

**Chapter 10 - The Rural Economy**

The Rural Economy E15										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Davies	Julie	147	CPRE Kent		Object	A significant amount of land is allocated for employment (53.5ha). Given that much of undeveloped land is best and most versatile agricultural land and that the district is small and villages are close to urban areas we consider that the policy is unnecessary.		401		Web
Lee	A	133			Object	The plan needs to ensure that rural expansion to be in line with current percentage of land occupied by buildings.		328		Web
Repsch	John	126			Object	E15  New-build in the last few rural areas remaining should be more or less stopped, while there are still rural areas left. Concentrate urban building in urban areas.		831		Web
Stevens	Angela	163			Object	Building on the scale proposed by TDC does not fit into a scale compatible with existing rural areas and should be seriously reconsidered.	Drastically reduce the number of houses to be built in all our rural locations. Also, reinsert Policies SP05 and EC4 to protect the airfield.	680		Web

Conversion of rural buildings E16										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/English Heritage		155			Support	Policy E16 - support, with particular reference to bullet point 4).		938		Email
Twizell	Heather	512	Natural England		Object	<p><b><i>Conversion of rural buildings</i></b></p> <p>Paragraph 10.5 – we welcome the recognition that disused rural buildings may be important for protected species although this paragraph currently refers incorrectly to the ‘Wildlife and Conservation Act 1981’ which should be corrected to the ‘Wildlife and Countryside Act 1981 (as amended)’. You may also wish to consider referring to the Conservation of Habitats and Species Regulations 2017 instead as this is the highest tier of relevant legislation (transposing the European Habitats Directive into UK law) – all bat species are protected under the Habitats Regulations for example.</p> <p><b><i>Policy E16 - Conversion of rural buildings for economic development purposes</i></b></p> <p>We welcome the inclusion of clause 6 in relation to protected species but would suggest the following alternative wording: ‘Where the building currently contains protected species, any negative impacts should be fully addressed following the avoid, mitigate, compensate hierarchy.’</p>		1470		Email

Farm Diversification E17										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Giddins	Rod	62			Observation	Natural England has categorised types of agricultural land across the country. Thanet contains <u>rare</u> Grade I agricultural land, identified in the Local Plan as “the best and most versatile agricultural land”. Policy E17 (Farm Diversification) aims to protect existing farmland and to keep it in production but Policy E18 would allow housing development on this Grade I land. As food production and bio-security become ever more important – and will continue to do so after we have left the EU – and the population continues to increase, the Local Plan should be used to strengthen the protection of this vitally important asset and to designate all Grade I land as “protected” and therefore not included in housing land allocations. If we lose this land to development it will be lost forever.		167		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	It seems a little strange that applicants for farm diversification projects should be required to assess carefully any adverse effects relating to traffic and landscape impacts, and to the depletion of land resources, whilst house building on such land does not appear to need to take this into account.		588		Web
Lee	A	133			Object	The plan should state that farm diversification should not mean change of use of the land for housing.		329		Web

Best and most versatile agricultural land E18										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Agnew	Richard	516	Gladman		Object	<p>Policy E18 – Best and Most Versatile Agricultural Land</p> <ul style="list-style-type: none"> <li>The Judgment in BT&amp;W V SSCLG and Gladman Developments Ltd. [2016] EWHC concludes that Paragraph 112 of the Framework, regarding best and most versatile agricultural land (BMV), cannot be characterised as a policy which indicates that ‘development should be restricted’ within the context of Paragraph 14 of the Framework (and the associated footnote 9). Whilst the Council should be seeking to use areas of poorer quality land in preference to that of a higher quality this should not rule out the development of higher quality agricultural land where poorer quality agricultural land is available.</li> </ul>		1542		Email
Davies	Julie	147	CPRE Kent		Object	<p>Best and most versatile agricultural land (BMV) is a finite resource. 61.5% of land in the District is classified as Grades 1 and 2 compared to 16.9% for England. Grade 3a is not identified and thus the amount of BMV could be higher than 61.5%. None of the District is identified as Grade 4, and a small amount (1.2%) is Grade 5 which is in NNR, SAC, Flood Zone 3 and identified as Marshes Landscape Type. Many of the allocations are on BMV and we are concerned that the policy approach could result in the further loss of BMV agricultural land.</p>		402		Web
Giddins	Rod	62			Observation	<p>Natural England has categorised types of agricultural land across the country. Thanet contains <u>rare</u> Grade I agricultural land, identified in the Local Plan as “the best and most versatile agricultural land”. Policy E17 (Farm Diversification) aims to protect existing farmland and to keep it in production but Policy E18 would allow housing development on this Grade I land. As food production and bio-security become ever more important – and will continue to do so after we have left the EU – and the population continues to increase, the Local Plan should be used to strengthen the protection of this vitally important asset and to designate all Grade I land as “protected” and therefore not included in housing land allocations. If we lose this land to development it will be lost forever.</p>		168		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	<p>Agricultural land should be protected at all costs, we may need it in the future!!</p>		143		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	<p>It has already been stated that it is felt that there should be no occasions whatsoever when the best and most versatile agricultural land should be used for development. Every brown field site and redundant existing buildings should be used</p>		590		Web

						instead.			
Lee	A	133			Object	There should be no loss of agricultural land to large scale housing. The proposal is very short sighted and not considering longer term implications.		330	Web
Repsch	John	126			Object	<p>This introduction should be enough to halt the plundering of our last surviving Grade 1 farmland forthwith. What is the point of giving this soil the top rating when that rating counts for nothing?</p> <p>Only 60% of food consumed in the UK is home-grown. The figure is expected to fall to 53% by the early 2040s. That figure of 53% will have serious implications for the economy and unemployment.</p> <p>Food security will be under greater pressure with a prospective increase in UK population of 13 million by the early 2040s. Climate change, market volatility and the possible actions of hostile countries may make farmland of Thanet's calibre even more precious.</p> <p>The standard of imported food may be significantly lower than our own.</p> <p>Future generations would be deprived of Thanet's countryside. Our legacy to them would be urban sprawl.</p>		833	Web
Solly	C	419			Object	<p>No further development of housing should be considered in unallocated areas. Despite the housing delivery not meeting the OAN, it does show in this plan there are a number of sites available. Commercial and industrial use should use the business parks and/or commercial areas in Primary and Secondary Frontages.</p> <p>The brownfield register should be used as a guide for suitable areas of lesser land quality.</p> <p>Thanet Council has not assessed the value of Agricultural land and its effect on the local economy, as swale council has: <a href="https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/Further-evidence-2015/Agricultural-Land-Value-SBCPS0888.pdf">https://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/Further-evidence-2015/Agricultural-Land-Value-SBCPS0888.pdf</a></p>	<p>Include the use of the Brownfield register, ensure that housing is delivered in the sites in this local plan.</p> <p>Commercial and industrial use should be located in Business Parks and Primary and Secondary Frontages.</p> <p>An assessment on the Value of the Best and Most Versatile Agricultural land.</p>	1249	Email
Stevens	Angela	163			Observation	It is well known in and around Thanet that farmers wishing to sell up and make money deliberately mis-use and neglect their Grade 1 fields and thereafter render them Grade 2 agricultural instead, to make the land saleable for development. This has to stop!		681	Web
Sykes	Anthony	31			Observation	Land used for solar parks could be replaced by roofs of industrial buildings being covered by panels. Similarly Westwood cross car parking could be roofed over with solar panels.		63	Web
Trotter	AR & PJ	388			Object	AGRICULTURAL LAND		1150	Paper

						It appears that the Council has allocated agricultural land for the building of 75% of the new houses required to be built under the local plan. This is a completely unacceptable loss of prime agricultural land.				
Twizell	Heather	512	Natural England		Object	<p><b><i>Best and most versatile agricultural land</i></b></p> <p>Natural England notes that the majority of agricultural land in Thanet qualifies as ‘best and most versatile’ (BMV). We welcome the provision of Policy E18 to safeguard BMV land as far as possible but there does not appear to be any wider policy protection of soils more generally in the Plan and we would encourage you to address this and consider where in the Plan it would best sit.</p> <p>Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) ‘<i>The Natural Choice: securing the value of nature</i>’ (Defra , June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils, for example:</p> <ul style="list-style-type: none"> <li>○ A Vision for Nature: ‘We must protect the essentials of life: our air, biodiversity, soils and water, so that they can continue to provide us with the services on which we rely’ (paragraph 2.5).</li> <li>○ Safeguarding our Soils: ‘Soil is essential for achieving a range of important ecosystem services and functions, including food production, carbon storage and climate regulation, water filtration, flood management and support for biodiversity and wildlife’ (paragraph 2.60).</li> <li>○ ‘Protect ‘best and most versatile’ agricultural land’ (paragraph 2.35).</li> </ul> <p>The conservation and sustainable management of soils also is reflected in the NPPF (2012), particularly in paragraphs 109 and 112. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to:</p> <ul style="list-style-type: none"> <li>○ Avoid development that would disturb or damage other</li> </ul>		1471		Email

					<p>soils of high environmental value</p> <p>(e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands, <i>Biodiversity enhancement, NIAs etc.</i>), and, where development is proposed.</p> <ul style="list-style-type: none"> <li>○ Ensure soil resources are conserved and managed in a sustainable way.</li> </ul> <p>Some of the most significant impacts on soils occur as a result of activities associated with construction activity. A Code of Practice has been developed by Defra to assist anyone involved in the construction sector to better protect the soil resources with which they work and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment. We advise that this code is used as part of addressing soils in development plan policies. For further information see <a href="http://www.defra.gov.uk/publications/2011/03/27/construction-cop-soil-pb13298/">http://www.defra.gov.uk/publications/2011/03/27/construction-cop-soil-pb13298/</a></p>				
--	--	--	--	--	--	--	--	--	--

Agricultural related development E19										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Resilience and Emergency Planning: <b>Para. 10.11</b></p> <p>KCC recommends the following amendment to the paragraph to ensure consideration of resilience and sustainability for large-scale agricultural related developments:</p> <p><i>“The National Planning Policy Framework (NPPF) requires that Local Plans support the needs of the food production industry. Agricultural related businesses are those that are not part of a farm business, such as producing and packing operations. These value adding operations are an important part of the rural economy but their scale and location should respect the character and appearance of the rural area. “Further, energy efficient design, sustainable urban drainage, adequate landscaping and travel plans should be key considerations when evolving such schemes.</i></p> <p>Resilience and Emergency Planning: <b>E19</b> Agricultural Related Development</p> <p>KCC recommends the following amendment to the policy:</p> <p><i>“Development related to the agricultural industry will be approved subject to landscape, traffic, <b>design, sustainability</b> and other planning considerations, and the scale of the development being acceptable”</i></p>		1523		Email
Samme	Linda	16	Manston Parish Council		Object	No planning needed in greenfield		274		Web
Ward	Linda	157			Observation	The roads are already insufficient to support present demand.		505		Web