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6th May 2019

Dear Mr Birkinshaw, I appreciate the opportunity to put a second representation to you and your team. I am no longer a councillor, but I am a resident of Thanet and although some concerns were addressed at the previous examination days, it has also raised further fears about TDC's emerging local plan that I would like to address in more detail.

Transport Strategy

This strategy looks like KCC's shopping list of all the roads that need improving in Thanet, even without the extra homes. When we discussed Westgate on 10th April, I was concerned about the lack of consultation for the Transport Strategy and that it wasn't carried out in line with the consultation of the local plan. I am not sure how you can make a decision on one without the other!

I asked about why there is a 50% decrease in cost from the initial estimates of the IDP, I am not wholly convinced that the guesstimate is anywhere near where the cost should or even might be. I am concerned that if these costings are just plucked from the air, we may never have enough to cover the costs to get this infrastructure completed or that we are even asking the developers for enough funding. I also asked what cost would be applied to each strategic site but there was no response to this question. There is a distinct lack of information in the IDP with many boxes in the spreadsheet are incomplete (Not a great business plan).

Another point that was answered but not adequately. Minster Road, specifically the section from the site to Canterbury Road is already a pinch point, especially at peak times as there are 3 primary schools and 2 secondary schools that are situated within less than ½ mile of ST1 and ST2, the only way to access these schools is Minster Road, which narrows to single lane traffic. KCC's answer was parking controls, this suggestion is not included in the current strategy and I don't think it has really been thoroughly thought through.

As a councillor I was privy to viewing the transport strategy in 2015, with some minor alterations around Manston it has remained the same and yet there has been an addition of 2500 houses just on the Shottendane Road area and yet KCC still believe this is sustainable. The improvements to Shottendane Road, other than adding a pathway and improving the junctions, isn't really going to change much. I am not an expert but KCC has provided nothing to prove this improvement will work. To date no TDC councillor has seen any evidence that proves the modelling works.

Environment / Climate Change

I have recently read alarming reports about building on **the best and most versatile land**. Soil expert Prof Jane Rickson from Cranfield University, UK - "The thin layer of soil covering the Earth's surface represents the difference between survival and extinction for most terrestrial life. Only 3% of the planet's surface is suitable for arable production and 75 billion tonnes of fertile soil is lost to land degradation every year." She said soils form at a rate of 1cm in 300 years. See full report below:

<https://www.bbc.co.uk/news/science-environment-48043134>

Thousands of years to produce **the best and most versatile land** and it will be gone in a heartbeat if we build on it.

This report also mentions the importance of our soil when it comes to Climate Change, as it contains three times more carbon in the soil than in the atmosphere – This is fuelling climate change - problems include soils being eroded, compacted by machinery, built over, or harmed by over-watering. According to the report hurting the soil affects the climate in two ways: it compromises the growth of plants taking in carbon from the atmosphere, and it releases soil carbon previously stored by worms taking leaf matter underground.

Not only have we got to consider where our food is going to come from but how we are going to protect the environment that produces it and clearly this has more advantages than providing sustenance for humans but also resources and habitats for our wildlife. Wildlife is already in crisis. **Over half of UK species have declined since 1970 and 15% are now at risk of extinction. But the natural environment isn't a nice-to-have: it's critical for our survival as a species. We rely on it for the air we breathe, the food we eat and to keep our climate in check.* *Kent Wildlife Trust

Just because you can build on **the best and most versatile land** it doesn't mean we should! I am pleased you asked for more evidence in relation to brownfield sites – there are plenty of sites in Thanet and more are becoming available, such as the MOD site and Fire Training School in Manston. The infrastructure in those locations are far more sustainable than ST1 and ST2.

I also wanted to bring to your attention again to two paragraphs in my initial representation:

Our current policy CC1 will be replaced in the emerging plan with SP21, which is a very watered-down policy and does not go far enough to protect our countryside and allows land previously protected to be developed, which I believe to be short sighted and it is not following the guidelines set out in the NPPF:

15. Conserving and enhancing the natural environment

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland

The Ove Arup report (Sustainability Assessment), reference policy SP15 – expressed concern about the Strategic Housing Sites in Westgate; that it does not support the Sustainability Objective and expresses concern about the environmental impact of the housing on greenfield sites.

Previously at the hearing I raised my concern about the open space between Westgate and Garlinge, this openness and separation of the two villages will be decimated with the development on ST1 and ST2. Garlinge has already lost its identity as the overall site on all documentation is called Westgate, yet it has almost 2/3 of the housing allocation is in Garlinge. I also believe this openness should be retained for the sense of wellbeing open countryside provides

CPRE's website states: *Experts increasingly agree that a connection to nature is vital to the happiness and wellbeing of the nation. Proximity to open green spaces in urban areas has been shown to reduce stress levels, and one study by Mind, for example, found that a walk in nature led to 71% of participants feeling more positive, with 88% experiencing an overall boost in their mood.*

<https://www.cpre.org.uk/magazine/opinion/item/5040-wellbeing-and-the-countryside>

There are so many reasons we should not be building on **the best and most versatile land** and I am sure you will consider all the issues and concerns of the residents in Thanet.

Yours sincerely,

Carol Messenger