

Power point presentation documents

1. Saving Betteshanger Country Park- slide only.

2. Why are we here today?

The simple answer is that a much-loved country park was sold to a developer who wants to build a hotel and surf lagoon there.

This development will degrade a unique ecology, probably irreparably, and change the whole character of the park.

There will be a shift from providing a 'not for profit' resource, to a privately owned park run for profit. As we will see later these new proposals are financially very risky.

The park has been rewilding since 1989 with managed rewilding since 2000 when SEEDA took on the regeneration of the site. It did this working with Kent County Council, Dover District Council, other public bodies and local stakeholders. The proposed project was supported by policy AS2 in the 2002 Local Plan.

The result was a 2004 planning application and planning consent granted to SEEDA for development of a country park with, amongst other things, a visitor centre and managed rewilding. Something like £30m was spent on roads, landscaping, planting 130,000 trees and shrubs, a professional cycle track etc. The country park was opened in 2007. The section 106 agreement attached to the planning consent required DDC to designate the park as a Local Nature Reserve. DDC has not done this or provided a satisfactory reason why this didn't happen.

In 2012 the Coalition Government decided that regional development agencies were not needed and SEEDA was abolished. The park was sold to Hadlow College for £1.00 by the Homes and Communities Agency, which later became Homes England. To safeguard the park, a restrictive covenant was set up, limiting the use of the park to a country park. This covenant 'runs with the land' and could be enforced today. Deal Town Council, Walmer Town Council, Sholden Parish Council, CPRE Kent and RSPB, have all written to Homes England asking for this restrictive covenant to be enforced.

In February 2019 Hadlow College went bankrupt. This had nothing to do with the costs of running the park. The 250-acre park was then sold at a 'firesale price' of £621,999 excl VAT to the current owner. The price may well have reflected the restrictive covenant and DDC's policies of support for the SEEDA concept for the park.

The much smaller 50-acre pithead site with an attached DDC AS1 Policy, permitting light-industrial development, was sold for £1.4m. Planning consent for 210 houses on the pithead site was granted in 2021. It was sold by the developer to Redrow who paid £7,981,673.00 for it.

There has been no discussion of a change of use for the park by DDC in the development of the new Local Plan and it was not put forward for inclusion in the emerging Local Plan currently being examined. Hence there is no policy attached to the park. If it had been put forward, it is very likely it would have been excluded due to the need to protect the park's ecology.

The last hotel application was rejected, and a new application will be decided by the planning committee imminently, possibly December 2023, so we can expect a decision soon.

If you need any further information, please email Peter at: betteshangerfriends@gmail.com

3. Why is the park important?

Heritage – Betteshanger Country Park is a fitting, natural legacy to the East Kent mining community.

The park is a wildlife haven for an abundance of rare and endangered plant and animal species. The Friends of Betteshanger have formed a partnership with CPRE(Kent), RSPB, Kent Wildlife Trust and Bug Life, whose aims are to protect and promote this vital wildlife corridor.

It is protected, natural, open, green space – freely accessible to thousands of walkers and cyclists for their physical and mental wellbeing.

The park has been made an official asset of community value.

The park is an integral part of government and DDC strategies on 'Open Space' and 'Green Infrastructure'.

4. Impacts of the proposed development

The impacts of the proposed developments will affect us all and be far-reaching.

The Friends of Betteshanger presentation talks you through the impacts the proposed developments will have on our everyday lives, as we move in and around the town.

We will look at how the loss and destruction of wildlife and protected open space affects our physical and mental wellbeing, along with increased traffic and its resulting deterioration in the quality of the air we breathe.

What will our vibrant little character town and surrounding countryside start to look like?

And what about the water and electricity we are continually being asked to cut back on?

Betteshanger Country Park sits on a raised elevation in the landscape, so what will the noise impacts be to the peace and tranquillity that we currently enjoy?

And finally, what will the impact be on our thriving local economy?

5. Betteshanger Grove once its wildlife was destroyed

This slide shows why wildlife is under threat from major development. This is the Redrow site on the old Betteshanger pithead area where over 200 houses are being built, and shows the extent of the clearance. This was a thriving wildlife site – it was completely cleared in a few days.

6. Loss of habitat and destruction of wildlife

Nature is in crisis and time is running out. This is according to the 2023 State of Nature Report which gives us the most up-to-date picture of the devastating declines in wildlife throughout the UK. The report says that 1500 species are now threatened with extinction. So, what does this have to do with Betteshanger Country Park and the 2 planning proposals? The park is without doubt one of Dover District's most important undesignated wildlife sites. Here's why it is so important.

1. It is a botanical hotspot with over 330 native plants, 20 of which are on the Kent Rare Plant Register. This includes the second most important colony of lizard orchids in the

UK, many of which grow on the surf lagoon site. This makes the park of **NATIONAL** importance.

2. It is of **NATIONAL** importance for its invertebrates. This is why Bug Life has included the park in the Kent Downs and Stour Valley Important Invertebrate Area (IIA). It has over 20 invertebrates with a conservation designation – the most recently recorded rarity being the fiery clearwing moth found on both proposed development sites.
3. The park is an important site for reptiles and has grass snakes, slowworms, and significant numbers of common lizards. In 2016 over 1300 common lizards were moved to Betteshanger Country Park from the Discovery Park in Sandwich for their long- term protection. The receptor site was next to where the developer wants to build the surf lagoon. If it goes ahead the lizards would have to be moved all over again.
4. Large numbers of bats – at least 7 different species – use the tree line at the edge of the hotel site to forage and commute. The removal of the line of conifers and many other small trees and vegetation will impact their feeding, as these areas support their invertebrate prey. Badgers and beavers are also found in this area, and all these protected species will be threatened by the noise, light and disturbance associated with the building of a large hotel.
5. The hotel would be built in the middle of water vole habitat. They are a protected species, having disappeared from 94% of their previously-known habitats. Although in the amended hotel application water vole ponds would not now be removed, 200m² of their reedbed habitat would, and it is likely that the disruption will result in them abandoning the area.
6. Turtle doves are one of the park’s iconic species and make it of national importance. They are the UK’s fastest-declining bird, as their numbers having plummeted by 98%. They are vulnerable to extinction. Special mitigation areas, set up under the terms of the Redrow application on the pithead area, are threatened by the current proposals, as these areas are directly adjacent to the proposed building sites. Inadequate mitigation for turtle doves was one of the reasons why the hotel application was rejected in July. Other red-listed species at the park are skylarks (their nesting areas would be removed under the surf lagoon plans) linnets, mistle thrush, cuckoo, yellowhammer and starling.

The importance of the park for biodiversity is reflected in the fact that we are partnered in our campaign by the RSPB, Kent Wildlife Trust, CPRE(Kent) and Bug Life. Many other nature conservation organizations have objected to the proposals, including Plantlife, Froglife, The Botanical Society, The Kent Field Club, Kent Amphibian and Reptile Group, Sandwich Bay Bird Observatory and Natural England.

Natural England’s involvement is particularly significant as they only get involved in planning applications involving protected species under exceptional circumstances.

7. Loss of open space

This is an important issue, as it is one of the reasons the hotel application was rejected in July.

I guess we all know how important open green spaces are for our wellbeing, how a walk in an autumn woodland can lift our spirits, how being high up on the downs can put a spring in our step. And there is so much evidence from bodies such as Public Health England and Natural England that green spaces really do improve our physical and mental health.

And greenspace has other benefits too – it improves air quality, reduces risks from flooding and heat waves, locks up carbon in the fight against climate change, gives us access to nature, provides a home for wildlife.

All these benefits are recognized both nationally and locally. The National Planning Policy Framework and the Dover Local Plan both have policies to protect open space. In the new Local Plan, Betteshanger Country Park is listed under Protected Open Space with a recommendation that it should be retained as semi-natural green space.

However, there are exceptions where development is permitted and this is being exploited by the developer, who is claiming that there is a surplus of green space in the Dover District and therefore building on Betteshanger Country Park can be justified. We are refuting this claim.

Besides being designated as Protected Open Space and part of Dover District's green infrastructure, the park has also been designated an Asset of Community Value, as it furthers the social wellbeing and social interests of the local community.

We need to resist any attempts to build on our open spaces, our green infrastructure and our Asset of Community Value. We need to say NO to the development of Betteshanger Country Park.

If you need any further information on the biodiversity or mitigation issues relating to the Hotel and Seahive applications, please email Sue Sullivan at:
betteshangerfriends@gmail.com

8. Restrictions to our access and amenities

New ownership of the park in 2019 has resulted in a restriction of opening hours, as the park now closes late afternoon. Residents can no longer make the most of the light evenings in the summer months and use the park after work to relax or for recreation.

When the park was first created, our town and parish councilors fought very hard to provide residents from north and middle Deal with signed walking and cycling routes, for their physical and mental wellbeing, along a public right-of-way up to the rear Colliers Gate.

This vital access to residents is now closed off every time there are events inside the park.

This goes against the DDC recent Green Infrastructure Strategy, as residents in these areas have the worst-recorded health records and lowest life expectancy in the town.

The large gate at this entrance should always be open to allow ease of access to cyclists but it's now permanently closed. Opening it would avoid the need for people to try and lift their bikes through the awkward swing gate.

Not everyone has a car, and it goes against several council policies to force people into their vehicles to travel round to the main front entrance to the park via the already congested A258.

The cost of parking at the park is now £5 per day. This impacts disadvantaged sectors of the local community and reduces the number of trips families with limited means can make to the park.

The new park owners have failed to maintain and have now closed the bird viewing platform and bridge across the pond at the far-end of the park. They have also failed to maintain the parks signage telling of our proud mining history and wildlife within the park.

This presents a missed eco-tourism opportunity to attract birdwatchers and wildlife lovers who used to come and watch the thousands of migratory birds which stop here on their flights in and out of the country.

With such an abundance of wildlife, it's hard to comprehend why the new park owners have failed to engage with and support events promoted by the major wildlife trusts such as "Big Garden Bird Watch" and "National Dawn Chorus Day." These free-to-enjoy activities are excellent for engaging the community with nature and the outdoors, and would attract more visitors to the park and the town.

Many of the woodland walk areas have now been barricaded off for 'paid-only events.'

This stops the public from immersing themselves in nature for some quiet time and mindfulness. There are also other walking and cycling routes around the park that have been shut, and there has been the creation of an assault course in place of an intended Sculpture Park.

Wildlife, by its very name is WILD, and yet the park owners say on their website that they plan to fence off the remaining wildlife inside the park.

How will the public, and especially children, enjoy and engage with wildlife from behind a fence?

Most recently, there have been two business units installed without planning permission inside the park. A main office for Datum Ground Works and marketing suite for Redrow. There have also been tons of type 1 (concrete) poured into the parking area.

All of these are now the subject of planning enforcement action by our District Council.

Thank you to all of you who took the trouble to object, and to our district councilors for listening. The Redrow Marketing Suite has now been removed from the park, and the message is clear: Betteshanger is a country park NOT a business park.

If you need any further information, please email Jane Langstaff at:
betteshangerfriends@gmail.com

9. Traffic

The park's owner has said 'We anticipate that we could be looking at transforming our visitor numbers from 170,000 a year towards 700,000 a year with the creation of this facility'. The traffic impacts on the local road network arising from the anticipated increase in visitors travelling to the country park will undoubtedly be significant. Yet the Transport Assessments submitted with the applications for the hotel and surf lagoon suggest the traffic impacts would be minimal.

The reasons why the Transport Assessments can suggest traffic impacts would be minimal is because they misrepresented the catchment area and undervalued the number of vehicle journeys to the country park and traffic impacts on nearby junctions.

The Transport Assessments estimate that the majority of trips to the country park will be by Kent residents, with 45% of the trips coming from Canterbury, Thanet, Whitstable and Herne Bay; 45% from Dover, Folkestone and Ashford, and 10% from Deal and Walmer.

But the Transport Assessments conveniently omitted the Swale, Medway, Dartford and Gravesham areas, which all have large populations. The Transport Assessments also used the 2011 Census to estimate the likely populations from each area, not the 2021 Census which would have given higher population figures.

However, the Socio-Economic Benefits Assessments submitted with the planning applications for the hotel and surf lagoon by Icen Projects, the developer's agent, show a much larger area of the southeast as the catchment area, and say:

'The application is located within the wider southeast region...it is likely that the catchment profile of visitors will also be from a wider region. The region roughly mirrors a 2-hour drive-time which is the primary catchment.'

This wider catchment area extends as far north as Milton Keynes and as far west as the New Forest. Conveniently, the whole of London, Greater London and parts of south Essex have not been included, even though these areas are within the '2-hour drive-time'. These areas are densely populated, and would therefore potentially generate a high percentage of trips to the park. Because this would have to be reflected in the estimated trip figures to the park, as well as the impact on the strategic and local road network, it is presumably why these areas have been excluded.

The website for the Seahive has global ambitions for the surf lagoon at Betteshanger and is promoting the surf facility as being easily accessible from Northern Europe, via the ferry service to Dover and the Eurostar from Brussels to Ashford International. The fact that the Eurostar hasn't stopped at Ashford International since the pandemic is a minor detail!

The Transport Assessment identifies that access to the site is from the A258 which connects to the wider highway network, but given that the country park is not directly accessible from this network, it's likely that many visitors will cut across country on narrow rural roads, causing road safety and congestion problems for local people.

Because the annual number of vehicle trips to the hotel and surf facility were undervalued, National Highways and Kent County Council Highways offered no objections to the proposed development, since they could only form an opinion based on the information provided to them. In addition, by undervaluing the annual number of visitors, it enabled the developer to avoid the necessity of having to carry out an Environmental Impact Assessment, which is required for leisure developments expected to attract over 250,000 visitors per annum.

Dover District Council has publicly indicated its support for the country park to be used for tourism development. Had National Highways or KCC Highways raised concerns about the

proposal on highway grounds, the Council would have had difficulty granting these applications. As it stands, even though there will clearly be a large increase in traffic to the country park arising from these proposals, highway impacts are now not an obstacle to the Council granting planning permission.

Impact assessments

The Transport Assessments also undertook video monitoring on several junctions in the vicinity of the country park.

The London Road/Manor Road roundabout was described as 'the relative impact of the net additional development trips is considered to be negligible.' This view is contradicted in the Council's Infrastructure Delivery Plan dated October 2022, which says:

'These junctions have been assessed. It has been confirmed in the modelling and by KCC that there are no mitigation options available at these junctions, which have been assessed a number of times. The Local Plan approach has been to limit opportunities for further growth in this area to prevent a 'severe' impact on these junctions.'

The limited opportunities for further growth in this area of Deal doesn't seem to have deterred the Council from granting permission for hundreds of new houses in this area.

Committed developments

The Transport Assessments also took some committed developments into account in order to predict traffic flows for future years up to 2027. However, there are many more developments for housing in the Deal area that had been given planning consent by the Council, that were not included in the Transport Assessment. And since the submission of the applications for the hotel and surf lagoon in September 2022, there have been at least 3 more planning applications granted for large numbers of housing in the vicinity of the country park.

With all the hundreds of new houses that have recently been granted planning consent off London Road in Sholden, the problems with poor air quality at the London Road/Manor Road roundabout are likely to worsen.

Given the tens of thousands of new houses that are under construction and proposed for east Kent, including over 5,000 at Whitfield alone, little account of the cumulative impacts of all this development on local road networks in conjunction with the proposed developments appears to have been considered.

Living on or near a busy road can be stressful. The impacts of noise and air pollution on people's quality of life as well as their mental and physical health can be severe. All the more reason to ensure Betteshanger Country Park is protected from development and remains a place of peace and solace for people and nature.

10. Traffic - Icini map which omits London!

If you need any further information, please email Debbie Turner at:
betteshangerfriends@gmail.com

11. Air pollution

We have two nursing homes and three primary schools either facing or backing onto the busy A258 London Road towards Betteshanger Country Park.

Nitrous Oxide (NO₂) levels at the busy school crossing at the London Road/Manor Road roundabout have exceeded acceptable W.H.O. (World Health Organisation) limits each month for the whole of 2022.

Currently, there are three nitrous oxide monitors, in this vicinity. One is located at the crossing outside Sholden Primary School, and two are located near the London Road/Manor Road roundabout where cars tend to idle.

The Air Quality Assessments submitted by the developer for the proposed hotel and surf lagoon only provided data for one of these monitors and that was at Sholden Primary School. We should be asking ourselves why.

This is unacceptable because it means that the planning applications fail to address the impact of exposing residents to dangerous levels of CO₂, especially the young and old. Increases in visitor and service traffic to the park will cause the already poor, air-quality levels on these access roads, as well as the currently clean air inside the park to deteriorate, adversely affecting the health of people and the park's wildlife.

As we have heard, there are several new housing developments currently in progress along the A258 and a walking route and cycle track run parallel to it, putting users at a much greater risk from the effects of air pollution.

This exposure is unacceptable for those choosing exercise and 'green' low key recreation and transportation options.

The starkest example of authorities failing to address serious air-pollution levels in this country was the very sad case of 9-year-old Ella Adoo-Kissi-Debrah. She died following an asthma attack caused by inhaling excessive CO₂ emissions along her regular walking route to school. Ella was the first person in the UK to have air pollution listed as a cause of death.

It is therefore incumbent upon our public servants to ensure she is the last.

If you need any further information, please email Jane Langstaff
at:betteshangerfriends@gmail.com

12. Landscape Impacts

The hotel and surf facility will be the single most dominant feature in an otherwise open, rural landscape and will have an immensely adverse visual impact. Unsurprisingly, the Landscape and Visual Assessments submitted with the hotel and surf facility applications did not provide any significant visualisations of what the developments would look like in the surrounding area, no doubt because this would have shown what a complete blight on the landscape both would be.

The height of the hotel is given as 15m in the plans submitted. It's suggested that 'most of the hotel would be softened by the existing trees to the northern edge of the park'. However,

this would not in any way minimise the visual impact of the hotel on the wider landscape. In any event, trees don't live forever, or could be damaged in construction or removed after planning permission to make way for further development of the site. Imposing a planning condition to retain these trees would also prove to be unsatisfactory, because conditions are seldom adhered to or enforced, by which time the loss has already taken place.

Originally, it was proposed the surf facility would have eight, 24m-high lighting columns, but this has since been changed to eighteen, 12m-high lighting columns. The illustration indicates the possible impact these lighting columns would have on the landscape outside daylight hours. The surf lagoon is expected to operate from 7.00am until 10.30pm; later in the evening when events are scheduled.

The rural landscape around the country park is identified by the Campaign for the Protection of Rural England as an area of 'dark sky', so the light pollution from the hotel and surf facility will harm this quality of the landscape.

Government Planning Guidance on Light Pollution says:

'Lighting schemes for developments in protected areas of dark sky or intrinsically dark landscapes need to be carefully assessed as to their necessity and degree.'

The Landscape and Visual Assessments acknowledge that:

'As the proposed location for the Seahive is not currently lit, the proposed lighting would result in a high impact, but the reduced height of the lighting columns would not result in light spillage beyond the Site.'

That's not what the Institute of Lighting Professionals guidance says. It says:

'A lower mounting height can create a higher level of light spill.'

Impact On Wildlife

In addition to the detrimental visual impact of the hotel and surf facility on the landscape, light pollution and noise from the hotel and surf facility will adversely impact wildlife in the country park and surrounding area, particularly for nocturnal animals such as bats and insects.

Government Guidance on Light Pollution says:

'Wildlife species differ from humans in their sensitivity to light, and can be adversely affected by very low levels of light.'

Betteshanger Country park lies within the Lydden Valley. The Council's Landscape Assessment for the Dover District describes this landscape as: 'An open landscape, with long views and dramatic skies that create visual sensitivity to any form of development or tall structure within it'. While the Council's guidance for the development management of this landscape says:

- The open character of the landscapes accentuates the visual impact of many proposals over a wide distance - avoid proposals that can result in the interruption of views of large open skies or horizons or impinge on the remote undeveloped quality.
- Consider impact of development on adjacent slopes on this low-lying open landscape including around Betteshanger Country Park and the northern edge of Deal avoiding extension of an urban fringe landscape. Development here will impact on views within this open landscape.

Interestingly, in recent years, the Planning Committee have refused a number of planning applications on grounds associated with harm to the prevailing rural character of the countryside. In view of this fact, the Council should demonstrate consistency in its decision making, and apply the same reasoning with regards to the proposed development and refuse the applications.

If you need any further information, please email Debbie Turner at: betteshangerfriends@gmail.com

13. Energy

One hour at the park will use between 300 to 400 kwh. To put that in perspective, Ofgem calculate the average 2-3-bedroom house uses 7.9 kwh. An hour of generated waves uses the equivalent of what 50 average households use in one day, and over the course of a day would be as much as 300 to 400 houses. This is without factoring in the hotel and all other additional running costs.

We have been informed the surf lagoon will be using green energy. However, unless they install their own solar panels, their supply will come from a green energy supplier, much like you and I use. That's a lot of green energy used to make a fake wave, that could be used for far more important things, especially in the current climate.

14. Noise

Due to the location of the pool and its position facing into the park, much of the noise generated will be carried across the park. Noise from plunging waves would be in the 50 to 60db noise bracket and would also be carried further with prevailing winds.

Factor in also the extra noise from spectators cheering people on in competitions, then going to the park for a quiet walk will be a thing of the past.

Extra noise will also be at a detriment to the local wildlife. Data was gathered from a bioacoustics research laboratory in Australia due to a planned surf lagoon at Alfred Cove in Perth. It claimed it would be damaging to the local wildlife and warned that until further evidence of noise generated from such parks is available, control of such noise will be difficult to evaluate. Additionally, authorities should demonstrate caution when assessing such

proposed developments placed in noise sensitive areas. Betteshanger park is a noise sensitive area.

15. Water

The surf pool would need around 25 million litres of water to make it operational. The Bristol Wave Garden allowed up to ten days to fill their pool. Water is also lost through the filtration system at around 1m³ a day, which equates to over 300,000 more litres a year. The figure for water loss through evaporation is harder to quantify. However, agitated water increases the speed at which water evaporates, so understandably the wave-pool water will be affected more by evaporation, so the lost water will need to be replaced on a regular basis.

The Environment Agency states that Kent is the most water-stressed county. The current climate crisis will only exacerbate this situation.

As a commercial entity, any restrictions on water usage will not affect the wave pool. Southern water will, however, tell us the consumer, how we can better conserve water with initiatives like water butt use, or shorter time in the shower etc. A far easier and more obvious solution would be to object to the hotel and surf park.

In France, the desire to set up "surf pools" or "surfparks" on French soil is not new. Since 2013, 9 projects have been initiated, none of which have ever seen the light of day (Souston – Magescq in the Landes; Saint-Geours de Maremne in the Landes; Bordeaux-Bruges in Gironde; Lacanau in Gironde; Bed and Mix in the Landes; Sevrans in Seine-Saint-Denis; Castets in the Landes; Saint-Père-en-Retz, in the Loire-Atlantique département and Saint-Jean-de-Luz in the Pyrénées-Atlantiques).

Of these 9 projects, nipped in the bud for financial, environmental or political reasons, 7 of them were based on technology owned by the company Wave Garden. France is twice the size of the UK yet there are still no wavepools for very good reasons!

If you need any further information, please email: Dan Richards at: betteshangerfriends@gmail.com

16. Economy

Many developers claim their development will deliver much needed social and economic benefits. It's a carrot that a lot of developers hold in front of local authorities to persuade them to approve their developments... and it's very successful!

The consultants acting on behalf of the owner of Betteshanger Country Park submitted Socio-economic Benefits Assessments to support the hotel and surf lagoon applications.

Unsurprisingly, the assessments claim the development will provide much needed jobs which will help elevate deprivation in the district, will increase tourism to the district, boost the local economy and provide a 4*/5* luxury hotel for attracting golf tourists, while the surf lagoon would provide opportunities for health and well-being.

The purported benefits of this proposal are a rather clever attempt at concealing the true environmental, social and economic impacts of this development.

Employment

In terms of jobs, most of the types of jobs on offer in the hotel and surf lagoon will typically be low-paid, part-time or seasonal and consequently, will have little or no employment protection or pension provision.

The proposal claims there would be 75 full-time equivalent jobs in the hotel and 74 for the surf lagoon. This is probably an overestimate, and these figures are for full-time equivalent jobs in high season. For low season, 45 full-time equivalent jobs are estimated for each development.

An online search of vacancies available at the surf lagoon, The Wave, near Bristol in April this year, showed that the majority of vacancies were temporary, short-term contracts and barely above the National Minimum Wage of £10.42 per hour.

Low-paid work is a key contributor to in-work poverty and is a contributing factor in the current housing crisis and the increasing levels of homelessness, as large numbers of people are unable to meet the rising cost of housing. Low-paid work therefore has significant implications for local authorities and other service providers who are struggling to meet the growing need for their services which is seldom considered.

A study by the Office of National Statistics found that only 31% of workers in the tourism sector in Britain had a private pension, compared to 51% in the other 10 main industries. This is only 710,000 people out of a total of 2.3 million tourism workers.

What this means is that people employed in the tourism sector, and women in particular, tend to have inadequate pension provision later in life. The consequence of this is that they are more likely to be in poverty and in need of social housing and benefits.

The Hotel

Regarding the proposed hotel, there are many excellent hotels, guest houses, pubs, B&Bs, self-catering and holiday lets in the district offering high-quality accommodation. In terms of recent volume accommodation in the area, a 108-bedroomed Travelodge opened in Dover in 2018, a 75-bedroomed Travelodge opened in Sandwich in 2021 and a 90-bedroomed hotel, with swimming pool, restaurant, bar and workspace is scheduled for Dover Marina.

The Royal St George's and Royal Cinque Ports Golf Clubs have written letters to the Council supporting the hotel development, lamenting the lack of quality hotel accommodation for golf fans. Then why have they not built a hotel on their own land? The country park was intended as a community park and nature reserve for local people following the closure of the colliery in 1989; now the local community is facing the prospect of losing their park to a development that will predominately cater to those who can afford to use it.

Purported health, wellness and community benefits

The purported health, wellness and community benefits from the surf lagoon of 'blue therapy' conveniently ignores the fact that there are already a number of water parks in Kent providing a wide range of facilities and activities including:

- White Mills Wake and Aqua Park, Sandwich
- Bewl Water Aqua Park near Tunbridge Wells
- St Andrews Lakes, Rochester (which is the largest water park in Kent)
- Several surf schools around the Kent coast

In addition, Your Leisure Kent Ltd, a registered charity based at the Discovery Park in Sandwich, is already working in partnership with Dover and Thanet Councils, and Kent County Council, providing community health and wellbeing courses and activities at a range of local centres and swimming pools, including accessible sport, fitness and pool facilities.

Contrary to the claims that the surf lagoon will be a year-round facility, this is simply not the case. The surf lagoon at Bristol has to close during very cold weather, and from the 5th November this year is only open from Thursday to Sunday. So not many jobs on offer there then!

Friends of Betteshanger recently learned that, the CEO of the Seahive, Jim Storey, is visiting local schools and community groups promoting the surf lagoon with the offer of free surf lessons and meals for children. The Goodwin Academy in Deal recently submitted a letter to the Council supporting the surf lagoon following Jim Storey's visit to them. Friends of Betteshanger have written to all the local schools expressing their concerns about endorsing a proposal that would result in the destruction of protected, priority habitats and species, and result in the significant loss of free public access to much-needed open space in our community. Thankfully, it looks as if the letter of support from the Goodwin Academy has since been removed from the Council's planning portal.

Intended Business Model for Betteshanger Country Park

Ultimately, the primary beneficiaries of this development will be the developer and his investors.

If you look at the website for 'Wavegarden', this is the global company behind these surf lagoons which are promoted as a means of increasing revenue from all the onsite activities and services like bars, restaurants, fitness centres, public events such as surf competitions and concerts. To quote Craig Stuart, the former CEO of the Wave at Bristol: ***The business model is based on multiple revenue streams, including accommodation, food and drink, events, and retail, alongside the surfing offer.***

This is the intended business model for Betteshanger Country Park - all expenditure will be retained on site from accommodation, the surf lagoon, restaurants, bars, cafes, beauty and spa treatments, corporate facilities, music and other events. This development is unlikely to

benefit the local economy or businesses at all, and could even take custom away from local accommodation providers, restaurants, pubs, bars, and cafes, many of which are struggling in the wake of the pandemic and rising operational costs.

This development could actually contribute to the demise of a number of our independent shops and businesses. Independent, local businesses are the lifeblood of Deal and Sandwich, they are integral to our sense of community and belonging. We don't want to see our town go the same way as other coastal towns and villages, where little remains of once thriving local businesses serving their communities, entirely geared to catering to tourists.

Long-term viability of the proposed development

The financial viability of the proposed hotel and surf facility is questionable, particularly in the current economic climate. Surf lagoons allegedly are expected to have a life span of 25 to 30 years. Given the surf lagoon at Snowdonia Adventure Parc recently closed due to ongoing mechanical problems with the wave generator after only a few years in operation, and which cost the Welsh Government several million pounds in investment, surf lagoons can hardly be regarded as having a sustainable future. Maybe that's all part of the long-term game plan for Betteshanger? When the surf lagoon has served its financial purpose, and the park, its habitats and wildlife destroyed, is left desolate, the public no longer having access, the land can then be used for housing or some other pointless development.

If you need any further information, please email Debbie Turner at: betteshangerfriends@gmail.com

17. Previous hotel and current hotel application

The latest arguments put forward by the applicant and the economic case for rejecting the applications.

According to the National Planning Policy Framework (NPPF), a development has to be environmentally, socially and economically sustainable. We have established that the applications are not environmentally sustainable and it is very doubtful that they are socially sustainable. We must therefore look at the economic case.

Recently, the applicant provided a Financial Summary which says the park is losing £48k per month. These losses are due to current activities in park and the servicing of loans. This is despite not having the costs of providing a Nature Conservation Management Plan or any Wildlife Wardens.

The argument is that if the park continues to make a loss, then the park will become unsustainable and have to be closed. This will become very likely if DDC refuses planning consent for either hotel or surf lagoon.

Quoting the Financial Summary:

'If both proposed developments were undertaken the Country Park is projected to just make enough to carry on and start to repay some of the debt'

Note this also opens the possibility of further applications in the future.

The possibility of closing the park can't be a 'material consideration'. This is a well-established law tested all the way to the Supreme Court recently, in the case of Wright v Resilient and Forest of Dean Council in 2019. A planning application has to be decided solely on its own merits. These are 'material considerations' derived from the Local Plan and can't include an 'ulterior purpose' such as subsidising a loss-making business.

Could the statements about closing the park be intended to influence DDC, even though they can't be a planning consideration or a planning condition?

The Economic Case

1) The true economic picture should include costs/harms borne by the public.

These include health issues brought about through toxic emissions from cars, health costs from the loss of open space, congested roads and large electricity use which contribute to global warming, water stress and above all, loss of 'natural capital' (reckoned as 40% of GDP). It is estimated that parks and green space contribute £6.6b to our economy each year. We know already about the potential costs of the sharp decline in natural pollinators, trees etc. In complex ecosystems the cost of the loss of protected species such as water voles, turtle doves etc. are hard to calculate but will be large.

2) It is very doubtful whether the hotel and surf lagoon will be financially viable.

The hotel and surf lagoon will be burdened by large debts, and expected to pay high rents to the park (£820k is expected by 2026 for both developments). The running costs need to be covered by profits to break even, especially for the surf lagoon, which would use very large amounts of electricity added to the costs of servicing the loans to pay for construction. We don't know if surf lagoons are a passing fad. If it fails like the Snowdonia Surf Park, what will happen to what will become a degraded site?

3) As has been shown, the concept is for visitors to the hotel to spend on site at the spa, restaurants, cafes etc. so it is very unlikely to make a contribution to the local economy.

4) There is an alternative, based on the original SEEDA proposal, which is sustainable.

We can respect the priceless ecology value and provide a resource for the public. There is no need for theme-park activities which damage the unique ecology, and we believe often lose money. We will say something about this alternative, less risky and more sustainable model later.

18. How are planning decisions made?

To be effective we need to work through the planning system.

Applications are decided at a Planning Committee Meeting (for the hotel it could be December 14th). The 10 members of the planning committee are the key people to persuade.

The Planning Officer provides a report to the planning committee analysing all objections and arguments and makes a recommendation. It is the report which frames the discussion. For the previous hotel application, the Planning Officer recommended giving consent but the majority of councillors didn't accept his conclusions and weightings and rejected the application.

It is councillors not officers who make planning decisions.

Each application is treated as 'stand alone' and the councillors don't need to follow a previous decision. They can for example give different weightings to different material considerations.

The two key concepts are 'weighting' and 'material consideration'.

The key concept is 'material consideration' and any objection not containing a 'material consideration' will be discarded. Any argument must be traceable to a policy in the NPPF or Local Plan. Material considerations derive from planning policies which are compared to the facts of a planning application. A planning decision is then reached through considering and 'weighting' all the relevant 'material considerations' and making a decision to accept or reject.

The National Planning Policy Framework is written using very general terms so the interpretation of policies is very important.

It is up to the planning committee to decide on weightings of the different arguments and this gives a lot of scope.

The more openness, transparency, accountability in a public authority the better. However, we do have important rights to participate in the planning process.

1) Making objections.

These are arguments containing material considerations which are included and evaluated in the Planning Officer's report and are read by councillors and public.

2) Writing to express our views to councillors, planning officers and planning committee members.

Such communications need to be courteous and respectful. We can make representations, ask questions, ask for reasons for a decision.

3) Asking for information about the planning application.

Public bodies are required to follow principles of open government. We can also make FOI(Freedom of Information)/EIR(Environmental Information Regulation) requests to find out information.

The planning committee rejected the previous hotel application because they gave more weight to ecological damage than purported economic gain. The current application is fundamentally the same as the rejected application so it should be rejected.

If you want to protect the country park there is much you can do.
If you need any further information, please email Peter at:
betteshangerfriends@gmail.com

19. Alternative vision for the park.

Government Policy to increase access to green space.

For example, Environmental Improvement Plan initiative launched by the government in 2023.

Environment Act 2021 which introduces Local Nature Recovery Strategies. One is being developed by KCC, working closely with NGOs to develop a joined-up plan. In the DDC area, there will also be a DDC Green Infrastructure Strategy. It would be great to have a joined-up environment strategy which included Hacklinge, Sandwich Bay, Betteshanger and Cottington Lakes.

Some gains from keeping the country park in preference to building a hotel and surf lagoon.

- Low debt means much lower costs so that you don't need to generate large cash flows.
- Debt-free development creates a much lower risk with organic sustainable growth.
- It creates high-quality skilled and sustainable jobs.
- There is no need for damaging theme-park type events which harm wildlife and public enjoyment of a tranquil space.
- It helps develop the tourism offered in our area and supports local businesses, especially with growing eco-tourism.
- It protects species headed for extinction and protects and develops the park's ecology.
- It makes sure a Natural Conservation Management Strategy is in place and followed.
- It works towards having the park declared an SSSI.
- We are proud of our mining/local heritage and can give it a high prominence. The Mining Museum can be nurtured with informative visitor information boards in the park etc.
- The Miner's Statue should stay where it belongs. Local people, especially mining families have made this clear.
- Keep faith with past promises and £30m taxpayer investment for a regeneration project.
- It would guarantee free access and enjoyment for local people whilst welcoming tourists who want to experience the benefits of a rewilded space.
- It improves the mental and physical health of local people.
- It provides a safe haven for 'mitigated' wildlife.
- There will be a huge benefit in developing a sense of community through working creatively together with NGOs to make the park a success.

- It would combat climate change and species decline.
- It enhances education about nature for local school children; the park could also provide INSET training for teachers and CPD for organisations.

There is nothing Utopian about keeping the park for public use.

There are many ex-mining sites successfully running as Country Parks throughout the UK.

- If the park was run by a trust or made a charity, it could get tax exemptions, grants, charitable donations etc.
- Grant-aided bodies such as charities for lizard orchids, fiery clearwing moths, fungi, lizards etc. will contribute.
- KCC/DDC could contribute a reasonable amount.
- DDC and Sandwich TC provide funds for Gazen Salts Nature Reserve in Sandwich. Deal, Walmer and Sandwich have funding available for projects of up to £1k per annum.
- At the moment, DDC has funds that they need to match to projects.
- NGOs could contribute a small amount each year.
- Lottery grants are available, especially backed by council, NGOs etc. There was a very large Heritage Lottery Grant given for construction of the visitor centre.
- The restaurant, cafe, parking etc. provide an income stream.
- Wardens can lead nature walks and give talks and educational training; volunteers can organise events.
- We could tap into the vast creativity of local people as there are many, many ways to create income.

If you need any further information, please email Peter at:
betteshangerfriends@gmail.com

20. Alternative vision for the park

Case Study: Shorne Wood Country Park

- It is near Gravesend and owned by KCC. It makes a profit and is self-sustaining.
- KCC Country Parks were on average 46% self-financing in 2009 and this rose to 81% in 2020. With low intensity, recreational activities they are able to create income streams whilst enhancing the environment.
- The KCC Country Park service cost 28p (2009 – 2019) per year per person between 2009 and 2019. Is this a high price to pay for so many green spaces for public enjoyment?
- The park management judged that many theme-park type events such music festivals were uneconomical.
- Like Betteshanger, this park has very large numbers of protected species, in particular dormice.
- Zoological Society of London:

‘Once common across the UK, the hazel dormouse is now considered at risk of extinction.’

across the to woodland habitat loss and mismanagement

For more – read their management plan 2021-2026

https://www.kent.gov.uk/_data/assets/pdf_file/0003/61167/Shorne-Woods-Country-Park-Management-Plan.pdf

- Car parking charges are £2.00 weekdays; £3.00 weekends; £52.00 for the year and free for blue badge holders.
- The park generates income streams through low-intensity activities such as farmers' markets, INSET for teachers and Continuing Personal Development (CPD) for others. They generate enough income to maintain and develop the park.
- Particularly exciting are the links with local schools. **'It is the ideal place to bring schools and groups.'** We could do the same at Betteshanger.
- A well-run park, **can** be self-sustaining.

If you need any further information, please email Peter Cutler at:
betteshangerfriends@gmail.com

21. What can I do?

Object to both the hotel and surf facility planning applications on the following issues:

- Loss of biodiversity
- Loss of public open space
- Traffic & air quality impacts, landscape impacts
- Water & energy use

Hotel Ref: 23/01095

Surf Lagoon Ref: 22/01158

<https://publicaccess.dover.gov.uk/online-applications/>

22. We need your help

- Please email or write to all the planning committee councilors (details on attached sheet). Ask them to refuse the applications.
- Donate & share the Save Betteshanger Crowd Funding Page so that we can mount a judicial review if the council approve the planning applications.
- Please sign and share our online petition and information from tonight with your contacts and encourage them to object.
- Please think about your own contacts/skill sets. How can you help our campaign however large or small the task?

Skills we currently need:

- Researchers- to look at specific reports on the planning portal
- Accountants
- Fundraisers

If you can help, please email: betteshangerfriends@gmail.com

Conclusion by East Kent Climate Action

We hear a lot about tipping points. The plans for Betteshanger are set to tip this area into a vortex it won't be able to claw its way out of.

East Kent Climate Action have been campaigning locally for over five years and Betteshanger brings every one of our group's concerns into sharp focus: pollution, emissions, biodiversity, depletion of resources, sustainability. It's happening now and it's happening here.

You may not feel that you can influence the issuing of oil licences in Scotland. You may feel powerless against the growing mountain of fabric waste in Chile; but Betteshanger is something you can tackle head on. Your voice can make a difference, your input and action will have an effect.

The climate emergency may not be top of your agenda, but the encroachment of what's planned for Betteshanger will certainly affect your children's lives. And those of future generations and we all know how fast that future creeps up.

Love Deal. Love our vulnerable coastal community. Leave Betteshanger undeveloped. It needs to be sensitively managed and **then** it will play its role in mitigating *some* of the effects of the climate crisis.

It will provide us with a space as nature intended, sustaining our health and wellbeing, giving us all the opportunity we deserve to enjoy our precious planet.

For further information on East Kent Climate Action who meet locally in the centre of Deal once a month contact: ekclimateaction@gmail.com facebook and instagram