

45 Reading Street
Broadstairs
Kent
CT10 3AZ



10th October 2019

Dear Ms Feeney,

I am writing to you to comment on Thanet District Council's amendments re the 5 years supply plan and to the sustainability assessment on one particular planned development: the plan to build 24 houses north of Reading Street on land that was previously the Club Union convalescent home.

You may recall that on 22nd of February, 2019, I emailed you my submission re Matters, Issues and Questions to put before the Inspectors re TDC's Local Plan. Now I have focused on the amended document that will be put before the inspectors.

I have posted my comments to you in this envelope, as I was uncertain that I could make my submission via email. If it is possible to do so and you wish me to submit via email, I can do that if you email me on either of these emails: [REDACTED] or [REDACTED]

I would be obliged if you could email me and let me know that you have received my documents. I am uncertain if any other residents are allowed to object. If you could clarify this matter also I would be grateful.

Yours sincerely,

R H Jaffa

Response to TDC's latest submissions to the planning inspectorate re the five year land supply and sustainability report, specifically on 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. But there is no approved planning application on this land. In the past there was approval to build thirteen houses on part of the land, approval which was given by the council in 2005. But this has now lapsed. On other parts of the land no planning approval has ever been given.

The current application is the subject of much controversy. Two of Thanet District Council's (TDC) planning committees have rejected plans to build on the land. These rejections have been challenged by the developer whose appeals have been dismissed by two separate planning inspectors. I believe that their reasons for rejecting the plans would equally apply to the plan for 24 houses which is currently scheduled to be put before a planning committee on 20th November 2019. Moreover, I believe that none of the criticisms identified by both inspectors have been addressed by the developer and his consultants and that the sustainability report and table 87 in the document, as a result, is fatally flawed and should not be accepted by the inspectors as being a truthful assessment of the sustainability of this planned development.

In the local plan and in the sustainability assessment, for example, there is no mention of the following critical issue that is yet to be resolved. There is a dispute between Thanet District Council and Broadstairs & St. Peters town council over the town council designating as 'Local Green Space,' a small parcel of land at the entrance to the development land in Reading Street. I believe the designation has been endorsed by a planning inspector. However, TDC want to modify the Broadstairs & St Peters neighbourhood plan. They claim that: 'Two of the designations of Local Green Spaces proposed in the neighbourhood plan are considered contrary to the national policy and policies in the emerging, Thanet Local Plan.' The council is therefore proposing modifications to the neighbourhood plan that these two designations are deleted from the neighbourhood plan.

I believe the real reason for their concern has nothing to do with this. It is because TDC and Kent County Council (KCC) want to 'gift this piece of land' to the developer, so that he can enlarge the entrance to the development site and as a result build his 24 houses. I understand that there is no indication of the ownership of this land. Alongside many local residents who oppose this development for the detrimental impact it will have on our historic village, I question who in TDC or KCC can authorise the sale, or gifting, of land they do not own? Under what council powers is this being considered?

Surely, until this issue is resolved (and I believe the Secretary of State has already been asked to step in by our local MP), there can be no signing off of this development or any suggestion of its 'sustainability.'

I believe this to be the case simply because of this single issue; the land, which has two memorial benches, flowers in wooden pots, a post office box and which has been enjoyed as a place of rest and tranquillity in the village conservation area for decades by the local community. Carol singing has taken place on this land and residents of Reading Street have maintained and planted flowers on it - the small parcel of land has been an integral part of the village community. Indeed, we created a

document to apply for village green status for this land, which was lodged with Kent County Council. But KCC responded by saying that they could not consider this whilst there was an ongoing planning application on land adjacent to it.

In the sustainability assessment re the former club union convalescent home, North of Reading Street, Broadstairs. Page 508 point 3.21 the document states: '24 houses contribute 0.14% of housing needs' I would add: and destroys 100% of a historic village that has taken more than 300 years to evolve.

It goes on to say that: 'non-significant effects relate to providing a sustainable supply of housing, contributing to vibrant balanced communities, providing access to employment opportunities, improving efficiency in land use, ensuring sustainable pattern of development, conserving and enhancing the area's townscape and proving access to sustainable public transport.'

Further it states: 'Planning permission was granted for the erection of 13 detached houses in 2005, since which time, additional land has been included and revised plans submitted. This consent has now expired. A planning application for the erection of 24 residential units on the site was validated in July 2019 (REF: F/TH/19/0813. This application has not yet been determined.' I understand it is currently likely to come before TDC's planning committee on 20th November 2019.

In general terms the plan for 24 houses has many similarities with the two plans rejected by planning inspectors; one for 30 houses, by Mrs Sheila Holden and the other, for 25 houses, by Rajeevan Satheesan. Both were highly critical of the plan itself and of the way that the modern housing estate would impact the existing, historic settlement of Reading Street.

Their criticisms have simply not been dealt with in the latest plan, by the developer, his consultants, or by TDC's planning department. There is no road connecting the western and eastern parts of the site and the pedestrian link through the site is the same as that described by Mrs Holden: 'The pedestrian link through the site would appear to serve little purpose other than attempting to connect two very different forms of development. In reality there would be inadequate functional, visual or social links between the two areas, making it difficult to integrate them with each other or with the surrounding area.' She criticised the developer for not taking advantage of the extra land he had acquired: 'These changed circumstances appear to provide an opportunity for a different, more creative approach to the overall layout. Instead, the current scheme proposes amendments and 'add-ons' to the now lapsed proposal for thirteen dwellings. The proposal would therefore appear to be two separate developments, unrelated to the surrounding street scene, rather than an extension to the village with its own sense of identity.'

In rejecting the plan to build 25 houses on the land, Inspector Rajeevan Satheesan said: 'It would not be sympathetic to local character and history, including the surrounding built environment and landscape setting, as advocated by the 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 Streets listed buildings, eighteen (we believe the most anywhere in Thanet in the shortest distance). He said: 'In giving great weight to the asset's conservation, I consider 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 said that: 'I must attach considerable importance and weight to that harm which I find would not be outweighed by public benefits and which would not result in sustainable development in the meaning set out in the Framework.'

I believe that the current plan for 24 houses is also unsustainable.

Let me now look at the table 87 in detail (this can be found on page 510-513 of the document).

Point 2. Is an admission that as the proposed development does not include additional provision of healthcare services, it is likely to place a short-term pressure on existing healthcare services such as, GP surgeries and dentists.

Point 3, looks at education services and suggest this too would place increasing pressure on Broadstairs education provision. My point on both of these situations is that they would be made harder and less sustainable as there is virtually no local bus service into Broadstairs or to the nearest shops. So the development would be wholly reliant on car transport, something that I believe is not sustainable.

Point 4 .To increase public safety and reduce crime and the fear of crime: This point addresses the issue thus: If the development is designed with safety and crime considered, it could have a beneficial impact. Any proposed site design should consider enhancement measures set out within the "Secured by Design" guidance such as appropriate lighting, modern safety measures, boundary treatments and planting. This is a wish list of measures that we know have not been implemented in any plan. For example, the two roads that run into the development site (one from the Convent Road side and one from Reading Street) will both be unadopted and unlit. This feature is the same in the plan for 24 houses. Kent Police expressed concerns about the design in a letter to the planning department of TDC on 15.02.2018 (which was not responded to) and on 9th July 2019. I do not know what action has been taken on this, but until this is clear there is a high risk that if the plan is passed one of the results would be higher crime rates impacting not just the development but surrounding area.

Point 5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation across the wards. In answer to this point the submission states: '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.' This is not the picture now. There is no local bus service anymore and no local shop in Reading Street. Brodstairs has shops but they too are restricted and going to the supermarkets at Westwood Cross is a car drive away. This document needs to be checked as it is dishonest. Without a car the 'vulnerable' will be trapped in the development. This is not sustainable development and where or where is the TDC planning department which should be working harder to get the developer to take all the issues outlined by the inspectors, seriously and act upon them one by one, to produce a suitable and sustainable plan that protects or enhances the existing village of Reading Street and builds something that people can be proud of.

Point 6. To create vibrant balanced communities where residents feel 'a sense of place' and individual contribution is valued. The proposed site allocation could have a beneficial effect by helping to support Broadstairs town centre. How in the world do the authors jump to this

conclusion, particularly if there is no local bus transport to Broadstairs from anywhere near the estate? 'Details of the proposed developments are unknown at this stage (they have been known for some time so I find this difficult to understand) but it goes on 'there is likely to be a positive impact if the design and mix of housing maintains the character and sense of place associated with the area.

This is something that the two Planning Inspectors commented on, in particular highlighting the difference in height between the development site and the listed buildings nearby (Inspector Sheila estimated that the listed buildings were 1.6 metres lower than the development land). The planned modern housing is three storeys in height. There is no doubt that these buildings will be visible in the gaps between existing houses in the village and will spoil the setting of the whole village. What are required are lower houses, something the developer and his consultants have rejected outright. Inspector Sheila Holden said: 'The proposal would be a poor quality design that would not add to the overall quality of the area. I consider this to be a matter that attracts substantial weight. It would adversely affect the setting of Listed Buildings, a matter of significant weight....The proposal would therefore not meet the environmental dimension of sustainable development. I do not see that this situation has altered with the minor changes made to the current plan for 24 houses on the site.

Point 9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy. 'The site would be developed on the urban-rural border on land not currently in agricultural use. Therefore the semi-natural environment would be permanently altered. However, as any master planning exercise for the site, the creation of open spaces and habitat would be positive. Any site development should include measures to incorporate open space and habitat creation.' The developer's solution to this is to chop down all but one tree on the site and put in fast growing replacements...this is not habitat creating, it is habitat destroying.

Point 12. To preserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas. 'Redevelopment of the site would proactively contribute towards a better townscape, if quality design standards are met.' They have not been met in any of the developer's plans. His latest plan is just as damaging to the surrounding village, with high modern boxes planned on land around a village more than 300 year old. Little has changed in the plans since the criticisms of two planning inspectors; the new plan is just as flawed as its predecessors were. There is no detail in this point because the authors know there is nothing positive to say about the development that could tick this box in terms of of preserving or enhancing the character of the villages' townscape. Why not say so?

Point 13. To preserve and enhance sites, features and areas of historic, archaeological or architectural importance and their settings. 'Redevelopment of the site could contribute towards the enhancement of townscape if it is undertaken in a sympathetic and robust manner.' This developer has shown no inclination to engage in a dialogue with local residents, he has shown no willingness to address the criticisms of the planning inspectors and I see again, no substance in this which should in any way be described as a tick in a box for a sustainable development.