal and, if necessary, further surveys, the proposed development fails to demonstrate that protected species would not be harmed, contrary to Policy DM28 of the Swale Borough Local Plan 2017.*
- (4) *The proposed development will create potential for recreational disturbance to the Swale Special Protection Area. The application submission does not include an appropriate financial contribution to the Thames, Medway and Swale Strategic Access Management and Monitoring Strategy (SAMMS), or the means of securing such a contribution, and therefore fails to provide adequate mitigation against that potential harm. The development would therefore affect the integrity of this designated European site and would be contrary to the aims of policies ST1, DM14, and DM28 of the adopted Swale Borough Local Plan 2017; and paragraphs 8, 170, 171, and 175 of the National Planning Policy Framework.*

2.3.4 Following the refusal, the applicant then lodged an appeal under reference APP/V2255/W/22/3298519 against Swale Borough Council's decision on the 10 May 2022. Within the appeal an Ecological Habitat Appraisal produced by Fellgrove, and a Unilateral Undertaking for the SAMMs payment was submitted to address the concerns within the Decision Notice. On the 3 April 2023 the appeal was dismissed.

2.3.5 The Inspectors' main concern was for the design of the holiday lets, which comprised a single building with a barn-like appearance, which was found to be out of keeping within the local scene and would be prominent in the location due to the bulky roof, overall scale, and position to the road.

2.3.6 There was, however, no objection on the basis that the proposal would be visually superior to the mobile homes and chalets to the rear of the site, just that the proposal would impose an artificial and contrived design approach. The Inspectors' concerns regarding the design of the 6no. unit scheme have been fully addressed by this proposal.



- 2.3.7 As to parking, one vehicle parking space was proposed to the rear of each cottage with any overspill parking accommodated within the car park of the public house. This was considered acceptable and would not increase the pressure to park along Fourth Avenue or Warden Road.
- 2.3.8 The proposed development was considered acceptable in principle by the Inspector due to the policy background allowing new tourist accommodation on the site, with DM3 referring to expansion of tourist and visitor facilities in appropriate locations.
- 2.3.9 Given the above, the applicant has considered the reasons for refusal and has amended the proposed scheme to reduce the overall number of holiday units down from 6 to 4. The applicant has also carefully considered a better approach to the design of the units and believes that the new proposal is more in keeping with the local area, providing a reduced impact on the character and appearance of the landscape. Specifically, the proposal now delivers 4no. bungalow units of a design and scale similar to others found in the local area.

## 3 THE PROPOSED DEVELOPMENT

### 3.1 OVERVIEW

- 3.1.1 This planning application seeks permission for the erection of 4no. holiday let cottages, with associated access, parking, and landscaping.



FIGURE 3.1: PROPOSED SITE DEVELOPMENT LAYOUT (DRAWING NO. 23.53-PL05 [COLOURED])

### 3.2 LAYOUT, HEIGHT, AND SCALE

- 3.2.1 The four units will be located within the centre of the plot. There will be four units in total but they will be separated into two structures and then the buildings will be split in half to provide the two holiday units.

- 3.2.2 The units will follow the same layout pattern as the mobile homes to the north and the majority of the development in the area. They will sit length ways northwest to southeast.
- 3.2.3 Each structure will be in a staggered layout as shown in figure 3.2 below, to ensure high levels of privacy are provided to each holiday unit.

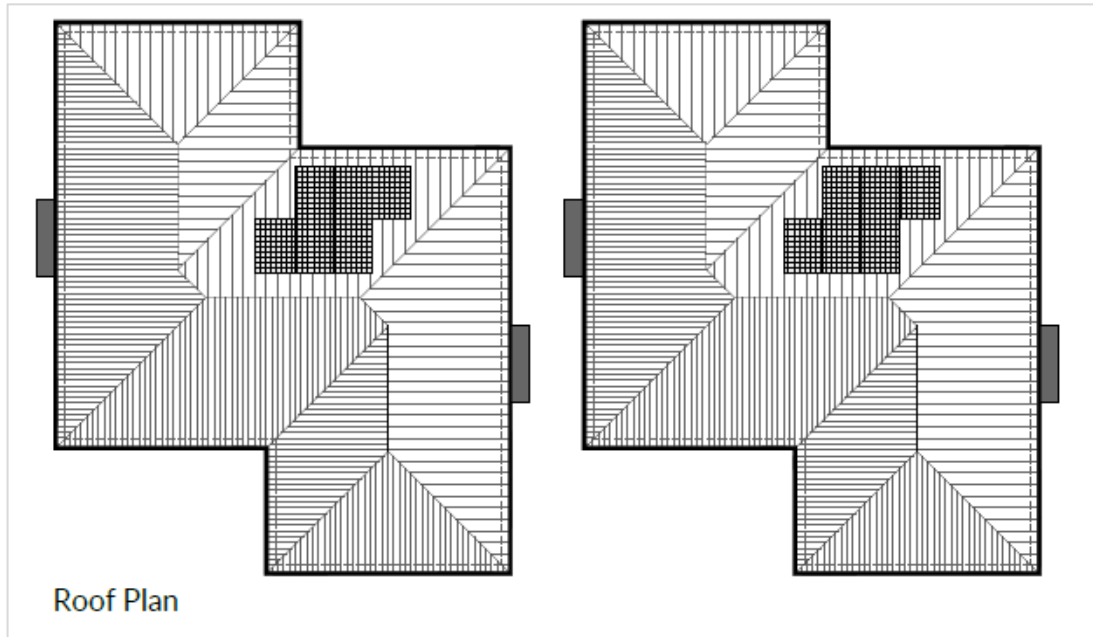


FIGURE 3.2: ROOF PLAN (DRAWING NO. 23.53.PL06)

- 3.2.4 The height of the units will be single storey with hipped rooves to form four bungalows. The scale of the bungalows will be significantly smaller than the adjacent development, and they will be subservient to the surrounding landscape compared to Sunnymead and The Dickens Inn.

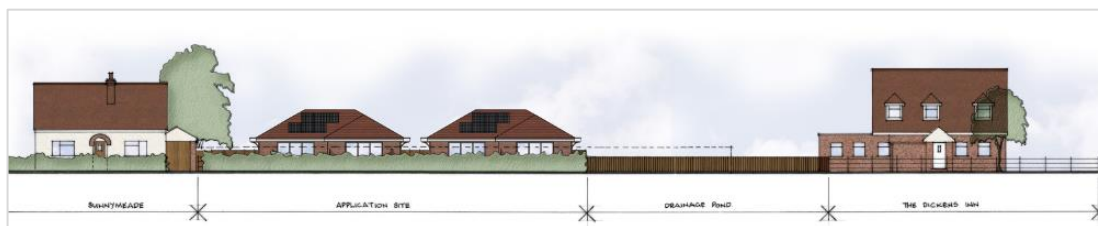


FIGURE 3.3: PROPOSED STREET ELEVATION (DRAWING NO. 23.53-PL07)

- 3.2.5 Internally, each unit will comprise one double bedroom and one single bedroom to the northwest end of the unit. The entrance hall will be in the centre of the unit with a cupboard next to the entrance door and a family bathroom straight across from the door. The southeastern aspect will comprise an open plan kitchen/living/diner area which will have sliding patio doors that open out onto the large garden area.
- 3.2.6 Each end unit will also have a side gate that provides direct access to the rear garden space. The central units will share a rear gated access to the rear gardens.

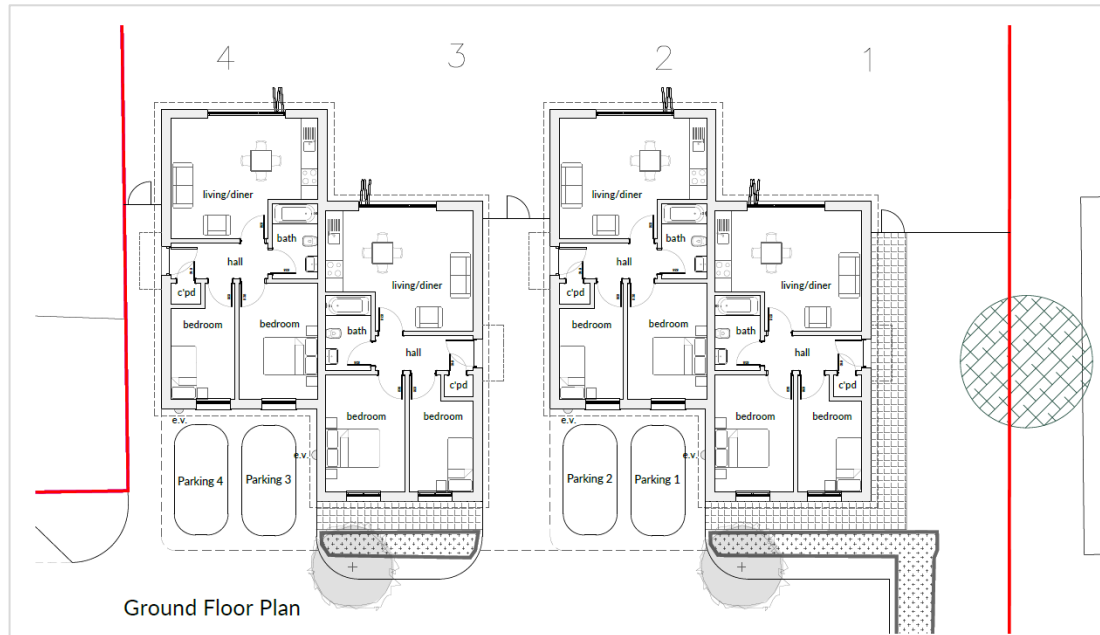


FIGURE 3.4: PROPOSED GROUND FLOOR PLAN (DRAWING NO. 23.53-PL06)

### 3.3 LANDSCAPE AND APPEARANCE

- 3.3.1 No trees will be removed from the site and two additional trees will be planted out the front of the units creating a break between each pair of units that share a central wall.
- 3.3.2 There will be a small hedged and grassed area fronting the parking areas out the front of the units, however the main private garden amenity space will be to the southeast of the units, fronting Warden Road.

### 3.4 ACCESS

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- 3.4.1 Access to the site will be taken from the existing hardstanding that runs to the front of the Dickens Inn, which leads to Fourth Avenue, running to the north of the holiday lets. Each holiday let will have its own parking space, which will equate to 4 parking spaces in total for the 4 proposed units.
- 3.4.2 Similarly, to the previously refused scheme, any overspill parking can be accommodated within the car park of the public house (20no. parking spaces). As confirmed by the Inspector, this level of parking is fully acceptable.

## 4 PLANNING POLICY CONTEXT

### 4.1 OVERVIEW

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- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and S.70 of the Town and Country Plan Act 1990 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 4.1.2 For the purposes of this planning application, Swale's development plan comprises the following:
- The Swale Local Plan (Bearing Fruits 2031) (adopted 2017).
- 4.1.3 Adopted Supplementary Planning Documents (SPDs) are also a material consideration where appropriate but are not part of the Development Plan.
- 4.1.4 In addition to the development plan, the Government's updated National Planning Policy Framework ('NPPF') was revised on the 5 September 2023. The NPPF sets out the Government's requirements and policies for planning in England and must be treated as a material consideration.
- 4.1.5 This chapter highlights the parts of the NPPF and development plan that are relevant to this application and the weight that can be given to the existing adopted policies as a precursor to a review of the development plan.

### 4.2 DEVELOPMENT PLAN

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#### [Swale Borough Council Local Plan \(2017\): Bearing Fruits 2031](#)

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- 4.2.1 The Swale Local Plan, adopted in 2017, is a key document that provides a framework for planning in the Borough. The Local Plan covers the period 2017-2031.
- 4.2.2 **Paragraph 4.3.14** discusses the council's approach to development outside of the built-up area boundary. It states that the line between consolidated areas of built development and open countryside may not always be clear cut, and judgements may need to be made on a case by case basis. With regards to land beyond the built-up area boundaries, land and other settlements regarded as being within the open countryside. Only development essential to social, economic or environment well-being as set by local and national policy will be permitted. Required it is consistent with the primary objective of protecting and enhancing the countryside.
- 4.2.3 **Policy ST1** - Delivering sustainable development in Swale.

*'Policy ST1 is intended to build a strong competitive economy by meeting identified needs for inward investment and indigenous growth on allocated and suitable sites, including meeting the needs of under-represented sectors. Support a prosperous rural economy, especially for sustainable farming and tourism, or where enabling communities to meet local needs or benefiting countryside management. Achieve good design through reflecting the best of an area's defining characteristics. Promote healthy communities including by focusing the location of development to achieve safe, mixed uses and shared spaces and integrating the benefits of ecosystems to society across all policy areas.'*

4.2.4 **Policy ST3** - The Swale settlement strategy.

*'In relation to development outside built up area boundaries:*

*At locations in the open countryside, outside the built-up area boundaries shown on the Proposals Map, development will not be permitted, unless supported by national planning policy and able to demonstrate that it would contribute to protecting and, where appropriate, enhancing the intrinsic value, landscape setting, tranquillity and beauty of the countryside, its buildings and the vitality of rural communities.'*

4.2.5 **Policy ST6** – The Isle of Sheppey area Strategy

*On the Isle of Sheppey, settlements within the West Sheppey Triangle are the focus of development and long-term change. Development proposals will, as appropriate:*

- (1) Bring forward economic development on allocated sites and, as available, at the 'Existing Strategic Employment Sites', including, at the Port of Sheerness, supporting diversification of its activities in accordance with Policy Regen 3;*
- (2) Support the existing tourism offer or assist its modernisation and diversification into new markets, including eco-tourism;*
- (3) Consolidate and enhance the retail and service role of Sheerness Town Centre, especially where increasing its comparison provision or providing other services that enhance the centre. Where sites cannot be made available in the town centre, planning permission will not be granted for retail and leisure proposals at other sites where these would undermine the vitality of the town centre or prejudice the delivery of industrial floorspace, especially at the 'Existing Strategic Employment Sites' identified by Policy CP 1;*
- (4) Bring forward the comprehensive regeneration of the Trinity Road area in accordance with its development brief, alongside wider enhancements across the centre;*

- (5) *For larger scales of development, be well located in respect of the most accessible parts of the Island to both car and public transport and, where appropriate, bring forward improvements to the A2500 Lower Road;*
- (6) *Regenerate Queenborough/Rushenden on allocated land and at other sites as they become available and in accordance with its Masterplan, or be located at other sites within the built-up area boundaries.*
- (7) *Reduce levels of deprivation in the most deprived wards and facilitate as required, increased capacity in infrastructure and services;*
- (8) *Manage the level of risk from climate change, flooding and coastal change, especially where subject to the Policy DM 21 and Policy DM 23;*
- (9) *Improve the condition and quality of landscapes in the area, especially those in poor condition and ensure that development is appropriate to landscape character and quality, especially within landscape designations and areas with low or moderate capacity to accommodate change. Additionally, the Council will seek to bring landscape wide initiatives to Sheppey to improve landscape condition;*
- (10) *Where possible, achieve net gains in biodiversity and natural/semi-natural greenspace at development sites and minimise and mitigate impacts on internationally designated sites for biodiversity, including, from developments within 6 km of an SPA, contributions toward the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) in accordance with Policy CP 7. The Council will, where appropriate, establish the Island as a focus for achieving net gains in biodiversity both through the appropriate mitigation and compensation of projects within the Borough and further afield;*
- (11) *Unless allocated by the Local Plan, avoid the loss of high quality agricultural land in accordance with Policy DM 31;*
- (12) *Maintain the individual character and separation of important local countryside gaps between the settlements of Minster, Halfway, Queenborough and Sheerness in accordance with Policy DM 25; and*
- (13) *Make effective heritage protection, integration and enhancement a priority, whilst conserving and enhancing the historic and special interests of the town, coast, rural area and landscapes.'*

#### 4.2.6 **Policy CP1** – Building a strong, competitive economy.

*'Actions by public, private and voluntary sectors shall work towards the delivery of the Local Plan economic strategy. Development proposals will, as appropriate:*

- (1) *Stabilise losses of jobs and/or floorspace within the manufacturing sector or exploit competitive strengths in the Swale economy including uplifting*



*sectors related to the visitor economy and expansion of the pharmaceutical and science sectors;*

- (2) Bring forward an increase in homegrown business creation and inward investment, including those able to encourage younger people to retain their skills within Swale;*
- (3) Secure additional non-food retail/leisure growth, taking account of committed schemes and existing centres and provide flexibility over uses in town centres to enable them to respond to the challenges they face;*
- (4) Encourage educational facilities or an expansion of vocational learning, developing links between institutions and the private sector or work-based learning at key locations;*
- (5) Contribute to the delivery of a comprehensive land portfolio for the Borough by: a. safeguarding and maximising the potential of identified 'Existing Strategic Employment Sites'; b. bringing forward the stock of existing committed employment sites for industrial use; and c. addressing qualitative issues with new provision at Local Plan allocations to support established industrial markets, additional office space, the release of poorer quality locations and the broader upgrade of the supply; or d. managing existing and future employment potential by upgrading older industrial areas.*
- (6) Be supported when including sectors that are under-represented in Swale that may potentially enable a reduction in commuting out of the Borough;*
- (7) Avoid proposals that would result in the diminishing of existing employment sites and allocations where appropriately located and suitable, viable for users under normally functioning economic conditions or required to meet the identified needs for the plan period;*
- (8) Address future challenges to the agricultural and woodland/forestry industries with sustainable and appropriate proposals to create new markets and greater resilience;*
- (9) Safeguard or enhance Swale's 'Principal Tourism Assets' and consolidate or widen the Borough's tourism potential, particularly where embracing principles of sustainable tourism;*
- (10) Focus large scales of development where they utilise the strategic and primary road networks;*
- (11) Support sectors attractive to the local population who would otherwise out-commute for work;*
- (12) Facilitate the delivery of digital infrastructure, including access to high speed Internet connectivity from all new developments;*

- (13) *Create resilience in existing businesses to forecast changes in flood risk, climate change and natural processes or lead to an expansion of businesses in the low carbon sectors; or*
- (14) *Provided the Local Plan strategy is not significantly compromised and sites cannot be found within criterion 5, meet unanticipated needs on appropriate sites within one or more of the following 'Priority Locations':*
  - (a) *the extension of an existing employment site;*
  - (b) *where benefits to deprived communities can be achieved;*
  - (c) *sites well related to the A249, A2, Sittingbourne Northern Relief Road or A299 Thanet Way; or*
  - (d) *re-use of heritage assets or where delivering significant benefits to the conservation of landscape or biodiversity.'*

#### 4.2.7 **Policy CP4** – Requiring good design.

*'All development proposals will be of a high quality design that is appropriate to its surroundings. Development proposals will, as appropriate:*

- (1) Create safe, accessible, comfortable, varied and attractive places;
- (2) Enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and strengthening sense of place;
- (3) Make safe connections physically and visually both to and within developments, particularly through using landscape design and open space to retain and create green corridors for pedestrians, cyclists and biodiversity;
- (4) Make efficient and prudent use of natural resources including sensitively utilising landscape features, landform, biodiversity and climate to maximise energy conservation and amenity;
- (5) Retain and enhance features which contribute to local character and distinctiveness;
- (6) Conserve and enhance landscape, biodiversity and local environments by:
  - (a) *assessing and responding to landscape character, condition, sensitivity and any limitations arising from its overall capacity for change, together with the guidelines set out within the Landscape Character and Biodiversity Assessment and Guidelines and Urban Extension Landscape Capacity Study;*

- (b) *retaining trees where possible (including old orchards and fruit trees, hedgerows, shelter belts, woodland and scrub) particularly those that make an important contribution either to the amenity, historic, landscape character or biodiversity value of the site or the surrounding area;*
  - (c) *providing a high standard of locally native plant species and trees (of local provenance and supportive of biodiversity) for soft (including green walls) landscaping in a pattern which respects the landscape character;*
  - (d) *providing hard landscaping, surface and boundary treatments that are locally distinct and that respond positively to the character of the locality; and*
  - (e) *provide features and management intended to encourage biodiversity.*
- (7) Achieve a mix of uses, building forms, tenure and densities;
  - (8) Be appropriate to the context in respect of materials, scale, height and massing;
  - (9) *Make best use of texture, colour, pattern, and durability of materials;*
  - (10) *Use densities determined by the context and the defining characteristics of the area;*
  - (11) *Ensure the long-term maintenance and management of buildings, spaces, features and social infrastructure;*
  - (12) *Be flexible in order to respond to future changes in use, lifestyle, and demography;*
  - (13) *Maximise opportunities for including sustainable design and construction techniques including the use of recycled and recyclable materials, sustainable drainage systems, carbon reduction and minimising waste; and*
  - (14) *Adhere to relevant supporting design guidance.'*

#### 4.2.8 **Policy DM3** - The rural economy

*'Planning permission will be granted for the sustainable growth and expansion of business and enterprise in the rural area. Planning permission for residential development will not be permitted where this would reduce the potential for rural employment and/or community facilities unless the site/building(s) is demonstrated as having no demand for such purposes or its use would be undesirable or unsuitable. Development proposals for rural based employment will:*

- (1) *For all proposals:*
  - (a) *in the case of larger scales of development, be located at the rural local service centres and urban areas as defined by Policy ST3 and in accordance with Policy CP1;*
  - (b) *firstly, consider the appropriate re-use of existing buildings or the development of other previously developed land, unless such sites are not available or it is demonstrated that a particular location is necessary to support the needs of rural communities or the active and sustainable management of the countryside;*
  - (c) *retain or enhance the rural services available to local communities and visitors without undermining or resulting in the loss of existing services unless demonstrated to be unviable for the existing use or other employment/community use;*
  - (d) *for new buildings and ancillary facilities, the design and layout will need to be sympathetic to the rural location and appropriate to their context;*
  - (e) *result in no significant harm to the historical, architectural, biodiversity, landscape or rural character of the area; and*
  - (f) *avoid scales of traffic generation incompatible with the rural character of the area, having regard to Policy DM6 and Policy DM26.*
- (2) *For tourism and leisure:*
  - (a) *in the case of green/sustainable tourism proposals, be demonstrated by reference to their principals;*
  - (b) *provide for an expansion of tourist and visitor facilities in appropriate locations where identified needs are not being met by existing facilities in the locality or where able to increase facilities available to local communities as well as visitors; and*
  - (c) *where relating to holiday parks, proposals are also in accordance with Policy DM 4.'*

#### 4.2.9 **Policy DM4** – New holiday parks or extensions to existing parks

- (1) *'Planning permission will be granted for the upgrading and improvement of existing static holiday caravan and chalet sites (including their conversion from one to the other) within the existing boundaries of the Holiday Park areas as shown on the Proposals Map. Planning permission will not be granted for any new static holiday caravans and chalets, or extensions, outside of the Holiday Park areas on the Isle of Sheppey as shown on the Proposals Map.*

- (2) *In circumstances where land is lost to coastal erosion, minor extensions to existing static holiday caravan sites will be permitted where:*
- (a) *in accordance with Policies DM 22 and DM 23 relating to the coast and the coastal change management area;*
  - (b) *it is demonstrated that on-site upgrading and improvement is not practicable or viable;*
  - (c) *there is no overall increase in the existing number of accommodation units;*
  - (d) *it is part of a scheme to upgrade and improve the quality of tourist accommodation and other amenities on the site;*
  - (e) *it results in a significant and comprehensive improvement to the layout, design and appearance of the site, together with an integrated landscape strategy that creates a landscape framework for both the existing and proposed sites that will reduce their overall impact within the landscape in accordance with Policy DM24;*
  - (f) *in accordance with Policy DM 5; and*
  - (g) *there is no unacceptable impact on the local environment.*
- (3) *Where new or improved facilities are proposed within the existing boundaries of the Holiday Park areas, as shown on the Proposals Map, planning permission will be granted provided they are:*
- (a) *of a type and scale appropriate to the site or park they are intended to serve;*
  - (b) *where feasible, made available for use by the local resident population; and*
  - (c) *in accordance with Policy DM 5.'*

4.2.10 **Policy DM7** - Vehicle Parking

*'The council will continue to apply extant Kent County Council vehicle parking standards to new development proposals.'*

4.2.11 **Policy DM14** - General development criteria

*'All development proposals will accord with the adopted Development Plan. Where appropriate, all proposals will reflect the positive characteristics and features of the site and locality. Cause no significant harm to amenity and other sensitive uses or areas, and be both well sited and of a scale, design, appearance and detail that is sympathetic and appropriate to the location.'*

#### 4.2.12 **Policy DM28** – Biodiversity and geological conservation

*'Development proposals will conserve, enhance and extend biodiversity, provide for net gains in biodiversity where possible, minimise any adverse impacts and compensate where impacts cannot be mitigated.*

##### **Part A. For designated sites**

*Development proposals will give weight to the protection of the following designated sites for biodiversity, as shown on the Proposals Map, which will be equal to the significance of their biodiversity/geological status, their contribution to wider ecological networks and the protection/recovery of priority species as follows:*

- (1) Within internationally designated sites (including candidate sites), the highest level of protection will apply. The Council will ensure that plans and projects proceed only when in accordance with relevant Directives, Conventions and Regulations. When the proposed development will have an adverse effect on the integrity of a European site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated.*
- (2) Within nationally designated sites (including candidate sites), development will only be permitted where it is not likely to have an adverse effect on the designated site or its interests (either individually or in combination with other developments) unless the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the designated site that make it of national importance and any broader impacts on the national network of Sites of Special Scientific Interest. Where damage to a nationally designated site cannot be avoided or mitigated, compensatory measures will be sought. Development will also accord with and support the conservation objectives of any biodiversity site management plans;*
- (3) Within locally designated sites (including draft published sites), development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site. Compensation will be sought for loss or damage to locally designated sites.*

##### **Part B: All Sites**

*Development proposals will:*

- (1) Apply national planning policy in respect of the preservation, restoration and re-creation of:*

- (a) *the habitats, species and targets in UK and local Biodiversity Action Plans and Biodiversity Strategies;*
  - (b) *linear and continuous landscape features or those acting as stepping-stones for biodiversity;*
  - (c) *aged or veteran trees and irreplaceable habitat, including ancient woodland and traditional orchards;*
- (2) *Be informed by and further the guidelines and biodiversity network potential of the Council's Landscape Character and Biodiversity Assessment SPD;*
  - (3) *Support, where appropriate, the vision and objectives of relevant environmental and biodiversity management and action plans;*
  - (4) *Be accompanied by appropriate surveys undertaken to clarify constraints or requirements that may apply to development, especially where it is known or likely that development sites are used by species, and/or contain habitats, that are subject to UK or European law;*
  - (5) *When significant harm cannot be avoided through consideration of alternative sites or adequate mitigation provided on-site or within the immediate locality, compensatory measures will be achieved within the relevant Biodiversity Opportunity Area, or other location as agreed by the Local Planning Authority;*
  - (6) *Provide, where possible, a net gain of biodiversity overall; and*
  - (7) *Actively promote the expansion of biodiversity within the design of new development and with reference to the wider natural assets and green infrastructure strategy in Policy CP7.'*

## 4.3 WIDER MATERIAL CONSIDERATIONS

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### National Planning Policy Framework (2021) (NPPF)

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- 4.3.1 The NPPF was revised on 5 September 2023 and sets out the government's planning policies for England and how these are expected to be applied.

### *Achieving Sustainable Development (Section 2)*

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- 4.3.2 **Paragraph 7** states:

*'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable*

*development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.'*

4.3.3 The overarching principle of the NPPF is a clear presumption in favour of sustainable development. **Paragraph 8** states the three dimensions which are interdependent and need to be pursued in mutually supportive ways:

*(a) 'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*(b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe built places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*(c) an environmental objective – to contribute to protecting and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

4.3.4 It is noted in **paragraph 9** that:

*'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.'*

4.3.5 **Paragraph 10** states:

*'So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**.'*

4.3.6 **Paragraph 11** states: (edited)

*'Plans and decisions should apply a presumption in favour of sustainable development.*

*For decision-taking this means:*



- (d) approving development proposals that accord with an up-to-date development plan without delay; or*
- (e) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
  - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'**

4.3.7 **Paragraph 14** states:

*'In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:*

- (a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;*
- (b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;*
- (c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and*
- (d) the local planning authority's housing delivery was at least 45% of that required over the previous three years.'*

***Decision-making (Section 4)***

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4.3.8 **Paragraph 38** describes how Local Planning Authorities should approach decisions on proposed development in a positive and creative way:

*'They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'*

4.3.9 **Paragraph 47** states that:

*'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.'*

4.3.10 **Paragraph 55** outlines that Local Planning Authorities should consider:

*'Whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.'*

*'Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.'*

*Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.'* (**Paragraph 56**).

***Building a strong, competitive economy (Section 6)***

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4.3.11 **Paragraph 82** states:

*'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.'*

4.3.12 With regard to supporting a prosperous rural economy-

4.3.13 **Paragraph 84** (edited) states:

*'Planning policies and decisions should enable:*

- (a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- (c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*

- (d) *the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.'*

4.3.14 **Paragraph 85** states:

*'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'*

***Ensuring the vitality of town centres (Section 7)***

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4.3.15 **Paragraph 88** states:

*'When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.'*

***Promoting healthy and safe communities (Section 9)***

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4.3.16 **Paragraph 93** (edited) states:

*'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- (a) *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- (c) *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*
- (d) *ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.'*

### ***Promoting sustainable transport (Section 9)***

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4.3.17 **Paragraph 104** states:

*'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- (a) the potential impacts of development on transport networks can be addressed;*
- (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- (c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*

4.3.18 **Paragraph 111** states:

*'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*

### ***Making effective use of land (Section 11)***

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4.3.19 **Paragraph 119** states:

*'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*

4.3.20 **Paragraph 124** states:

*'Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- (a) *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- (b) *local market conditions and viability;*
- (c) *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- (d) *the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- (e) *the importance of securing well-designed, attractive and healthy places.’*

### ***Achieving well-designed places (Section 12)***

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#### **4.3.21 Paragraph 126 states:**

*'The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'*

#### **4.3.22 Paragraph 130 states:**

*'Planning policies and decisions should ensure that developments:*

- (a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- (c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- (d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

- (e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*

4.3.23 **Paragraph 131** states:

*'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that...appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.'*

4.3.24 **Paragraph 134** states:

*'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:*

- (a) *development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- (b) *outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*

4.3.25 **Paragraph 135** states:

*'Local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion.'*

***Meeting the challenge of climate change, flooding and coastal change  
(Section 14)***

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4.3.26 **Paragraph 170** states:

*'In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.'*

4.3.27 **Paragraph 171** states:

*'Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:*

- (a) be clear as to what development will be appropriate in such areas and in what circumstances; and*
- (b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.'*

***Conserving and enhancing the natural environment (Section 15)***

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4.3.28 **Paragraph 175** states:

*'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*

***SBC Vehicle Parking Standards Supplementary Planning Document (SPD)***

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- 4.3.29 This document is pursuant to Policy DM7 of the Bearing Fruits Local Plan and was adopted by the Council in June 2020. The document is a material consideration in the determination of planning applications.

## 5 PLANNING ASSESSMENT

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and S.70 of the Town and Country Plan Act 1990 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 5.1.2 In considering whether the proposal accords with the development plan and addresses the previous reasons for refusal under application 21/504668/FULL, it is necessary to consider the following issues:
- (1) The Principle of Development;
  - (2) Design and Appearance;
  - (3) Ecology;
  - (4) Tourism and Business Use;
  - (5) Sustainability;
  - (6) Highways and Design; and
  - (7) Flood Risk.

### 5.2 PRINCIPLE OF DEVELOPMENT

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- 5.2.1 The site lies within the open countryside, where there is a general presumption against development, however the site also lies within a designated holiday park area as defined under policy DM4 of the Local Plan. Policy DM4 is therefore the key policy within this case and states that permission will be granted for the improvement of existing static holiday caravan and chalet sites within the existing boundaries of the Holiday Park areas.
- 5.2.2 Where the site is within the holiday park area, the development proposal must provide holiday accommodation units of an appropriate type and scale to the surrounding park they are intended to serve and be available for local resident use. As such it is considered that the four units will meet the conditions of policy DM4, ensuring that the scale of the development is subservient and in-keeping with the surrounding development and holiday park. The units will also provide holiday accommodation for residents throughout the year. This is a matter previously accepted by the Inspector.
- 5.2.3 Moreover, Policy DM3 relates to the rural economy and supports the provision for expansion of tourism and leisure if the facilities are in appropriate locations and can increase the facilities available to local communities along with visitors. The policy prefers new buildings justified for tourism use to be built on previously



developed land, therefore the erection of four holiday units complies with policy DM3.

- 5.2.4 The proposal will retain existing tourism assets and widen the Borough's tourism potential through the introduction of four new holiday units that can be rented all year round, which will lead to increased expenditure and revenue amongst the local services. It is considered that the proposal will be in accordance with policy CP1.
- 5.2.5 It should be highlighted that within the Officers Report for the previous refused scheme (21/504668/FULL), the Case Officer stated that 'in principle, the delivery of new tourist accommodation could accord with the policies CP1, DM3 and DM4, subject to detailed consideration of impacts.' Similarly, the Appeal Decision also stated that the Council accepted that the 'policy background potentially allows for new tourist accommodation on the site'. Therefore, as the proposal addresses the previous concerns and does not change the use of the units proposed, it is considered that this stance remains valid and supports this application.
- 5.2.6 Given the above and the revisions made to the proposal, it is considered that thought has been given to the previous concerns and potential impacts, which have then been addressed to ensure the proposal will provide high-quality, reflective holiday accommodation to the holiday park area. The proposed development therefore complies with policies CP1, DM3 and DM4 of the Local Plan and paragraph 84 a) of the NPPF.

### 5.3 DESIGN AND APPEARANCE

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- 5.3.1 Under the previous refused application, the main reason for refusal was the design and appearance of the units. It was stated that the design and scale of the cottages would appear out of place in the area, causing harm to the wider countryside. The size, height, and roof form were seen to be bulky and dominant in comparison to many of the surrounding properties which include bungalows, holiday chalets and caravans.
- 5.3.2 The applicant addressed these concerns within this revised application and considers that the single storey bungalow design of the four holiday units significantly reduces the bulk and dominance of the buildings in the context of the surrounding built form.
- 5.3.3 The single storey design of the units with a hipped and gabled roof will reflect the residential development adjacent to the site, whilst the single storey aspect will allow the units to remain in-keeping with the other mobile homes and chalets that are sited to the north.
- 5.3.4 It is considered that the proposed development is of an appropriate scale to the site as it allows for the creation of 4no. holiday let units whilst ensuring the units

are located approximately 6m from Warden Road to the south and 7m from Sunnymeade to the west.

- 5.3.5 In addition, due to the low height and massing of the units, there will be no harm to the closest neighbouring property Sunnymeade, in respect of light and overlooking. The Sunnymeade property will also stand another storey higher than the proposed units, similarly with the Dickens Inn to the north of the site, therefore it is evident that the proposal will be subservient to its surroundings but will provide high-quality holiday accommodation for an ever-expanding clientele.
- 5.3.6 Similarly, Berryfield which lies approximately 17m to the southeast and the holiday chalets that lie roughly 20m to the northwest are not considered to be negatively impacted by these units which is supported by the previous Officers Report under application 21/504668/FULL.
- 5.3.7 Given the above and the amendments to the height, scale and density of the proposal, it is considered that the development is in accordance with policies CP4, DM4 and DM7.

## 5.4 ECOLOGY

- 5.4.1 To support this application Fellgrove Environmental Consultancy were instructed on behalf of the applicant to produce an Ecological Impact Assessment and Habitat Appraisal for the previous appeal against the refused permission under application 21/504668/FULL. The survey took place on the 6 April 2022.
- 5.4.2 The report concludes that the key findings from the survey are as outlined below:

SPECIES	CONSIDERATIONS	RECOMMENDATIONS
<b>Nesting / breeding</b> birds	Low potential	Any site clearance of overhanging tree branches where birds might nest should ideally take place outside the main nesting season (1st March – 31st August).
Amphibians	Negligible potential	A drainage pond within 250m of the site contains significant waterfowl presence, a population of carp and as a result amphibian presence is considered negligible. The site also lacks connectivity to the wider habitat.

TABLE 5.1: KEY FINDINGS FROM ECOLOGICAL IMPACT ASSESSMENT AND HABITAT APPRAISAL (FELLGORVE)

- 5.4.3 Low potential for nesting birds was identified within the adjacent bordering trees. The drainage pond adjacent to the site was identified as having negligible potential to support amphibians due to significant waterfowl and carp presence.
- 5.4.4 The report concludes that there is negligible potential impact from the development proposal on amphibians or any other protected species. Further

surveys for amphibians or any other protected species are considered unnecessary.

- 5.4.5 In terms of biodiversity enhancements, Fellgrove recommended three bird Woodstone nest boxes be installed onto the new build and remaining trees at suitable heights in suitable locations to increase the nesting opportunities.
- 5.4.6 The proposal is likely to have minimal impact on local wildlife therefore mitigation is not necessary, however there is some habitat enhancement opportunity through landscaping as follows:
- Planting: for parking areas or entrance ways, instead of using concrete or tarmac, permeable materials that allow vehicle access but also allow plants to grow through can be used.
  - Birds: an additional bird nest box should be installed once works have been completed, and installed in a suitable location and height, for surrounding local bird activity.
- 5.4.7 The site is considered a low ecological impact proposal and there is in full compliance with policies CP4 and DM28 of the Local Plan.
- 5.4.8 Additionally, the applicant accepts that a SAMMS payment will be required and paid to the Council to mitigate against the potential impacts of the development upon the Swale Special Protection Area of which the site falls within the 6km Buffer Zone. Accordingly, the applicant will submit a Unilateral Undertaking to agree the contribution payment following validation of the application.

## 5.5 TOURISM AND BUSINESS USE

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- 5.5.1 The applicants own the Dickens Inn and intend to further encourage tourism and other businesses that are within the tourism and leisure use within the surrounding area. Policy DM3 of the Local Plan relates to the rural economy and states at criterion 2(b), that tourism and leisure planning permission should expand tourist and visitor facilities in appropriate locations.
- 5.5.2 In recent years, it has become apparent that more people are deciding to vacation in the UK, which was largely a result of the COVID-19 pandemic. This very much highlighted the need for local businesses to grow and provide additional facilities to keep up with the demand and to turn over a larger profit to remain viable. Policy St1 criterion 3 provides support for a prosperous rural economy, especially for sustainable tourism, or where proposals enable communities to meet local needs or benefit countryside management.
- 5.5.3 The businesses related to this site will remain local as the applicant's intention is to manage the Dickens Inn and the holiday lets. As we understand it, the applicants

will provide breakfasts, day-to-day management and evening meals for tourists at the Dickens Inn which is no more than 60m north of the proposal site.

- 5.5.4 The holiday lets will provide year-round employment for the applicants as well as high-quality holiday accommodation for tourists suitable for short or longer-term breaks throughout the year. Due to the year-round accommodation option, Dickens Inn will be able to trade throughout the year including the colder months which will ensure a sustainable income for the owners.
- 5.5.5 By presenting a 'alternative' tourism accommodation rental offer, the proposal will also increase local expenditure in the long term. At 60% occupancy per year and based on a low expenditure per person of around £20 per day, with two people per unit, the proposal would bring around £52,500. The quality of units is such that we would expect a greater percentage of occupancy and spend to the local economy.
- 5.5.6 Within the vicinity of the site there is a limited amount of higher end, all year-round accommodation available, therefore the proposal will provide holiday lets to fill the gap in the tourism accommodation market. The four holiday units will help to attract additional tourists to the area and in doing so, will increase net spend into the local economy.

## 5.6 SUSTAINABILITY

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- 5.6.1 It is considered that the site is sustainably located for the proposed holiday let use, by virtue of the surrounding holiday caravans, mobile homes and chalet parks to the northeast, north and west of the site, and the relationship with the Dickens Inn.
- 5.6.2 All materials will exceed the requirements of the latest Building Regulations, in particular, Part L (Energy Use) by utilising materials that meet the BRE Green Guide A+ rating (materials which have the lowest overall environmental impact over the lifecycle of a product as calculated by BRE Environmental Assessment Method). All new windows will also be double-glazed or triple-glazed which will significantly reduce noise and improve heat insulation.
- 5.6.3 In addition, the proposed holiday lets will utilise features such as insulation, double or triple glazing, and renewable energy such as a ground source heat pump and solar panels. Solar panels will be implemented on the southeast roof elevations on both buildings to ensure the development is utilising renewable energy.
- 5.6.4 In addition, the proposed units aim to achieve good levels of daylight internally to reduce dependence on artificial lighting. Water usage shall also be minimised by use of efficient taps, dual flush toilets and low water use appliances. Therefore, the proposal demonstrates a desire to create a high-quality development comprising sustainable resources, in accordance with Paragraph 126 of the NPPF.

- 5.6.5 Construction at the site will also be managed in an environmentally responsible manner in terms of resource use, storage, waste management, and potential sources of nuisance or pollution.
- 5.6.6 Moreover, the development will bring more expenditure to the local area, which will help to support the nearby services within the holiday parks, and the surrounding local settlements. Providing more holiday accommodation options will also see a more diverse clientele coming into the area which should positively impact the local economy.
- 5.6.7 Overall, and in line with criterion (a) of Paragraph 130 of the NPPF, the outlined measures will help to ensure the development will function well and add to the overall quality and economy of the area, not just for the short term but over the lifetime of the development.

## **5.7 HIGHWAYS AND PARKING**

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- 5.7.1 Reason for Refusal Two under application 21/504668/FULL, states that 'the proposal does not provide adequate off-street parking'. However, within the appeal this was addressed and remains the same for this application, however the number of spaces has been reduced from six to four due to the number of units being reflectively reduced.
- 5.7.2 Each unit will have one parking space (four total), with overflow parking provided at the Dickens Inn which has space for approximately 20 vehicles which is more than suitable to accommodate the four proposed holiday lets and the existing Inn. We are therefore of the opinion that this planning application should not be refused in this regard. We note that these arrangements were considered acceptable by the Inspector.

## **5.8 FLOOD RISK**

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- 5.8.1 Paragraph 159 of the NPPF states inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 5.8.2 With regard to the Environment Agency Flood Risk Map, the site falls within Flood Zone 1 which has the lowest risk of flooding. Accordingly, a Flood Risk and Drainage Assessment was not required to support the Planning Application.

## 6 CONCLUSION

### 6.1 SUMMARY

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- 6.1.1 This Planning Statement has been prepared by DHA Planning on behalf of Mr and Mrs Trask in respect of a full planning application.
- 6.1.2 Planning permission is sought for the erection of 4no. holiday let cottages, with associated access, parking, and landscaping on the land at Dickens Inn, Fourth Avenue, Eastchurch, Sheerness, Kent, ME12 4EW.

### 6.2 CONCLUSION

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- 6.2.1 Considering the above context, we acknowledge that there are sensitive matters, to be balanced. However, the proposal is well-informed, and we firmly consider that this revised application addresses the concerns raised in the previous refused application.
- 6.2.2 We also consider that circumstances justify this high-quality, sensitive, and well-planned development proposal, in an area with high level tourism activity.
- 6.2.3 In conclusion, the public benefits of the proposal outweigh any limited degree of perceived harm. Consequently, we respectfully request that full planning application is granted without delay.