



Westgate-on-Sea Town Council,
78 St Mildred's Road,
Westgate-on-Sea
Kent
CT8 8RF

Rt. Hon Robert Jenrick MP
Rt. Hon Theresa Villiers MP
Copy to Sir Roger Gale

21st August 2019

Dear Mr Jenrick and Ms Villiers

Executive Summary

Over 8000 houses are allocated on top quality agricultural land in the Isle of Thanet, Kent through the Thanet District Council Local Plan and development will begin this year.

At a time when climate change will make the UK and the world more food insecure, the Westgate-on-Sea Town Council believes that this land should be protected for growing food.

The National Planning Policy Framework (NPPF) attempts to protect high grade agricultural land by stating that if housing must be allocated on farmland through local plans, that low quality farmland should be used first. The Isle of Thanet only has high quality agricultural land and therefore the NPPF gives no protection in our District.

There are two options to stop the destruction of agricultural land in farmland rich areas:

- 1) Protect high quality farmland by law, restricting large scale developments.
- 2) Draw up local plans over a larger area, e.g. county level instead of small district level, which allows a larger variety of land, including very low-quality farmland to be chosen for housing.

The Town Council gratefully requests the response to the following questions:

1. Do you think that the level of housing on the top-quality agricultural land in Thanet is acceptable?
2. Do you think that high quality farmland should have increased protection from large scale development to protect food security and mitigate climate change? If not, what are you views on how the UK can become more food secure?
3. Do you think that Local Plans should return to being drawn up over a larger area, for example, county or area-wide plans such as a Kent or South East Plan, to protect high quality agricultural land in farmland rich districts such as the Isle of Thanet?

1. Introduction

Westgate-on-Sea Town Council is very concerned about the destruction of the high-quality agricultural land in the town and in the district of the Isle of Thanet, Kent. Overall, the district has an “objectively assessed housing need” of 17.1 thousand houses as stated in the Thanet District Council draft local plan, the majority of which is allocated on farmland which is classed as “the best and most versatile agricultural land” according to the agricultural classification map (grade 1-2).

Westgate-on-Sea, a town of just 7,000 residents, has 2000 houses allocated on the farmland next to the town which is classed as very good (grade 2). According to the Office of National Statistics, Thanet already has a very high housing density (27%) compared to other districts such as Canterbury (9%) and Dover (8%), questioning further this level of housing on the farmland in Thanet.

Figure 1 below shows the number of houses allocated on the best and most versatile agricultural land in the Thanet District Council (TDC) local plan from strategic allocations of over 100 houses. This was calculated using the local plan and the agricultural land classification map. As it is calculated using just the larger sites, it is a gross under estimation of the real number of houses allocated on farmland, however, one can see that over 7500 houses are allocated on this exceptionally fertile agricultural land from these larger sites alone. We believe this is totally unacceptable.

Area – Strategic sites and larger sites (100 +) only.	Number of houses allocated on the best and most versatile agricultural land in the TDC Draft Local Plan
Westwood	1450
Birchington	1600
Westgate	2000
Land at Manston Court Road/ Haine Road	1200
Land off Nash, Manston Rds, Margate	250
Land West of Old Haine Road, Ramsgate	250
Land north and south of Shottendane Road	550
Tothill Street Minster	250
Land at Haine Road and Spratling Street	100
Total (Does not include smaller sites of up to 99, so the figure is actually much greater than this)	7650

Figure 1 Number of houses allocated on grade 1-2 agricultural land from sites >100 houses calculated using the TDC Local Plan and Agricultural land classification map. This is underestimated as it does not include sites < 100 and also does not include the Manston Green site.

Figure 2 shows the London and South East Region Agricultural Land Classification Map (Natural England, 2010)¹. The areas of dark and light blue are grade 1 and 2 agricultural land relating to excellent and very good soil. This map shows that there is only limited amount of this type of quality soil in the South East.

The higher-grade soil is concentrated in Kent and especially in and around the Isle of Thanet to the right of the map.

Natural England explains:

“The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance. This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future

¹ file:///C:/Users/User/AppData/Local/Microsoft/Windows/INetCache/IE/F7R6XZII/10-111g%20London%20&%20South%20East%20Region%20250k%20ALC.pdf

crops for food and non-food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England”.

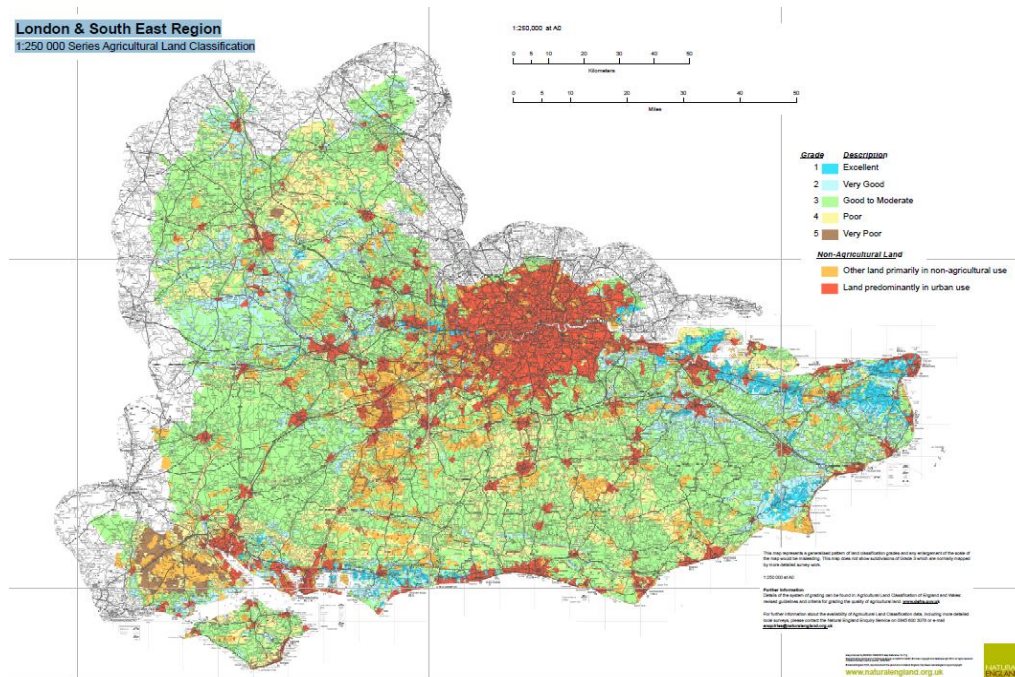


Figure 2 London and South East Region Agricultural Land Classification. Natural England (2010).

Figure 3 below shows the land classification map for the Isle of Thanet. All of the land in Thanet (apart from the marsh land around the River Stour which can't be built on) comprises of rich soil for growing food (grade 1 and 2).

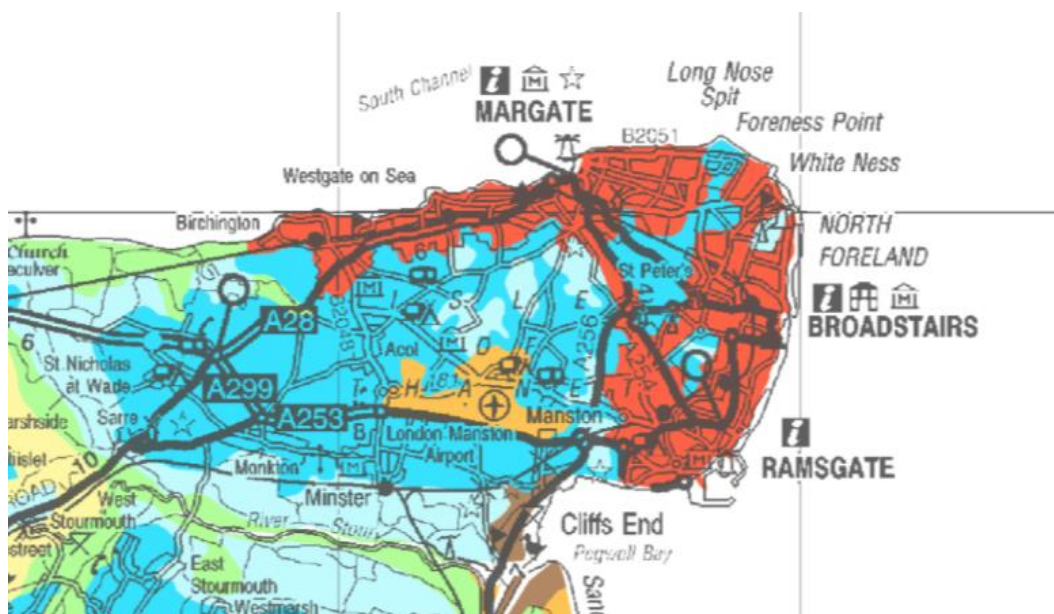


Figure 3 The Land Classification Map of the Isle of Thanet (Natural England, 2010)

Compare Figure 3 with Figure 4 below which shows the strategic allocations for housing in the TDC draft local plan. (Figure 4 does not show Manston airport as most of the allocations are in the North

Thanet area). These allocations are due to get bigger as the developers in Westgate-on-Sea and Birchington have requested more land.

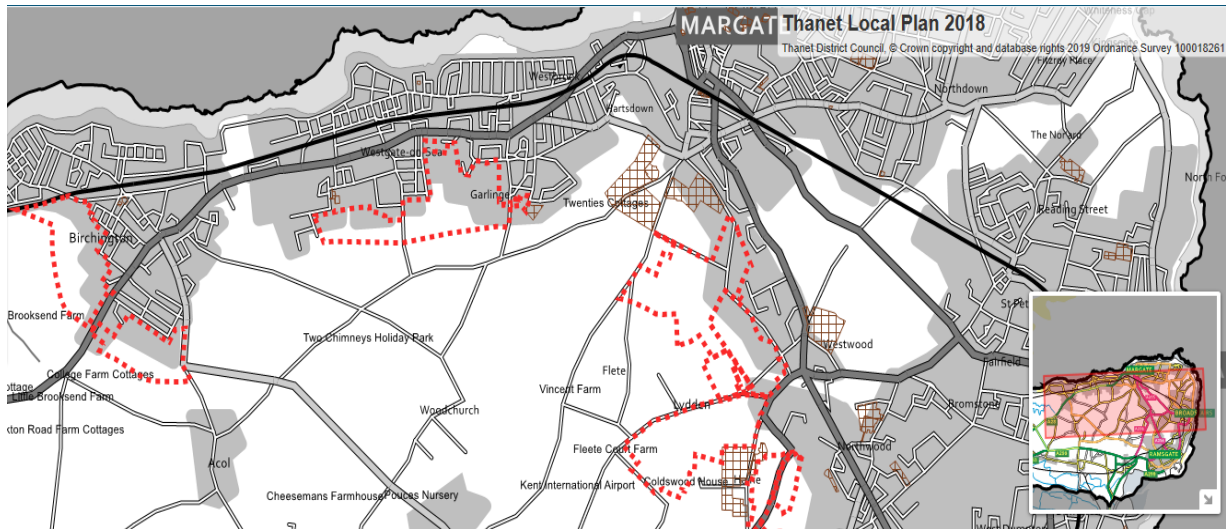


Figure 4 Local plan - strategic sites on the best and most versatile agricultural land. Some sites will get bigger as the developers want to use more farmland (Thanet Local Plan, Crown copyright and database rights 2019 OS 100018261²).

Not only is this land in Westgate-on-Sea is of high quality, but the crops grown on them have won awards (Figure 5). Local farmers and residents have worked this land for generations.

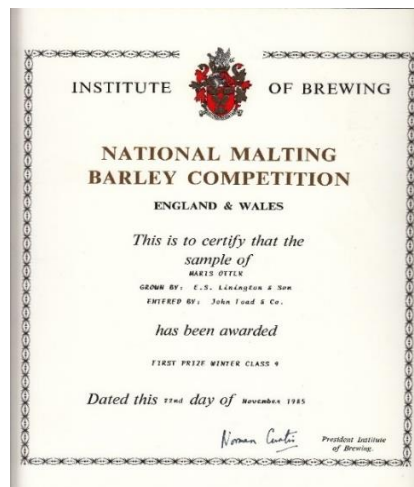


Figure 5 First prize award for the crop grown in Westgate.

Dr Hilary Newport of the Campaign to Protect Rural England (CPRE) stated that “*Thanet has a high proportion of the UK's best and most versatile agricultural land and we would completely agree that it should be safeguarded*”.

Trevor Mansfield of the UK soil Association stated: “*We believe that high quality agricultural land should be preserved for growing and protected from development both now and in the future. Good quality agricultural land is invaluable - It is the fundamental resource on which human life depends and protecting and improving the health of our soil is more important today than it ever has been. In*

² <https://thanet.opus4.co.uk/planning/localplan/maps/thanet-local-plan#/x:634479/y:168628/z:7/b:14/o:1735,o:1758>

the UK it's estimated that we lose 2 million tonnes of soil a year through erosion (see Defra's 2009 Safeguarding Our Soils); yet it can take more than 500 years to generate an inch of soil.

Soil stores 10 times more carbon than the forests. Climate change will bring even greater challenges in the future, with increased pressure due to waterlogging and drying, affecting the productive capacity of soils. More than 50% of Grade 1 soils in the UK are at risk from rising sea levels".

The Westgate-on-Sea Town Council and its residents believe that it is an absolute disgrace to build on such land and destroy its food growing potential forever. We believe that these fields should be protected for food, not for houses.

2. National Planning policy framework

The National Planning Policy Framework (NPPF) and the lack of strict protection for food security and soil in the UK are the cause of these problems.

The NPPF is a one size fits all policy and it does not fit the district of Thanet.

The NPPF states that if areas of agricultural land must be used to meet the objectively assessed housing need in a local plan, then lower quality farmland should be used first.

"Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality."

In Thanet there is no lower quality farmland, which means that large areas of top-quality soil will be irreversibly destroyed in the TDC local plan to 2031.

There is no overall protection for high quality farmland apart from this statement in the NPPF and therefore this will be devastating to agricultural land and food security in the UK at a time when we need to become more food secure.

3. Food security and climate change

The World Food Programme (2019) states that among the most significant impacts of climate change is the potential increase of food insecurity and malnutrition³ due to erratic weather patterns including extreme droughts and rainfall.

We need to heed this warning and start to become *more* food secure in the UK, as opposed to irreversibly damaging farmland by building on it.

The UK Government website (2014) states:

*"Climate change is happening and is due to human activity, this includes global warming and greater risk of flooding, droughts and heat waves."*⁴

We have already seen heat waves and flash floods this year alone.

The Food and Agricultural Organisation (FAO, 2015) ⁵states:

³ <https://www.wfp.org/climate-change/climate-impacts>

⁴ <https://www.gov.uk/guidance/climate-change-explained>

⁵ <http://www.fao.org/soils-2015/events/detail/en/c/338738/>

“The main problem we will have to face is the degradation of our soils. The world population continues to increase while we destroy more and more topsoil. If this is allowed to continue there won’t be enough fertile soil left to feed a growing world population.

The United Nations FAO calculated that we have **about 60 years of harvests left**.

How shocking it is therefore that we will allow such destruction of the agricultural land in the Isle of Thanet, at a time when quality farmland is becoming such a rare resource around the world?

Westgate-on-Sea Town Council believes that this level of destruction of agricultural land in Thanet does not fulfil the criteria of sustainable development whose high-level aims can be summarised as:

“meeting the needs of the present without compromising the ability of future generations to meet their own needs (Resolution 42/187 United Nations General Assembly)”.

We will destroy this land at the detriment of future generations.

4. Local Plan areas

During the Thanet District Council local plan hearing in public, it was clear that the Planning Manager and the QC were concerned about this level of destruction of agricultural land, but their job is to ensure that there is enough land to meet the objectively assessed housing need (OAHN). If they didn’t ensure this then the plan would be considered “unsound”.

The Planning Manager and QC suggested that in the future it would perhaps be better if the OAHN went back to being calculated over larger areas such as in a Kent plan, or even a South East plan. This is how the housing need was calculated before. The housing could then be allocated on a more variety of landscapes, such as brownfield sites and very low-quality farmland in South East, rather than on the high-quality agricultural land in Thanet.

Common sense tells us that farmland should be for food, not for houses.

Furthermore, the question is: when exactly will this destruction of farmland stop? Where is the environmental limit of an area, will this be calculated and used in planning?

Now Thanet only has agricultural land left, will we keep building and building to meet the OAHN, or will there be some environmental law that states that only a certain percentage (or even none) of the OAHN can be built on agricultural land?

5. Fields at Westgate-on-Sea and Birchington-on-Sea

The fields at Westgate-on-Sea have been cared for and fertilised by the generations of tenant farmers. The crops are grown in rotation including wheat, corn, potatoes and beans. Figure 6 and 7 show photos of wheat, corn and potatoes taken on the 2nd August this year.

This will all be irreversibly be destroyed when 2000 houses are built on this land. The local residents are devastated and are wondering “Will future generations congratulate us on our choices?”.

Our local MP, Sir Roger Gale, has also stated that this agricultural land should be protected and should not be built on.



Figure 6 Wheat growing in top quality farmland in Westgate-on-Sea. Soon to be 2000 houses.



Figure 7 Potato fields - ready to be harvested and corn (right) on fields allocated for housing in Westgate-on-Sea

The fields at Birchington-on-Sea in Thanet are being harvested right now.

Will this be one of the last harvests on this top-quality farmland?

1600 houses are allocated on this land in Birchington in the TDC Local Plan.



Figure 8 Wheat field being harvested August 2019 Birchington site for 1600 houses

6. Questions from Westgate-on-Sea Town Council

We would be grateful if you could answer the following questions from Westgate-on-Sea Town Council in your reply:

The Town Council gratefully requests the response to the following questions:

1. Do you think that the level of housing on the best and most versatile agricultural land in Thanet is acceptable?
2. Do you think that farmland should have increased protection from large scale development to protect food security and mitigate climate change? If not, what are your views on how the UK can become more food secure?
3. Do you think that Local Plans should return to being drawn up over a larger area, for example, county and area-wide plans such as a Kent or South East Plan to protect high quality agricultural land in farmland rich districts such as the Isle of Thanet?

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H. Scott', is positioned above a faint, light blue rectangular stamp.

Cllr Dr Hannah Scott (Chair of Planning, Highways and Environment, Westgate-on-Sea Town Council)

Cllr Martyn Pennington (Chair of Westgate-on-Sea Town Council)

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