

Representation to the Local Plan Hearing from the Westgate-on-Sea Neighbourhood Plan Steering Group (NPSG) Climate Change and the Environment 7th May 2019.

Summary

This representation asks the Inspector to consider adding three extra questions to the Hearing Day on the 30th May “Climate change and the environment” which are included in this summary (for ease of reading) as well as in the main body of the representation:

- 1) How can the Local Plan take into account the overall effects on climate change without a clear calculation of the total area of the best and most versatile agricultural land allocated for housing within the local plan period? Should a table calculating these allocations on farmland be added (similar to figure 1-1 below)? Should the effect of the loss of the best and most versatile agricultural land on food security, flooding and biodiversity be clearly added, along with how this land use change will affect the mitigation of climate change?
- 2) Where has the Local Plan addressed sustainable development with regards to food security i.e. how have the food security needs of the present been met without compromising the ability of future generations to meet their own food security needs? Have the effects of climate change on food security been taken into account?
- 3) How is the local plan addressing the poor status for groundwater quality and quantity? How will the local plan ensure that development will not cause further contamination of the groundwater?

It also includes three areas where the NPSG feels the local plan is not sound.

Overall, the local plan fails to address climate change and food insecurity fully. It also does not meet the NPPF definition of sustainable development with regards to meeting the food security needs of future generations. It neglects the simple truth that despite all of mankind's accomplishments we still owe our existence to the top 6 inches of soil and the fact that it rains.

1 Matter 18: Climate change and the environment

1.1 **Unsound 1: We question the soundness of the local plan with regards to climate change and the environment as it has not included a calculation of the total area of grade 1-3a farmland allocated for housing. We believe that this information, clearly set out, is needed to understand the true effect of this loss of farmland on climate change, food security, flooding as well as the in-combination effects on biodiversity (especially farmland birds) in the future.**

The natural impact of the loss of farmland, coupled with the further impacts of climate change should be considered in turn.

For example, climate change will negatively impact food production across the world. The World Food Programme (2019) states that among the most significant impacts of climate change is the potential increase of food insecurity and malnutrition¹ due to erratic weather patterns including extreme droughts and rainfall. This means that we will need to become *more* food secure in the UK, as opposed to irreversibly damaging farmland through building on it.

¹ <https://www.wfp.org/climate-change/climate-impacts>

The UK Government website (2014) states that:

“Climate change is happening and is due to human activity, this includes global warming and greater risk of flooding, droughts and heat waves.”²

Climate change will also cause more flash floods causing extra surface water. This could have a major impact in our area which has already suffered from surface water floods e.g. Westgate (namely Maudaunt Avenue and Essex Road which is an old river bed area) was flooded in the 1970s when the fields were ploughed in the wrong direction and heavy rain followed a dry spell. These impacts of climate change should be included in the local plan.

Figure 1-1 shows the number of houses allocated on the best and most versatile agricultural land in the local plan from allocation over 100 houses. This was calculated using the local plan and agricultural land classification map. As it is calculated using just the larger sites, it is a gross under estimate of the real number of houses on farmland, however, one can see that over 7500 houses are allocated on the best and most versatile agricultural land from these larger sites. This will have a massive impact on all the aspects mentioned here, and a clear table of the exact number of allocations on Thanet’s farmland, all of which is best and most versatile, should be calculated and added to the local plan.

Area – Strategic sites and larger sites (100 +) only.	Number of houses allocated on the best and most versatile agricultural land in the TDC Draft Local Plan
Westwood	1450
Birchington	1600
Westgate	2000
Land at Manston Court Road/ Haine Road	1200
Land off Nash, Manston Rds, Margate	250
Land West of Old Haine Road, Ramsgate	250
Land north and south of Shottendane Road	550
Tothill Street Minster	250
Land at Haine Road and Spratling Street	100
Total (Does not include smaller sites of up to 99, so the figure is actually much greater than this)	7650

Figure 1-1 Number of houses allocated on grade 1-3a agricultural land from sites >100 houses calculated using the TDC Local Plan and Agricultural land classification map. This is vastly under estimated as it does not include sites < 100 and also does not include the Manston Green site.

The NPPF Feb 2019, paragraph 149 states:

Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long term implications for flood risk...biodiversity and landscapes.

However, how can this be properly mitigated against when the number of houses on agricultural land has not been clearly calculated in the Draft Local Plan?

² <https://www.gov.uk/guidance/climate-change-explained>

1.2 Suggested Question 1: We would like the planning inspector to consider adding this question:

How can the Local Plan take into account the overall effects on climate change without a clear calculation of the total area of the best and most versatile agricultural land allocated for housing within the local plan period? Should a table calculating these allocations on farmland be added? Should the effect of the loss of the best and most versatile agricultural land on food security, flooding and biodiversity be clearly added, along with how this change of land use may affect the mitigation of climate change?

Evidence continued:

The Food and Agricultural Organisation (FAO, 2015) ³states:

“The main problem we will have to face is the degradation of our soils. The world population continues to increase while we destroy more and more topsoil. If this is allowed to continue there won’t be enough fertile soil left to feed a growing world population.

Some worrying facts are:

24 billion tonnes of fertile or 12 million hectares topsoil are lost every year.

25% of the earth’s surface has already become degraded. This could feed 1.5 billion people.

The United Nations FAO calculated that we have **about 60 years of harvests left.**”

The UK government responded to these concern of the UN and devised a plan to protect soil health. In the Government’s Response to the Committees first report of session 2016-2017 on Soil Health⁴ it says:

“The Government welcomes the House of Commons Environmental Audit Committee report on ‘Soil Health’. As the Committee has highlighted, soil is essential for underpinning a range of benefits including agricultural production and climate change mitigation. This is why the then Government set out the aim in 2011 of managing soils sustainably and tackling degradation threats by 2030. We stand by that aim.”

The Government states that soil is essential for agricultural protection and climate change mitigation and therefore supports the argument that the loss of agricultural land in the local plan period should be included in the assessment of the local plan on climate change.

1.3 Unsound 2: We believe that this Local Plan is not sound as it does not use the Natural Resources of the Isle of Thanet in a prudent manner as stipulated by the NPPF, and does not mitigate the effects of climate change, but worsens them by building on great areas of the best and most versatile agricultural land. Overall, it does not fulfil the criteria of sustainable development whose high level aims can be summarised as:

“meeting the needs of the present without compromising the ability of future generations to meet their own needs (Resolution 42/187 United Nations General Assembly)”.

We believe that this level of destruction of agricultural land compromises the ability of future generations to meet their own needs. This is exacerbated by the effect of climate change on future food production.

³ <http://www.fao.org/soils-2015/events/detail/en/c/338738/>

⁴ <https://publications.parliament.uk/pa/cm201617/cmselect/cmenvaud/650/650.pdf>

We would like this question to be added:

1.4 Question 2: Where has the Local Plan addressed sustainable development with regards to food security i.e. how have the food security needs of the present been met without compromising the ability of future generations to meet their own food security needs? Have the effects of climate change on food security been taken into account?

2 Flooding

Surface water management

The NP Steering group are concerned by paragraph 15.15 in the Local Plan which states:

“Under the Water Framework Directive (WFD) the Kent Isle of Thanet Groundwater Body has been classed as poor status for the groundwater quality and quantity. The groundwater is impacted by nitrates, pesticides, solvents and hydrocarbons which are of concern”.

2.1 Unsound 4. It is not clear how the Local Plan will address the concerns of nitrates, pesticides, solvents and hydrocarbons in groundwater. Furthermore, it is not clear how the developments will use SUDs in a way that this status can be improved or at least not further compromised.

We would like this question to be added:

2.2 Question 3: How is the local plan addressing the poor status for groundwater quality and quantity? How will the local plan ensure that development will not reduce this status even further?