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**BY EMAIL AND POST**

26281/A3/JM/cg

25 October 2019

Dear Ms Feeney

**THANET DISTRICT LOCAL PLAN EXAMINATION**  
**REPRESENTATION IN RESPONSE TO ADDITION INFORMATION CONSULTATION**  
**ON BEHALF OF PTARMIGAN LAND [REPRESENTOR ID – 493]**  
**OCTOBER 2019**

This representation in response to the current 'additional information' consultation is prepared on behalf of Ptarmigan Land who is jointly promoting the Birchington Strategic Site (Policy SP14) alongside Millwood Designer Homes.

The current consultation relates to 3no. matters as requested by the Local Plan Inspectors:

- Update on 5-year housing land supply position (CD9.30);
- Audit note on heritage assessment of allocated housing sites (CD9.31); and
- Sustainability Appraisal Addendum Report (CD9.32).

Each of these matters is considered and responded to in turn below.

**Update on 5-year Housing Land Supply Position**

As acknowledged in Ptarmigan Land's Matter 8 Hearing Statement, the stepped trajectory proposed through Policy SP11 would not result in the Council demonstrating a 5-year housing land supply post-adoption through either the Liverpool or Sedgefield approach. In light of this, we proposed an alternative trajectory, with a lower phased requirement in the early/mid part of the Plan to reflect completion data and when Strategic Sites are identified to begin delivery.

The Council's note on updated 5-year land supply (CD9.30) adopts the revised stepped trajectory proposed in our Matter 8 Hearing Statement, alongside most recent completion data for the monitoring year ending April 2019, and updated trajectories for sites SP13, SP18 and H03 (at the request of the Inspectors).



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The note includes, at Table 5, an updated 5-year housing land supply calculation (based on the Liverpool approach). Table 1.1 below reviews this, using the Council's updated completion and supply data, including utilising the Sedgfield approach. In both instances, it is now clear the Council can demonstrate a 5-year housing land supply on the basis of the proposed revised stepped trajectory.

**Table 1.1 - Revised Trajectory Housing Land Supply Assessment**

<b>Sedgfield</b>	<b>5 YEAR HOUSING LAND SUPPLY ASSESSMENT – BARTON WILLMORE TRAJECTORY</b>			<b>Liverpool</b>
17,140	Total Plan Requirement 2011 – 2031			17,140
3,355	Requirement 2011/12 – 2018/19 (1,555 dwelling across 2011-16 + 600dpa x 3 across 2016/17 and 2018/19)			3,355
2,704	Completions 2011/12 – 2017/18			2,704
651	Shortfall since Plan period began (2011)			651
4,800	Requirement 2019/20 – 2023/24 (600dpa x 2 + 1,200dpa x 3)			4,800
651	All in 5 years	Inclusion of identified shortfall	651 / 12 x 5 years	271
5,451	4,800 + 651	Revised 5 year requirement	4,800 + 271	5,071
1,090	20%	Plus HDT Buffer	20%	1,014
<b>6,541 (1,308dpa)</b>	<b>5,451 + 1,090</b>	<b>Revised Total 5 year requirement 2019/20 – 2023/24</b>	<b>5,071 + 1,014</b>	<b>6,085 (1,217dpa)</b>
<b>7,015</b>	<b>Supply of Housing 2019/20 – 2023/24</b>			<b>7,015</b>
<b>5.36</b>	<b>Supply in Years</b>			<b>5.77</b>

We support the proposed modification to Policy SP11, adopting our proposed revised stepped trajectory. This secures the necessary 5-year housing land supply at the point of adoption required for the Plan to be considered "sound" (NPPF paragraph 67) and aligns the necessary step change in trajectory with the delivery of Strategic Sites from 2021 onwards.

#### Audit Note on Heritage Assessment of Allocated Housing Sites

The audit note (CD9.31) acknowledges that Thanet District has a wealth of archaeology, from Palaeolithic to Modern periods, alongside designated and non-designated heritage assets. This, alongside technical advice from Kent County Council and the Council's Conservation Officer, has influenced site selection and the drafting of site specific policy requirements in relation to heritage.

The Heritage Asset Identification and Local Plan Policy Response for site SP14 – Birchington (the Birchington Strategic Site) is shown below, extracted from page 3 of the audit note.

<p>SP14 - Birchington</p>	<p>Archaeology - Significant throughout site. Two Scheduled Ancient Monuments (SAM 1004207 - Ring ditches, linear ditches and pits, SAM1005489 - ring ditches, curvilinear ditches and enclosures) within or close proximity to boundary. Listed Buildings - Gore End Barn Grade II, Upper Gore End Farmhouse Grade II Conservation Areas - N/A</p> <p>Avoid impact on major enclosure seen as cropmarks on west side and cropmarks to south which include a Scheduled Monument. Predetermination is needed over large areas but north may be slightly less sensitive.</p> <p>Cropmarks suggest prehistoric activity especially. A possible ring ditch is located towards the southern end. Evaluation needed.</p> <p>The site lies directly adjacent to Quex Park, which is a local listed parkland of historic importance. There would need to be early consideration of the setting of Quex Park boundary.</p> <p>Achievable housing numbers need to be adjusted to reflect the listed buildings on site and that they should be sympathetically converted and all historic walls and features retained; in addition, not all of the site should be developed into housing. This is because the site beyond the access track /path to Gore Court is so open in character such that its development would be a harmful intrusion into the countryside.</p>	<p>Requirement for pre-design archeological evaluation Requirement to preserve listed buildings on site and respect the setting of Quex Park</p>
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The Promoters of the site have completed a programme of archaeological investigation in support of promotion of land under their control through the Local Plan process.

The results of this work are detailed within Geophysical Survey Reports (September 2017 and May 2018) and an Archaeological Evaluation Report (August 2018) included as Appendix 10 – 12 of the Promoters' Regulation 19 consultation representations submitted October 2018.

In summary, the archaeological work undertaken has demonstrated that the majority of the Birchington Strategic Site is not constrained by archaeology, and the Site is able to deliver its full policy requirements within the identified constraints.

The programme of archaeological investigation has confirmed the presence, within the promotion land, of a prehistoric ring ditch, a further four prehistoric enclosures of probable ritual/mortuary function and a possible prehistoric settlement site. Additionally, at least seven medieval rectilinear enclosures, three of which contain sunken feature buildings, are identified. A moderate quantity of finds were recovered from 19 of the 35 evaluation trenches.

However, through the extensive archaeological investigations completed, areas of archaeological remains for preservation in situ have been identified. These can be successfully retained as part of the development proposals for the site within areas of public open space, securing a cultural resource for existing and future generations. Elsewhere, locally important archaeological remains will be subject to further investigation and recording in advance of development.

In regards to built heritage, the proposed allocation for SP14 includes land outside of the Promoters' control which includes the Grade II Listed Buildings of Gore End Barn and Upper Gore End Farmhouse. As confirmed in the audit note and reflected in Policy SP14, there will be a need for masterplanning to preserve these Listed Buildings, as well as respecting the setting of Quex Park to the east.

Initial capacity studies, included in Appendix 2 and 3 of Ptarmigan Land's Matter 5 Hearing Statement, demonstrates the full policy requirements can be delivered within the allocation land controlled by the Promoters. This reflect the need for areas of archaeological remains to be preserved in situ, alongside the retention of the identified Listed Buildings and provision of land for appropriate mitigation and/or set-backs from these and Quex Park.

Through careful consideration of both built and now known below ground heritage assets, masterplanning for the Birchington Strategic Site can ensure the policy requirements set out in SP14 can be achieved on the Site without significant heritage impacts.

#### Sustainability Appraisal Addendum Report

The Sustainability Appraisal Addendum Report (CD9.32) is supplementary to the Sustainability Appraisal Environment Report August 2018 (CD7.4) and, at the Inspectors' requests, includes Sustainability Appraisals for:

- Omission Sites (section 2);
- Individual housing sites over ten units within Policy HO1 (section 3);
- Individual housing sites within Policy HO3 – HO9 and HO11 – HO17 (section 4); and
- Employment allocations within policy SP03.

In regards to the Promoters' interests, Land south and west of Birchington is considered through Section 2 as an 'omissions site'. This relates specifically to a submission through the March 2018 call for sites by the Promoters' of land additional to that proposed for allocated through Policy SP14.

The executive summary of the Sustainability Appraisal Addendum Report notes that Omission Sites were not considered as reasonable alternatives and did not meet the criteria for allocation, however it does not acknowledge (within the summary or assessment of the site at Section 2.20) that the site is already proposed for allocation within the Plan, and has been considered at Page E43 to E46 of the August 2018 assessment.

We continue to support the conclusions of the August 2018 assessment and the proposed allocation of the Promoters' land to deliver 1,600 dwellings at Land south and west of Birchington.

We hope the above sets out our position in regards to the current 'additional information' consultation, but should you have any questions, comments or require any clarifications please do not hesitate to contact us on the details provided.

Yours sincerely



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