
HEARING STATEMENT

MATTER 5 – STRATEGIC SITES

09 & 10 APRIL 2019

THANET DISTRICT LOCAL PLAN EXAMINATION

Prepared on Behalf of
Ptarmigan Land
[Representor Id – 493]

March 2019

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1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Ptarmigan Land in respect of Matter 5 relating to Issues 1 (Methodology), 3 (Birchington) and 5 (Westgate-on-Sea).
- 1.2 The Birchington Strategic Site is jointly promoted by Ptarmigan Land, a strategic land promoter, and Millwood Designer Homes, a housing developer.

2.0 RESPONSE TO MATTER 5 – STRATEGIC SITES

Matter 5 Issue 1 – Methodology

Qn1.1 What was the process of identifying the residential site allocations, including their size, location and distribution? How were they chosen?

- 2.1 TDC's Strategic Housing Land Availability Assessment (SHLAA, CD4.4) undertakes a 5-stage methodology to identify and assess potential sites:
- Stage 1 – Identification of Sites and Broad Locations;
 - Stage 2 – Assessment of Sites;
 - Stage 3 – Windfall Assessment;
 - Stage 4 – Assessment Review;
 - Stage 5 – Final Evidence Base.
- 2.2 Stage 1 applied locational principles established in TDC's Issues and Options Sustainability Appraisal Interim Assessment (2013) which tested broad options. The option for accommodating development on brownfield sites within the urban area scored best. For where to best locate the greenfield element, the assessment favoured urban edge sites which scored best in sustainability terms.
- 2.3 Para 4.15 of the SHLAA (CD4.4) identifies a range of 'key sources' of potential sites were reviewed including previous urban capacity studies, allocated but undeveloped sites, brownfield register, empty properties and sites submitted by landowners and developers.
- 2.4 At Stage 2 all sites (with the exception of those not meeting Stage 1 locational principles) have been assessed for their suitability, availability and achievability, as well as reviewing housing capacity (based on a broad requirement of 35 dph) and deliverability. Those sites found suitable, available and achievable were progressed to the next stages.
- 2.5 Stage 3 and 4 review TDC's housing requirement, windfall provision and other sources of supply (e.g. completions and permissions) to confirm a need for 8,939 dwellings to be allocated to demonstrate sufficient supply of housing land.
- 2.6 Stage 5, and corresponding appendices of the SHLAA, list all SHLAA sites and summarises the rationale behind allocation or non-allocation of each. All those allocated are located on the Urban Edge, Village Edge or within the Urban Area.

- 2.7 SHLAA Appendix D confirms allocation sites are consistent with the findings and recommendations of the Sustainability Appraisal. Strategic Sites are noted to be consistent with other environmental and planning policy and guidance, and the majority assist in the delivery of the Inner Circuit relief scheme.

Qn1.2 Was the process of allocating sites robust? Did it take into account sufficient factors?

- 2.8 TDC's approach has followed National Planning Guidance and is in line with its Sustainability Appraisal findings. Section 4.15 of the SHLAA (CD4.4) details the key sources used in assembling the pool of sites considered. Through its SHLAA process the number of suitable, available and achievable sites has been identified.
- 2.9 Paragraph 5.11 of the SHLAA confirms TDC has completed its Stage 2 process in liaison with appropriate organisations/departments including Kent County Council, Southern Water, Environment Agency and Environmental Health ensuring the process completed was robust.
- 2.10 Following initial Issues and Options consultation in June 2013, TDC published its Preferred Options in January 2015 (both Regulation 18 consultations). The latter consultation set out the preferred spatial strategy, including the identification of 4no. Strategic Sites.
- 2.11 In response to an increased housing requirement, established in the SHMA Update (CD4.1), TDC undertook a Regulation 18 consultation on Proposed Revisions to draft Local Plan (preferred options) allocating additional sites for housing development (including the former Manston Airport).
- 2.12 Subsequently, TDC elected not to proceed in January 2018 and to delete the proposed allocation of the former Manston Airport site. TDC undertook a call for sites in February 2018 and re-allocated the 2,500 dwellings previously proposed for the former airport site to other suitable sites.
- 2.13 TDC has undertaken a robust allocation process which has taken into account a number of factors, including broad options tested through the Sustainability Appraisal process and SHLAA staged assessment. Further, TDC has continued to successfully respond to changing requirements, including increasing housing numbers and the need to identify additional suitable sites.

Qn1.3 How were site areas and dwelling capacities determined? Are assumptions justified and based on available evidence?

- 2.14 Paragraph 47 of the National Planning Policy Framework (2012) confirms that authorities should set their own approach to housing density to reflect local circumstances. Section 5.10 of the SHLAA confirms TDC has applied a standard density of 35dph across its SHLAA sites, except in cases where alternative capacities are justified.
- 2.15 The SHLAA densities have been reflected in the Plan housing allocations, albeit these propose a maximum density limit which should be amended to allow an average density (see Qn3.3).
- 2.16 This approach would be consistent with the current NPPF (2019, paragraph 123) which confirms where there is an existing or anticipated shortage of land for meeting identified housing needs it is important to ensure planning policies avoid homes being built at low densities and make optimal use of the potential of each site.
- 2.17 For clarity, the Birchington Strategic site can meet its identified capacity of 1,600 dwellings.

Qn1.5 How have the constraints of each site been taken into account and any necessary mitigation been considered as part of the process of allocating land for housing? In particular, how has the Council considered and assessed the impact of development on transport infrastructure, heritage assets and drainage? Where is this set out?

- 2.18 The SHLAA (CD4.4) confirms TDC undertook high-level technical assessment (stage 1) and technical reviews (stage 2) for SHLAA sites including input from Kent County Council, Southern Water and the Environment Agency.
- 2.19 The Sustainability Appraisal (CD7.4) includes an individual review of each Strategic Site against the 23no. SA Objectives determining any necessary mitigation and enhancement measures. Necessary measures have been incorporated within the Strategic Site policies or other Plan policies.
- 2.20 The Plan is accompanied by a range of evidence base documents reviewing technical matters including the SFRA (CD5.8), Landscape Character Assessment (CD5.1) and review of transport matters (CD6.1 – 6.8). The Plan is also accompanied by a Habitats Regulations Assessment (CD7.5). Together these assess and review the potential of the District, at a high level, to accommodate growth and have informed the Sustainability Appraisal process.

2.21 Through previous call for sites and Local Plan consultations, Strategic Site promoters have prepared and submitted technical supporting evidence. For the Birchington Strategic Site the following evidence has been submitted:

- Ecological Appraisal (PBA, July 2016 and Update October 2018);
- Landscape and Visual Appraisal (PBA, March 2017 and ETLA Update October 2018);
- Heritage Desk Based Assessment (PBA, March 2017);
- Geophysical Survey (CGMS, May 2017 and SUMO, September 2017);
- Archaeological Evaluation (CGMS, August 2018);
- Local Plan Technical Report – Flood Risk and Drainage (PBA, October 2018); and
- Development Capacity Plan (including allowance for open space, education) (Mosaic, October 2018).

2.22 Notwithstanding, planning applications will be determined in accordance with Development Plan policies.

Qn1.9 Are there any factors which indicate that a site(s) should not have been allocated for development? Are all the sites developable within the plan period?

2.23 TDC's approach to allocating Strategic Sites will assist in the delivery of the necessary infrastructure to support the Plan.

2.24 Of the Strategic Sites, 2no. have extant consents (SP13, Manston Green and SP17, Land fronting Nash and Haine Roads) and 1no. has resolution to grant following Planning Committee February 2019 (part of SP18, Land at Manston Court/Haine Road). In total these result in circa. 2,600 dwellings with (or soon to have) planning consent, including 1,000 dwellings with detailed consent.

2.25 The remaining Strategic Sites (SP14, SP15, SP16 and HO2) are pending submission of applications. We are aware of technical work underway for SP14 – SP16 (Birchington, Westgate and Westwood) and expect applications on these sites in late-2019/early-2020.

2.26 The delivery trajectory contained within SP11 is optimistic in the short-term, with the majority of Strategic Sites unlikely to begin delivering until 2021/22, however overall housing numbers are achievable within the Plan period.

Matter 5 Issue 3 – Birchington

Qn3.1 How was the site boundary defined and what is it based on? Are there any site ownership constraints likely to affect the deliverability of the site?

- 2.27 The Birchington Strategic Site allocation boundary presently comprises land controlled by the Promoters with the exception of a triangle of land to the north-west controlled by the Church Commissioners (CC). A map indicating land control is included in **Appendix 1**.
- 2.28 The Statement of Common Ground for Policy SP14 (SoCG) between TDC and the Promoters agrees a proposed modification to amend Policy SP14 boundary to remove the CC land (only identified as part of Policy SP14 at Regulation 19 stage) is appropriate. This ensures no land ownership constraints which could affect the delivery of the Site. This is consistent with our Regulation 19 Local Plan Representations which detail why the CC land is not necessary to form part of SP14.
- 2.29 The boundary of the Strategic Site follows existing field boundaries, with the exception of part of a field to the extreme south-west of the site excluded due to known archaeological sensitivities. As set out in our Regulation 19 Local Plan Representations, the Promoters request the field in its entirety be included in the allocation with the archaeologically sensitive area utilised for additional Green Infrastructure/Public Open Space (above allocation requirements).
- 2.30 The Strategic Site (excluding the CC land) comprises land owned by 3no. landowners, these being the Quex Park, St John's College and The Trustees of the Birchington Pool Trust. Ptarmigan Land has a Promotion Agreement with St John's College and The Trustees of the Birchington Pool trust, and Millwood have an Option Agreement with Quex Park.
- 2.31 Ptarmigan Land and Millwood, together as the Promoters, have collaborated to ensure a comprehensive development can be delivered across the Strategic Site.
- 2.32 There are no site ownership constraints across the Promoters land.

Qn3.2 What is the justification for allocating the site for up to 1,600 dwellings? What is this based on and is it achievable?

- 2.33 The SoCG details the allocation evolution of the Strategic Site.

- 2.34 Our Regulation 19 Local Plan Representations contained a Development Capacity exercise (**Appendix 2**), informed by detailed technical work, demonstrating the allocation land within the Promoters control sufficiently supports 1,600 dwellings alongside all other policy requirements.
- 2.35 The Regulation 19 Local Plan Representations also include a further Development Capacity exercise (**Appendix 3**) demonstrating how the allocation boundary could reflect existing field boundaries. The expansion of the boundary to incorporate the adjoining archaeology sensitive area would allow this area to be brought forward and managed as part of the development for a sensitively appropriate use and assist in providing a wider landscape interface between the urban edge and countryside.

Qn3.3 What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?

- 2.36 The Development Capacity exercise confirms the policy requirements can be achieved across the Birchington Strategic Site at an average density of 35 dwellings per hectare. The SoCG confirms agreement that Policy SP14 should be modified to reflect this.
- 2.37 The use of an average density, not a maximum density requirement, is consistent with the National Planning Policy Framework 2019 (para 123).
- 2.38 Final densities for the site will be informed by the required development brief and masterplan, with higher densities more appropriate in certain areas (i.e. along the link road and near to the small scale convenience retail provision).
- 2.39 Policy SP14 could therefore be amended to confirm that land is allocated at an average density of 35 dwellings per hectare.

Qn3.4 How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?

- 2.40 Open Space requirements were initially calculated using Table 7 of TDC's Preferred Options Plan (2015) based on 2005 Open Space audit.
- 2.41 Subsequently Open Space requirements have been reviewed and revised (as per Policy GI04 and updated allocation numbers). Draft SP14 reflects the revised Open Space requirements for the allocation.

- 2.42 Other uses have been informed by the draft Infrastructure Delivery Plan (CD1.2) and by advice from other statutory bodies.
- 2.43 The proposed uses are considered appropriate and justified.

Qn3.5 Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school will be delivered?

- 2.44 KCC's Regulation 19 consultation response (Comment ID 1502) confirms the request for a fully serviced site of no less than 2.05ha for the purposes of a two-form entry primary school. This is reflected in Policy SP14.
- 2.45 As confirmed through the Development Capacity exercise, land will be provided by the Promoters to ensure this is delivered by the education authority.

Qn3.6 Is it sufficiently clear to decision-makers, developers and local communities what is expected in relation to the provision of additional healthcare?

- 2.46 No specific detail is provided within Policy SP14 (or supporting text or evidence base) to establish the exact level of additional healthcare provision required to be delivered. The Development Capacity exercise set-aside circa. 0.17 hectares of land, adjacent to the existing Birchington Medical Centre, for potential expansion.
- 2.47 NHS Thanet Clinical Commission Group's Regulation 19 Consultation response (Comment ID 1485) identifies an increase in patients (from 1,600 dwellings) results in a requirement for additional 307sqm of floorspace. The response notes opportunities may exist to address this within the existing premise or through an extension to the existing building.
- 2.48 The exact level of land to be provided will be established through the application process, however sufficient land is clearly available within the Promoters control.

Qn3.7 Have the costs associated with the open space, primary school and medical centre expansion been taken into account in considering the viability of the site? Is the site developable within the plan period?

- 2.49 The Promoters are satisfied with the conclusions of the Viability work produced by the Council (CD1.3 – CD1.13) for the purposes of the Local Plan evidence base. More detailed work may be required at the planning application stage in accordance with relevant adopted policies.

- 2.50 The site is developable within the plan period as set out within the agreed trajectory detailed in the SoCG.

Qn3.8 How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?

- 2.51 TDC's Draft Transport Strategy 2015 – 2031 (CD6.1) has been jointly prepared with KCC to review the scale and location of allocations proposed. Section 11.3 confirms the Plan strategy is underpinned by a Strategic Highway Model. The Strategic Highway Model applied generic trip rates to allocated sites which have then been distributed based on surveyed data.
- 2.52 Section 9 of the strategy provides an action plan to address challenges arising from growth including improvements to the local highway network, including the Inner Circuit Route Improvement Strategy (ICRIS).
- 2.53 For the Birchington Strategic Site the ICRIS identifies the proposed site link road through the development connecting the A28 to Minnis Road. The Strategy identifies (para 9.3.2) this provides the opportunity for traffic to avoid the busiest sections of the A28 within Birchington (including Birchington Square). Details are provided as to the necessary standard the road would need to be constructed to.
- 2.54 The Development Capacity exercise demonstrates the ICRIS requirements for the Strategic Site have been fully considered and will be incorporated in development proposals for the site.

Qn3.9 What is the relationship with the Strategic Route safeguarded under Policy SP47? How will the Strategic Route be delivered, and is the delivery of the allocation dependant upon this new infrastructure?

- 2.55 The Strategic Routes, identified in Policy SP47 to support implementation of the Transport Strategy, include land within the Birchington Site. This forms the main access into the site and the link road through the development. It is therefore an integral part of the development and can be wholly delivered within the Promoters control.
- 2.56 There is no reliance on other developments to fund/part-fund this element of the Strategic Route.

- 2.57 The Strategic Route through the Birchington Strategic Site is not reflective of all routes safeguarded under Policy SP47 as it will be delivered as part of the development to be brought forward collaboratively by the Promoters.
- 2.58 As a Strategic Route the link road through the Site will be constructed to a specification over and above what would normally be expected for a road of this nature, reflective of its strategic importance to the wider network.
- 2.59 Delivery of the allocation will be phased to be constructed alongside parts of the link road (within the site) with the first phases of housing not dependent on the link road being completed.
- 2.60 The latter phases of the development will be phased alongside the completion of the link road and Strategic Route improvement along B2050 Manston Road. Land required for B2050 Manston Road improvements is in the control of the Promoters (Millwood) and KCC, ensuring these improvements can be successfully delivered at the appropriate time.
- 2.61 A proportionate contribution will be made towards off-site highways improvements to assist in the delivery of the wider Inner Circuit Route in line with Policy SP47. A Statement of Common Ground on Highways matters is being prepared between the Strategic Site promoters and Kent County Council.

Qn3.10 How has the effect of the proposed development on air quality been taken into account? What effect will the proposal have, and what mitigation will be necessary?

- 2.62 TDC's Air Quality Action Plan (2013) and Air Quality Technical Guidance (2016) support the Local Plan (CD5.18 and CD5.19).
- 2.63 The Thanet urban Air Quality Management Area (AQMA) encompasses the entirety of the Urban Area of Thanet District plus Cliffsend village.
- 2.64 TDC's Air Quality Technical Guidance confirms the designation of an AQMA does not result in no new development within that area being delivered but instead necessitates greater weight to be given to the consideration of air quality impacts and mitigation.
- 2.65 The Birchington Strategic Site is located outside of, but adjoining, the AQMA.

- 2.66 The Sustainability Appraisal (SA, CD7.4, page E45) confirms, in relation to the SA objective to improve air quality, development on the Birchington Strategic Site is likely to result in an increase in car journeys within the AQMA, albeit there is likely to be some inward migration resulting from the development.
- 2.67 As detailed in the SA, the Plan includes a range of measures proposed to mitigate air quality impacts include the provision of electric car charging points (Policy SP12/TP01, page E37/E222), the submission of Air Quality and/or Emissions Mitigation Assessment for major developments (Policy SE05, page E217) and a variety of Transport policies promoting travel options including walking, cycling and public transport (TP01 – TP05, page E222 – page E226).
- 2.68 Further, Policy SP14 requires masterplanning to include multi-modal access, including footway and cycleway connections and an extended and accessible bus service.

Qn3.11 How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use of more sustainable modes of transport?

- 2.69 Policy SP14 requires masterplanning for the site to include multi-modal access, including footway and cycleway connections and an extended bus services.
- 2.70 Policies TP01 – TP04 support a variety of measures to enhance and promote more sustainable modes of transport.
- 2.71 Any masterplan and subsequent application for the Birchington Site will be judged on the basis of the Plan policies and the overarching requirements of the National Planning Policy Framework to promote sustainable transport and deliver healthy communities.

Qn3.12 How does the scale of proposed development relate to the size, role, function and character of Birchington?

- 2.72 Birchington forms part of the Urban Area boundary as defined in the 2006 Local Plan (CD7.9). The Local Plan (CD1.1) expands the Urban Area boundary to include proposed housing sites.
- 2.73 The village of Birchington is predominately formed of post-war development, seeing extensive development in the period 1940 – 1960, including the housing developments to the north of the Strategic Site. Since the 1960s there has been relatively little development in and adjoining Birchington, with the exception of minor infilling.

- 2.74 A facilities plan for the village in relation to the Site is included in **Appendix 4**.
- 2.75 TDC's Town Centre Strategy identifies Birchington as a District Centre (CD1.1 Section 2). The village has a good retail offering, mainly located in the centre of the village along Station Road, including a variety of shops, cafes, pubs and restaurants and takeaways. Station Road is within a reasonable walking distance of the Strategic Site.
- 2.76 The village is served by a variety of public transport options, including a train station to the north of the village providing services to London, Ashford, Dover, the Medway towns, Margate, Ramsgate and Broadstairs.
- 2.77 Birchington CofE Primary School is located to the southeast of the village (circa. 500m from the Strategic Site) and King Ethelbert Secondary School to the north-east (circa. 1.6km from the Site)
- 2.78 The population of Birchington at the time of the last census (2011) was 9,961 people. The Strategic Site represents a population increase of circa. 35% reflecting the step change necessary to deliver the housing need across the Plan period and the appropriate urban edge nature of the site.

Qn3.13 Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?

- 2.79 The Birchington Strategic Site is being promoted by a strategic land promoter, with prior experience in delivering sites of this size and nature, and a housing developer, with a proven track record of housing delivery.
- 2.80 TDC has agreed to the Promoters' revised trajectory for the Site, as detailed in the SoCG. This includes the first 50 dwellings to be delivered during the 2021/22 monitoring year.
- 2.81 The SoCG includes a Deliverability Paper prepared by the Promoters which sets out timescales to first housing delivery and confirms the delivery of the first 50 dwellings during the 2021/22 monitoring year.

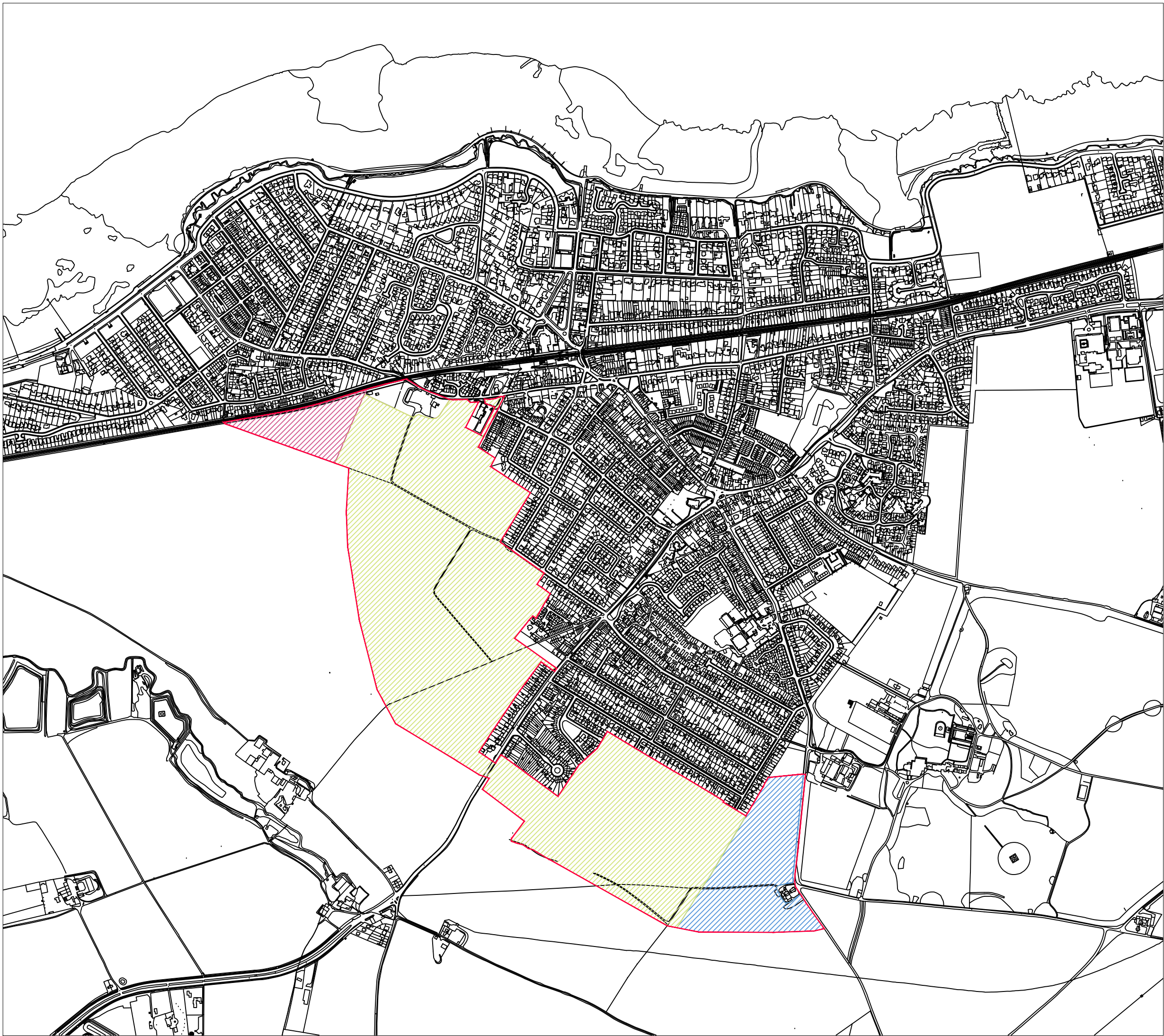
Matter 5 Issue 5 – Westgate-on-Sea

Qn5.9 How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?

- 2.82 TDC's Draft Transport Strategy 2015 – 2031 (CD6.1) identifies the Westgate-on-Sea Strategic Site as having an impact upon Birchington Square with such impact needing to be mitigated (para 6.9.5).
- 2.83 Appendix C (Infrastructure Proposals) of the Strategy identifies 4no. measures to manage traffic congestion at Birchington Square consisting the link road through the Birchington Strategic Site, widening of B2050 Manston Road and widening/improvement of Shottendane Road.
- 2.84 These measures, as part of the Inner Circuit, create a comprehensive solution managing traffic and reducing impacts on the A28, including Birchington Square, and will support the impacts arising from the Westgate-on-Sea Site.
- 2.85 As detailed in the Draft Infrastructure Delivery Plan (CD1.2), the Westgate-on-Sea Strategic Site will be required to proportionally contribute towards the Inner Circuit road improvements.

APPENDIX 1

LAND CONTROL PLAN



 Allocation Boundary

Landownerships:



Millwood



Ptarmigan Land



Church Commissioners



0 500
metres
(1:10,000)

Project
Land south and west of Birchington

Drawing Title
Allocation Plan

Date
27/09/2018

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1:10,000 at A3

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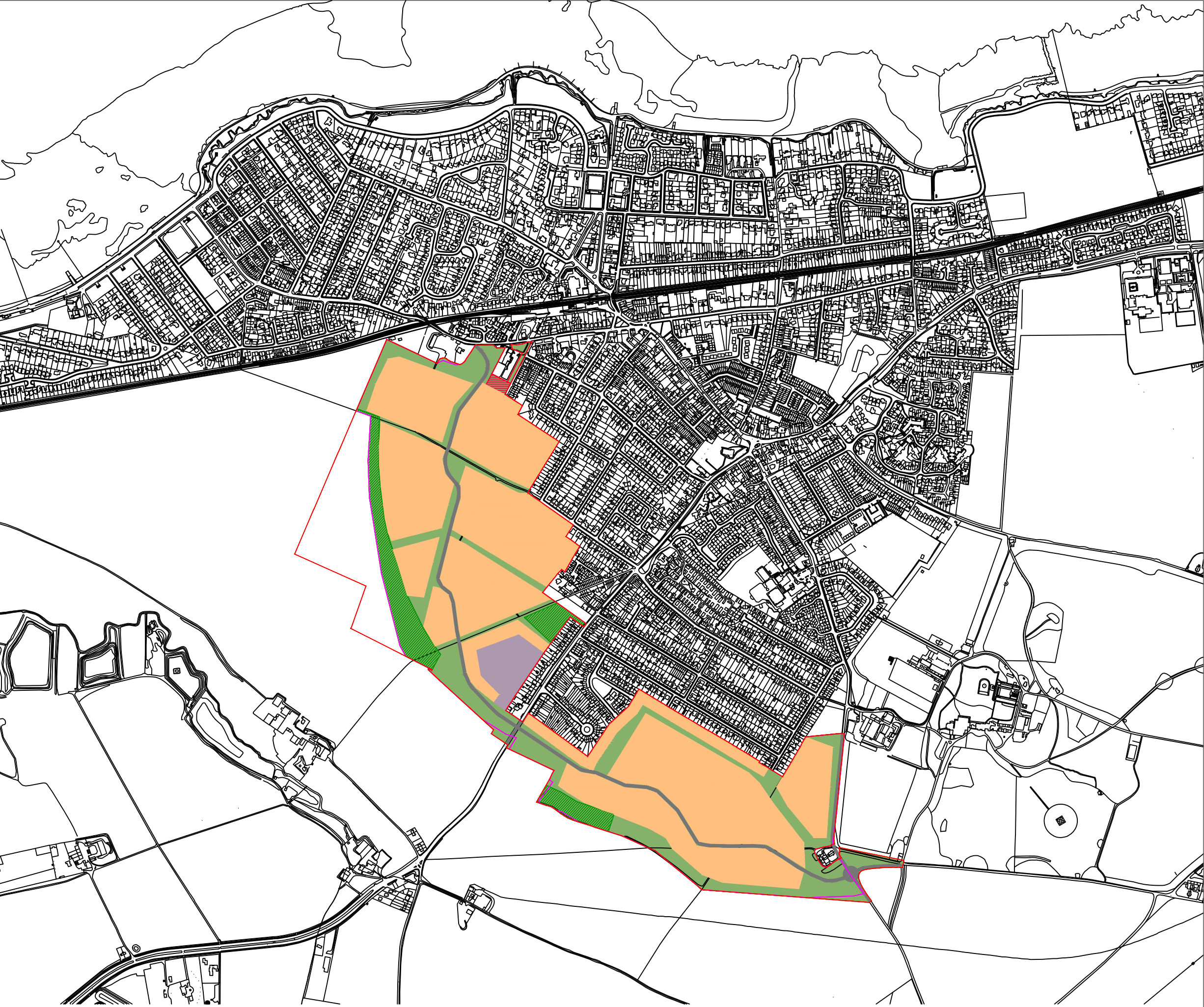
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1009

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014

Revision
A

APPENDIX 2

DEVELOPMENT CAPACITY PLAN (ALLOCATION)



- Strategic road
- Residential area 45.77Ha
1600 homes @35 dph
- Primary school 2.05Ha
- Potential land for Medical
Centre expansion
- Strategic public
open space 18.06Ha
- Archaeological sensitive area to
form part of public open
space/ landscaping
- Land within the Council's
Allocation Boundary and
the Site's Promotion Boundary

Promotion boundary 78.18Ha

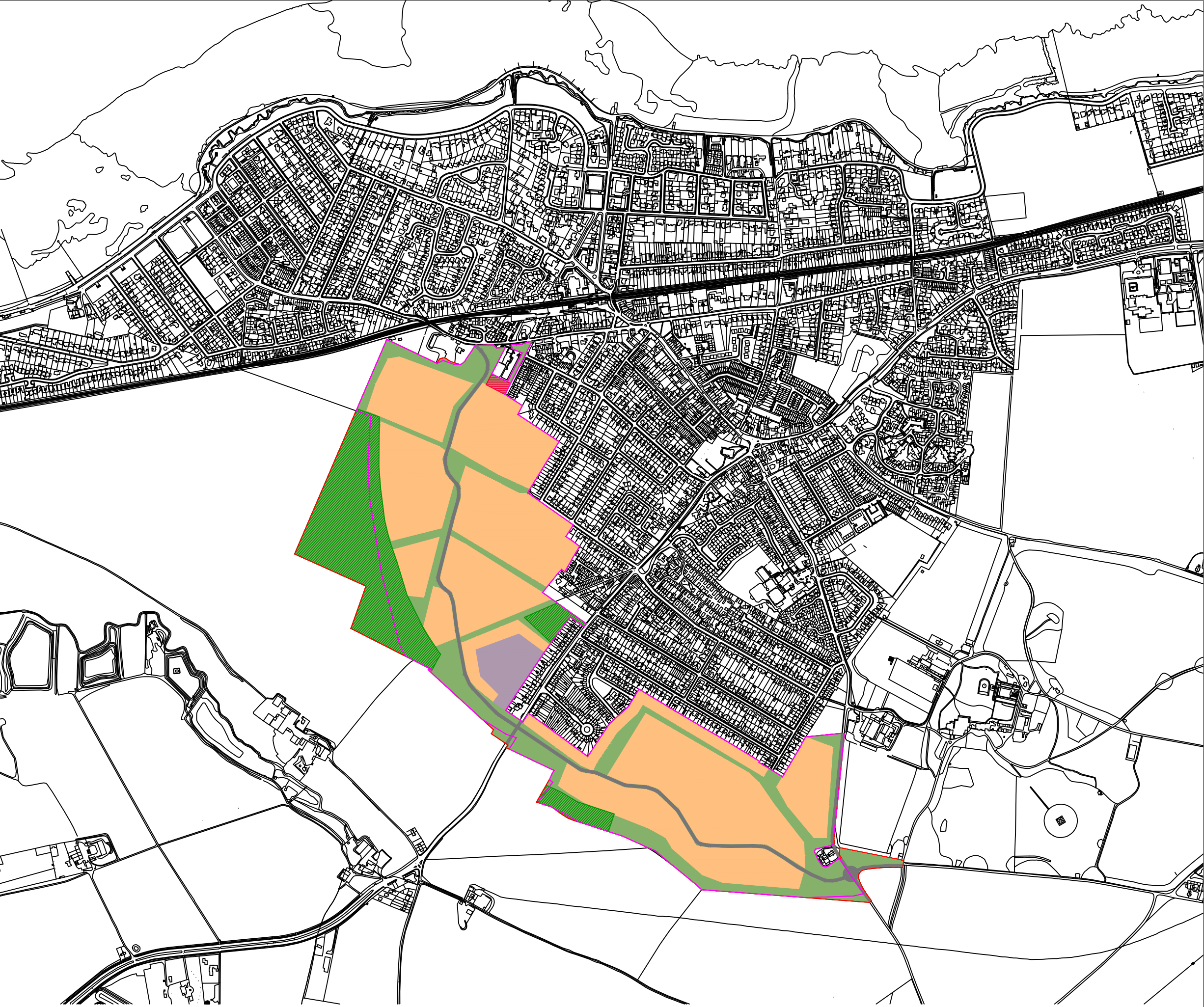
Project
Land south and west of Birchington

Drawing Title
Development Capacity Plan
(within the Allocation Boundary)

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03/10/2018	1:10,000 at A3	ML	SR
Project No	Drawing No	Revision	
1009	013	F	

APPENDIX 3

DEVELOPMENT CAPACITY PLAN (PROMOTION AREA)



- Strategic road
- Residential area 45.77Ha
1600 homes @35 dph
- Primary school 2.05Ha
- Potential land for Medical
Centre expansion
- Strategic public
open space 26.14Ha
- Archaeological sensitive area to
form part of public open
space/ landscaping
- Land within the Council's
Allocation Boundary and
the Site's Promotion Boundary

Promotion boundary 78.18Ha

Project
Land south and west of Birchington

Drawing Title
Development Capacity Plan

Date 0./10/2018	Scale 1:10,000 at A3	Drawn by ML	Check by SR
Project No 1009	Drawing No 012	Revision D	

APPENDIX 4

BIRCHINGTON FACILITIES PLAN



- Site boundary
- ⇔ Railway station
- Bus routes
- Bus stops
- School
- Pre-school
- Hall or community interest
- Sports
- Golf course
- Public open space
- Shops and restaurants



PTARMIGAN LAND
THE PLACE MAKING PROMOTER

BIRCHINGTON FACILITIES

March 2019

NTS