

**Save Betteshanger
Country Park :**
asset of community
value and Deal's
only significant
open green space

www.friendsofbetteshanger.co.uk



Why are we here today?

- Dover District agreed a section 106 agreement in 2004 to declare the park as a Local Nature Reserve. They didn't do this.
- Dover District had a clear policy to support a Country Park for 'low intensity recreational activities such as walking or cycling' for the enjoyment of local people. This vision was included as policy AS2 in the 2002 Local Plan and was put into effect in the 2004 SEEDA planning application and resulted in the opening of the park in 2007.
- Quinn Estates acquired the Country Park and pit head site in 2019. The sale was agreed by the Educational Administrator after the bankruptcy of Hadlow College.
- Quinn Estates submitted two planning applications in 2022 for a 120 bed hotel and surf lagoon. The application for the hotel was rejected in July and a new hotel application submitted in September.



Why is Betteshanger Country Park important?

- Heritage – 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, KWT and Bug Life, whose aim is to protect and promote this vital wildlife corridor.
- Protected natural open green space – free access 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'.



Impacts of proposed developments

- Loss and destruction of habitats and wildlife, including protected habitats and species
- Loss of protected open space
- Increased traffic
- Air quality
- Landscape impacts
- Water use
- Energy use
- Noise
- Economy



Betteshanger Grove 2023



Loss and destruction of habitats and wildlife

- Loss of priority habitats and species
- Adverse impacts on rare and protected species inhabiting the park and surrounding area.
- The proposed developments threaten one of Dover district's most important undesignated wildlife sites. The RSPB, CPRE(Kent), Kent Wildlife Trust, Bug Life and many other nature conservation organisations have submitted objections to the planning proposals.





Loss of Protected Open Space

The development proposals will result in the loss of open space, green infrastructure and contravene Local Plan policies, National Planning Policy Framework (NPPF) and current Green Infrastructure Strategy.



Restrictions to access and amenities at BCP

- Restricted opening hours
- Closure of rear Colliers Gate
- Closure of woodland areas and some walking and cycling routes.
- Closure of bird viewing platform and bridge to far end pond.
- Insertion of assault course, in place of intended sculpture park
- Daily parking now costs £5
- Plans to fence off existing wildlife.
- Installation of commercial units inside the park.

Increased Traffic

- The park's owner estimates around 700,000 visitors annually to the park.
- Hundreds of new houses are being built opposite Sholden Fields, Sholden and at Betteshanger Grove.
- The transport assessments submitted with the hotel and surf facility applications undervalue the number of vehicle trips to the park.
- Socio –economic assessments shows catchment will come from the whole of the SE region. Note London has been excluded.



Figure 1 Study area



Source: Socio-Economic Benefits Assessment for The SeaHive, IcenI Projects Ltd, August 2022
(Note: The same illustration is used for Hotel & Spa)

Air pollution

- Failure to address local air pollution levels will impact the health and wellbeing of residents especially the young and old.
- Middle and north Deal residents have the worst health in the town and the shortest life expectancy. (source: Green Infrastructure Strategy.)
- Betteshanger Country Park must be retained as a clean air zone if it is to fulfill its objective of benefitting the health and wellbeing of the town's residents.

Source: Daily Air Quality Index : www.kentair.org.uk
www.addresspollution.org



Landscape impacts

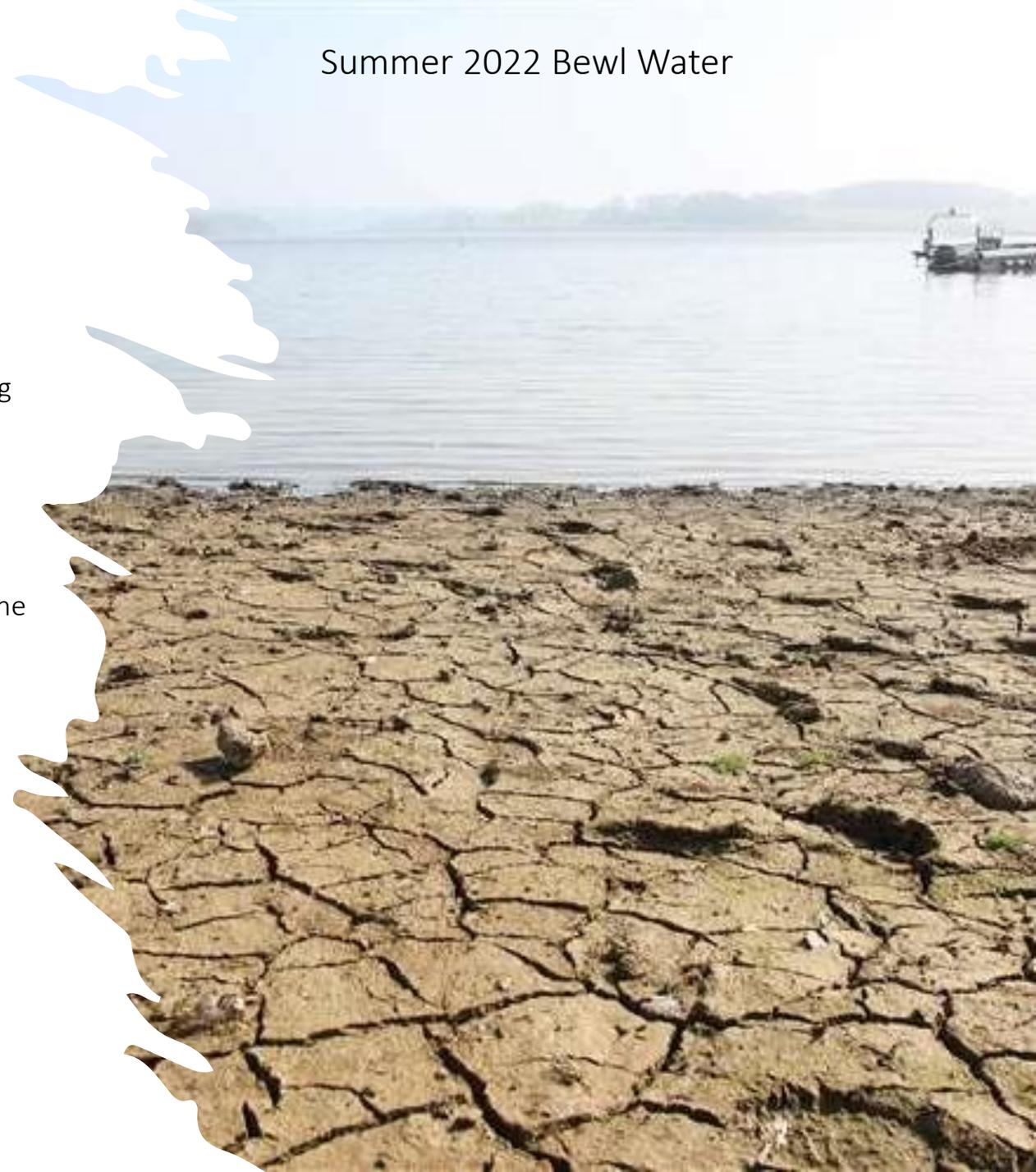


- The hotel and surf complex will be the single most dominant features in an open, rural landscape and will be seen for miles around.
- The light from the surf lagoon's eighteen, 12 metre high lighting columns, which will be in use outside daylight hours, will have a high visual impact on the night sky.
- The illumination from the hotel and lighting columns for the surf lagoon, will adversely impact wildlife, particularly nocturnal animals such as bats and insects.

Water usage

- BCP lies in a ground water protection zone.
- By 2030 demand for water will outstrip supply (South Eastern Rivers Trust)
- The proposed surf lagoon will take 30 million ltrs to fill plus evaporation along with demands of new housing
- Kent's household water use is above the national average.
- There are no plans to deal with the foul sewage. – There is no foul sewer in the vicinity.
- Waste treatment systems are undersized and lack adequate safety factors.
- There is no environmental impact assessment for this development.
- The Kent Environment Strategy, identifies Kent as one of the driest regions in England and Wales.

(source Wave Garden Technology)



Energy usage

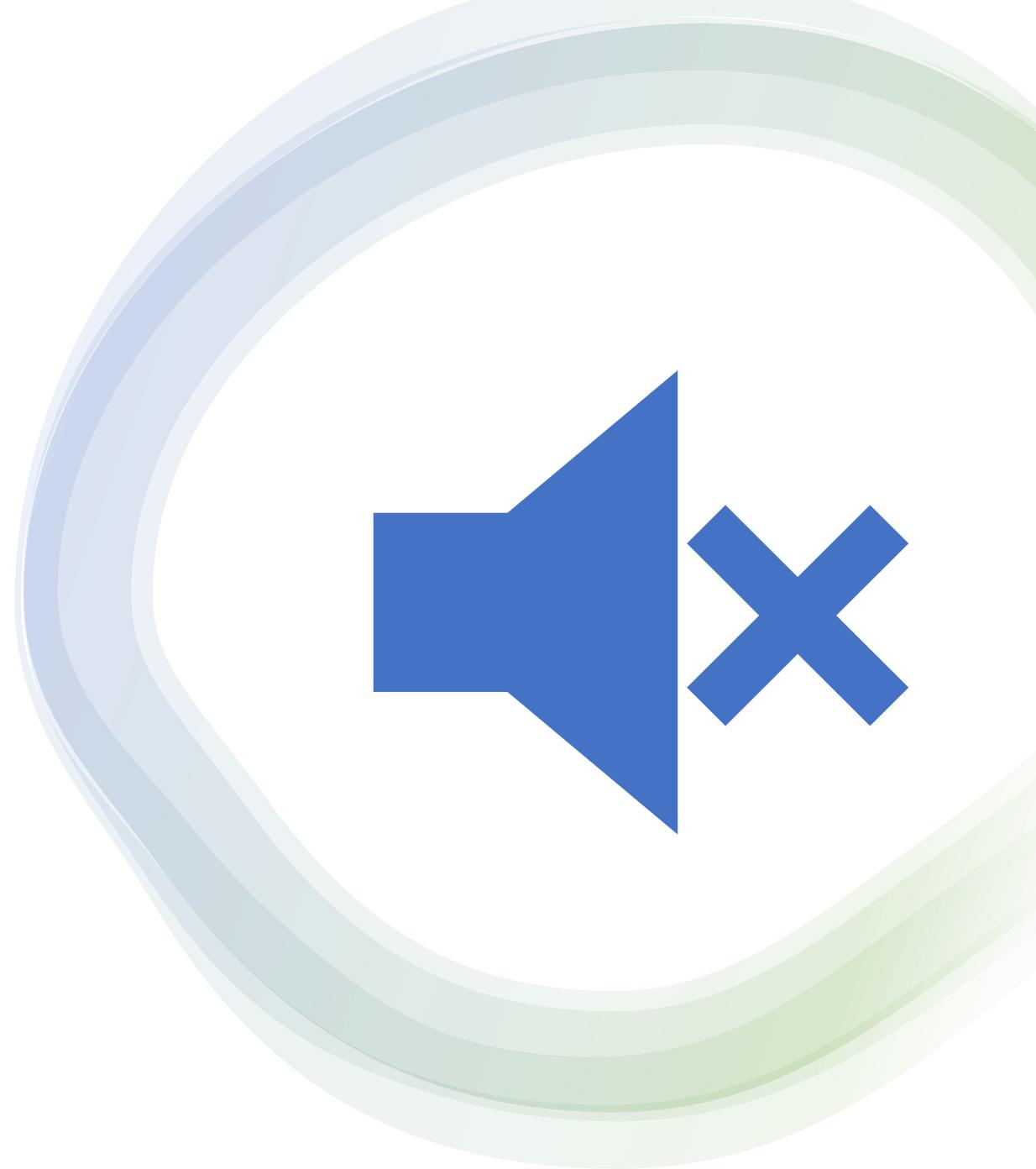
- The surf lagoon will use energy to create waves. The larger the wave to more energy it uses.
- It will use as much electricity as 300-400 houses at a time when the supply to our national grid is under threat.
- The 18, 40 FT lighting towers will also use large amounts of electricity.
- Kent Surf , Surf Rider Europe and The Olympic Committee are not supportive of surf lagoons at this time.

(Source Wave Garden designers of the technology)



Noise

- BCP is surrounded by wildlife sensitive areas and nearby residential dwellings.
- There is already significant noise nuisance emitting from inappropriate events contrary to saved policy AS2 which can be heard beyond the boundaries of the park as far as middle Deal.
- BCP has gone from a place of peace and sanctuary where activities used to be focused on appreciating and safeguarding our natural world ,to a place of noise, music and pseudo combat and adventure activities as advertised on their web site.
- The Sound pressure from the breaking point of the wave machine is about 75 decibels exceeding local noise regulation limits. (source urbn surf)



Economy

- Most of the jobs on offer in the hotel and surf facility will be low-paid, part-time or seasonal. The majority of jobs on offer at The Wave, near Bristol, are barely above the National Minimum Wage of £10.42 per hour.

- The country park was intended as a community park and nature reserve for local people after the colliery closed in 1989. The proposed development will turn the country park into a theme park, catering to those who can afford to use it.

- The whole business model for this development is to maximise and keep all expenditure from accommodation, spa, gym, restaurants, cafe's, bars, activities and events within the facility. This will not benefit local businesses, many of whom are struggling in the wake of the pandemic and rising operational costs.



The Previous Hotel Application and Revised Application

'If both proposed developments were undertaken, the country park is projected to make just enough to carry on and start to repay some of the debt.'

(source : Financial Summary provided by the applicant)

How can we rebut economic arguments provided by applicant:-

- 1)The true economic picture should include costs/harms borne by the public.
- 2)It is very doubtful if hotel and surf lagoon will be financially viable.
- 3)As will be shown the idea is for visitors to hotel to spend on site at bars , restaurants etc so unlikely to contribute to the local economy.
- 4) There is a viable alternative based on the original SEEDA proposal .



How are planning decisions made?

- The decision will be made at a planning committee meeting (for the hotel - quite likely on December 14th) and these are the people to persuade.
- They will receive a report from the planning officer who supported the original application. This will frame the discussion.
- There are 10 people on the DDC planning committee with the power to vote.
- Councillors not officers make planning decisions.
- The key concept is 'material consideration' and any objection not containing a 'material consideration' will be discarded.
- Any argument or 'material consideration' must be traceable to a policy in the NPPF or Local Plan. Material considerations derive from planning policies when applied to the facts of a planning application.
- A planning decision is reached through taking into account all the relevant 'material considerations' and making a judgement.
- The NPPF uses very general terms which can be interpreted in many ways.



Alternative vision for the park

- Our vision for Betteshanger Country Park is as a green countryside space open to all, for the enjoyment of its unique ecology and for low intensity recreational activities.
- Enhancing accessibility and quality of green space is a key government policy
- The alternative and its benefits for the local community.
- There are many ex-mining sites successfully running as Country Parks.
- One option: running the park as a charitable trust with sustainable income stream.
- How a charitable trust could work.

- Case Study Shorne Wood Country Park, owned by KCC, near Gravesend. It is well managed Country Park both self-sustaining and making a profit . Their management plan 2021- 2026.
- https://www.kent.gov.uk/data/assets/pdf_file/0003/61167/Shorne-Woods-Country-Park-Management-Plan.pdf.
- KCC Country Parks were on average 46% self financing in 2009-2010 and this has risen to £81% in 2019-2020. With 'low intensity recreational activities' they can create income streams whilst enhancing the environment. It employs 30+ people. The KCC Country Park service costs the people of Kent 28p per person per year (averaged 2009 – 2019). Is this too high a price to pay to provide our Country Parks?
- Betteshanger Country Park too could be self sustaining. This is a completely practical possibility.



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/>





We need your help

- Please email or write to all the planning committee councillors (details on hand out) 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