



27 October 2019

Ms Annette Feeney,
c/o Thanet District Council,
PO Box 9,
Cecil Street,
Margate, Kent, CT9 1XZ

Dear Madam,

Thanet District Council Draft Local Plan - Sustainability Appraisal Addendum Report (SAAS)

The report provides a useful compendium of information about the Local Plan proposals.

However, the document is riddled with factual errors and contradictions; much of the commentary is based on subjective judgements and overly unrealistic assumptions which tend to favour development.

Analysis is primarily focused inwardly on the proposed new developments and pays little regard to the wider impact on existing communities despite the thrust of Paragraph 2.23 of The Offices Report at Appendix A which states that:

'Piecemeal additions at different locations throughout Thanet may only serve to add pressure on existing social infrastructure, rather than create a local critical mass that would warrant a (viable) increase in local social infrastructure provision. Sustainability would depend on how well these new sites will link to neighbouring established developments and rural settings (Objective 20).'

The final sentence above being most important. The SAAS is a piecemeal document lacking community and district wide impact assessments and as such serves to confuse rather than clarify issues around sustainability.

Rather than critique the whole document in detail the enclosed document uses proposals for land at the south and west of Birchington to illustrate these points and Table 20 is shown with an objective assessment as an additional column.

I trust you will note these comments and pass them on to the Inspector.

Yours faithfully



Nick Blankley

Thanet District Council Draft Local Plan - Sustainability Appraisal Addendum Report (SAAS)

Section 20.20.3

'The northern end of the site lies within walking distance to Birchington-on-Sea station.'

The southern end of the site is over 2km in a straight line from the station.

'The nearest medical facility is Birchington Medical Centre to the north of the site.'

Correct, this too is over 2km from the southern end of the site and beyond walking distance for many people.

'The nearest retail and educational facilities are in the centre of the village.'

Retail facilities are in the centre of the village; Birchington Primary School is on the eastern edge of the village.

'The northern most point of the site is less than 100 metres from the coast.'

Incorrect – straight line distance from the closest point to the coast on the site is 300m across the railway line.

Section 20.20.3

'The proposed site allocation would likely deliver a number of modern residential units as part of an urban edge extension.'

Put another way, the site allocation would increase the village population by between 40-60% building on prime agricultural land adjacent the village.

'Beneficial significant effects have been identified'

Beneficial significant effects have been suggested but none are supported by evidence.

'The site would result in the direct loss of between 0.5% and 2% of the total Best and Most Versatile agricultural land in Thanet; this is considered unlikely to significantly affect Best and Most Versatile agricultural land.'

This is a totally subjective judgement and were it in reference to the author's salary a reduction 'of between 0.5% and 2%' would no doubt be considered to be very significant.

'Non-significant negative effects relate to etc.....'

A dismissive and unreliable summary derived from the poor analysis and generous interpretation shown in Table 20.

'All other effects are currently unknown at this stage but are unlikely to be significant.'

A nonsensical statement purporting to be able to predict the unknown.

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington

SA Objective	Proposed allocation – Land South and West of Birchington	Objective Assessment – Land South and West of Birchington
<p>1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand.</p>	<p>Permanent Direct ST/LT ++ The proposed site allocation would deliver dwellings as an extension to the district centre of Birchington-on-Sea. Large villages such as this are considered to have some scope for new housing development in order to meet local need. This is a large site; therefore, it is likely to be an affordable housing requirement, which would assist in the provision of a sustainable mix of types and tenures. The proposed housing density (approximately 18.5/ha) of housing on the site may impact on affordable housing provision. The scale of impact could be significant, but details of proposed developments are unknown at this stage. However, the provision of housing in this rural area is likely to directly benefit the area. To encourage benefits, requirements could be set regarding housing mix and tenure can help meet local demand.</p>	<p>RATING: ⓂⓂⓂ The proposed site allocation would deliver dwellings for 4-6,000 people on the edge of Birchington-on-Sea, a village with a current population of about 10,000. Local housing demand and the proposed mix and types of housing tenures are unknown and the proposed size and rate of expansion is disproportionate, beyond anything that the village has experienced in the past. Such a development would have a major negative impact on traffic and the environment, and local health, education and community facilities. It is doubtful that without substantial investment in infrastructure and facilities within the village and surrounding locality that such a development could be sustainable. It is not possible to identify any benefits for the existing community of such a large development.</p>
<p>2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.</p>	<p>Permanent Temporary Direct LT ? The development would be expected to provide an appropriate contribution to and land for the expansion of the Birchington Medical Centre. This would provide a neutral to positive impact, depending on whether the redevelopment of the medical centre appropriately improves medical facilities and increases capacity. To promote benefits, contributions for social infrastructure should be secured through a legal agreement to allow for improvements to existing facilities.</p>	<p>RATING: ⓂⓂ Primary, community and secondary care services in the area are amongst the worst performers in England. Birchington Medical Centre cannot recruit sufficient clinical staff to meet local needs. There is no evidence that the developer has engaged with local NHS service commissioners or social and long term care providers. Social care services and long residential care provision are operating at capacity. A contribution to and land for the expansion of the Birchington Medical Centre alone would be insufficient to even maintain the current less than adequate health and social care services in the area.</p>

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington (continued)

<p>3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.</p>	<p>Permanent Temporary Direct ST/LT ++ The proposed site allocation would have a positive effect on access to educational facilities as it is expected that the developer will be responsible for the provision of a two form entry primary school. Depending on the final design and number of residents, any proposed development should provide a contribution to increase the capacity of educational facilities should be secured through a legal agreement.</p>	<p>RATING: Ⓜ Birchington Primary School is already oversubscribed, in 2019 there were 134 applications for the 90 places available. Provision of a new, fully operational primary school is unlikely to be achieved early in the proposed development creating more pressure locally; a two form entry school is unlikely to meet the eventual additional demand for primary school places. The developer has made no provision for additional pre-school or secondary education places. Nor is there any planned provision for training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.</p>
<p>4. To increase public safety and reduce crime and fear of crime.</p>	<p>Permanent Temporary Indirect ST/LT + On larger sites, construction activity is likely to result in short term anxiety amongst existing residents due to site security and potential anti-social behaviour. However, new housing provides opportunities to create modern secure dwellings that offer people safe and comfortable homes. 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.</p>	<p>RATING: Ⓜ Construction of the new estate is likely to extend to 10-15 years; this activity is likely to result in anxiety amongst existing residents due to site security, transient workers and potential anti-social behaviour. Provision of secure houses and a site design with enhanced security is most likely to deflect criminal and anti-social activity to existing, less secure environments. The new estate is unlikely to increase public safety and reduce crime and fear of crime in the wider community.</p>

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington (continued)

<p>5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.</p>	<p>Permanent Indirect LT + The proposed allocation would result in additional housing provision within close proximity to Birchington town centre. There are several key retail and service facilities within walking distance of the northern site boundary, with good public transport links to other town centres. However, the access to these services afforded by the site would depend on the tenure type and mix provided.</p>	<p>RATING: 😊 Other than a convenience store the developer has no plans to provide appropriate key facilities to support vulnerable people and reduce the level of deprivation. There are several retail and service facilities in the village within walking distance of the northern site boundary, the remainder of the site would in most cases rely on car or public transport to access these services.</p>
<p>6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.</p>	<p>Permanent Direct LT + The proposed site allocation could have a beneficial effect by helping support Birchington's town centre. Details of the proposed developments are unknown at this stage, but there is likely to be a positive impact if the design and mix of housing maintains the character and sense of place associated with Birchington's town centre. To encourage benefits, requirements could be set regarding housing mix and tenure can help promote a sense of place.</p>	<p>RATING: 😊 Details of the proposed developments are unknown at this stage other than they will be predominantly housing with no community facilities provided. Proposals to manage the appearance of buildings to blend with the existing character may provide a superficial impression of 'sense of place' but the peripheral location and nature of the site is unlikely to encourage residents to associate with the village.</p>
<p>7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.</p>	<p>Permanent Indirect LT + The proposed allocation is unlikely to impact the levels of employment/unemployment of the population. However, the proximity to local and regional public transport links will allow appropriate access to employment within Thanet, Kent and the wider South East.</p>	<p>RATING: 😊 The proposed allocation is unlikely to create employment opportunities; Thanet has the highest unemployment rate in the South East. Local bus routes run along Canterbury Road and Minnis Road and the railway station is close to the northern boundary of the estate but a car journey away from the rest of the estate. It is likely that access to most employment will require a car journey.</p>
<p>8. To ensure the sustainable development of the proposed economic growth and encourage employment development at key sites within the District to support priority regeneration areas.</p>	<p>Permanent Indirect LT +/- By providing additional dwellings in the district, the proposed allocation could enhance the economic growth of the District in providing additional housing for working age individuals who work in the village. However,</p>	<p>RATING: 😊 The development will not provide nor encourage significant employment opportunities and will be in an area of already high unemployment. Any economic growth will be reliant on workers commuting to employment elsewhere. The loss of agricultural land may affect the rural economy.</p>

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington (continued)

<p>9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.</p>	<p>Permanent Direct LT +/- The proposed allocation would bring housing development to a rural area with several nearby attractions that support the rural tourist economy, such as the Minnis Bay beach area, sailing club, windsurfing club and the nearby Hawk Place campsite. If development is sensitive to the surrounding environment it could have a positive impact on the tourist economy, enhancing the area near the attraction sites.</p>	<p>RATING: 😊 The development on rural countryside which is prime agricultural land will detract from rather than protect and enhance the area's natural scene. The development will provide nothing to enhance the local tourist economy.</p>
<p>10(a). To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p>	<p>Permanent Direct ST/LT - The proposed allocation is for a relatively low – medium density development on a greenfield site, currently in agricultural use. As such it is a relatively inefficient use of land.</p>	<p>RATING: 😊 This is a green field site, the proposed development does not include any re-use of previously developed land and existing buildings, nor does it include plans to reuse of materials from buildings, and encourage urban renaissance.</p>
<p>10(b). To reduce the impact of development on Best and Most Versatile agricultural land</p>	<p>Permanent Direct ST/LT - The allocation of the site would result in a direct loss of 1.42% of total Best and Most Versatile agricultural land used within Thanet. While adverse, this is not considered to be significant.</p>	<p>RATING: 😊 The allocation of the site would result in a direct loss of 1.42% of total Best and Most Versatile agricultural land used within Thanet.</p>
<p>11. To ensure that a sustainable pattern of development is pursued.</p>	<p>Permanent Direct ST/LT + The proposed development would extend the village of Birchington. At present, there are some key facilities within walking distance of the northern aspect of the site. In addition to existing facilities, the developer would be expected to provide 14ha of open space, additional connections to the A28, multi-modal access to the site, an extended bus service and a primary school. Therefore, it is expected that a positive pattern of development will be pursued.</p>	<p>RATING: 😊 The proposed development would be on 81.6ha of prime agricultural land to the south and west the village of Birchington; the developer would be expected to preserve at least 14ha as open space. Much of the site is outside of walking distance to local facilities, it is expected that the developer will provide multi modal connections to the A28, an extended bus service and a primary school.</p>

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington (continued)

<p>12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.</p>	<p>Permanent Direct LT + Redevelopment of the site would proactively contribute towards a better townscape, if quality design standards are met. The development will also be designed in a way to enable a soft edge between the site and the open countryside.</p>	<p>RATING: 😊 Any development on open countryside is unlikely to conserve and enhance the character and quality of the area's landscape. Mitigating measures such as provision of a 'soft edge' (i.e. grass and trees) between the site and the open countryside can be used to hide the development.</p>
<p>13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.</p>	<p>Permanent Direct ST/LT + Redevelopment of the site would proactively contribute towards a better townscape, and the development design will address the need to preserve the listed buildings on the site and respect the setting of Quex Park.</p>	<p>RATING: 😊 The development design must address the need to preserve the nearby historic archaeological sites, listed buildings on the site and respect the setting of Quex Park.</p>
<p>14. To improve air quality in the District's Air Quality Management Areas.</p>	<p>Temporary Indirect ST - The level of car and bicycle parking associated with any development would be important in establishing the overall effect of the site on local air quality. However, it is likely that any development within the Thanet Urban Air Quality Management Area will adversely affect the AQMA objectives. Provision of bicycle storage and electric vehicle charging points could help mitigate performance against this objective.</p>	<p>RATING: 😞😞😞 Much of the proposed estate is more than walking distance from local facilities and public transport services; car use is likely to be high and this will adversely affect air quality within the Thanet Urban Air Quality Management Area.</p>
<p>15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.</p>	<p>Permanent Temporary Direct Indirect ST/LT + The provision of residential development within Thanet can improve access to employment, leisure facilities and services for those residents for those new residents. In addition, the proximity to local and regional public transport links will allow appropriate access to employment within Thanet, Kent and the wider South East.</p>	<p>RATING: 😞😞 There are no plans to enhance the existing local and regional public transport networks much of which is not easily accessible from the proposed estate, consequently there is likely to be high reliance on use of private vehicles.</p>
<p>16. To develop key sustainable transport links between Thanet and the wider Kent region and beyond, including road, rail and air.</p>	<p>Permanent Temporary Indirect ST/LT + Any large scale development within Thanet will help to support existing strategic transport links between Thanet and the wider south east, most notably rail links.</p>	<p>RATING: 😊 This development does not include proposals to develop key sustainable transport links between Thanet and the wider Kent region and beyond.</p>

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington (continued)

<p>17. To reduce waste generation and disposal and achieve the sustainable management of waste</p>	<p>Temporary Indirect ST + New developments offer an opportunity to proactively address waste management issues in Thanet and implement more modern approaches to waste disposal. Waste management arrangements should be confirmed as part of the planning process.</p>	<p>RATING: 😊 This proposed development does not include any measures to reduce waste generation and disposal and achieve the sustainable management of waste.</p>
<p>18. To ensure development within the District responds to the challenges associated with climate change.</p>	<p>Temporary Indirect ST + New developments offer an opportunity to proactively address climate change issues in Thanet and implement more modern approaches to climate change adaptation and resilience. Measures to promote climate change adaptation and resilience should be confirmed as part of the planning process.</p>	<p>RATING: 😊 Climate change is not addressed directly in the proposals, measures to promote climate change adaptation and resilience should be confirmed as part of the planning process.</p>
<p>19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with NPPF.</p>	<p>Neutral 0 The site is not at any risk from coastal or fluvial flooding.</p>	<p>RATING: 😊 The site is not at risk from coastal or fluvial flooding. However, the northern and eastern extents of the site are shown on the UK Government website as being at high risk of flooding.</p>
<p>20. To conserve and enhance biodiversity.</p>	<p>Permanent Direct ST/LT -/? The proposed site allocation could have a minor impact on the conservation and enhancement of biodiversity as it is a greenfield site. Mitigation measures to provide opportunities to develop or enhance new and existing wildlife and biodiversity areas could be included to offset the impact of the proposed development. During development, important habitats could be identified and protected through design.</p>	<p>RATING: 😊 The proposed site allocation will impact on the conservation and enhancement of biodiversity as it is a greenfield site.</p>
<p>21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites</p>	<p>Neutral 0 The proposed site is unlikely to affect any fluvial or coastal waters.</p>	<p>RATING: 😊 The proposed site is unlikely to affect any fluvial or coastal waters.</p>

Table 20: Enhanced Summary of Site Assessment – Land to South and West of Birchington (continued)

<p>22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.</p>	<p>Permanent ST/LT ?/+ New development at this scale provides opportunities to use sustainably sourced and recycled building materials. At the planning stage, the section 106 agreement could include a requisite to explore the possibility of using locally sourced materials.</p>	<p>RATING: 😊 Currently there are no plans for using sustainably produced and local products.</p>
<p>23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.</p>	<p>Temporary Direct ST/LT ++ New development at this scale provides opportunities for energy efficiency, such as those associated with current Building Regulations, to contribute towards a reduction in energy consumption in Thanet. Effects would be further enhanced if small scale renewable energy technology could be employed on site.</p>	<p>RATING: 😊 The net effect of the proposed development will be increased energy consumption. This could be mitigated to some extent by incorporating energy efficiency measures into new buildings and public places.</p>