



The countryside charity

Kent

Matter 3 – Housing Allocations

Issue 6 – Eythorne and Elvington and Wingham Housing Sites

Policy SAP28 – Land between Eythorne and Elvington

Q1 How has the scale of development proposed been established? Is it commensurate with the role and function of Eythorne and Elvington as separate Local Centres?

Q6 What is the justification for the suggested changes to Policy SAP28? Why are they necessary for soundness?

CPRE Kent has already submitted Hearing Statements in respect of Matter 2, Issues 2 and 3, with respect of how the settlement hierarchy and housing distribution will impact the two separate villages of Elvington and Eythorne.

We object to the scale of development being proposed because it's not commensurate with the actual role of Elvington and Eythorne villages, that is, they should not be considered to be existing local centres for the purposes of the settlement hierarchy.

By way of a recap, at the outset CPRE Kent would like to make it clear that it supports a spatial strategy that allocates development in accordance with the Council's settlement hierarchy, being as it is, an indicator of sustainability.

Using this evidence-based approach, it would be reasonable to expect that development would be focused at higher order settlements. Such that the regional centre of Dover (tier 1) would be allocated most development, followed by the district centre of Deal (tier 2) and the rural service centres of Sandwich and Aylesham (tier 3) before allocating land at the tier 4 settlements, identified as local centres.

With respect to local centres, it is noted that AM123 suggests the order of settlements in Appendix E be adjusted to reflect their actual score rankings – with Ash being ranked above Wingham and Eastry and the two separate villages of Elvington and Eythorne remaining at the bottom of the list of local centres.

It is noted that the Council has put forward additional modifications (AM9/AM10) that refers to the strategic allocation of land at Elvington and Eythorne as a means of strengthening their “settlement roles as local centres”, rather than as previously stated to create a new local centre.

This proposed modification would seem to suggest a degree of back-tracking. During the Regulation 19 consultation phase, these two poor-scoring developments were to be elevated out of the larger village category by virtue of the ‘benefits’ of development. Whereas now

CPRE Kent - The Countryside Charity

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent TN27 0AD
www.cprekent.org.uk Phone 01233 714540 Email info@cprekent.org.uk

Registered charity (number 1092012), limited company registered in England (number 4335730)

the proposed development is being presented as seeking to consolidate a role that they purportedly already fulfil.

We would welcome further explanation as to how the Council has differentiated between the two villages of Elvington and Eythorne as local centres and the larger villages listed in the settlement hierarchy.

Furthermore, it is not particularly clear in the methodology when it's the Parish of Eythorne that's being described, rather than the two individual villages of Elvington and Eythorne and whether the assessment of the provision of services and facilities at Parish level has somehow inadvertently fed into the resultant rankings of the two separate villages of Elvington and Eythorne.

By way of example, the alphabetical review of Parishes in HEB03 (Rural Settlement Hierarchy topic paper – table 5.1) refers to access to facilities for Elvington residents as being in neighbouring Eythorne, even though the walking route referred to is via a narrow footway along Adelaide Road, which does not seemingly allow for two-way pedestrian traffic to pass. Is there evidence that this is a well-used path to school, for instance, or are most journeys made by car?

In addition, Elvington only has a part time Post Office, so frequency/accessibility of services offered will be significantly different compared to residents in other villages with a full time Post Office. It is considered that the scoring for Elvington should be amended to take this into account.

The Council state at paragraph 4.9 of HEB03 (Rural Settlement Hierarchy topic paper) that the data in Table 2 (page 24) will be updated to reflect the changes in bus timetabling locally. Has this been done?

The scores attributed to Elvington (22) and Eythorne (20) raise cause for concern in themselves - when primary school children in Elvington need to travel to Eythorne for class – in that the presence of a school has resulted in a lower score than the village without one. Moreover, the top-ranking larger villages have broadly similar scores (18), reflecting the fact that they have their own primary schools.

On the subject of schools, it's not clear what the justification was for accepting the request of Eythorne Parish Council to include Woodpecker Court School (for children with an Education Health Care Plan) as a primary school for the purposes of the settlement hierarchy – see paragraph 4.7 of HEB03). Although an asset to the community in general, its very specific attendance criteria mean it shouldn't be given weight in terms of the Council's scoring methodology.

If the scorings for both villages were adjusted accordingly, they would be around the 19 mark, confirming that both the villages of Elvington and Eythorne are in fact larger villages and not local centres.

Clearly the Council hasn't followed its own evidence. Instead, development appears to have been suppressed at the highly sustainable town of Deal (which has no strategic allocations), in favour of the lower order, less sustainable villages of Elvington and Eythorne.

Not adhering to the evidence of the settlement hierarchy clearly undermines the Council's vision of a "spectacular and sustainable environment" – such that development is being focused in unsustainable locations.

This reliance on lower order settlements to fulfil the District's housing need could be re-thought if only the Council had worked with landowners to bring forward development in the most sustainable of locations.

In terms of the specifics of this strategic allocation Elvington and Eythorne are two distinct villages separated by an area of designated open space and other open land.

AM58 seeks to change the policy emphasis (paragraph 4.220) from one of growing the villages of Eythorne and Elvington to create a new local centre in the District, to one that instead seeks "to strengthen these settlements' roles as local centres with new services and facilities to be delivered alongside new homes".

For the reasons set out above, CPRE Kent considers Elvington and Eythorne to be individual villages and not separate local centres.

Development in the gap between these villages would result in coalescence and a loss of the specific identities of both villages.

Pedestrian links between the two villages are hampered by the narrow footway along Adelaide Road. Any proposed new linkages between the two villages would need to negotiate the significant drop in levels from Terrace Road into the site. The alternative option of using the Miners' surfaced footpath (accessed from the corner of Sweetbriar Lane) starts well and then becomes more problematic when it meets the fenced enclosure to the Pike Road Industrial Estate where it becomes unsurfaced path, and then further along the route is obstructed by electric fencing around horse paddocks at the end of Elmton Lane, which would place increased pressure on access local services and facilities by car, rather than on foot.

We query what has changed since the 2010 Core Strategy settlement hierarchy that has elevated these two villages from the status of "village" to "local centre" and urge the Inspector to consider a modification to the plan to place both villages of Elvington and Eythorne into a lower tier of the settlement hierarchy and delete strategic allocation SAP28.