

## Bredgar Parish Council Supplementary Response to Swale Borough Local Plan (October 2021) Issues and Preferred Options (Regulation 18)

Bredgar Parish Council has submitted a joint response with Rodmersham and Milstead prepared and submitted by Cerda planning consultants. This additional supplementary response is in support of that joint response and provides amplification of some of the issues raised in it.

The amplifying comments in this document are all shown with references to the corresponding Cerda response paragraph number and consultation question number.

Reference document:

Swale\_Reg18\_Representations\_Cerda\_Planning\_Bredgar\_Rodmersham\_Milstead\_Parish\_Councils\_FINAL.pdf” submitted by Cerda on 29<sup>th</sup> November 2021.

### Cerda Paragraph 5.15 / DLP Regulation 18 Question 5

Extract from Table 4.2.2 in the Swale Draft Local Plan Pre-Submission Document (Regulation 19).

Tier 5 – Small villages	Bapchild, Bayview, Borden, Bredgar, Conyer, Doddington, Dunkirk, Eastling, Hartlip, Kingsborough Manor, Lewson Street, Lower Halstow, Lynsted, Neames Forstal, Newnham, Oare, Painters Forstal, Rodmersham Green, Selling, Sheldwich Lees, Upchurch and Warden.	These smaller villages vary in size and offer. The more sustainable provide primary schools, recreation grounds, convenience stores and have fair public transport provision. These include the likes of Upchurch, Bredgar and Bapchild. The less sustainable are without a few or most of the key services and facilities with limited or no public transport offer. A common theme for these villages, however, is their isolation from the nearest urban service centres and towns, as well as the main transport corridors to access these locations (the A249 and the A2). Even by foot, there are not always suitable, lit footpaths for use. Single or occasional clusters of villages may contain enough services to meet the day to day needs for their own communities, whilst others would require investment to provide or improve them. Travel to the urban service centres and towns is necessary for many or most needs.
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BPC has very strong concerns about the designation of Bredgar as a Tier 5 **more sustainable village**. The parish does have some services and nine unsuitable sites proposed in the SHLAA but it is in fact a small parish of only 282 dwellings (approximately). It is the Post Office which promotes Bredgar into being considered more sustainable but that is only retained because the Parish Council subsidise it. The Parish Council pay the rent (15% of our precept) which is vital support for its survival. If this unique situation is removed from consideration, Bredgar scores 7 the same as Hartlip, Hernhill and Lower Halstow, all of which have similar or better access to major roads. It is also the case that the future of rural Post Offices is far from certain and there are no guarantees that there will be a Post Office in the village by the time of adoption of the Local Plan under discussion.

### Cerda Paragraph 5.13 / DLP Regulation 18 Question 5

In addition, the “Settlement Hierarchy Study 2020” is insensitive to many local factors. The location of Bredgar in the AONB and importance of landscape and heritage. No account is taken of the fact that Post Office is only open part time. Bredgar is scored for fibre broadband which is only partially correct. Most of the main village of Bredgar only has Fibre to the Cabinet and still uses copper to the premises. Fibre to the premises only applies to the hamlet of Swanton Street and north of the M2.

**Cerda Paragraph 5.14 / DLP Regulation 18 Question 5**

We note that the other Tier 5 more sustainable villages in the DLP are larger with over 1000 houses each. Development of the larger SHLAA sites in our parish would be of a scale of development out of all reasonable proportion to our existing small community. We foresee problems with community integration. The village has a small and active community, development needs to be appropriately scaled and factored over time to avoid a loss of identity. Address risks to landscape, conservation areas and harm to the AONB. The table below compares Swale parish dwelling numbers from the 2011 census. Bredgar is among the villages with lower housing numbers and therefore would be most significantly changed by large or medium size developments.

In conclusion on these points, BPC request that Bredgar is not named as a more sustainable village in Table 4.2.2 in the Swale Draft Local Plan Pre-Submission Document.

**QS418EW - Dwellings**

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population	All dwellings
units	Dwellings
rural urban	Total
dwelling type	All categories: Dwelling type
parish 2011	2011
E04005052 : Faversham	8,598
E04005079 : Minster-on-Sea	6,368
E04005068 : Queenborough	1,503
E04005073 : Teynham	1,280
E04005056 : Iwade	1,191

E04005063 : Newington	1,089
E04005077 : Upchurch	1,041
E04005045 : Borden	1,023
E04005058 : Leysdown	909
E04005044 : Bobbing	825
E04005046 : Boughton under Blean	816
E04005050 : Eastchurch	815
E04005078 : Warden	730
E04005049 : Dunkirk	522
E04005059 : Lower Halstow	499
E04005043 : Bapchild	458
E04005061 : Lynsted with Kingsdown	458
E04005076 : Tunstall	386
E04005070 : Selling	327
E04005067 : Ospringe	316
E04005054 : Hartlip	305
E04005055 : Hernhill	290
E04005047 : Bredgar	282
E04005066 : Oare	240
E04005048 : Doddington	234
E04005053 : Graveney with Goodnestone	228
E04005069 : Rodmersham	227
E04005071 : Sheldwich	221
E04005065 : Norton, Buckland and Stone	202
E04005064 : Newnham	158
E04005051 : Eastling	154
E04005075 : Tonge	147
E04005074 : Throwley	140

E04005062 : Milstead	118
E04005072 : Stalisfield	96
E04005042 : Badlesmere	52
E04005057 : Leaveland	44

### **Cerda Paragraph 5.65/5.66 / DLP Regulation 18 Question 34**

There is a statement in the Sustainability Assessment by the AONB Unit “*[The Kent Downs AONB Unit is not] opposed to any new housing in the AONB, particularly if development increased the supply of affordable housing for those with proven local needs. However, it would need to relate well to existing villages, be of a limited scale and complimentary to local character in form, setting, scale and contribution to settlement pattern. Advocate the use of landscape capacity studies to ascertain the capacity of AONB villages.*” BPC strongly support this statement by the AONB Unit and assert that any development in Bredgar must be to meet only proven local community needs, must protect and enhance the landscape, improve biodiversity and protect our heritage.

Our SBC Ward Cllr requested a Housing Needs Surveys for all the villages in her ward in August 2019 and the Chair BPC followed up on it in January 2020. Despite the request being accepted it has not yet been started. Bredgar obtained funding for a Conservation Area Review from the Western Area Meeting this year but the SBC Conservation & Design Manager has indicated it is unlikely to be scheduled until 2023. In answer to a question (by Cllr Monique Bonney) at the last Western Area Meeting he also rejected adoption of a Landscape Assessment by SBC, even if BPC funded the work. All these matters need to be addressed before any development is considered in Bredgar.

### **Cerda Paragraph 5.69 / DLP Regulation 18 Question 37**

SBC are trying to grow their tourism offer and economy. Bredgar in the AONB is a tremendous asset for the borough of Swale, it is one of the most picturesque villages in Swale with its village pond, and a place to be cherished for the benefits it delivers for tourism and leisure now and in future (see <http://www.bredgarpc.org.uk/community/bredgar-parish-council-12636/home> ). The Parish includes Bredgar and Wormshill Light Railway that has the potential to positively contribute from its setting in the AONB. For these reasons and more, mandatory pre-requisites, before any development, must be Housing Needs Survey, Conservation Area Review, and Landscape Assessment, and any other assessment needed to protect against harm to the parish, all formally adopted by SBC.