

Response to TDC's latest submissions to the planning inspectorate regarding the five year land supply and sustainability report, in respect of the sustainability of a development plan to build 24 houses on the land which formally housed the Club Union Convalescent Home, in Reading Street, Broadstairs.

The Local Plan states that the land has been allocated for the development of 24 houses. It outlines that 10 houses will be built by 2021/22 and a further 14 built by 2022/23. However, this proposal is highly controversial and arguments made regarding its sustainability are flimsy and inaccurate:

No planning application has been approved for this site. Two recent applications (the most recent being for 25 houses) have been rejected both by TDC's Planning Committee and Government Planning Inspectors. In rejecting the plan to build 25 houses on the land, Inspector Rajeevan Satheesan commented that the plan 'would not be sympathetic to local character and history, including the surrounding built environment and landscape setting, as advocated by the National Planning Policy Framework... and 'would therefore be an inappropriate development to conflict with Saved Policy D1 of the Thanet Local Plan (2006), which amongst other things requires new development to respect or enhance the character or appearance of the surrounding area'. He recognised the importance of Reading Street's historic character and 18 listed buildings, concluding that that 'the proposals would harm the setting of the nearby Grade II listed buildings, and in this respect, would also not accord with the relevant sections of the Framework, which seek to conserve and enhance the historic environment. In dismissing the appeal, he attached particular importance and weight to that harm, which he found 'would not be outweighed by public benefits and which would not result in sustainable development in the meaning set out in the Framework'. A current planning application for 24 houses (likely to come before the Planning Committee in November 2019) does nothing to address the above issues that led to Inspector Satheesan rejecting the plan for 25 houses and so is likely to be similarly rejected.

In the Local Plan and sustainability assessment, there is no mention made of the dispute between TDC and Broadstairs & St. Peters town council regarding the latter's designation of land at the entrance to the proposed development as 'Local Green Space'. The land, which has two memorial benches, large flower pots and a post box, has been enjoyed as a place of rest and tranquillity for locals and visitors for decades. TDC wishes to modify the Broadstairs & St Peters neighbourhood plan by removing this designation. This appears to be an attempt to take from the community a valued piece of open space and gift it to the developer of the Club Union site. Until this issue is resolved by Secretary of State there is no possibility of this development being deemed to be sustainable.

TDC arguments regarding the sustainability of 24 house development on this site are inaccurate on several counts:

1. The proposed development would put pressure on education and healthcare provision. The NHS estimate that 24 new houses, most of which have four or five bedrooms, would only lead to 56 new patient registrations in the area is an absurd underestimate.
2. There is now only a very limited bus service in Reading Street (and no local shop). It is not true, as the submission claims, that 'there are several key retail and service facilities within a reasonable travel distance of the site, with good public transport links to other town centres.' Thus, the development not sustainable in this regard.
3. The roads in the current proposed development would be unadopted and unlit. Kent Police have expressed concerns about this, which they believe could lead to higher crime rates in the development and the surrounding area of Reading Street village.

4. A modern housing estate of 24 dwellings would not augment 'a sense of place' in a historic village with 18 Listed Buildings, as noted by the Planning Inspectors who have rejected the two previous planning applications on this site. A modern housing estate would not 'protect and enhance the area's natural, semi-natural and street scene to support the tourist economy', nor would it 'preserve and enhance the character and quality of the area's landscape and townscape'. Most importantly, it would not 'preserve and enhance sites, features and areas of historic, archaeological or architectural importance and their settings'.

Reading Street is a unique, historic Thanet village, which, once damaged by a modern housing estate, could never be recovered. 24 houses would contribute just 0.14% of Thanet's housing needs, yet would destroy 100% of this special historic village.