

The Ramsgate Society response to a TDC Consultation on Local Plan Update documents

Introduction and Background

1. Thanet District Council (TDC) adopted a Local Plan in July 2020, and it was subsequently reviewed in line with the recommendations of the Local Plan Examination Inspectors. Policy SP03 in the Plan commits the Council to an early review and to consider policy changes in order more effectively to manage a range of changing circumstances including the climate change emergency (declared by the Council in July 2019). The Local Plan is now the subject of a “partial update” which includes issues such as the implications of the Government’s Local Housing Need Methodology, the identification of additional employment land, and the updating of retail floor-space figures for town centres.

2. The Ramsgate Society welcomes the opportunity to comment on the papers recently released by TDC to inform this Update. The documents we consider here are as follows:

Discussion Papers

- A. Development Strategy
- B. Employment Need

Evidence Base Documents

- C. Local Housing need Update
- D. Retail & Leisure Study
- E. Sustainability Appraisal Scoping Report

Preamble

3. We make numerous references to the Manston airport site in our comments on the documents. We do so without apology. ‘Manston’ is *‘the elephant in the room’* in that it is the single biggest planning issue in Thanet, yet it is not addressed in any of the Update papers. This may be deliberate at this stage, but it should not be ignored. It will determine whether or not the Council has the capacity to deliver a “sound” and “sustainable” Draft Local Plan. We argue that if the Manston site is given over to ‘aviation use’ the consequences will be such that the Plan will not be sufficiently compliant, and the Authority will inevitably attract severe criticism when it is scrutinised by the Planning Inspectorate.

A. Discussion Paper - Development Strategy

4. The Development Strategy discussion paper (document 'A') states that during the preparation of the adopted Plan, five development strategy options were assessed. Two options related to previously developed land in the towns and three to greenfield sites. The huge Manston brownfield site in the District was not then, and is not now, considered as a contingency despite the Planning Inspectorate ruling against the DCO at that time, and the pending redetermination by the Secretary of State.

5. The adopted Local Plan sets out the development strategy at Policy SP01. The adopted Local Plan identifies sites, to meet the housing requirement to 2031, on previously-developed land in the urban areas; other urban sites adjacent to the urban areas; and at some of the larger rural settlements.

6. In terms of suitability, Government guidance states that a range of matters needs to be taken into account (A, para 14, p3), as follows:

“1. Supporting sustainable patterns of development, with local services that are accessible by a variety of means of transport, and encouraging walking and cycling;

2. Giving priority to the use of previously-developed land;

3. Avoiding flood risk areas;

4. Avoiding impacts on heritage, townscape and landscape assets;

5. Protecting the integrity of nationally and internationally important wildlife sites.”

7. The lack of response to the call for sites to date, the paucity of brownfield sites within the urban areas, together with the resultant pressure to encroach on greenfield sites on the fringes of towns and villages, have conspired to make SP01 unpopular in the community and difficult to deliver. Furthermore, new forecasts of housing need call for an additional 4,000 houses, bringing the 2040 target to 21,000. This situation calls for more than “a slightly different approach” (D1, para 10, p9): it demands a radically different approach.

8. The Manston site must be the priority site for development, ahead of encroachments into greenfield land. Manston is the ‘get out of jail card’ for the Council in terms of making material progress in meeting housing need. The Manston

site could cater for several thousand houses together with appropriate community facilities. This was made abundantly clear by the former site owners, Stone Hill Park, in their May 2018 planning application (OL/TH/18/0660) for a mixed use development scheme. They set out proposals for up to 3,700 homes built over a 15-20 year period; 46,000 sq. m of advanced/hi-tech employment space; with a heritage airfield for classic and vintage flights connected to a new museum quarter, schools, a 120-bed hotel, space for a higher education campus and repurposing of the main runway as a recreational and community space.

9. We are reminded that the case for the substantial public sector investment in the new Thanet Parkway Station was predicated on the assumption of significant residential and business development on the Manston site.

10. In our view, in order to meet those housing obligations, the Council must make every effort to remove the Manston site from dedicated large scale aviation use. Even if the DCO is eventually granted (which the Society believes to be very unlikely), the Council should prevail upon RSP, the site owners, to adopt, on behalf of its investors, the far less risky commercial case for the site to be allocated to mixed use with a substantial residential content.

11. The Manston site would readily meet each of the five site 'suitability' criteria, whereas any other housing site strategy option would inevitably involve major incursions onto greenfield, and often high grade agricultural, land. In the light of Government guidance, under examination, the Planning Inspectorate would find the latter unacceptable.

12. Ultimately, the Inspectorate will assess the Draft Plan based on "soundness", as tested against the following criteria:

"1. Positively prepared - seeks to meet the area's objectively assessed needs;

2. Justified - is an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;

3. Effective - deliverable over the plan period, and based on effective joint working; and

4. Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies of the NPPF".

13 Our comments on these criteria are as follows:

Criterion 1: Given that every commissioned aviation sector expert, the Planning Inspectorate and most recently Arup's for the SoS, has declared

there is no “need” for a cargo hub airport at Manston, plus the fact that there is no evidence whatsoever that there is any “need” for any other “aviation use” on the site, then the Inspector may well conclude that the draft Plan has not been “positively prepared”.

Criterion 2: Equally, the Draft Plan may risk being rejected on the basis of failing to consider “reasonable alternatives” and “proportionate evidence”.

Criterion 4: Manston airport would, if it ever went ahead, severely compromise the obligation to deliver sustainable development, whereas alternative uses of the site would score positively in relation to the sustainability objectives (see Suitability Scoping Appraisal Report).

We therefore assert that the Draft Plan would be likely to fail the test of ‘soundness’ if the Manston site remains designated for ‘aviation use’.

B. Discussion Document- Housing Needs Update Report

14. The “Housing Needs Update Report-Summary”, drawing on the work carried out by G.L.Hearn in 2020 and updated in 2021, concludes that there is an annual requirement up to 2040 of 1085 dwellings, or a total of 21,700 dwellings. The need for affordable housing is assessed to be 548 dwellings per year, which is 50.5% of the total dwelling need. Logic would suggest, therefore, that the requirement under “planning obligations and developer contributions” should be 50%, whereas Thanet District Council’s long standing policy has been for a 30% affordable housing requirement.

15. We believe that, if the 30% requirement is retained, as seems likely, it is very important that it be strictly enforced: developers are adept at presenting all manner of reasons why the figure should be lowered, or cannot be met, and often seek to provide the affordable houses off-site or, even worse, to settle for a financial contribution in lieu of on-site provision. Thanet’s requirement set out in its paper “Planning Obligations and Developer Contributions” rather oddly states that these alternative arrangements “may be accepted as long as the agreed approach contributes to the creation of a mixed community in Thanet”: it is difficult to see how building a separate area of affordable houses out of sight at the other end of the village is likely to achieve a sense of community.

16. It is difficult to avoid coming back to the “elephant in the room”: although it is hardly mentioned in all the Update papers, the Manston site is so obviously the best way of securing a substantial proportion of the 21,700 dwellings required by 2040 in

one well-planned, mixed use, sustainable development, using brown-field land, with a wide range of economic, social, educational, leisure and sporting facilities, rather than in series of smaller, sometimes very small, edge of village housing developments which face vigorous opposition over an extended period, often with little or no affordable housing.

17. We have strong reservations about The Sustainability Appraisal Scoping Study's "Appraisal Framework". It includes a scoring scheme which, whether intended or not, incorporates an unacceptable bias, in that it has the effect of giving disproportionate weighting to smaller sites, and is particularly disadvantageous to larger sites. Why? The scores for residential sites are based on a threshold of more than, or less than, 100 homes, and do not differentiate between sites of different size beyond this arbitrary threshold. We are, however, pleased to see that the scoring makes a very clear distinction between greenfield and brownfield sites.

18. In principle, the site size component of the score should be more or less directly proportionate to the potential number of dwellings on the site. To take an example, 50 homes on a greenfield site should give a score of -0.5; 50 homes on a brownfield site +0.5; 100 homes on a greenfield site +1.0; 100 homes on a brownfield site +2.0; and 800 homes on a brownfield site +8.0 (or at least +4.0 if the scoring system is less than strictly proportional). There may be a case for further refinement to distinguish between categories of 'greenfield' site such as 'Grade 1' agricultural land.

19. Developers may prefer flat, uncontaminated greenfield sites, which will be relatively easier to develop and more profitable, but public policy has for decades insisted that brownfield sites are preferable on sustainable development grounds, as set out clearly in a number of the Update discussion papers. For example, in the Discussion Paper-Development Strategy, paragraph 14 includes "Giving priority to the use of previously-developed land", and the list of Sustainability Assessment (SA) objectives in the Scoping Report includes the following:

"SA8: To improve efficiency in land-use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings..."

20. Our criticism of the Sustainability Framework site scoring scheme is indicative of a wider perception, namely, that none of the documents under review has been prepared in readiness to respond to the pivotal change that the Manston DCO decision will bring. The Manston site dwarfs any other development opportunity in the District. In short, it will be a 'game changer' that demands far more attention than a passing mention as an "uncertainty".

21. The level of consistency between authors of the various discussion papers is such that we assume that they were briefed to ignore Manston in their deliberations. We believe that to be a serious misdirection. Each of the Update documents needs to be tested against two scenarios representing the binary outcome of the DCO. We have already suggested that the Sustainability Appraisal Framework scoring will be found wanting in those circumstances.

22. The SAF may well be required to evaluate a scheme similar to that tabled several years ago. As pointed out earlier in our paper, in May 2018 Stone Hill Park, then owners of the Manston Airport site, presented a vision for a sustainable mixed-use development. They submitted a planning application (OL/TH/18/0660), the details of which are set out above in paragraph 7. We maintain that their vision and outline plan would be a better fit to Thanet's needs for housing and employment development and would enhance Ramsgate's status as a visitor destination.

C. Discussion Documents- Thanet Retail and Leisure Study, and Employment Need

23. In this section our comments apply to the *Employment Need* and to the *Retail and Leisure Study* documents. Our major concern about these papers relates to the lack of focus on Tourism. If 'Manston' is the "elephant in the room" of the Update papers, then Tourism is perhaps the "ghost in the machine". There is a disquieting absence of recognition of the enormous future importance of tourism to Thanet in the range of discussion papers relating to, and underpinning, the Update.

24. There is, for example, no reference to the Thanet Destination Management Framework prepared by Blue Sail, and published in January 2020 . It reveals that, in Thanet, "1 in every 5 jobs is in tourism", with a growth in jobs of 2000 (1,400 FTE) between 2013 and 2018, and a total of 7950 jobs in 2018. The paper reported that visitor satisfaction had risen by a significant amount (from 75.4% to 87.2%) between 2010 and 2018, but that "Thanet's visitor economy feels vulnerable", due in large part to the "down-at-heel feel to the town centres."

25. The Update discussion paper, "Employment Need", looks at employment floor-space need by sector. However, there is no specific sector for tourism as such, and its role and need for floor-space is concealed within the two sectors of "Accommodation and food service activities" (covering 10.7% of Thanet's floor-space need, and with 1241 growth in jobs expected up to 2040) and "Arts, entertainment and recreation" (3% and 348 respectively). There is another sector with a tourism element, the retail element of the strange combination sector of "Wholesale and

retail trade, and repair of motor vehicles and motorcycles”. It is important to remember that shopping is an important leisure and tourism activity.

26. The problem here is that the focus of this employment analysis is the need for floor-space rather than the activities which the type of employment (industrial, commercial and service sector) involves. Leisure facilities such as restaurants, hotels, pubs, cinemas, theatres, and museums serve both the local population and visitors/tourists, but the floor-space classification system struggles to capture the specific additional employment contribution (and floor-space need) of tourism. The only reference in the Update paper table to specifically tourism-related additional floor-space is under the Accommodation sector, with a figure of 372 extra hotel rooms required by 2040. If tourism numbers continue to increase at the rate they have in the last 10 years, that figure is likely to be a significant under-estimate.

27. An attempt was made in Visit Kent’s “Economic Impact of Tourism” (2019) to separate out the contributions of the local population and of visitors respectively to spending on “leisure attractions”: of the overall spend of £61.6m, tourist spending was £27.4m, or about 45%. Even this calculation was complicated by some of the leisure spending of the local Kent population taking place outside of Kent, although that would increase the relative importance of the visitor spending within Kent. This illustrates how the true significance of tourism expenditure and contribution to the local economy can easily be under-estimated.

28. In conclusion, we believe that the updated Local Plan needs to give much more prominence to tourism. Its floor-space requirements may not be on the scale of other sectors but it is very important to future employment opportunities, particularly for younger people. In planning terms, there should be a degree of presumption in favour of planning applications which will contribute to the development of tourism, subject to the usual conditions.

29. Brexit, and the phases of the Covid pandemic have, when rules have allowed, impacted to boost domestic, and diminish overseas, tourism and leisure industries, with proportionately far greater numbers taking vacations and leisure breaks in the UK. This shift is, however, in relative terms: recent figures this month from Visit Kent show that during the Covid pandemic, there was a 50% drop in visitor numbers in Kent, and a 61% drop in visitor income (from £4 billion in 2019 to £1.6 billion in 2020), and it is likely that these reductions will have been more severe for Thanet than for any other District. It remains to be seen what the longer term impact of those influences will be. However, the climate change emergency is pervasive, enduring, and escalating. It may well progressively inhibit foreign travel and bring a permanent boost to domestic tourism and leisure.

30. Thanet needs to position itself to capitalise on visitor needs in the 21st century. Until the downturn caused by Covid, tourism has been the most buoyant sector of the economy in the District, and the prospects for the future are very good, given intelligent choices in relation to plans, policies and the scale and allocation of investment. In the context of tourism, we again cannot ignore the elephant called 'Manston'. If the site opens as an air cargo hub it will inflict severe damage to the tourism and leisure sector in Thanet as a whole, and to Ramsgate most acutely, with a consequential direct impact on jobs in the sector and hence the wider economy. RiverOak's proposed scheme will involve a flight path directly over Ramsgate's Royal Harbour, its beaches, the High Street and its largest Conservation Area with frequent low-flying jumbo jets.

D. Discussion Documents- Sustainability Appraisal Scoping Study

31. We welcome this thorough and comprehensive report and recognise the validity and wide applicability of the revised list of 14 Sustainability Objectives. Whilst we look very favourably on the report as a whole, we do have some reservations about the site evaluation scoring within the SA Framework, as set out earlier in our paper (paragraphs 15-17).

32. Sustainable Development, or Sustainability, is an imperative and overarching principle that must underpin the Local Plan as well as the full range of Council policies. There is, however, an ever present danger that these principles can easily be compromised if they become inconvenient obstacles to what Government and its agencies, local authorities, or private developers, wish to pursue as policies or development projects.

33. The Society believes that the continued support for Manston to remain designated for aircraft use, and for the proposal to turn it into an air-freight hub, is in clear contravention of the principles of sustainable development in general, and the SA Objectives, particularly numbers 1 (housing), 3(health), 7(air quality), 8(re-use of previously developed land), and 10(mitigating climate change). The SA must be applied to the Manston Airport site whether or not the DCO is granted. Proposals for the use of the land and the impact of operations would have to be evaluated against the 14 SA Objectives. It must also be judged against other options for the use of the site. 'Aviation use' is very unlikely to be the best use of the site given the wider circumstances across Thanet.

34. The SA Objectives, Appraisal Questions, and Assumptions must all be tested and amended as appropriate against the options relating to the Manston site. The SA Framework (Table 10.1, p164) may be appropriate for a typical Local Plan;

however, Thanet is not typical. The scale and impact of the development of the Manston site are a 'game changer' that could turn the Draft Local Plan on its head.

35. While the pending re-determination of the DCO by the SoS is mentioned in the brief it is ignored in the rest of the report. The Local Plan must be reviewed following that decision in the light of the development options and planning decisions that stem from the redetermination. Even if the DCO is approved the reopening of Manston airport as a dedicated cargo hub is not an inevitable outcome, given that the site owners would still have a choice of how they wish to develop the 700 acre site. The SHP mixed use proposal for the site in 2018 (referred to elsewhere in our comments) is a realistic illustration of what could be done.

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