



Strategic Planning
Thanet District Council
PO Box 9
Cecil Street
Margate, Kent
CT9 1XZ

3 March 2015

Dear Sir or Madam

Draft Thanet Local Plan to 2031 – Preferred Options Consultation, January 2015

Please find enclosed a completed questionnaire setting out the comments from CPRE Kent on the draft Thanet Local Plan.

As you will know CPRE Kent is the Kent Branch of the Campaign to Protect Rural England, which is part of the national CPRE charity. It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone and we believe the planning system should protect and enhance the countryside in the public interest for the important contribution it makes to peoples' physical and mental wellbeing, as well as its vital role in feeding the nation. It is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

Our primary concern with the draft plan is that at 12,000 dwellings the housing target is set too high. We believe that this is in part because it is based on an unrealistically high target for new jobs, but also because it fails to give necessary regard to important environmental constraints in the district.

The plan aims to create 5,000 jobs, but we believe this is too high because the '*catalyst for growth*' on which it is based – Manston Airport – has gone. We consider that the lower baseline target of 3,100 jobs is a more realistic and achievable target. This, as demonstrated in the Strategic Housing Market Area (SHMA) review, means that the objectively assessed housing need is more realistically around 9,500 dwellings.

The consequence of the 12,000 dwelling target is that the plan promotes significant areas of greenfield land, mainly if not entirely grade 1 agricultural land, for

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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development. Of the 12,000 new dwellings proposed, over 5,000 are proposed on such land. We consider this to be unacceptable. Such good quality agricultural land is a nationally important asset and the council should not simply accept that it is appropriate to use it for development in order to provide houses. Because Thanet has such a high proportion of good quality farm land, it should be seen as a major constraint to development. And so should the fact that Thanet faces serious water supply and water quality issues, which are openly admitted in the plan. We believe that together, the loss of high quality agricultural land and water supply and quality should have a moderating effect on the amount of housing that should be provided.

We also do not consider that the infrastructure impacts of the housing and employment targets have been properly assessed, as we highlight in point 2 below. We believe that the impacts on infrastructure – transport and social infrastructure – should mean that lower targets for employment and housing growth should be set.

In addition to the specific concerns that we raise in the questionnaire, we would also wish to make the following points for which the questionnaire does not allow a response:

1. Sustainability Appraisal and Habitat Regulations Assessment: We are concerned that the proposals in the plan have not been subject to a Sustainability Appraisal (SA) or a Habitat Regulation Assessment (HRA). These are requirements of the plan making process to ensure that proposals are thoroughly assessed to ensure that they are appropriate and the best solutions. It would seem to be the case, since neither an SA nor an HRA have been presented alongside the plan, that the proposals in the plan – and most importantly alternatives to them – have not been subject to the necessary testing. In particular, the SA process is an iterative one which is necessary at each stage in the plan making process. We consider that the failure to present an SA at this stage is a serious failing in the process.
2. Infrastructure Delivery Plan: We are concerned that at this stage the council has not presented an Infrastructure Delivery Plan (IDP). Whilst we appreciate that the council may not yet possess all the detailed costings to be included in the IDP, we do not consider it unreasonable for the council to have included in the plan a schedule detailing the essential infrastructure that would be needed to support the level of development and sites proposed. From the comments we have received from local residents, it is clear that a major concern that they have with the plan is the impact that the proposed development will have on existing infrastructure and how such impact will be alleviated. The inclusion of an IDP would, if for no other reason, have helped people to see that the council was giving regard to these matters and that a plan was developing. We believe that leaving this important matter to the next stage in the plan making process, when it will be in the form that the council wishes to submit for examination, is too late.

3. Evidence Base: We are concerned that key parts of the evidence base are not up-to-date as required by the National Planning Policy Framework (NPPF) and as explained in the National Planning Practice Guidance (NPPG). In particular:
- the Employment Land Review (ELR), from which the employment targets flow, pre-dates the closure of Manston Airport which was regarded in the ELR as the '*catalyst for growth*'. The closure of the airport has fundamentally changed the economic dynamics of the district;
 - The SHMA review is based on old population projections; and
 - The agreed Transport Strategy, covering the period 2005 to 2011, is out-of-date.

As a result we do not believe that as currently drafted the plan is soundly based on key aspects of the necessary evidence.

4. Manston Airport: As we have explained in the questionnaire, we do not consider that it is appropriate to leave the future of Manston Airport to be determined through a separate Area Action Plan (AAP). It cannot be right that the future of such a major strategic site is not addressed in the local plan, and that this is not considered alongside the need for development elsewhere. This approach is all the more odd given that council officers at a public meeting at Minster stated that the AAP was being prepared in parallel with the local plan and that it was hoped that it would be considered alongside the local plan at the same Examination in Public. If this is the case, then we can see no reason why this important site cannot be included in a single local plan.

Notwithstanding the above, and the approach advocated in Policy SP05 of the plan, parts of the plan are written as though the airport is still operational – see for example paragraphs 6.3 and 6.4 of the draft Plan. The plan needs to be reviewed to remove these misleading references.

5. Policy SP01: We do not believe that this policy is necessary and it should be deleted from the plan. Paragraph 14 of the NPPF explains that the presumption in favour of sustainable development is at the heart of the NPPF and that it is the 'golden thread' running through both plan-making and decision-taking. It is clear from the NPPF that the presumption in favour of sustainable development is not to be achieved simply by compliance with a single local plan policy. Compliance is a matter for the plan as a whole. Given that it is one of the tasks of the Inspector examining the plan to consider whether or not the plan is consistent with national policy, specifically to ensure that the plan enables "*the delivery of sustainable development in accordance with policies in the framework*" (paragraph 182 of the NPPF), we find it difficult to see the need for a specific policy in the local plan saying this. If the plan taken as a whole fails to accord with the NPPF the Inspector will find it unsound or will recommend that modifications are made to it. Simply by putting into the plan a policy on the

presumption does not make it compliant with the NPPF if the policies and proposals in the plan are not so compliant.

Furthermore, the policy simply restates the presumption word for word as included in the NPPF. It has been longstanding practice in plan making, in order to help ensure that plans are as succinct as possible and locally distinctive, that national policy is not repeated in plans. Also, the inclusion of the policy, which seeks to ensure that development is approved wherever possible, does not include all the detailed aspects of sustainable development as set out in the NPPF. Consequently, it undermines the proper role of the local plan in setting out policies that seeks to deliver sustainable development in an integrated and balanced way.

For these reasons we do not consider that the policy is needed or appropriate and it should not be included in the plan.

6. The Vision: We generally support the 'the vision' presented in the Plan. In particular we welcome the recognition that tranquillity is a feature of the district's countryside. We are disappointed, though, that the need to retain tranquillity is not subsequently recognised in any of the strategic priorities or policies in the plan. As we explain in the questionnaire, we consider that that tranquillity should be included in Policy SP22.

Conspicuous by its absence in the vision is the future of Manston Airport which, as we explain above, needs to be dealt with comprehensively in the plan. It is difficult to see how there can be a vision for the future of Thanet without any reference to the future of the airport.

Then main part of the vision that we disagree with is the intention of the plan to promote Westwood as a new integrated community. As we explain in response to Policy SP05 in the questionnaire, we acknowledge that Westwood has grown as a major retail centre and that this has been designated for some time as a town centre in planning terms. However, it functions as an out of town shopping destination rather than as a town centre. Because of this, we consider it is inappropriate to try and justify it as a town centre by proposing a new residential community around it. This will only serve to push the urban area further into the countryside and will go a long way to infilling the 'horseshoe' of coastal urban development that is described in the plan as being characteristic of Thanet. It will also continue to undermine the vitality and viability of the coastal communities. We do not consider that such further expansion of Westwood to create a new residential community is justified.

Furthermore, we believe that by focusing further growth at Westwood other elements of the vision will be undermined, especially the revitalisation of the coastal towns. Indeed, we believe that it has been the growth of Westwood that has in large part lead to the demise of the economic fortunes of the coastal towns.

7. Strategic Priorities: We comment as follows on the individual strategic priorities:
- **Strategic Priority 1** – we support the stated priority and most of the objectives. In the penultimate objective the words “*as a national resource*” should be added after “*agricultural land*”. The final objective, which seeks to support the development and regeneration of Manston Airport as a local regional airport, seems to be a legacy from before the airport closed and is at odds with the approach promoted in Policy SP05. This objective needs to be recast in accordance with the future intentions for the site.
 - **Strategic Priority 2** – we generally support this priority but, as we have explained elsewhere in our comments, we do not support the continued strengthening of Westwood and its development as a town centre sitting within a new residential community.
 - **Strategic Priority 3** – we support the stated priority and objectives, though as we have explained elsewhere in our comments the housing target is too high being based on an unrealistically high employment growth target. We believe that the priority and objectives can equally be achieved if a lower housing target is set. We also consider that an objective should be included which seeks to ensure that the many long-term vacant dwellings in the district are brought back into beneficial residential use.
 - **Strategic Priority 4** – we generally support the priority, though to be consistent with the last paragraph of the vision the priority should additionally refer to tranquillity. The first objective should be recast or deleted as it does not naturally flow from the stated priority. The third objective should additionally refer to landscapes and tranquillity.
 - **Strategic Priority 5** - we support the stated priority and objectives.
8. Key Diagram: There seems to be a number of presentational issues with the Key Diagram with symbols and notations shown on the diagram not included in the legend and vice versa.
9. Listed Buildings: The plan explains that there are around 2,000 listed buildings in Thanet, and we note that various references are made to listed buildings in several policies in the plan. However, unlike for conservation areas, there is no policy in the plan that gives specific guidance on how the council expects listed buildings, and their setting, to be safeguarded generally. A policy needs to be included.

We trust that you will give full regard to the comments we have made on the plan, both in this letter and in the questionnaire. In particular we consider that to address our concerns with the housing and jobs targets, and the matters covered by the first

four points listed in this letter, a new draft plan should be produced before the final publication plan is drawn up.

We would be happy to meet with you to discuss any of our concerns in more detail. If you would find this helpful please let me know.

Yours faithfully

A handwritten signature in black ink, appearing to read 'B Lloyd', with a large, sweeping flourish underneath.

Brian Lloyd BSc (Hons) MSc MRTPI
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CPRE Kent