

Thanet Local Plan Enquiry Inspectors
Consultation 2019

Response to new information (28-OCT-2019):

Responses to further Information submitted to
Inspectors by TDC (October 2019)in response
to Inspectors Questions:

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Kent CPRE

1Additional Sustainability Appraisal Work

2The Delivery of Inner Circuit and the Use of Interim Highway s Measures

Apologies for the inclusion of tables of
information within text (of information
previously submitted) in the interests of
avoiding cross referencing

1 Additional Sustainability appraisal Work

In this submission are set out a critique of firstly the processes of Sustainability Appraisal that seem to have been adopted for the Plan and secondly using Pages 18 to 24 a commentary of the subjective way in which the appraisal of one site at Westgate on Sea has been carried out

CPRE have great concerns that nearly three months after the closure of the Enquiry over 700 pages of important information have finally been released into the public realm ,even now,however,it is still presented in a confusing and possibly obfuscating way (as an example Para on Page)

Much of the information has been carefully published in obscure appendices and the method of presentation has not now (or ever) revealed a comprehensive full universal summary of the total sustainability impact of 17000 New Houses on the agricultural economy or character and the life of the people of Thanet.

Not only have the community (and especially the decision makers Thanet Council)not been aware of the impact of the proposed changes but ,most importantly successive political Parties who have governed Thanet since the Draft Local Plans inception have not been made truly aware of the choices foisted upon them by unelected officers

Sadly only now in late 2019 has much of the information been made available to Inspectors and the general public and even now it is incomplete and has been presented in a subjective manner on the basis of an 'a priori' presumption that the target of 17000 plus houses is the only goal for Thanet

The Councils "Sustainability Appraisal Environmental Appraisal Report"(General Document CD7.4 (some 422 pages long)by Ove Arup & Partners Ltd was published only in August 2018 long after the draft Local Plan Policies had been agreed by the Council without the benefit of any sustainability appraisal. In that report the following statement was made in Chapter 8 Page 45

8 Key Sustainability Issues for Thane

The SEA Directive confirms that the Environmental Report should include the following information: 'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC'54. The examination of policy and baseline characteristics, has allowed sustainability issues to be identified which may influence the emerging Local Plan. Presented in Table 13 are the Key Sustainability Issues for Thanet. It should be noted that to assist in transparency, sub issues have been included for each of the key issues. These provide an indicator of the particular facet of economic, environmental and societal (the three core elements of sustainability) that the issue is most relevant to. The table proved useful in developing relevant objectives and indicators during SA Stage A4.

It should be noted that the Draft Local Plan then proposing 12000 houses was presented to the Council in December 2013 which contained all of the key development sites .The first consultation on the Draft Plan was carried out in Spring 2014 and many criticisms were made by objectors concerned about the inadequacy of the process particularly in respect of environmental matters,the implications for appropriating 300hectares Best and Most Versatile Agricultural Land for new

housing and the process of evaluation (or rather the lack of any rational process of evaluation)

Criticisms have been raised by CPRE over many aspects of the Draft Local plan but especially sustainability *"the avoidance of the depletion of natural resources in order to maintain an ecological balance"* which, in CPRE's should have been at the very heart of the plan and all of the plan processes rather than being claimed to have been a tool that has, allegedly, being used to aid the choice of sites for new development. Interestingly one of the 20+ criteria for the sustainability evaluation is Criterion 11 "To ensure that a sustainable pattern of development is pursued" implying that somehow sustainability is but a sub criterion in the Councils approach to Sustainability!

Rather than being an empirical approach to evaluate and compare sites and strategies it has appeared from 2018 when a sustainability analysis was published that the process has been simply "retrofitted" to justify a strategy dictated by sites proposed by developers /owners of land. This process of "retrofitting" is again at the root of the new 700+ page report published on 10th October (*" all good grist to the mill for profit account the chosen Consultants" a cynic could comment !*)

Flawed Processes

The methodology that has been claimed to have been used for appraising the sites has been to consider the following Criteria derived from Strategic Objectives

1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.
4. To increase public safety and reduce crime and fear of crime
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards
6. To create vibrant balanced communities where residents feel a 'sense of. place' and individual contribution is valued
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.
8. . To ensure the sustainable development of the proposed economic growth and encourage employment development at key sites within the District to support priority regeneration areas.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.
10. a To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance
.b To reduce the impact of development on Best and Most Versatile agricultural land

11. To ensure that a sustainable pattern of development is pursued.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings
14. To improve air quality in the District's Air Quality Management Areas
15. To provide a sustainable public transport network
16. To develop key sustainable transport links between Thanet and the wider Kent region and beyond, including road, rail and air.
17. To reduce waste generation and disposal and achieve the sustainable management of waste
18. To ensure development within the District responds to the challenges associated with climate change
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with NPPF.
20. To conserve and enhance biodiversity

Commentary on Criteria

Although the criteria are all relevant to the local plan there does not appear to have been any effort to measure to what degree for each site

- the criteria are achievable or
 - when each site has been evaluated on all the criteria how these evaluations are combined together to arrive at a ranking of preferred sites
21. A number of the criteria are very nebulous eg criteria 11 "To ensure that a sustainable pattern of development is pursued." whilst others complementary/repetitive because the close correlation with the economics of encouraging large scale development sites large scale developments eg criteria 1-6,8,10,17,18

and

Moreover because there is no quantitative evaluation of scores of each site there is no possibility of comparing the relative merits of the various proposed sites



The Conclusion (Page 39 of the June 2018 Document)was

Summary The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District's housing supply and improvements to community facilities, such as the provision of a new District Centre There is also potential for additional community facilities improvements, such as inclusion of a functional green corridor to not only offer better connectivity to established site but to the new urban edge development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The implementation of a new link road to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood. With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for master planning being informed by and addressing the implementation of Policy SP26 and the SPA mitigation strategy.

There was no mention whatsoever of the of the unsustainability effects of developing in total up to 20000 houses in Thanet

In the recent document The Draft Local Plan records that:-

"Thanet has an area of about 40 square miles (103,300ha) and a resident population of about 140,000. Thanet is the fourth most populated district in Kent, and has the second highest urban area around the coast. Outside of the urban area, much of the land population density. About 30% of the district is urban with 95% of the population living in the main urban area which is high quality and intensively farmed agricultural land."

But the Draft Local Plan has not (and has ever at any stage in the processes) quantified for the whole of Thanet either the quality and area of existing current agricultural land or the quality and area of the proposed overall land take associated with the proposition of up to 20000 new dwellings with perhaps a 40% increase in population and the concomitant population density despite the commissioning of expensive Consultants to give advice on sustainability appraisal of the Draft Local Plan and notwithstanding one of the cited criteria for site appraisal "To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products."

Surely it seems that if such a criterion is suitable for application to site appraisal then it should be an issue that is capable of commentary for the whole of Thanet within the Local Plan framework and CPRE have been surprised and perplexed that Thanet Council (unlike other planning Authorities in Kent for example Swale and Shepway Councils has not attempted such an appraisal as part of the Local Plan -Process) especially given the amount of resources that TDC seem to have had available to employ well known, and expensive, Consultants on other matters

It appears, to CPRE, that the more the various reports have been produced the more apparent it has become that prestigious Consultants have been commissioned on a the basis of substantiating/supporting the Council Officers preferred Policies rather than objectively assessing the potential impact of 17000 (possibly more) new houses .

It has also become abundantly clear that the plan in all its aspects is a wholly developer sponsored plan -this has been particularly apparent in the Plan's nonchalant attitude towards the very important (CPRE would argue the preeminent) sustainability issue which is the degree of development that will require the use Best and Most Versatile Agricultural Land and the criterion of reducing the global, social and environmental impact of consumption of resources by using sustainably produced and local products of which agriculture is now, for Thanet, the predominant resource.

In an early report by Arups in 2016 the issue was mentioned only in passing (and effectively dismissed)

Policy E18 - Best and Most Versatile Agricultural Land

The proposed policy has the potential to contribute towards the economy, avoiding increases in flood risk and significant benefits for the protection of greenfield land from development. All of the negative and uncertain effects associated with both the proposed option and no policy option can potentially be mitigated either by development management policies or the NPPF requirements. The no policy option is not predicted as being likely to have any positive effects where they are not counteracted by potentially adverse effects as illustrated by the volume of 'uncertain' effects.

. There has still been no emphasis on the Impact upon Agricultural Land of the planned development of 17000 houses to achieve the proposed Inner Circuit even within the latest information submitted to the Inspectors

However the most striking commentary under criterion 9(page 21) is “The proposed allocation is for a relatively low – medium density development on a greenfield site, currently in agricultural use. As such it is a relatively inefficient use of land” CPRE are concerned that no explanation is given for the judgement of relative inefficiency (apart from the issue that it offends the Planners by not being currently built upon for housing) and to CPRE's knowledge no survey of the agricultural efficiency of Agricultural Land has ever (or was ever) been carried out by TDC or any of its many highly paid Consultancy firms(unlike in Swale 's Local Plan where the issue of economic importance of agriculture was given consideration) .There is ,maybe an issue that many parcels of Agricultural Land in Thanet farmed by temnant farmers in Thanet which were effectively given a 'death sentence 'by their designation in the Draft Plan in 2013 and since which may have deterred both owners and tenants from continuously and conscientiously investment in the past 5 years .However the land in question appears (albeit to a Civil Engineer)to be under continuous cultivation capable of delivering three reliable crops per year

It is notable that in the previous Thanet Local Plan 2006 the following statement was included in Strategic Background (Page 242)

10.7 Agricultural Land Concerns have been dominant in determining planning policies and decisions in Thanet for many years. Thanet's farmland ranks as some of the best and most versatile productive land in Kent and in the South-East, by virtue of both the high soil quality, and the extensive and continuous nature of the lad in production. As a national food resource it therefore merits long term protection from irreversible development

10.8 Agriculture enjoys very favourable conditions in respect of general climatic conditions, reliability of rainfall, topography and drainage. Furthermore, the farming sector in Thanet has long track record of good productivity, efficiency, technical innovation and business

In the 2006 Local Plan there also is an objective (page241)

OBJECTIVE (3) TO PROTECT THE BEST AND MOST VERSATILE AGRICULTURAL LAND FROM IRREVERSIBLE DEVELOPMENT IN THE INTERESTS OF LONG-TERM AGRICULTURAL PRODUCTION

It is difficult to understand that such a demonstration of importance of Agriculture in 2006 Local Plan (which at present is the only approved Local Plan for Thanet) could have been so readily ignored and systematically overturned without the Council having realised .Moreover It could have been reasonably expected that any sustainability

appraisal by the Councils Planners should have placed some emphasis on this topic of the protection of a national food resource especially on areas Best and Most Versatile agricultural land such as in Westgate .CPRE considers that the omission of serious consideration of the effect on sustainability

No commentary has ever been offered within the Local Plan Planning Process since 2013 on the impact on the Urbanisation of Thanet of the effects of the potential loss of up to 300 hectares of Best and most versatile Agricultural Land which would result in this unique area of Kent losing forever a huge amount of this valuable natural resource and the potential to improve agricultural sustainability and ,in doing to radically ,intensify the urban character of the Area and adversely effect the natural environment of Thanet.

Land at Westgate

In the Report published in 2018 CD7.4.1-Thanet-Local-Plan-Revised-Options-Sustainability-Appraisal-June-2018 an appraisal is set out(partially reproduced below on pages 37 to 39).CPRE Kent have examined this portion of the report and bring forward a commentary partially because it exemplifies the flawed approach by TDC and the deliberate commissioning of prestigious Consultants to 'bolster up'the Officers'proposals

Thanet District Council Draft Local Plan
Sustainability Appraisal Addendum Report
258960 | Issue 4 | 3 October 2019
\\GLOBAL\EUROPE\LONDON\PTG\ICL-JOBS\258000\258960-00 THANET SUSTAINABILITY APPRAISAL\4 INTERNAL PROJECT DATA\4-05
ARUP REPORTS\2019 JULY SITE
ASSESSMENT\SA REPORT_FINAL ISSUE_2019\1003.DOCX

Site location – Land at Westgate

2.3.2 Site information

Site Address: Land at Westgate

Capacity and Proposed Use: circa 2500 homes and associated development, including open space and landscaping (the full area of the site would not be proposed for built form)

Site Area: 172ha

Current Use: Agricultural land

2.3.3 Site description

This site is located to the south of Westgate-on-Sea, which is in the north of Thanet. The site is currently used for agricultural purposes and lies adjacent to the urban edge of Westgate-on-Sea. The proposed development is large and will consist of low/medium density housing. The north east of the site is within walking distance to Westgate-on-Sea station. There are health and education

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services within close proximity to the site in Westgate-on-Sea. The nearest retail and educational facilities are in the centre of the village.

2.3.4 Appraisal summary

The proposed site allocation would likely deliver a number of modern residential units as part of an urban edge extension. The site is in close proximity to local retail, employment and service provision, as well as the nearby bus and rail transport links, which provide access to the rest of Thanet and the wider South East region.

Beneficial significant effects have been identified in relation to providing a

sustainable supply of housing. No significant adverse effects were identified. Non-significant negative effects relate to the efficient use of land, the Thanet Urban Air Quality Management Area and potential effects on biodiversity. **The site would result in the direct loss of 2% or more of the total available Best and Most Versatile agricultural land in Thanet; this is considered to have a potentially significant adverse effect on Best and Most Versatile agricultural land.** Positive effects relate to access to education and training facilities, increasing public safety and reducing the fear of crime, providing appropriate key facilities for vulnerable people, creating vibrant balanced communities, providing access to employment and sustainable economic growth, supporting the area's tourist economy, encouraging sustainable development patterns, improving local townscape and enhancing cultural heritage features, providing access to sustainable public transport, developing key strategic transport links, reducing waste generation and promoting good waste management, responding to climate change and promoting energy efficiency in new developments.

All other effects are currently unknown at this stage but are unlikely to be significant.

2.3.5 Other planning considerations

Located at the urban edge, this site is consistent with the findings and recommendations of the Sustainability Appraisal and is also consistent with other environmental and planning policy and guidance. Allocation of this site assists in the delivery of the Inner Circuit relief scheme. Due to Green Wedge, best and most versatile agricultural land and scheduled ancient monument designations(post-medieval farmstead),

Table 3: Summary of Site Assessment – Land at Westgate

SA Objective Proposed allocation - Land at Westgate

1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand.

Permanent Direct ST/LT ++

The proposed site allocation would deliver dwellings as an extension to Westgate-on-Sea. This is a large site; therefore, it is likely to be an affordable housing requirement, which would assist in the provision of a sustainable mix of types and tenures. The proposed housing density (greater than 14.5/ha, as not all of the site will be built form) of housing on the site may positively impact on affordable housing provision. The scale of impact is likely to be significant, but details of proposed developments are unknown at this stage. However, the provision of housing in this rural area is likely to directly benefit the area.

To encourage benefits, requirements could be set regarding housing mix and tenure can help meet local demand.

2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.

Permanent Temporary Direct LT ?

The development would be expected to provide an appropriate contribution to and land for the expansion of existing healthcare provision. This would provide a neutral to positive impact, depending on whether the redevelopment of the medical centre appropriately improves medical facilities and increases capacity.

Contributions for social infrastructure should be secured through a legal agreement to allow for improvements to existing facilities.

3. To provide access to appropriate educational facilities for all sectors of society including focus on training

vulnerable and welfare dependant workers with skills necessary to ensure year round employment.

Permanent Temporary Direct ST/LT +

The proposed site allocation would have a positive effect on access to educational facilities as it is expected that the developer will be responsible for contributing towards off site education and training facilities.

Depending on the final design and number of residents, any proposed development should provide a contribution to increase the capacity of educational facilities should be secured through a legal agreement.

4. To increase public safety and reduce crime and fear of crime.

Permanent Temporary Indirect ST/LT +

On larger sites, construction activity is likely to result in short term anxiety amongst existing residents due to site security and potential anti-social behaviour. However, new housing provides opportunities to create modern secure dwellings that offer people safe and comfortable homes.

Any proposed site design should consider enhancement measures set out within the 'Secured by Design' guidance such as appropriate lighting, modern safety measures, boundary treatments and planting.

5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.

Permanent Indirect LT +

The proposed allocation would result in additional housing provision within close proximity to Westgate-on-Sea town centre. There are several key retail and service facilities within walking distance of the site, with good public transport links to other town centres. However, the access to these services afforded by the site would depend on the tenure type and mix provided.

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SA Objective Proposed allocation - Land at Westgate

6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.

Permanent Direct LT +

The proposed site allocation could have a beneficial effect by helping support Westgate-on-Sea's town centre. Details of the proposed developments are unknown at this stage, but there is likely to be a positive impact if the design and mix of housing maintains the character and sense of place associated with Westgate-on-Sea's town centre.

To encourage benefits, requirements could be set regarding housing mix and tenure can help promote a sense of place.

7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.

Permanent Indirect LT +

The proposed allocation is unlikely to impact the levels of employment/unemployment of the population. However, the proximity to local and regional public transport links will allow appropriate access to employment within Thanet,

Kent and the wider South East.

8. To ensure the sustainable development of the proposed economic growth and encourage employment development at key sites within the District to support priority regeneration areas.

Permanent Indirect LT +

By providing additional dwellings in the district, the proposed allocation could enhance the economic growth of the District in providing additional housing for working age individuals who work in Westgate-on-Sea.

However, the removal of agricultural land may affect the rural economy.

9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.

Permanent Direct LT +/-

The proposed allocation would bring housing development to a rural area with several nearby attractions that support the rural tourist economy. If development is sensitive to the surrounding environment it could have a positive impact on the tourist economy, enhancing the area near the attraction sites.

10(a). To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.

Permanent Direct ST/LT -

The proposed allocation is for a relatively low – medium density development on a greenfield site, currently in agricultural use. As such it is a relatively inefficient use of land.

10(b). To reduce the impact of development on Best and Most Versatile agricultural land

Permanent Direct --

The allocation of the site would result in a direct loss of 3.17% of total Best and Most Versatile agricultural land used within Thanet which is considered to be a significant adverse effect.

11. To ensure that a sustainable pattern of development is pursued.

Permanent Direct ST/LT +

At present, there are some key facilities within walking distance of the northern aspect of the site. In addition to existing facilities, the developer would be expected to provide 16.6ha of open space, multi-modal access, off-site highway improvements and education contributions. Therefore, it is expected that a positive pattern of development will be pursued.

12. To conserve and enhance the character and quality of the

Permanent Direct LT +

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SA Objective Proposed allocation - Land at Westgate
area's landscape and townscape particularly associated with town centres and coastal areas.

Redevelopment of the site would proactively contribute towards a better townscape, if quality design standards are met. The development will also be designed in a way to enable a soft edge between the site and the open countryside.

13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.

Permanent Direct ST/LT +

Redevelopment of the site would proactively contribute towards a better townscape, and the development design should address the need to protect historic buildings on the site.

14. To improve air quality in the

District's Air Quality

Management Areas.

Temporary Indirect ST -

The level of car and bicycle parking associated with any development would be important in establishing the overall effect of the site on local air quality. However, it is likely that any development within the Thanet Urban Air Quality Management Area will adversely affect the AQMA objectives.

Provision of bicycle storage and electric vehicle charging points could help mitigate performance against this objective.

15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.

Permanent Temporary Direct Indirect ST/LT +

The provision of residential development within Thanet can improve access to employment, leisure facilities and services for those residents for those new residents. In addition, the proximity to local and regional public transport links will allow appropriate access to employment within Thanet, Kent and the wider South East.

16. To develop key sustainable transport links between Thanet and the wider Kent region and beyond, including road, rail and air.

Permanent Temporary Indirect ST/LT +

Any large scale development within Thanet will help to support existing strategic transport links between Thanet and the wider south east, most notably rail links.

17. To reduce waste generation and disposal and achieve the sustainable management of waste

Temporary Indirect ST +

New developments offer an opportunity to proactively address waste management issues in Thanet and implement more modern approaches to waste disposal.

Waste management arrangements should be confirmed as part of the planning process.

18. To ensure development within the District responds to the challenges associated with climate change.

Temporary Indirect ST +

New developments offer an opportunity to proactively address climate change issues in Thanet and implement more modern approaches to climate change adaptation and resilience.

Measures to promote climate change adaptation and resilience should be confirmed as part of the planning process.

19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with NPPF.

Neutral 0

The site is not at any risk from coastal or fluvial flooding.

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SA Objective Proposed allocation - Land at Westgate

20. To conserve and enhance biodiversity.

Permanent Direct ST/LT -/?

The proposed site allocation could have a minor impact on the conservation and enhancement of biodiversity as it is a greenfield site.

Mitigation measures to provide opportunities to develop or enhance new and existing wildlife and biodiversity areas could be included to offset the impact of the proposed development. During development, important habitats could be identified and protected through design.

21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites

Neutral 0

The proposed site is unlikely to affect any fluvial or coastal waters.

22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.

Permanent ST/LT ?/+

New development at this scale provides opportunities to use sustainably sourced and recycled building materials.

At the planning stage, explore the possibility of locally sourced materials being a requisite of any section 106 agreement.

23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.

Temporary Direct ST/LT +

New development at this scale provides opportunities for energy efficiency, such as those associated with current Building Regulations, to contribute towards a reduction in energy consumption in Thanet. Effects would be further

enhanced if small scale renewable energy technology could be employed on site

Many of the general commentaries offered by CPRE obviously apply to the Westgate appraisal especially the issues and principles of losing the use of the Best and Most Versatile agricultural land

Accuracy As far as the accuracy of the report is concerned, reproduced below are two extracts from the report cited above relating to Westgate

2.3.4 Appraisal summary

The proposed site allocation would likely deliver a number of modern residential units as part of an urban edge extension. The site is in close proximity to local retail, employment and service provision, as well as the nearby bus and rail

transport links, which provide access to the rest of Thanet and the wider South East region.

Beneficial significant effects have been identified in relation to providing a sustainable supply of housing. No significant adverse effects were identified. Non-significant negative effects relate to the efficient use of land, the Thanet Urban Air Quality Management Area and potential effects on biodiversity. **The site would result in the direct loss of 2% or more of the total available Best and Most Versatile agricultural land in Thanet; this is considered to have a to have a Potentially significant adverse effect on Best and Most Versatile agricultural land**

Whilst later within the detailed appraisal it is recorded that

10(b). To reduce the impact of development on Best and Most Versatile agricultural land

Permanent Direct --

The allocation of the site would result in a direct loss of 3.17% of total Best and Most Versatile agricultural land used within Thanet which is considered to be a significant adverse effect.

It is recognised that 3.17% is greater than 2% but nevertheless a 50% rounding factor should have been detected and corrected by a capable Senior Officer in any Authority ,(even Thanet) before publication .This is a concern as there has been two months for TDC to prepare and publish -and presumably check information-it is a serious commentary on the professionalism and especially because of the inaccuracies in the Report which neither TDC Officers or the signing off engineer to the Arup Report appear to have noticed or been bothered with such significant numerical differences within the Report .There has only been time to examine a small part of the 740 page tome but the lack of professional care/expertise in simple fact checking should be a matter of concern to the Inspectors

It is however , more appropriately , a serious concern that the scale and the nature of the effect on Best and Most Versatile Agricultural Land is an issue that has been systematically,wilfully and culpably ignored by "Local Planning"during the whole Local Plan process .Maybe this could be because of an ignorance of the importance of land husbandry on Agricultural processes -in which case expert advice could have and should have been sought in the same way that Arups were successively reemployed to carry our sustainability and other assessments to defend Officer recommendations !

In the summary section is the following statement which is typical of the tone and tenor of the whole report "This is a large site; therefore,it is likely to be an affordable housing requirement, which would assist in the provision of a sustainable mix of types and tenures." which amounts to accentuating the positive and eliminating the negative rather than developing a balanced objective professional appraisal.of the proposed development location

Transport Access :In the section **2.3.3 Site description**

2.3.3 Site description

This site is located to the south of Westgate-on-Sea, which is in the north of Thanet. The site is currently used for agricultural purposes and lies adjacent to the urban edge of Westgate-on-Sea. The proposed development is large and will consist of low/medium density housing. The north east of the site is within

walking distance to Westgate-on-Sea station.

the assertion is made that "The north east of the site is within walking distance to Westgate-on-Sea station" whereas the actual distance from the boundary of the proposed new development to the Station is 950metres effectively a 35minute walk

In the section **2.3.4 Appraisal summary**

2.3.4 Appraisal summary

The proposed site allocation would likely deliver a number of modern residential units as part of an urban edge extension. The site is in close proximity to local retail, employment and service provision, as well as the nearby bus and rail transport links, which provide access to the rest of Thanet

the assertion is made that "The site is in close proximity to local retail, employment and service provision, as well as the nearby bus and rail" whereas the actual distance from the boundary of the proposed new development to the Canterbury Road where the only regular bus route runs is 650metres effectively well over the 400 metre normally regarded as a desirable maximum reasonable walking distance for accessibility in urban areas

CPRE contends that the site is definitely not " in close proximity to local service provision, as well as the nearby bus and rail transport links", and therefore considers that this aspect of the sustainability appraisal has not only been misrepresented by omission / lack of simple measurement on plan but is indicative of the unprofessional careless approach of the Arup report

2The Delivery of Inner Circuit and the Use of Interim Highway s Measures

On Day 13 of the Hearings, under Matter 13, the Inspector asked the Council (with Kent County Council) to prepare a note to identify alternative highways measures that might be employed at the limited number of “pinch-points” along the route identified under Policy SP47. This note has now been published as CD9.33 and concludes with proposed new policy

In the event that there is any delay in site acquisition or assembly in relation to any of the schemes identified in Policy SP47, the Council will, in conjunction with the County Council, make interim highway arrangements to enable allocated development schemes to proceed, pending full implementation and provision of planned strategic highways infrastructure through the regime of planning conditions and planning obligations.

Initial Comic Commentary

The proposed policy once again presages the 2019 panto season in 'Thanet Neverland' and the lost boys and girls of KCC /TDC ' with the continuing commitment to promising 'faery gold' of development presenting an unusual cuckoo's nest of an upgraded mediaeval county lane system (the "ThanetburgerRing" aka the fabled "Inner Circuit relief scheme" aka TDC "Yellow Brickroad Circuit".) to be eventually financed by the mythical Golden Eggs of Contributions from Developers intent on irreversibly converting prime agricultural land into ubiquitous housing for which there is no demonstrable local demand apart from the developers .

A pantomime plot that could only happen in Thanet due to the incestuous relationship of the lost boys and girls 'forward planners' of TDC and inexperienced arrogant technicians of the East Kent Highways office more concerned with creating Thanet Legoland/Neverland to complement "Thanet Earth " than serving the community

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Formal Commentary

In our submission earlier this year CPRE Thanet KENT submitted the view that

in producing the Draft Local Plan Thanet Council have not addressed the primary Question /Challenge of managing patterns of growth to make the fullest possible use of public transport, walking and cycling and have instead put forward a wholly unsustainable potentially undeliverable plan based on an a priori presumption of an unsustainable primary highway network base on outmoded transport thinking that potential developers will be unwilling to enter into agreements that would be demonstrably deliverable

The two Authorities Officers have not answered the Inspectors question satisfactorily or properly and that this is due to their inability to be able to guarantee/assure finance to provide infrastructure to accompany development because of Thanet Councils reluctance to countenance using policy of requiring "Community Infrastructure Levy" Contributions as part of the Planning Process

It was noted at the enquiry that KCC representative placed emphasis on the role the proposed "Inner Circuit relief scheme"(ICRS) would play in relieving existing traffic problems in the Area which had been emphasised by CPRE's professional witness particularly conditions on the A254 Margate to Ramsgate route which had been nationally dubbed Britain's highest risk route in research by the Road Safety Foundation .However despite KCC's crash statistics the Highway Authority has done little or nothing to solve problems on the Route -reliance still was placed by KCC(in July) on the "ICRS" despite the likelihood that the scheme will ever be financed let alone built because of reliance on unguaranteed developer funding

.At the Inquiry hearing on Transport representatives of TESCO made representations against the inclusion of a route "link road between A256 Westwood Road and A254 Margate Road and extension of Millennium Way to A254 Margate road "which would sever the Company's Car Park part of KCC;s case for the road was to complete a ring road around Westwood Cross that would not be otherwise built.

This statement has to be read in the context of Westwood Cross never having either an adequate master plan nor a practical transport strategy which has resulted in years of congestion confusion and KCC scrambling together funding retrospectively to cover lack of either TDC or KCC Officers adequate planning for the future

In the TDC Officerproposal it is stated that the Council "will, in conjunction with the County Council, make interim highway arrangements to enable allocated development schemes to proceed "..... Nevertheless in the note accompanying the proposition it is stated that

the Councils are confident that interim measures can be utilised to enable development of housing sites to commence. However, these measures are not considered to provide long term solutions, or to be alternatives to the measures set out in the Local Plan and Transport Strategy. The Councils regard any such measures as interim measures to allow development identified in the Local Plan to proceed without being constrained by limitations in the highway network in the early part of the Plan period. This may result in an acceptance of additional traffic pressure within certain localities on an interim basis.

The proposed policy carries with it the reliance that the two Councils have competence to enable , "make interim highway arrangements to enable allocated development schemes to proceed" without reference to the poor record that KCC actually has with regard to procuring adequate funding to deal with either existing highway problems or transport problems caused by new development. However on recent without reference to the poor record that KCC actually has procuring adequate funding and in the light of the Councils reliance on S106 funding rather than CIL processes it is suggested that the Council Officers confidence is misplaced and without foundation

CPRE suggests that the suggested policy or rather tacit admission of any realistically practical policy should be rejected and that a fuller and more substantiated explanation needs to be provided to the Inspectors Questions

CPRE considers that at the heart of the Inspectors question is the issue of Resilience of the plan and the suggested policy does nothing to substantiate the ability of the Local Highway authority to deal with scenarios where funding is not available to deal with highway problems nor would other bodies (health ,social services ,education etc)have appropriate funding to deal with new effectively unplanned development

without developer funding .Both authorities officers gloss over the growing difficulty in securing funding by S106 funding either on time or to the extent originally envisaged

As an aside CPRE have raised the issue of lack of any emphasis/explanation within the Draft Plan on utilising the bus network in Thanet which is an essential part of the infrastructure in Urban Thanet

...Elsewhere Local infrastructure improvements to support buses includes planned interventions to improve the efficiency and reliability of services and facilities to allow for the decarbonisation of bus fleets. In Thanet On the existing road network, local authorities should have identify key locations (maybe the A254 Margate to Ramsgate route ?)where the use of bus only routes and priority traffic lights could improve the attractiveness of services and even (as was the case with the "Loop Scheme"encouraging the form of a network of routes maybe even in the development of a Bus Rapid Transit systems.

Conclusion

Most importantly in the Local Plan the Local authorities should have ensured that new housing and commercial development would be designed in a manner that supports good accessibility by buses. Where appropriate, this could include bus priority measures and road layouts designed to allow easy pick up and drop off of passengers.At local level, local authorities, NHS patient transport, school transport and social services transport budgets should be combined to create a single local bus funding pot to support bus services to provide for future sustainability and resilience

Sadly all these opportunities were forfeited in a headlong rush to maximise new Housing Development on valuable Agricultural Land and create an outmoded Inner Circuit of developer funded highways which will never be practical,deliverable or sustainable ..

CPRE hopes that the Inspectors may find this advice useful and worth taking into account as their deliberations are finalised and may recommend that the Draft Local Plan should be rejected in its entirety and a new sustainable and resilient Local Plan should be commenced as soon as possible

David Morrish 28/10/2019