

Craig Solly

Matter Statement 16 – Design, Heritage and the Rural Economy (Policies QD01-QD03, QD06-QD07, SP33-SP34, HE01-HE05, HO19 and E15-E19)

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Issue 1 – Design – Policies QD01-QD03, QD06-QD07 and SP33

Q1. Is it clear to decision-makers, developers and local communities what constitutes the “most recent government guidance” for the purposes of Policy QD01? Is the policy effective?

Response: In light of the time period I had to respond to the publication and the materials in the evidence base, it is not clear what this would have been. Thanet is in one of the warmer areas in the country and we have a microclimate which ensures high sunshine hours. It is unclear on how the council have harnessed this benefit in the local plan.

I would query the 21-23 range of temperature, the average temperature is 20c and from the leaflet “Keep Warm Keep Well” leaflet

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/748499/keep_warm_keep_well_2019.pdf) its states:

Heating your home effectively and safely

Some of these heating tips may seem obvious, but they can make a big difference when it comes to protecting your health and reducing your fuel bills.

- Heating your home to at least 18°C (65°F) in winter is particularly important if you have reduced mobility, are 65 and over, or have a health condition, such as heart or lung disease. Having room temperatures slightly over 18°C (65°F) could be good for your health.
- If you are under the age of 65, active and wearing appropriate clothing, you may wish to heat your home to a temperature at which you are comfortable, even if it is slightly lower than 18°C (65°F).
- Overnight in winter, people who are 65 and over or who have pre-existing health conditions, may find bedroom temperatures of at least 18°C (65°F) are good for their health; this may be less important if you are a healthy adult under 65 and have appropriate clothing and bedding.
- To reduce the risk of sudden infant death syndrome, rooms in which infants sleep should be heated to between 16 – 20°C

This in turn affects fuel poverty:

Caitlin Bent, home energy expert at the Energy Saving Trust, states: ‘You should heat your home to the lowest comfortable temperature, we’d recommend between 18 and 21C ‘Turning your room thermostat down by just one degree will save around £80 on your energy bill for a typical, gas-heated three-bedroom semi, so it’s worth testing a lower temperature to see if

you're still comfortable. 'If there are any vulnerable people in your home, for example young children or elderly, we wouldn't recommend lowering the temperature below 18 degrees, as this could pose a health risk.'

Solar energy is mentioned in the local plan, but it's unclear how the local plan promotes this technology, this in turn could improve affordability in reducing energy costs in the long term for homeowners.

Q4. Does Policy QD02 provide an appropriate policy framework to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion? As submitted is the policy consistent with paragraph 58 of the Framework?

Response: I am concerned that large scale development if not designed or supported correctly may not provide adequate policing. New areas may require extra policing resource and infrastructure to provide the best solutions.

I have written to the Police Commissioner on my concerns on the size of the Westwood expansion in the local plan as it is clear that young anti social behavior is present currently in the Westwood shopping area and the slowly developing housing sites in the Local Plan. I have also contacted crime prevention to see if they can respond to the local plan as this was not made (however my representation includes Kent Police information).

The housing planned at Westwood appears to me to provide housing for the lower end of the housing market, attracting first time house buyers and younger people and as such are prone to be working locally as there is no railway station in walking distance to travel to other work areas (a good bus link does exist however). I also have made the point under SP02 (point 3 page 17) that the job creation in the plan is not sustainable locally in its own right and does depend on job opportunities outside the area.

In my representation under SP01, I have made reference to the Kent Police representation (reg 18) for which the housing provision is the same (17140 houses). I don't see any social aspects being represented in the local plan and as such my representation is limited to SP01 Point 5 (page 7) to explain the social aspects of the local plan.

A document released by the council "CD8.11 TLG Out of Area Vulnerable Placements (Same as CD4.6)" shows the issues that Thanet has and is a problem in other areas (Cliftonville). Because this document was released after publication it appears not to be informing the local plan as it was not in the evidence base at the time, it was not clear to local communities either.

It is clear that vulnerable people include young people, unemployment also is the highest in Kent for the 18-24 age range being at 7.2% (Rep SP02, Point 2).

Plan making should be considering all of the evidence and ensuring that the plan “create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion” (NPPF Para 58).

It is clear that Thanet has many challenges ahead and I am concerned that there isn't any positive policy making to improve the area for younger families and children. Strategic Priority 4 states:

- Accommodate the development needed to optimise access to jobs, key services and facilities required to promote the physical and mental well-being, independence and quality of life of all sections of the community, and retain young people.
- Reduce opportunities for crime and the fear of crime

There is no report or assessment in design principles in achieving these points in the evidence base. However there is evidence to suggest that there are risks to this policy which currently resides in the area. Kent Police appear not to have been approached in providing guidance in preventing crime and could be too late to inform masterplans at the planning application stages.

Q5. Does the Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the Framework?

Response: Paragraph 69 states:

“The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning. Planning policies and decisions, in turn, should aim to achieve places which promote: opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.”

I can comment that this has not happened and only at consultation. Many neighbourhood plans are being developed at the moment in response to the local plan but have been restricted in doing so.

I am concerned for instance that Birchington and Westgate will not have time to respond to the Locals plans adoption and the phasing of those sites. It is stated for instance that a planning application for Birchington will occur in December 2019 (as stated in statement of common ground).

As stated under Matter 1 issue 2, it was said that the council did not provide the support at consultations as requested by parish councils. Birchington Parish council (Caroline Vincent) stated that:

The Parish Council were not satisfied with the consultation on the amendments, they requested an officer to attend the public meeting particularly as the amendments had significant effects on the community and this was denied. The only consultation for the people of Birchington was a small box of papers in the library, this is considered unsatisfactory.

Birchington Parish Council is currently drafting their Neighbourhood plan.

Q6. Policy QD03(3) requires the provision of private or shared external amenity/play space in new residential development. Is this suitably flexible to take account of circumstances where this may not be possible, such as the conversion of an existing building or where shared amenity space will be provided on site?

Response: A comment from a resident who lives in the area of westwood stated:

(Kirsty Channing) I live in the new builds @ Westwood cross with my four year old. Was told when buying there might be a park there, when we moved in a park was not created it's just a fenced off area with one bench and three rocks. I would love nothing more than my son to make friends in that area, there's lots of kids around here but very rarely is anyone playing out I was half tempted to buy a swing ball, cheap slide and things to keep their to try get the kids to play out so they can all get to know each other. It's a shame because it's such a nice area within the houses it's very closed off and the grass area is big enough!

Q8. What is the justification for requiring an independent design review for proposals under Policy SP33? Will it be sufficiently clear to decision-makers, developers and local communities when such a review will be required?

Response: It is unclear at what point in the application process where this fits in. It has not been considered by Birchington Neighbourhood plan group.

Issue 2 – Conservation of the Historic Environment – Policies SP34 and HE01-HE05

Q2. Is Policy HE03 consistent with paragraph 135 of the Framework which states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining planning applications. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset?

Response: Looking at many responses and from my perspective it is not clear where to find the local list, how often it is reviewed and how does a new asset be entered into the list.

Issue 3 – The Rural Economy – Policies HO19 and E15-E19

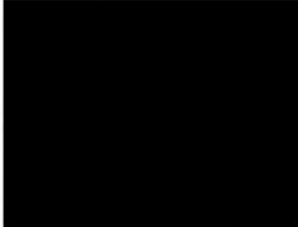
Q7. Is Policy E18 consistent with paragraph 112 of the Framework relating to the use of best and most versatile agricultural land?

Please see a letter from Roger Gale MP which is a response to the protection of Best and Most Versatile Agricultural Land. This is shown below:



The Rt Hon Sir Roger Gale M.P.

25/02/2019



House of Commons
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Dear Mr Barar,

Reviewing correspondence relating to local planning over the weekend I came across the accompanying letter from George Eustice which may be of use to you in your representations on the Local Plan. The phrase "it also expects Local Plans and strategies to recognise not only the character and beauty of the countryside but the benefits from natural capital and ecosystems including those of our best and most versatile farmlands" is a quote that you might wish to deploy in the course of the hearing!

With my best wishes.
Yours sincerely,

Sir Roger Gale MP
cc Craig Solly



Department
for Environment
Food & Rural Affairs

From George Eustice MP
Minister of State for Agriculture, Fisheries and Food

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Sir Roger Gale MP
House of Commons
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Our ref: MC2018/19806/DG

18th October 2018

Dear Sir Roger

Thank you for your letter of 14 September to the Secretary of State on behalf of your constituents about the need to retain Grade 1 agricultural land. I am replying as the Minister responsible for this policy area.

It is for elected local authorities (LAs) to plan their areas using agreed Local Plan policies, and then to decide planning applications in line with the Plan, and all other relevant factors, including the revised National Planning Policy Framework (NPPF). I share your concern about preserving greenfield land from unnecessary development and retaining farmland in productive use. The revised NPPF retains rigorous protection for Green Belt, National Parks, Areas of Outstanding Natural Beauty and other designated areas. It also expects Local Plans and strategies to recognise not only the character and beauty of the countryside, but the benefits from natural capital and ecosystems, including those of our best and most versatile farmland.

We have no plans at present to veto the loss of Grade 1 land for buildings. The NPPF includes strong protections for the natural and historic environment, and is clear that LAs when considering development proposals should take into account the economic and other benefits of the best and most versatile (BMV) agricultural land. These include making effective use of previously developed land and, where a proposal involves agricultural land, being clear that this is necessary and that poorer quality land is to be used in preference to land of a higher quality. Another safeguard is that a LA has to consult Natural England before granting planning permission for non-agricultural development that would not be in accord with the Local Plan, and would involve the loss of BMV agricultural land, or the loss of less than 20 hectares of agricultural land in circumstances likely to lead to a further loss of 20 or more hectares in those grades.

You are right to underline the importance of brownfield re-use. The NPPF has a new chapter of policies encouraging LAs to put suitable brownfield and under-used land to good use, and prioritising brownfield wherever practicable. However, as brownfield sites vary in suitability, viability and availability, it would not be practicable to try to forbid other development until all brownfield land in the area has been redeveloped. We want LAs, in consultation with local people, to identify sites and decide if they are suitable to redevelop. The new Registers of brownfield land are already a great help, bringing thousands of hectares of suitable brownfield to the attention of house-builders and self-builders.

George Eustice

GEORGE EUSTICE MP

The planning system should already recognise and offer some protection to BMV agricultural land (Grade 3B and above)



Thanets undeveloped land is high quality agricultural land rated mainly as Grade 1 and 2 ALC. Land of lesser quality is in flood zones or previously developed land.

However, there are sites which are have been brownfield for some time. It has been recognised already at examination that Brownfield land will have a lesser allocation of affordable housing to try and promote the land to be redeveloped. This is a challenge to the area in promoting this activity and should be done as priority.

It has been unclear the benefits that BMV land has to Thanet in the evidence base, Thanet council has not provided any evidence in understanding the rural economy to Thanet, it is unclear and unjustified. Other councils have done this work and this does provide some guidance in making decisions down the line. Thanets Heritage has been firmly based in agriculture.

It is becoming clear that the protection of agricultural land has many benefits in Thanet, in all aspects of plan making and it is a finite resource.