

Email: [REDACTED]



**SENT BY EMAIL**

Dear Ms Feeney

24 October 2019

**THANET DISTRICT LOCAL PLAN: FURTHER CONSULTATIONS**

Thank you for your email inviting further representations and comments on three issues upon which the Inspectors have requested additional information. I wish to make the following representations.

**1. Update 5 year housing land supply**

I have read the Council's latest forecast but have to question their basic assumptions about population growth and therefore the overall allocation in the draft Local Plan.

Over the period from mid-2009 to mid-2018 the population of Thanet increased from 132,337 to 141,819, a rise of 9,482 or 7% over nine years. (See *Office for National Statistics (ONS) Population Forecasts*). If this rate of increase is applied for the period mid-2018-mid-2028, Thanet's population would increase to 151,746, a change of 9,927. However, the ONS this week forecast that the population of the UK would only increase by 4% over that same period, so if this is applied to Thanet we would see an increase of only 5,672. These are significantly lower than the forecast submitted by G L Hearn and Partners in their report to the Council in 2017, where they predicted an increase of 20% from 2011-2031 resulting in the population of Thanet increasing to 161,282. Even allowing for a 7% upward adjustment to take account of the likely change from 2028-2031, the population would only reach 154,932 by 2031.

The ONS data for Thanet confirms that there has been a significant reduction in net inflows of migrants to Thanet since 2015, when compared to the peak period of 2011-2013.

My representation is that the overall housing allocation in the draft Local Plan should be reduced to reflect the more accurate and up to date population forecasts published by the ONS and that the supply of land currently identified is sufficient for much longer than the 5.77 years identified in the Local Plan.

**2. Audit note of Heritage Assessment**

I refer specifically to SP14 – South and West Birchington and the statement produced by Thanet Council. The proposal is that achievable housing numbers needs to be adjusted to reflect the listed buildings on site. There is also significant archaeology across the site.

It is unclear from this whether archaeological remains and heritage assets such as Quex Park will be adequately protected, not only from the proposed housing development but also the intrusion of the Inner Circuit road improvements, including the by-pass and road widening schemes that could directly impact on the setting and quiet enjoyment of Quex Park.

It is also unclear whether it is intended to reduce the housing numbers or simply to increase the density in other less sensitive parts of the site.

**(Continued)**

My representation is that the statement is welcome, but clarification is needed as to the impact of this on the scale and density of the housing allocation for this site.

### 3. Additional Sustainability Appraisal

I have read this additional report produced by Arup and Partners and wish to make the following comments.

There is a fundamental flaw in the way in which this report has been compiled. The authors have undertaken an appraisal of each site allocated for development in the draft Local Plan and assessed it against the Plan SA Objectives. However, this obscures the overall impacts that the proposals in the Plan will have on the people of Thanet.

Take, for example, Objective 2 – Healthcare: some sites are shown as “red” (i.e. where there is a significant long term impact) but this masks the fact that when aggregated across the district every development site that provides housing for an increased population will have a negative effect on healthcare in the district, because the system is highly likely to be unable to service such an increase in demand without significant investment in healthcare provision, notably professional staff to run the service. The Plan should demonstrate that such provision will be made otherwise it is unsound.

My second example relates to Objective 10(b) – Best and Most Versatile Agricultural Land: the majority of sites for development are on land currently used for agriculture. The appraisal deals with each site, concluding that there will be minimal impact. However, when aggregated, development sites will result in a loss of about 7.5% of best and most versatile agricultural land. At a time when the UK is seeking to become less dependent upon imported food and needs to reduce our impact on climate change, the Plan should be seeking to afford greater protection to the highest quality agricultural land that we have in Thanet.

I have considered the Arup report and in particular the commentary about SP 14 – South and West Birchington, which is allocated for 1600 houses. First, Arup states that the capacity and proposed use is 1500 units. Second, it states that the proposed housing density of 18.5 dwellings per hectare “may impact on affordable housing provision”. This needs clarifying because the allocation in the Plan is based on 35 dph and we must ensure that it includes affordable housing. I can only assume that the figure of 18 dph is an averaged across the whole site, therefore does not take into account heritage constraints, open space and other land uses. Please could this be clarified.

My second point about SP14 relates to the narrative on page 122. I fundamentally disagree with this in relation to the positive effects described:

a) access to education and training facilities (SA Objective 3): the provision of a new primary school is seen as a benefit, but the secondary school serving this area is already at capacity, so there is not a positive benefit for education

b) increasing public safety and reducing the fear of crime: adding 1600 houses to the existing village makes it more likely that crime will increase as it will become a more urban environment so this development will not benefit the community. Quoting “Secured by Design” (SA Objective 4) is inappropriate for this development on the edge of a rural area and much greater emphasis should be given to creating a bespoke, appropriate design guide for SP14

c) reducing waste generation and promoting good waste management (SA17): the new housing may well be built to incorporate the latest ecological principles, but this development by itself generates more waste that has to be disposed of so it does not bring a positive benefit to the community

**(Continued)**

d) SA Objective 10(b) – loss of best and most versatile agricultural land – see my comments above.

The Arup report does not examine the impact of the Local Plan's sustainability in regard to utilities, in particular water supply and sewage disposal facilities. Thanet is already one of the driest parts of the UK, yet the Local Plan relies upon statements of intent from the water companies that they will meet demand, but these need to be supported by detailed plans demonstrating how the increased demands will actually be met over the Plan period.

My overall representation is that the Additional Sustainability Appraisal is inadequate and misleading because it does not address the overall impact of all the development sites when aggregated. Healthcare and Education impacts in particular, must be considered in aggregate, across the whole of the district and not obscured by assessing individual sites.

I am also concerned to note at paragraph 2.23 and 2.41 that land at Little Brooksend Farm and land to the south of Birchington have been included in the appraisal, yet these are not sites allocated in the draft Local Plan. Please can you clarify the status of these sites and confirm that they are not being considered for inclusion as development sites in the current draft Local Plan period to 2031.

I trust that these further representations and comments will be considered by the Planning Inspectors. Should you require any clarification or further information please contact me.

Yours sincerely



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