

Cabinet Meeting	
Meeting Date	3 June 2020
Report Title	Interim Planning Policy Statement for park home sites
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning
SMT Lead	James Freeman, Head of Planning
Head of Service	James Freeman, Head of Planning
Lead Officer	Jill Peet, Planning Policy Manager
Key Decision	No
Classification	Open
Recommendations	It is RECOMMENDED that the Interim Planning Policy as set out in paragraph 3.2 is adopted as a material planning consideration.

1 Purpose of Report and Executive Summary

- 1.1 Priority 1 of the Council's emerging corporate plan is "Building the right homes in the right places". With average house prices in the borough over 9 times average income, affordability is an issue for many. The Council is seeking to explore different avenues to widen the housing options in Swale and to explore the potential for non-traditional types of home, for example, park homes or modular housing and specialist accommodation to meet the needs of the borough's (growing) elderly population across the borough. The local plan review and housing supplementary planning document will provide the detailed policies to support the provision of the right homes in the right places but in the meantime, the need has arisen to prepare an interim planning policy statement to support proposals for park homes.
- 1.2 Members will be aware the Council does not have a 5 year housing land supply and consequently is vulnerable to the application of the 'tiled balance' when determining planning applications. The 'tiled balance' is where proposals for new housing (in all its forms) must be considered favourably IF it is sustainable development and the benefits of the proposals outweigh the harm. This applies to sites that are not local plan housing allocations. The Council is vulnerable to speculative planning applications for Park Homes and as it currently stands, there are no policies or guidelines for new Park Homes sites. This Interim Planning Policy Statement provides clear guidance through a pro-active approach that seeks to protect amenity of existing and new communities and ensure the Council maintains the control needed to ensure quality and standards are achieved.
- 1.3 As well as promoting a wider range of housing options, the interim planning policy statement has the potential to address some of the planning enforcement issues on holiday park sites in breach of seasonal holiday park occupancy where

permanent residential use could be acceptable. In areas where permanent residency would not be acceptable under the terms of the interim planning policy statement, enforcement action will take place against those in breach of their planning conditions.

- 1.4 The purpose of this report is to agree a way forward on the planning policy position by seeking to adopt an interim planning policy statement that would be a material consideration in supporting proposals for park homes.

2 Background

- 2.1 This approach provides the potential to widen the housing options available in Swale and to recognise the housing needs of the elderly population in particular, supporting park homes, a housing product that can be exclusively for the 55+ years age group.
- 2.2 Appendix I of this report is the Local Plan Panel report of 7 May 2020 explaining the issues that brought about a proposed interim planning policy position that started with considering the potential of some small scale private enclaves that might better lend itself to the park home model. The consultation undertaken along with a summary of the main issues raised is also set out in this report and its appendices.
- 2.3 Specialist consultants are currently preparing evidence for the local plan review on the borough's housing needs in terms of the size, type and tenure of housing needed for different groups in the community. This includes older people and an assessment of the demand for park homes. This evidence will be reported to the Local Plan Panel in due course and will feed into the development of the policies in the local plan review. In the meantime, there is an opportunity, through the proposed interim planning policy statement to provide support for this type of housing in a proactive way that could help to increase Swale's housing offer and supply.
- 2.4 A park home is a pre-fabricated dwelling constructed to a British Standard under controlled workshop conditions before being transported to a park/location. They are timber framed and mounted onto a steel frame. They have tough, durable weatherproof exterior and textured finish. They are put together on site and connected to mains services (electricity, gas and drainage). They are single storey pitched roof constructions, usually provided fully furnished with built-in cupboards and wardrobes, kitchen with integrated appliances and central heating, double glazing and carpeting throughout as standard. The relevant legal requirements, e.g. space standards, protections and so on are contained in the Mobile Homes Act (2013).
- 2.5 In the last decade, the industry has modernised and homes are now required to be built to BS3632 standard that ensures properties have high specifications in insulation, ventilation, sustainability, room sizes and design elements (e.g. larger kitchens). The council declared a climate change emergency and, as part of the

local plan review, is looking to secure low and/or zero carbon dwellings. The potential for park homes to achieve higher standards could be a possibility given the bespoke and made-to-order nature of park home manufacturing. The potential for carbon neutral homes is being explored as part of the local plan review process.

- 2.6 The introduction of the Policy will have the advantage of ensuring that any Park Homes proposals brought forward would need to meet expected standards in terms of siting, standards of construction and safety and protecting the amenity of those living on the sites.
- 2.7 The new policy approach could result in a shift of enforcement resource pressures to a different council department (e.g. licensing or housing) but this is likely to be a gradual process and of limited scale given the policy's criteria that restricts locations where such proposals would be acceptable. A license is also required for the land upon which a park home is situated

3 Proposals

- 3.1 Although an Interim Planning Policy would not have the full weight of adopted local plan policy, it will be a material planning consideration that will hold some weight in the consideration of planning proposals for park homes in the interim until the local plan review is progressed to adoption.
- 3.2 The Interim Planning Policy is proposed as follows:

Proposals for residential park homes will be granted provided that all of the following criteria are met:

- 1. the site is in a sustainable location with access to services and facilities;***
- 2. if the site is within an area at high risk of flooding, the risks must be mitigated through design solutions to the satisfaction of the Environment Agency and these solutions will not lead to other material planning harm;***
- 3. the accommodation that is the subject of the application complies or will comply within 12 months of the granting of planning permission with standards BS3632 and meets the requirements of the Caravan sites and Control of Development Act 1960 (as amended) and the Mobile Homes Act 2013 in terms of both standard and condition of the unit and external layout within the context of surrounding area;***
- 4. the proposed development will demonstrate that they are designed in line with the 'Lifetime Homes' criteria;***
- 5. the site is not in an area of coastal erosion; and***
- 6. the site layout is acceptable in terms of privacy and amenity of site occupants.***

- 3.3 It should be noted that whilst the Policy does not close down the option for permanent residences to be formed within the flood risk areas, the 'design and quality' bar would be set very high, including overcoming any Environment Agency objection to ensure that such development would not give rise to any significant safety issues.
- 3.4 Whilst it is possible a number of caravan and chalet parks could take advantage of the policy position, it is likely that many existing larger scale holiday park operations would remain as such and unlikely to see any significant commercial benefit for changing from their current operation.
- 3.5 In the absence of planning permission for permanent residential use, the Council will consider taking enforcement action in order to ensure compliance with occupancy conditions imposed on holiday parks.
- 3.6 The scale of park home development that is likely to come forward is difficult to predict but it is likely to be small scale, leading to a number in the low hundreds over the local plan period. This is because of the limited number of Park Home operators generally and the specific requirements of the policy that rules out locations in the coastal erosion areas and land at high risk of flooding, sites in unsustainable locations and the licensing requirements that must also be adhered to. Although not explicit in the policy, the expectation is that this is housing more suitable for the 55 years + age group and this will be controlled through planning conditions and/or licensing.

4 Alternative Options

- 4.1 The Council could decide to continue with its existing policy noting that its position has been backed by Planning Inspectors. However, this would prevent or delay opportunities to facilitate the delivery of a wider choice of homes and would also require the Council to seriously consider proceeding comprehensively with prosecution action in the next few closed seasons noting the increased significant number of occupiers currently flouting the occupancy condition without a home to return to. This could result in a switch of pressures to other Council services (for example, the need to provide for those presenting as homeless).

5 Consultation Undertaken or Proposed

- 5.1 In late January of this year, the Council wrote to all registered park owners/operators in the Borough to gauge interest for a revision to the current policy approach. The response rate was over 60% and was generally supportive. With this in mind, the policy set out above was drafted in collaboration with other council departments and consulted on for a period of 6 weeks.
- 5.2 There were 14 separate responses to the consultation, including individuals, park owners and operators and the parish councils of Minster on Sea, Warden and Eastchurch with a further representation from a member of Sheerness town council. The comments received have been summarised in appendix II of this

report (with a proposed response) and the full representations made by the town and parish councils is contained in appendix III.

5.3 Many of the comments made were generally supportive of the proposed approach set out in the draft policy although a number of concerns and objections were also raised. These are summarised below:

- Vehicular access and condition of roads, especially in winter where roads are not treated
- Ability of the Council to enforce breaches of planning permission in light of current failures to enforce.
- The policy will create substandard housing accommodation
- Burden on infrastructure
- Increase in the value of the site will force out those unable to upgrade their units
- There will be no benefits of the proposal to the existing residents in the area
- Loss of holiday accommodation and the impact this will have on the local economy and tourism
- Concerns that this policy will create a negative image of areas where there is a concentration of residential caravans/chalets
- The cost of the required upgrades to the standards will be unaffordable for most already living in caravans
- Enforcement action will still need to be undertaken to ensure no abuse of the policy occurs and should be adequately resourced and supported
- Criticism that the focus should be on delivering better quality bricks and mortar homes as the lower costs of this type of accommodation will exacerbate problems associated with poverty and homelessness

6 Implications

Issue	Implications
Corporate Plan	Priority 1: Building the right homes in the right places and supporting quality jobs for all.
Financial, Resource and Property	<p>There are no direct financial implications of proceeding with the interim policy.</p> <p>However, there could be an unintended consequence of additional stress being put onto Housing Service in having to potentially handle more homelessness cases.</p> <p>Licensing – potential to place additional pressure on licensing resources</p>

	Amendments to the current waste collection contracts may need to be negotiated and this could have resource implications.
Legal, Statutory and Procurement	Should the Interim Policy be agreed, this is likely to lead to a reduction in the number of enforcement notices served and the potential for prosecution action.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	It will be important to ensure that any relaxation of occupancy condition protects the living conditions of occupiers and the local environment.
Health and Wellbeing	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Local Plan Panel Report, appendices and addendum of 7 May 2020
- Appendix II: Minutes of the Local Plan Panel 7 May 2020

8 Background Papers

None.

Local Plan Panel Meeting	
Meeting Date	7 May 2020
Report Title	Interim Planning Policy for Residential Park Homes
Cabinet Member	Cllr Mike Baldock, Cabinet Member for Planning
SMT Lead	James Freeman, Head of Planning
Head of Service	James Freeman, Head of Planning
Lead Officer	Jill Peet, Planning Policy Manager
Key Decision	No
Classification	Open
Recommendations	<p>It is RECOMMENDED that:</p> <ol style="list-style-type: none"> 1. the content of this report and the attached appendices are noted; and 2. the Interim Planning Policy as set out in paragraph 3.2 be agreed and presented to Cabinet for agreement; and 3. The Interim Planning Policy is adopted as a material planning consideration.

1 Purpose of Report and Executive Summary

- 1.1 The Council has served around 200 planning enforcement notices on holiday park sites across the Borough in respect of breaches of seasonal holiday park occupancy conditions and as a consequence should normally be seeking to prosecute those which have not complied with the enforcement notice over the recent closed season.
- 1.2 However, the Council may wish to reconsider its position regarding whether at least some Holiday Park sites may be suitable for permanent residential use rather than restricted to either an 8 month or 10 month open season holiday use.
- 1.3 The purpose of this report is to agree a way forward on the Holiday parks planning policy position by seeking to adopt an interim policy statement that would be a material consideration in determining future planning applications to convert to permanent residential use and will aid any decision to proceed with any planning enforcement action and/or prosecution.

3 Background

2.1 The Council's current planning policy for holiday parks is set out in the adopted local plan, Bearing Fruits (July 2017). Policy DM4 provides the policy framework for proposals for new holiday parks or extensions to existing parks. Policy DM5 sets out the

policy framework for addressing the planning implications of proposals relating to the occupancy of holiday parks. The Policies are set out in appendix I.

2.2 Most holiday parks in Swale are restricted by planning condition to an eight or ten months period of occupation. The limited occupancy period was imposed with a view to ensuring that these holiday parks were not used as permanent (and often sub-standard) housing, many of which would be in poorly accessible parts of the Borough and to protect the character of rural areas and the tourism offer that is a significant part of the Borough's economy.

2.3 There remain a number of holiday caravans and chalets being occupied as permanent dwellings in breach of planning conditions. Whilst the Council acknowledges the reasons for this are many and complex, the use of holiday caravans and/or chalets on some sites should not be continued in perpetuity due to the:

- external space standards affecting the layout of holiday parks and standards of privacy and amenity for occupants
- sustainability of the location in terms of access to services and facilities
- the risk of flooding and/or coastal erosion where applicable
- the impact on the character and appearance and tranquillity of the countryside

2.4 It should be noted that permissions being granted for year round occupation would not necessarily result in a permanent residential use of a caravan or chalet as they may remain and operate as a holiday home with unfettered access as a second home. In these circumstances, these units would not contribute to meeting the Council's housing requirement set by Government.

2.5 Standards and legislative requirements vary between holiday and residential caravans, and holiday chalets and dwellings, and this is something to bear in mind when considering the overall policy approach.

2.6 However, there is a view that suggests that some of the existing holiday parks may be able to be converted to permanent residential sites and could be operated on the 'park homes' model and provide relatively cheap good quality residential properties, particularly for the over 55's to release equity to support their retirement and/or to provide equity for their children to help contribute towards saving for a home. This would therefore have the significant benefits of releasing housing for younger families and to provide a significant contribution to meeting housing need for the elderly and the housing numbers required by Government.

2.7 Should this conversion to permanent residential use be supported, there would therefore be a need to ensure that the policy drafting only enables those schemes which deliver a well designed residential layout and environment, meet legislative requirements and provide appropriate access to support services and facilities.

3 Proposals

3.1 Although an Interim Planning Policy would not have the full weight of adopted local plan policy, it will be a material planning consideration that will hold some weight in the consideration of planning proposals for the conversion/redevelopment to permanent residential use of such parks in the interim until the local plan review is progressed to adoption. Additionally, it would provide a basis upon which the Council would review its position regarding the current active planning enforcement notices and consider whether any prosecution should take place during the next closed season.

3.2 The proposed Interim Planning Policy is proposed as follows:

Proposals for the conversion/redevelopment of holiday accommodation on holiday parks in the Borough to permanent residence (12 months of the year) will be granted provided that all of the following criteria are met:

1. the site is in a sustainable location with access to services and facilities;
2. if the site is within an area at high risk of flooding, the risks can be mitigated through design solutions to the satisfaction of the Environment Agency and these solutions will not lead to other material planning harm;
3. the accommodation that is the subject of the application complies or will comply within 12 months of the granting of planning permission with standards BS3632(2015) and meets the requirements of the Caravan sites and Control of Development Act 1960 (as amended) and any associated Acts such as the Mobile Homes Act 1983 (as amended) and the Mobile Homes Act 2013 in terms of both standards, agreements and conditions of the units on site and external layout within the context of surrounding area;
4. the site is not in an area of coastal erosion; and
5. the site layout is acceptable in terms of privacy and amenity of site occupants

3.3 In the absence of planning permission for permanent residential use, the Council will consider taking enforcement action in order to ensure compliance with occupancy conditions imposed on holiday parks.

4 Alternative Options

4.2 The Council could decide to continue with its existing policy noting that its position has been backed by Planning Inspectors. However, this would then require the Council to seriously consider proceeding with prosecution action in the next closed season noting the potential impacts to those occupiers currently flouting the occupancy condition without a home to return to. This could result in additional pressure for other Council services (for example, the need to provide for those presenting as homeless).

5 Consultation Undertaken or Proposed

5.1 In late January of this year, the Council wrote to all registered park owners/operators in the Borough to gauge interest for a revision to the current policy approach. The response rate was over 60% and was generally supportive. With this in mind, the policy set out above was drafted in collaboration with other council departments and consulted on for a period of 6 weeks.

5.2 Twelve responded to the consultation, including individuals, park owners and operators and the parish councils of Warden and Eastchurch with a further representation from a member of Sheerness town council. The comments received have been summarised in appendix II of this report (with a proposed response) and the full representations made by the town and parish councils is contained in appendix III.

5.3 Many of the comments made were generally supportive of the proposed approach set out in the draft policy although a number of concerns and objections were also raised. These are summarised below:

- Vehicular access and condition of roads, especially in winter where roads are not treated
- Ability of the Council to enforce breaches of planning permission in light of current failures to enforce.
- The policy will create substandard housing accommodation
- Burden on infrastructure
- Increase in the value of the site will force out those unable to upgrade their units
- There will be no benefits of the proposal to the existing residents in the area
- Loss of holiday accommodation and the impact this will have on the local economy and tourism
- Concerns that this policy will create a negative image of areas where there is a concentration of residential caravans/chalets
- The cost of the required upgrades to the standards will be unaffordable for most already living in caravans
- Enforcement action will still need to be undertaken to ensure no abuse of the policy occurs and should be adequately resourced and supported
- Criticism that the focus should be on delivering better quality bricks and mortar homes as the lower costs of this type of accommodation will exacerbate problems associated with poverty and homelessness

6 Implications

Issue	Implications
Corporate Plan	Priority 1: Building the right homes in the right places and supporting quality jobs for all.
Financial, Resource and Property	There are no direct financial implications of proceeding with the interim policy. However, there could be an unintended consequence of additional stress being put onto Housing Service in having to potentially handle more homelessness cases.

	Amendments to the current waste collection contracts may need to be negotiated and this could have resource implications.
Legal, Statutory and Procurement	Should the Interim Policy be agreed, this is likely to lead to a reduction in the number of enforcement notices served and the potential for prosecution action. Changes could potentially lead to an increase in workload for other departments such as housing who enforce the Caravan Site and Control of Development Act.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	It will be important to ensure that any relaxation of occupancy condition protects the living conditions of occupiers and the local environment.
Health and Wellbeing	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

- Appendix I: Adopted Local Plan Policies DM4 and DM5
- Appendix II: Summary of comments received and proposed response
- Appendix III: Comments received from Warden Parish Council, Member of Sheerness Town Centre and Eastchurch Parish Council

8 Background Papers

None.

Appendix I: Bearing Fruits Policy DM4 and DM5

Policy DM 4 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 DM 24;
 - 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.

Policy DM 5 The occupancy of holiday parks

In order to ensure a sustainable pattern of development and to protect the character of the countryside, planning permission will not be granted for the permanent occupancy of caravans and chalets. Where it can be demonstrated that higher quality standards of holiday accommodation can be secured, planning permission will be granted for proposals to extend the occupancy of holiday parks between 1 March and 2 January the following year (a 10 month occupancy), provided that:

1. The site is not at risk of flooding, unless, exceptionally, applications accompanied by a Flood Risk Assessment (FRA) satisfactorily demonstrating that the proposal would result in no greater risk to life or property and where an appropriate flood evacuation plan would be put in place;
2. The amenity and tranquillity of the countryside and residential areas are safeguarded;
3. The proposals are in accordance with Policies DM 22 and DM 23 relating to the coast and the coastal change management area; and
4. Where located adjacent or in close proximity to the Special Protection Areas (SPA), an assessment has been undertaken to determine the level of disturbance to over-wintering birds and identified mitigation measures, where appropriate.
5. The extension of occupancy is subject to planning conditions safeguarding the holiday accommodation from being used as sole or main residences, as set out in Appendix 2.

Appendix II: Summary of consultation responses and proposed response

Local Plan Panel 7 May 2020

Respondent	Representations made	Proposed response
Park owner	Is of the opinion that their park will meet the criteria of the draft policy and fully supports the proposed policy approach set out in the consultation draft.	Support noted.
Park owner	In other areas where 12 months occupancy is permitted, the units are available all year regardless of the weather. Static caravans and lodges are now built to such a high standard that meet the BS3632 standards that are residential grade. Having a home to use all year has benefits with no need to close down. This approach allows fairer competition with other sites offering 12 months occupancy.	Support noted.
	It is not clear what the difference would be between 12 months occupancy for holiday homes and permanent residency. This needs to be clarified.	It is understood that it is not always possible to differentiate between a permanent residency and a holiday home, although it would be only those homes which would demonstrably be permanent residencies that would contribute to meeting housing need and as a consequence housing supply.
Park owner	In the event that 12 months occupancy isn't suitable for a particular site, can SBC follow the approach undertaken by neighbouring councils (Thanet, Canterbury and Medway) and allow 11 and a half months?	This is unlikely to be possible given the objectives of the draft interim policy statement.
	Size of parks could be a factor in determining their eligibility for extension to 12 months occupancy. Smaller parks are likely to have a less detrimental impact on local community and surrounding areas.	The significance of park size would be considered on a case by case basis along with other factors.
	12 month occupancy would have a beneficial impact on the local economy and make some services more viable.	Support noted.
	Provides opportunities for those to have their own home who otherwise wouldn't be able to afford one and/or save for a traditional home as caravan/chalet rents are lower.	Support noted.
	Caravan/chalets are particularly suitable for those with mobility and/or health issues.	Support noted.

Respondent	Representations made	Proposed response
Resident of Oak Lane	All parks should have proper vehicular access and a safe walking route for pedestrians.	This will be assessed on a case by case basis and, if relevant to the individual proposals, the highways authority must be satisfied
	Sites should be reserved for non-Travellers	The Council has no control over who occupies any home.
Resident of Minster	Supports the proposed policy and approach.	Support noted.
Park owner	What means and resources will the Council employ to ensure 'unfettered access' to a second home does not become unpoliced residential use when they can't deliver effective policing and enforcement of existing site licence conditions.	Enforcement has already proven to be challenging for existing breaches due to the high legal bar that is set. It is understood that it is not always possible to differentiate between a permanent residency and a holiday home, although it would be only those homes which would demonstrably be permanent residencies that would contribute to meeting housing need and as a consequence housing supply.
	Does the policy apply to Sheppey or the whole Borough?	This would be a Borough-wide policy if adopted.
	The Borough is under extreme pressure to reach housing targets and to allow the conversion of holiday caravans would be a cheap and dirt way to unload the burden. The Council should not skate around the trouble and expense of planning enforcement activity related to this.	The Council is now looking at alternative products to deliver new homes and widen the housing offer of Swale. The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.
	The majority of people who are currently being allowed to 'live' on these parks do so because of their limited means and would not have the funds available to sell their existing holiday caravan back to the park owner (at a loss) and then spend many tens or even hundreds of thousands on a new BS3632 rated home. Policy in its current proposals could adversely affect the people it purports to be aiding.	The Council is seeking to ensure a minimum standard for permanent residency housing to be secured in line with Park Homes. The Council accepts that this may not be possible for every case but permanent residency in a home that is not at an acceptable standard will not be permitted.
	BS3632 (for non-permanent dwellings) does not match the stringent properties demanded by SAP calculations in current homebuilding. An explosion of reduced quality dwellings within the borough cannot be a good direction of travel.	Objection noted, although standard is in line with Park Homes.
	Presenting residential status to holiday parks (albeit with a few compliance requirements) will add much value to the premises, as much as doubling the value of some parks. SBC needs to ask itself if it wishes to reward rogue park owners who don't manage their business affairs legally and who flout regulations,	Not all parks will be eligible for residential status. Permissions will only be granted where the criteria in the policy is met and with conditions. The draft policy seeks to ensure a quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.

Respondent	Representations made	Proposed response
	because this will be the net result of the proposed changes – they’ve been breaking your rules and now you propose to fill their pockets with money	
	If Swale Planning intends to offer residential status to qualifying holiday parks I believe it should place a five-year moratorium (on residential status) on those parks subject to existing planning enforcement notices. This would show great justice and fairness being dealt and would allow the professional and conscientious park operators to show the way forward.	The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.
Resident of Minster	Oppose this proposal on grounds of further negative impacts on local image, social deprivation, quasi-urban sprawl and burden on infrastructure.	Opposition to the draft policy is noted.
	To allow existing caravans to become permanent homes would make it difficult to refuse other developments of a similar low standard. To refuse those is liable to end up in Judicial Review, unless the Council could identify exceptional circumstances to justify the exercise of discretion. Shanty towns would spread, consuming ever more viable agricultural land.	Not all parks are eligible to become permanent homes. Proposals will be determined based on their individual merits and would be required to meet the standards of the draft policy as a minimum. Allowing, where appropriate, the permanent use of holiday caravans will assist with delivering needed homes in the Borough and has the potential to reduce some of the pressure to develop on greenfield sites in the Borough.
	Infrastructure on the Island is already at breaking point and will not cope with an increase in more permanent homes.	Opposition noted. Proposals will be determined based on their individual merits and could create opportunities to support existing local services and facilities. Holiday parks will only be eligible to become permanent residences if they meet the criteria in the draft policy.
	The existing arrangements limiting occupation of caravans already sends a clear signal that they are not suitable for permanent residence.	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits.
Park owner	Generally supportive of the approach proposed in the draft interim policy statement.	Support noted.
	With regard to external space standards we suggest that these should be based on Government Model Standards for Caravan Sites in England and Wales. as follows.	These standards are set out in the draft policy under BS 3632.

Respondent	Representations made	Proposed response
	<p>- Except in the case mentioned in sub paragraph (iii) and subject to sub-paragraph (iv), every caravan must where practicable be spaced at a distance of no less than 6 metres (the separation distance) from any other caravan which is occupied as a separate residence. (ii) No caravan shall be stationed within 2 metres of any road or communal car park within the site or more than 50 metres from such a road within the site. (iii) Where a caravan has retrospectively been fitted with cladding from Class 1 fire rated materials to its facing walls, then the separation distance between it and an adjacent caravan may be reduced to a minimum of 5.25 metres.</p> <p>For chalets this would be controlled by building regulations and subject to materials.</p>	
	<p>With regards to conditions relating to occupancy, those applied to previous permissions extending occupancy from 8 months to 10 months should be revised. This is because they would not apply satisfactorily to 12 – month occupancy in certain circumstances. Therefore, the current schedule of conditions attached to a planning application should be revised as follows:</p> <p>“ 1.(a) No chalet shall be used as a postal address; and (b) No chalet shall be occupied in any manner, which shall or may cause the occupation thereof, to be or become a protected tenancy within the meaning of the Rent Acts 1968 and 1974; and (c) If any chalet owner is in breach of the above clauses their agreement will be terminated and/or not renewed upon the next expiry of their current lease or licence. On request, copies of the signed agreement[s] shall be provided to the Local Planning Authority.</p> <p>2. Any chalet that is not the subject of a signed agreement pursuant to condition 2 shall not be occupied at any time.</p>	<p>Conditions for 8 months or 10 months would only be revised through the planning process and an application for a change of condition or fuller scale changes such as for permanent residential use. Each case is assessed on its own merits and would need to meet the criteria in the policy once approved.</p>

Respondent	Representations made	Proposed response
	<p>3. (a) The owners or operators of the Park shall at all times operate the Park strictly in accordance with the terms of the Schedule appended to this decision notice.</p> <p>Schedule: The Park operator must:</p> <p>(1) Ensure that all chalet users have a current signed agreement covering points (a) to (c) in condition X of the planning permission; and</p> <p>(2) On request, provide copies of the signed agreement[s] to the Local Planning Authority; and</p> <p>(3) Not allow postal deliveries to the caravan or chalet, postal deliveries to be made to the park office".</p> <p>This schedule will enable the units to be occupied in a way which complies with the suggested intentions of the council Local Plan Panel report.</p>	
	<p>Para 2.6 should be amended to reference that existing parks could be designated as park home sites if they are satisfactorily laid out in accordance with the space standards set out above and conditions are attached to a 12 month occupancy.</p>	<p>Noted. This is set out in the draft policy.</p>
<p>Warden Parish Council</p>	<p>The revised policy to allow 10 months of the year occupancy was consulted on and agreed. Enforcement action not being taken against 200 individuals. Why are these sites that break the rules not being served the notices?</p>	<p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal 'high bar' in place for evidence to support the fact that someone is living permanently in a holiday home.</p>
	<p>The areas in the East of Sheppey are poorly served by services and facilities, particularly roads, schools, bus services and roads.</p>	<p>Objection noted.</p>
	<p>There has been no enforcement for years on the current regulations to stop unfettered use, what will change if this is granted?</p>	<p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal 'high bar' in place for evidence to support the fact that someone is living permanently in a holiday home.</p>

Respondent	Representations made	Proposed response
	<p>There is no evidence to suggest that more than a very few sites could have access to the millions of pounds to provide the units you are suggesting, prices for Park Homes start at £200,000. Probably 1 or 2 smaller sites might qualify now.</p> <p>The proposals will not help the tourism or economy, the majority of holiday unit users come here to escape the hustle and bustle of town life and could not afford to upgrade their units. and this part of the economy will be lost.</p>	<p>Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. A significant number of parks will not be eligible as they will not meet the criteria and their continued use as holiday accommodation is supported.</p>
	<p>If you prematurely allow the sites 12 months to meet your planning specifications and they don't comply, what will you do to rescind the decision, as the councils record of enforcement has been non existent over the last years, which is why you have ongoing situation now.</p>	<p>The grant of planning permission would require any existing holiday home operation to transfer to permanent residency upon compliance with conditions and associated standards being implemented.</p>
	<p>The sheer volume of the units on the island and the implications for the settled community far outweigh the small benefit that can be gained from this substantial increase to the population, which already an area of deprivation. We would urge the council not to pass this proposal and continue with the existing policy until you have complete control of the current problems. Please don't make a "drop in the ocean" problem escalate into a flood.</p>	<p>Objection noted although not all parks will be eligible for permanent residential status and proposals must meet the standards set out in the draft policy.</p>
Park owner	<p>The parks' owner remains supportive of the proposed policy change and the wording of the said policy. However, there are perhaps further opportunities to improve the flexibility of this proposed policy wording. For example, in the instances where only parts of the site are considered acceptable for the siting of caravans as a permanent residence (i.e. due to the layout), the policy could be worded to ensure that those parts of the site which are in compliance with model stands (BS3632) and can achieve an adequate residential layout, are not prejudiced by those parts of the site that cannot. As a result, a park could effectively operate as a mixed-use park, where certain areas</p>	<p>General support for policy approach noted. There is no restriction on the size of site that can be submitted for consideration under this draft policy. Parts of sites or entire sites could be submitted and each will be assessed based on their individual merits.</p>

Respondent	Representations made	Proposed response
	could accommodate caravans used as a permanent place of residence while the rest remains as a holiday park.	
	Regardless of whether the sites are considered acceptable for residential occupation, we consider it appropriate (at the very least) to either remove the policy restricting occupancy of caravans all together, or if still considered necessary, provide an additional policy to the one currently proposed, which sets out a standard condition such as: 'Caravans shall be occupied for holiday purposes only (12 months) and shall not be occupied as a person's sole or main place of residence, whilst the owners/operators shall maintain an up-to-date register of the names of all owners/occupiers of individual caravans on the site, and of their main home'. This would bring the policy in line with recent case law decisions, which deems the suggested wording sufficient from preventing permanent residential occupation and meets all the NPPF tests for imposing conditions.	Conditions can only be removed through the planning application process. Each case needs to be assessed on its individual merits and the removal of a policy restricting occupancy as suggested would not be appropriate.
Resident/Member of Sheerness Town Council	The proposal suggests that in making changes enforcement of the current rules could be relaxed removing the need to take action against parks presently not recognising restrictions. The Isle of Sheppey already has many Holiday Parks acting as unofficial residential parks. The current system is flawed with many using friends and relatives homes as "main residence" whilst living at these parks throughout the open season. Those presenting as homeless and criticising the closed season do so after knowingly entering into such an arrangement possibly and providing false information.	The Interim Policy would enable a more focussed approach to planning enforcement on those sites not complying with their occupancy conditions which would also not demonstrably be able to meet the criteria policy and/or are within areas where permanent residency would not be accepted e.g. flood risk areas, cliff erosion zone etc.
	The proposal ignores the contribution Holiday Parks make to the Island economy and seasonal employment catering for tourists. Holiday makers and Residential Homes do not sit well together. The prospect of mixed use with little to no enforcement as currently the case, is fraught with potential issues.	Not all holiday parks would be eligible to change to permanent residential. For example, sites that fall within land at risk of flooding or coastal change would not be permitted. The majority of sites on the Island fall within these categories and would not be eligible for any permission allowing permanent residential occupancy.

Respondent	Representations made	Proposed response
		Many other existing holiday park sites would have no intention of moving to non holiday park operation.
	Whilst the standard of these Park Homes is higher than a holiday home it is less than ideal and the prospect of such homes being the answer to lack of affordable homes in an area of severe social deprivation is unacceptable. I have little confidence that such an issue would not arise when already occurring under the radar at many of the holiday parks the current Covid 19 situation has illustrated that some Parks will disregard regulations if not monitored.	Comments noted.
	I do question why this idea of “Residential Parks” is focussed upon the Islands existing tourist parks and not other rural areas around Swale.	The draft policy would apply to the whole Borough.
	The current lack of affordable homes on the Island is supported by the current policy that permits sites to come forward with 0% affordable homes. With the Islands average household income way below national average the current homes are attracting “incomers” rather than providing for local housing need. To provide a lower standard of homes for those unable to afford what is currently available we will further add to the overall strain on infrastructure.	<p>The Council has no control over who occupies any home.</p> <p>The standard of these homes would be compliant at a minimum to BS3632 and suitable for permanent residential use with comparable standards for energy efficiency and so on.</p> <p>The purpose of this policy is to widen the range of alternative housing products across the Borough.</p>
Eastchurch Parish Council	The proposed Policy is far reaching in its future effects on the holiday parks and the local communities in which they reside.	Comments noted.
	Suggests enforcement issues are greater due to unreported breaches. Are breaches clustered around a particular area. Is the number of breaches increasing against figures for previous years?	The Council can only act on reported breaches.
	The Council needs to agree on whether to pursue the enforcement action or whether to change planning policy to accommodate it. This would be against their current policies but throws light on the lack of investment in the Enforcement Team in previous years. The policies are only as good as the	The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.

Respondent	Representations made	Proposed response
	<p>team who are able to ensure that they are being adhered to. This is very much an issue that the residents do not understand. If a breach of planning occurs, there is little confidence in that reporting it will stop the problem as nothing appears to be done.</p>	
	<p>This proposed change of policy could incorporate residential status on some caravan parks and thereby resolve the issue of breaches over the closed period. It does not take into consideration the long-term effects or the perception of the policy by site owners and users.</p>	<p>Noted.</p>
	<p>Changes to 10-month occupancy across large numbers of the sites has had a negative effect on many of the surrounding residential communities. Whilst put in place to further economic benefits, the real effect has been that of a changing nature and lack of respite for those communities it was designed to protect. It is also quite clear regarding occasional 10 month occupancy being limited to ensure that sites were “not used as permanent housing, affording periods of tranquillity in rural or other areas”. 7.1.28 states quite clearly that “Permanent occupation will continue to be resisted”. 7.1.29 refers to flooding but fails to mention accessibility in winter months. Most of the sites in Eastchurch are located off the Warden Road, these areas are not on a prime salt route in the winter and are all situated in a rural location. The roads and drainage are not well maintained, and flooding is an issue. If twelve-month occupancy were allowed it would put extra pressure on our Parish infrastructure. All sites are served off single-track unadopted roads that are not maintained. The local infrastructure is not proportional to the amount of properties if permanent. Eastchurch Parish Council would like figures on how many caravans there are compared to number of Warden road residents.</p>	<p>It is acknowledged that over time as permissions are granted for permanent residential use all year round, that that will increase the number of permanent households within the areas concerned and the general activity in the area. The increased activity arising all year round would contribute to supporting the viability for services and facilities to be provided.</p> <p>Permanent housing units are required to pay council tax and would be counted by any public agencies in the requirement for infrastructure and services provision.</p>

Respondent	Representations made	Proposed response
	<p>Policy DM5 states that the “amenity and tranquillity of the countryside and residential areas are safeguarded, and that the extension of occupancy is subject to planning conditions safeguarding the holiday accommodation from being used as sole or main residences. This interim policy goes against these safeguards. The list of requirements in Appendix 2 is already being widely disregarded. Caravan sites have regular postal deliveries and there are documented cases within SBC of State Benefit being paid to some addresses. Is there a system in place for ensuring that the requirements are carried out and that the correct documentation is held? Have any of the site owners been contacted regarding the breaches of the conditions? Have any of the site owners had licences revoked or refused because they were permitting the use of the site for longer occupancy than is permitted?</p>	<p>The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.</p> <p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.</p>
	<p>The main reason for limiting the occupancy was to protect the settled community and the rural areas. We have majority of sites on the island in Eastchurch. Conditions are imposed on site owners and caravan owners, but we question whether these are being checked or enforced.</p>	<p>Not all holiday parks would be eligible to change to permanent residential. For example, sites that fall within land at risk of flooding or coastal change would not be permitted. The majority of sites on the Island fall within these categories and would not be eligible for any permission allowing permanent residential occupancy.</p> <p>Many other existing holiday park sites would have no intention of moving to non holiday park operation.</p>
	<p>Year-round occupation permission does not necessarily equate to permanent residence. However, past history has proved that this is incorrect. Because of a lack of monitoring of the licences on the sites, there are many caravan owners that live on sites as a permanent residence, even if they have to “move” for six weeks from early January to March. During the closed period, some still visit the sites during the day and only some do not actually sleep there for period, which technically means that they are not staying</p>	<p>It is understood that it would not be possible to differentiate between a permanent residency and a holiday home, although it would be only those homes which would demonstrably be permanent residences that would contribute to meeting housing need and as a consequence housing supply.</p> <p>The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place.</p>

Respondent	Representations made	Proposed response
		Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.
	Legislative requirements mean very little if you have bought a caravan and it is your only residence.	Noted.
	Park homes are perceived, rightly or wrongly, as caravan sites to the majority of the general public. The perception would open the flood gates for a different wave of enforcement issues. Whilst in an ordinary setting with few caravan parks around, this may be resolvable, on the Isle of Sheppey this would be untenable. The sheer volume of sites and caravan owners would prove impossible for the majority of the public to be able to distinguish one from the other. The release of properties is smoke and mirrors and assumes that all are house owners and not tenants.	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. A significant number of parks will not be eligible as they will not meet the criteria and their continued use as holiday accommodation is supported. Regardless of whether the unit was owner occupied or rented, it would need to have planning permission for year round residency.
	Should the scheme be pursued by the Council, there must be sufficient support for the Enforcement department to be able to function effectively when the inevitable breaches occur. This would apply to not just the newly licenced sites but also to the existing caravan sites and their disregard for existing policies.	Noted.
	If this “interim policy” is agreed, it will have enough weight to cast aside any objections that are made by, or on behalf of, residents. It will be adopted into the Local Plan review as the precedence for its existence will be there. The residential use of a holiday park is an oxymoron. Adoption of the Interim Policy would give the Council a way out of following through on the existing enforcement breaches which is unacceptable.	The interim policy is required to provide an appropriate basis for the Council to consider how best to use its planning enforcement powers effectively whilst also meeting other planning objectives including meeting housing needs. The Interim Policy will not have full weight of planning policy until its inclusion within a reviewed Local Plan which has been adopted following a public examination.
	Why is this just the Isle of Sheppey? Surely policy should cover all of the Borough. The proposal all the way through refers to Borough and regional attributes and statistics. “Proposals for the occupancy of holiday accommodation on holiday parks on the Isles of Sheppey for permanent residence (12 months of the year)” defeats the object of growing tourism and encourages the use of caravans as a second home. You cannot have	Misprint in consultation document. The policy applies to the whole Borough. Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. A significant number of parks will

Respondent	Representations made	Proposed response
	permanent holiday occupancy on a holiday site and then call it a permanent residence. It is a trailer park.	not be eligible as they will not meet the criteria and their continued use as holiday accommodation is supported.
	“Consider” taking enforcement action suggests that there will be an extension to this policy when the full extent of inevitable breaches in unauthorised parks becomes unmanageable. This action should already be being taken on existing policies and existing breaches on the sites and against both the site owners and the caravan owners.	The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal ‘high bar’ in place for evidence to support the fact that someone is living permanently in a holiday home.
	The existing position has been backed by Planning Inspectors. This implies that there is a legal backing and justification for the existing policies. The statement suggests that the planning department are already aware of the number of unauthorised occupancies in the caravan parks. The parks are not a solution to problems of poverty and homelessness within the Borough but are a way of disguising and hiding numbers rather than dealing with the problem.	The Council is now looking at alternative products to deliver new homes and widen the housing offer of Swale. The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.
	Did the Council write to all holiday park owners or just those on Sheppey? Even with a response rate of 60%, the number of site owners supporting the policy remains at less than 50% of the total.	All holiday park owners were contacted.
	<p>The consultation document raises other issues that need to be addressed before the Interim Policy” is agreed as this information has a direct bearing on the ability of the Council to make an informed decision.</p> <ul style="list-style-type: none"> • Clarification needs to be given on whether this policy would apply to all of Swale or to just Sheppey. • If as is inferred it is for Sheppey, then the figures for Sheppey need to be provided separately along with answers to the questions raised in the report response, number by number. Details need to be provided of the caravan sites in each Parish and the number of units on each. This information must be held in order to provide the statistical data used in the Local Plan. 	<ul style="list-style-type: none"> • Policy applies to the whole Borough • This information (number of units and location) will be collected as part of the Council’s monitoring work

Respondent	Representations made	Proposed response
	<ul style="list-style-type: none"> • The question of Council Tax has not been raised but is an important unwritten feature of the policy. Caravan sites can opt to pay business rates to SBC. This then negates the Council Tax cost for site users. Eastchurch has less than 100 units paying Council Tax which means that Precept requirements on the local residential population are higher. The resulting decreased tax base is unfair on the local populations. Owners of caravans should be paying a pro rata amount in Precept for their use of their property in a bid to have equality. The Business Rate system should only apply to business areas and separate Council Tax liability should be applied to each caravan owner on a pro rata basis. Owner occupiers and those that would seek to reside there permanently increases, the pressure on local roads and infra structure. • The Interim Policy could see the creating a new permanent occupation of sites once they were able to comply with the suggested conditions. This in turn would be perceived as a new cheaper housing option and could also be seen as an area for siting of homeless people and the creation or the perceived creation of American style trailer parks. • Enforcement and Legal need to have the support of the Councillors and the trust of the residents. At the moment this is not there. This is about the historic underfunding of Enforcement in Officers and support staff. The levels of breaches have risen over the past years as officers are overwhelmed with the number of cases. The issues need to be taken back to basics with the Council looking at a realistic way of dealing with breaches. This policy is an attempt to solve a problem by taking away the restrictions. If the restrictions had been enforced in the first place, this situation would not have developed. Whilst everyone is aware that funding is always limited, budgets must be adjusted in order that the appropriate staffing levels can be applied to provide an adequate service. 	<ul style="list-style-type: none"> • Permanent residential units are required to pay council tax • The Council is now looking at alternative products to deliver new homes and widen the housing offer of Swale. The draft policy seeks to ensure a high quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted. • The sites have already been served with notices. The issue is the compliance with the notices which give rise to potentially significant housing and well-being issues should prosecution take place. Additionally, there is a legal 'high bar' in place for evidence to support the fact that someone is living permanently in a holiday home.

Respondent	Representations made	Proposed response
	Taking away the policy because you cannot afford to enforce it is the wrong measure as is trying to introduce a measure that tries to reduce the workload by covering up the perceived problem.	

Appendix II: Summary of consultation responses and proposed response ADDENDUM:

Local Plan Panel 7 May 2020

Respondent	Representations made	Proposed response
Leysdown Parish Council (Submitted after the deadline for comments)	Leysdown Road Traffic congestion, the alternate routes via Donkey Hill and Warden is inaccessible for most vehicles routes so when Leysdown Road closes due to accidents which is a common occurrence its gridlock with long delays	This will be assessed on a case by case basis and, if relevant to the individual proposals, the highways authority must be satisfied
	Concern for speed of traffic on the Leysdown Road	This is not a planning policy issue.
	Several times in the last year the parish has appealed for the reinstatement of CCTV camera which has always been denied	This is not a planning policy issue.
	School places already under pressure with several Leysdown residents children not being able to get a place at Borden Grammar School due to increase in housing elsewhere on the island	Permanent housing units would be counted by any public agencies in the requirement for infrastructure and services provision.
	No doctors surgery at Warden is already putting pressure on Leysdown Doctors Surgery	Permanent housing units would be counted by any public agencies in the requirement for infrastructure and services provision.
	Limited employment opportunities locally especially in the winter months	The policy provides the potential to increase expenditure in the local economy supporting employment opportunities
	The eastern end of the island already has issue with isolation need to consider increase in support services for elderly & mental health	Permanent housing units would be counted by any public agencies in the requirement for infrastructure and services provision.
	Parking issues are a constant issue with parking on double yellow lines and the crossing at Leysdown Shops	This is not a planning policy issue.
	Very low number of PCSOs on Sheppey and limited police presence for the current population	This is not a planning policy issue.

Respondent	Representations made	Proposed response
	Bus services are limited	This approach has the potential to make services more viable.
	Littering and fly tipping is a constant ongoing issue	This is not a planning policy issue. Littering and fly tipping should be reported to the Council via the online form on the website or customer contact centre
	More common in the seasonal months is concern for anti social behaviour	This is not a planning policy issue.
Minster on Sea Parish Council (comment omitted from original table in error)	Allowing the holiday homes to become residential and / or have extended or twelve-month occupancy would completely undermine the tourist industry in Minster-on-Sea and across the Isle of Sheppey as a whole, on which the economy relies.	Not all parks will be eligible for residential status. Permissions will only be granted where the criteria in the policy is met and with conditions.
	Many of these units are in poorly accessible parts of the Island and any expansion in the term of occupation would be detrimental to the character of the countryside and rural settings.	The draft policy seeks to ensure a quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted. Sites will be assessed on a case by case basis and the highways authority must be satisfied. Permanent housing units would be counted by any public agencies in the requirement for infrastructure and services provision.
	It would also impact on the Isle of Sheppey's infrastructure which cannot support its current population never mind an increase of potentially 30,000 people which this expansion would bring.	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits.
	No changes should be made to Swale Borough Council's planning policy for holiday parks as set out in the adopted local plan, Bearing Fruits (July 2017) which is in place to ensure that holiday parks are not used as permanent (and in many cases sub-standard) housing in areas that present risk particularly of tidal flooding and / or coastal erosion and /or impact on the character, appearance and tranquillity of the countryside.	Only those parks that meet the criteria in the draft policy would be eligible. Many parks are located within land at high risk of flooding or coastal change and would therefore not be suitable. Proposals will be assessed on their individual merits. The draft policy seeks to

Respondent	Representations made	Proposed response
		ensure a quality standard of amenity, layout and building for residents for a relaxation in the occupancy condition to be accepted.
	Why Swale Borough Council would put forward a proposal that offers people residencies that fall below the standards expected and places them in situations of risk.	The Council is seeking to ensure a minimum standard for permanent residency housing to be secured in line with Park Homes. The Council accepts that this may not be possible for every case but permanent residency in a home that is not at an acceptable standard will not be permitted.
	A more realistic solution exists, instead of proliferating the use of holiday homes as sub-standard accommodation , remove the 0% Community Infrastructure Levy (CIL) [lack of] obligation on the Isle of Sheppey and make it mandatory for developers to commit to providing an adequate proportion of affordable housing on each site.	The adopted local plan, Bearing Fruits does not require affordable housing in developments on the Isle of Sheppey due to evidenced viability issues at the time the current Plan was prepared. The Council will be reviewing its affordable housing policy and whether to introduce CIL as part of the Local Plan Review as well as looking at alternative products to deliver new homes and widen the housing offer of Swale.

APPENDIX III: Comments received from parish and town councils (Minster on Sea, Warden, Eastchurch, Sheerness)

SEPARATE ELECTRONIC FILES TO THIS REPORT