

**Response by Cllr Hannah Scott, Chair of the Westgate-on-Sea Neighbourhood Plan  
Steering Group**

## **1 Executive summary**

The Draft Thanet Local Plan - 2031 - Pre-Submission Publication, Regulation 19 is unsound for a number of reasons.

Firstly, the objectively assessed housing need (OAHN) has been calculated including unusual peaks in internal migration and is therefore inflated. The consultants GLH have also inflated it further using questionable assumptions. The figures also do not take into account the reduction of immigration from the EU which will reduce the OAHN.

Using calculations based on ONS figures, the OAHN should be reduced from 17.1 k to at least 13k because of the inaccuracies with the population projection figures, and then should be reduced further to 12.25k when taking Brexit into account (cautious estimate) or to 10.8k (stronger effect of Brexit).

**The OAHN should be recalculated using the most recent population projection figures and by taking an average from a larger range of years e.g. average of the population increase for 10 consecutive years rather than 5 consecutive years. It should also take into account the predicted effect of Brexit on the international migration to Thanet which mainly consists of EU citizens.**

Secondly, the vast majority of houses in the Local Plan are allocated on grade 1 agricultural land, which is contrary to other Government policies regarding food security and soil health. **The OAHN should be reduced and therefore the area of farmland that is allocated should then be reduced.** The National Planning Policy Framework states that the Best and Most Versatile Land should be used as a last resort and therefore reductions in the OAHN should be removed from this agricultural land first.

**The plan is not sound with regards to environmental sustainability and the sustainability policies of NPPF due to the massive areas of agricultural land that will be destroyed.**

Thirdly, the process by which the allocations have been chosen has been weighted by a need to use section 106 monies to pay for a new road on the Isle of Thanet, as funding could not be accessed from elsewhere. The choice of the allocations in this way is very questionable. Also, as the majority of the s106 money will be used to fund a major infrastructure project, it will leave little for the local community. TDC has stated that all monies will be used as s106 and not as a Community Infrastructure Levy (CIL). This is particularly unfair as a Neighbourhood Plan is being written in Westgate-on-Sea which can increase the CIL contributions.

**The plan should be rethought with regards to housing allocations being based on local need and sustainability, rather than based on the need to collect monies for the new road system.**

Fourthly, the whole process was not consulted on properly. The foundations of the local plan is based on the views of approximately a hundred people in 2013. They were consulted on the possibility of around 7,000 houses being built in Thanet.

**There should be a full new consultation as the answers people gave in the first consultation in 2013 are now not valid due to the massive increase in OAHN.**

Furthermore, the computer system was problematic over the last consultation period, leading to representations being lost. This included the representation sent to TDC by the Westgate-on-Sea Town Council, who has a receipt that it was received. It became clear that TDC had not read it when the green spaces put forward by the Town Council were not added to the subsequent draft Local Plan. The TDC Planning Manager apologised that they had lost the representation. How many more had they lost?

**The Local Plan should be withdrawn, comprehensively reconsidered and redrafted to reflect the lost representations made and take on board the views of the community.**

Lastly, the whole process of TDC local planning has been top down, despite the Government promoting neighbourhood engagement in planning e.g. through a Neighbourhood Plan. This process did not have an inch of Localism in it and in my view, the Localism Act is dead.

**Furthermore, not only is the OAHN over inflated causing unnecessary damage to the local communities and environment, but the plan is undeliverable at present without a fully integrated infrastructure, transport plan and fully costed implementation programme.**

## **1.1 The Objectively Assessed Housing Need**

The OAHN has been created from population projections based on population increases between the years 2009 - 2014. It was suggested by the 2014 based ONS figures that Thanet's population will increase by 1200 every year, however the population only increased by approximately 509 in 2016-2017 (Figure 1-1).

The population projections are over-estimated due to the fact that the projections are made using just a 5 year span between 2014 – 2009 and one of these years (2013-2014) had an unusually high increase (1734 people) in population compared to other years.

If the average population increase was taken over the whole of graph from 2001 – 2017 the figure would be 894 people each year, >300 less than the projections.

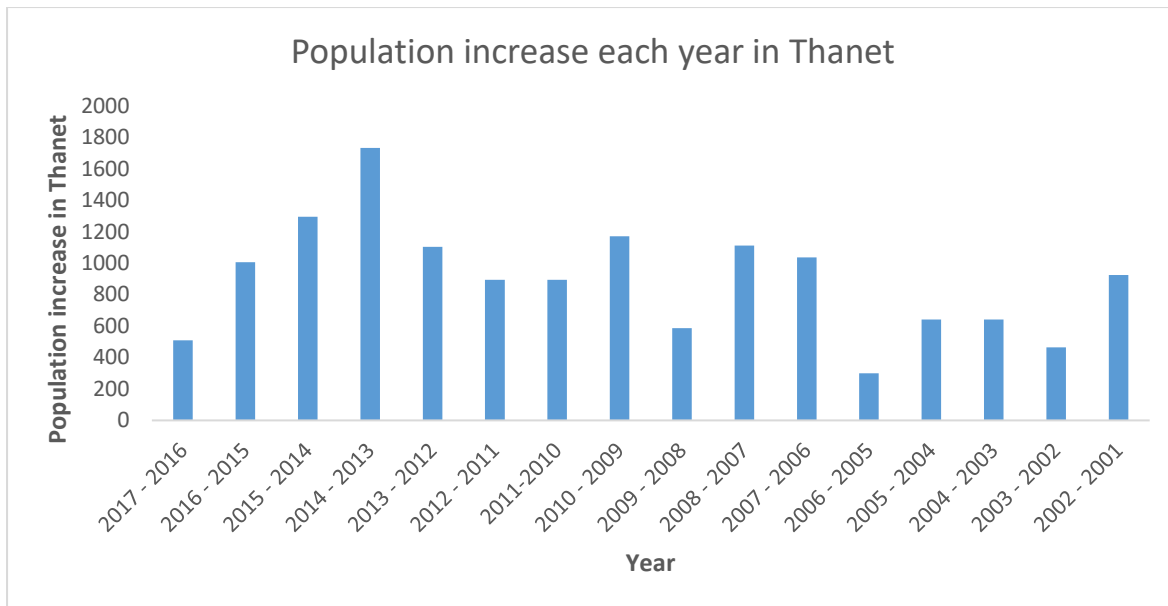


Figure 1-1 Population increase per year created from ONS figures UK mid year estimates 2017 <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>. See table MYE 5 line 307.

Using 894 as the increase in population each year, this would give an increase in population of 17,880 over the 20 year period, instead of the 24,000 that the ONS projects. These figures have approximately 3,000 added to them due to the aging population giving the calculated approximate figure of 20,800 people over 20 years (17,880 + 3,000). If 2 people live in each house this would give an OAHN of 10,400. I know that TDC are adding on a couple of thousand houses as housing rate has been slowed in recent years so this would give us a final OAHN of 12,400. Even if 1.6 people live in each house this would only give an OAHN of 13k.

Interestingly this is similar to the number of houses that the Local Plan began with back in 2015. Because the figures used the ONS figure 2014 based, the population projections were skewed and Thanet has been allocated an overinflated and unfair number of houses.

As well as the inflated figures caused by this method, GLH consultants also added to the OAHN using questionable assumptions regarding extra movement from London. TDC was assured by London Boroughs that they would address their own OAHN and it is unfair that Thanet should have to increase the OAHN to cater for the lack of planning in London, forcing people to move out of the city. It is clear that people have always migrated to Thanet, however these extra figures added to the OAHN by the consultants is an unsound way of calculating the OAHN.

Over the period of 2002 – 2014 the average international migration each year was 300. In Thanet this international migration is mainly made up of European citizens. If Brexit was to reduce this number by just a third to 200 people each year this would mean that 1,200 less

European Citizens will come to Thanet to 2031 (100 people x 12 years (2019 – 2031)). This is important as the OAHN could be reduced by 600 houses if 2 people live in each house. If the ratio is 1.6, the OAHN would reduce by 759 houses.

If Brexit was to reduce the figure even more, to just 100 people coming to Thanet every year, then 2,200 less people would be included in the population projections, which would be a decrease of 1392 houses from the OAHN.

This is important because large areas of agricultural land will be destroyed in the Local plan and any reduction in the number of houses should be removed from the agricultural land first. The OAHN should be recalculated and the reduction in allocation should be taken from the agricultural land first.

**Using the calculated figures above, the OAHN should be reduced from 17.1 k to 13k because of the inaccuracies with the population projection figures and then should be reduced further to 12.25k when taking Brexit into account (cautious estimate) or to 10.8k (stronger effect of Brexit).**

**The OAHN should be recalculated using the most recent population projection figures and by taking an average from a larger range of years e.g. average of the population increase for 10 consecutive years rather than 5 consecutive years.**

It has been suggested by the Planning Manager that if housing numbers were reduced they would **not** be taken off of the “Strategic Housing sites” on the agricultural land. This would break the only legal protection for grade 1 agricultural land as stated in the NNPF. The housing on the agricultural land should be removed first and foremost as the NPPF states that the best and most versatile land should be only be used as a last resort.

## **1.2 The loss of significant tracts of Grade 1 agricultural land**

In the Thanet Local Plan all of the strategic sites are allocated for agricultural land. Building on grade one and grade two agricultural land, or any agricultural land, is unacceptable. This is more so now than ever before. The Food and Agricultural Organisation for the United Nations (FAO) explains:

“to provide for a (predicted worldwide) population of 9.7 billion in 2050, food production will need to increase from the current 8.4 billion tonnes to almost 13.5 billion tonnes a year” (FAO, 2017)

We will need much more food in the future and therefore building on our top quality farmland is a very short sighted method of planning for housing.

The FAO goes on to explain that:

“Eighty percent of the additional (food) required to meet demand in 2050 will need to come from land already under cultivation.”

In other words, agricultural land will need to become even more productive than it already is. This shows how ludicrous it is to build on this land under cultivation in Thanet.

Many residents of Thanet are against the building of houses on the agricultural. It needs to be valued and viewed as a precious commodity. As building on the soil will cause irreversible destruction of the farmland, when it is gone, it will be gone forever.

Trevor Mansfield of the UK Soil Association has written:

“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 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”.

He points out that soil is the resource on which life depends and so protecting it is vitally important. He goes on to explain that it can take almost half a century to produce an inch of soil. How sad it would be to see our soils destroyed as if they were of no value.

Global Climate Change is a real issue caused by man-made increases of greenhouse gases such as carbon dioxide in our atmosphere, and this will affect everyone in the world. Soils store large amounts of carbon and help with balancing our carbon cycle. They also assist with flood mitigation preventing flooding (POSTnote 484 in POST, 2015).

The Parliamentary Office of Science and Technology conducted research into the importance of soils in the UK and concluded:

“Around 95% of food production relies on soil. The global nature of the food system makes soil health (or quality) an international concern. Soils filter and store water, support agriculture and other plant and animal communities, and harbour a quarter of the world's biodiversity”.

Soil quality is of international concern. Not only do soils have a multifunctional purpose, but they also harbour a quarter of the world's biodiversity.

The land at ST1 and ST2 in Westgate-on-Sea is grade 1 agricultural land and has produced award winning crops (Figure 1-2).

People might question the sanity of those who thought that building on this land was a good idea whilst conducting the SHMA a few years ago, including Quex Estates themselves. The Linnington family has lovingly fertilized and nourished the soil. They have prevented the soil from eroding and decreasing in fertility, which has been the fate of many other soils across the world; over half the world's agricultural land is subject to soil erosion (POST, 2015). Destroying the soil now would undo all their hard work to sustain this precious resource.

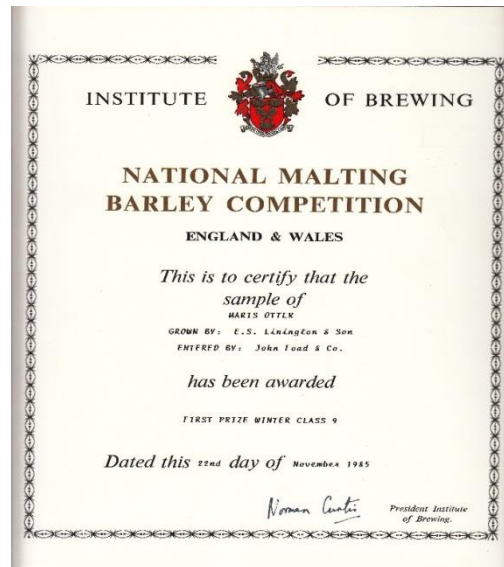


Figure 1-2 Certificate for Barley crops

The National Planning Policy Framework states that the best and most versatile land (Grade 1-3 soils) "is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations".

Protecting soil presents an opportunity to address simultaneously several global challenges such as food security, climate change, water security, waste management and biodiversity loss (POST, 2015).

**We must protect and value this finite resource and build only the very smallest number of houses on the agricultural land. We need it for growing food in a world of ever increasing population and demand on food supplies.**

The in combination effect of such a large housing allocation in Thanet will impact the birds and wildlife of the area significantly.

**The loss of significant open spaces and associated birds and wildlife in the local plan together with the loss of agricultural land means that the plan is not sound with regards to the sustainability section of the NPPF.**

**The Local Plan does not meet the criteria in the sustainability section of the NPPF.**

**The OAHN should be recalculated and some of the housing allocation should be taken off of the agricultural land.**

### **1.3 The Proposed allocations ST1 and ST2**

The proposed allocations ST1 and ST2 in the Draft Local Plan are not proportionate to the existing built form and local services and should be withdrawn. Moreover it is now clear that the designation of the proposals may have been to provide contributions towards a new highway Route. The “Inner Circuit” requires development contributions which will not and, at the current time, cannot be financed by KCC - the strategic highway Authority. Also, the money made from the housing allocation will be taken as section 106 monies for this new road. TDC have stated that they will not consider the CIL monies and this once again is against Localism.

### **1.4 The Local Plan and associated consultation process has been complex and confusing and the process has been inadequate**

The original 2015 Local Plan and associated consultation process was felt to be overly complex and confusing (see the DCLG Committee expectations on this process) and was not been reviewed or improved for the 2017 Consultation. It has also has not been properly user friendly to all sections of the community despite the published intentions of Thanet Council. As a result all the consultations, because of its limited and poor publicity, constrained nature and sheer overload of information has not been acceptable or fit for purpose.

Also the consultation for the Transport plan has been confusing and has not been in step with the Local Plan, which is exceptionally worrying.

**The initial Strategic consultation in 2013 which fed into the 2015 draft local and is the basis for the draft local plan is out of date.** In 2013, participants of the initial consultation were asked to think about allocating 7 thousand houses in Thanet. Four years on, the OAHN was calculated as 17,100 houses, meaning that this initial consultation for the housing allocation is now irrelevant - the figures have changed so much. There has been no proper consultation for the housing figure of 17,100.

People attending a consultation regarding 17,100 houses may have suggested that a new town should be built rather than the individual allocations bolt onto to existing towns. This could have saved large areas of agricultural land and also the distress caused by the adhoc bolt on allocations to towns and villages. Such a new town could have been competently planned with its own infrastructure and services and not added pressure to the existing individual towns (see Otterpool New Town).

In order to demonstrate the probity of the consultation process allied to fostering confidence, **the Local Plan should be withdrawn, comprehensively reconsidered and redrafted to reflect the representations made and take on board the views of the community, especially as the housing numbers have changed inordinately since the 2013 consultation.**

## **1.5 Localism Act is dead**

It has been a real shock to local people to find that they had no real say in the allocation of the housing in the Local Plan. Quex and TDC have worked together to get the best deal for them, without consulting with the local residents of Westgate-on-Sea first. This is not Localism and the Localism Act is dead.

Also, the needs of the local communities have not been taken into consideration and there are real concerns about the amount of thought that has gone into these allocations. There has never been an adequate analysis of the impact of new development proposals on the infrastructure (highways, water, welfare, education and social) to demonstrate the designation of any of the proposed housing areas.

Moreover, the infrastructure delivery plan that was originally promised for 2015 is even now not in its final form, which is necessary to ensure that infrastructure will keep pace with developments. This is aggravated by the phasing, or lack of proper phasing, of new developments in a structured manner that would guarantee the delivery of adequate infrastructure to support development. The outcome of the lack of a proper realistic implementation policy would mean by the end of the plan period there could be no mitigation of the problems caused by the growth and addition of the potential 17000 households to an already over-crowded and stretched and, in instances, neglected infrastructure that we have in Thanet. **In the absence of a fully costed implementation programme and open book funding plan, the Draft Local Plan is considered to undeliverable in the manner proposed.**