

Identification and Release of Housing Land for Development HO1										
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
Barar		375			Support	<p>11 - Housing Identification and Release of Housing Land for Development</p> <p>Allocated sites</p> <p>11.2 The geographical extent indicated for site allocations affecting greenfield land represents the anticipated maximum land requirement. Proposals will be expected to consider, and where possible accommodate, notional maximum dwelling capacities indicated together with all other relevant policy requirements within a lower level of greenfield land take.</p> <p>Unidentified housing sites</p> <p>11.6 Sites not previously identified and allocated in Local Plans (sometimes referred to as "windfall" sites") have contributed significantly in recent years to housing delivery in the district. It is anticipated that these will continue to come forward. Such opportunities can serve to make effective use of previously developed land and contribute towards the housing land supply. For the purposes of the following policy, previously developed land is as defined in the National Planning Policy Framework (NPPF) and does not include residential gardens.</p> <p>Policy HO1- Housing Development</p> <p>Permission for new housing development will be granted on:</p> <ol style="list-style-type: none"> 1) Sites allocated for such purposes, subject to consistency with indicative phasing in Appendix B. 2) Non-allocated sites within the existing built up confines consisting of previously developed land. 3) Residential gardens where not judged harmful to the local area in terms of the character and amenity considerations set out in Policy QD02. <p>and provided that all the following criteria are met:</p> <ol style="list-style-type: none"> 4) Proposals comply with the requirements of SP12- General Housing Policy and the 		1099		Email

						<p>relevant area specific housing objectives set out in the housing strategy section are addressed, and</p> <p>5) It is demonstrated that adequate infrastructure will be in place to serve each unit ready for occupation.</p> <p>6) Satisfactory details are provided showing how any physical conditions including land stability and contamination, affecting the site can be overcome.</p> <p>Alternative development on sites allocated for residential development will not be permitted.</p> <p>With specific reference to points 11.2 and 11.6 as well as policy HO1, I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors.</p>				
Barnett	David	146			Observation	Further to comments previously made by me regarding Policies SP20, SP 21 and SP 22 I submit that Pendell, Broadley Road, Margate CT9 3UP can be considered to be a "windfall site" and that the NPPF definition of previously developed land applies to this site. It follows therefore that this site should be considered as a potential site to be considered for housing land supply as per paragraph 11.6		460		Web
Cooper	Barbara	514	Kent County Council (KCC)		Object	SUDS: KCC recommends that it should be included that any development over 1 ha in area will need to be accompanied by a Flood Risk Assessment.		1524		Email
Elbourn	Bernard	131			Object	Water supply must be a priority consideration	Water and related supplies must be a priority consideration	318		Web
Elliott	Samuel	290	Planning Potential Ltd.		Object	Please see letter attached.	Please see letter attached.	845	3966_ALDI Ramsgate_Local Plan Representations_ October 2018.pdf (479 KB)	Web
Hart	Natasha	230			Observation	Having recently learned that our next door neighbours have acquired 'strategic housing development land' status, for their house and garden; we too wish to explore this option ourselves, for a portion of our own large rear garden. Particularly as our land has boundaries with both next door's proposed		700	35image3.jpeg (285 KB) 35image2.jpeg (122 KB) 35image1.jpeg (119 KB) 35image4.jpeg	Email

						land to one side, and an agricultural field which also has said status as part of the local plan (the other side of our plot meets a private access lane). In fact, we somehow appear to have almost been 'left out' of the considered area when you look on the map. Had we known private dwelling land was also eligible, we would have made contact sooner. However, within all the realms of local plan documentation and terminology used which is alien to us, though we had shown keen interest in it all, we apparently seem to have so far missed this opportunity, that must have been open to us if it was to our neighbours. We understood that the only opportunity was open to owners of farm and commercial land locally. Can you tell me if we can apply for such status for a part of our land retrospectively at this stage please? FYI, the area we have in mind, now fully laid to lawn (and weeds), did historically play host to six small residential dwellings if that bears any additional consideration. I have attached some images that will help you understand our plot and the surrounding area as part of the emerging plan. You will recognise the red dotted lines, land within which has been allocated as 'strategic development'. Our land is shown shaded in blue (lying just outside the 'net' of strategic plan land). Our next door neighbour's land with boundary to the side of our plot is shown in yellow, and the farmers field which joins the end of our garden is shown as green			(309 KB)	
Jones-Hall	Jason	228			Object	Manston Site MUST be reallocated for mixed use development rather than re-allocating houses originally earmarked for this brown-field land to green-field sites.	Reallocate Manston site for mixed use housing development	923		Web
Lee	A	133			Object	Agricultural land and large green spaces should not be released for housing developments.		331		Web
Margate Estates		460	Margate Estates	Zena Foale-Banks - Nexus Planning	Object	Policy H01 details that permissions for new housing development will be granted in particular locations. On review of the policy, we consider that further emphasis should be placed on the sequential preference for major residential developments to be located within the coastal towns to protect Green Belt land from development.		1323		Web
Millwood		508	Millwood	Anna Gillings -	Object	The policy states that alternative	The policy should be	1429	Gillings	Web

Designer Homes Limited			designer Homes Limited	Gillings Planning Ltd		development on sites allocated for residential development will not be permitted. This is in direct conflict with SP15 (and other strategic policies) which require a mix of uses to be provided. Such a mix of uses is appropriate for the creation of a balanced sustainable community, particularly on the larger allocations. The policy should therefore be amended to ensure consistency.	amended to read : “ Alternative development on sites allocated for residential development will not be permitted, unless supported by site specific allocations”		Millwood.pdf (74.4 MB)	
Skerratt	Michael	254			Object	There are significant concerns around the high numbers of additional housing allocated and the associated environmental impact, including significant increase in pollution levels, poor air quality impacting upon local health, and further loss of green space in Thanet. Also the infrastructure plans are inadequate for vehicular, pedestrian and alternative modes of transport such as cycling. Westwood Cross is a prime example where road improvements were seen as an after thought, but should have been implemented before the development, and even now are still not great. Agreed restrictions are not monitored or enforced by the council, for example deliveries to the Tesco store on Canterbury Road, Margate near the Royal Sea Bathing Hospital site. There have been a number of fatal and serious accidents involving cars, motorcycles and cyclists, on the roads around Thanet, which are very hazardous, and unlikely to improve with potential significant residential development of the area. Many of these routes around the Westgate, Birchington, Westwood and Manston offer alternative routes for locals, either as short-cuts or when the main roads are congested, but were not built or intended for heavy traffic, and remain dangerous particularly for pedestrians, cyclists, motorcyclists or when used by farm vehicles (as intended) or lorries.		770		Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached submission from SPRU	See attached submission from SPRU	298	09.27.18.AB.K502 2PS.GeneralRep.Final.pdf (739 KB)	Web
Thomson	Mark	151	Savills		Support	Representation to Draft Local Plan (under Regulation 19 of the Local Planning England Regulations 2012) on behalf of Kent Property		421		Email

					<p>Management & Developments Limited Land adjacent to the former Manston Allotments, Manston Road, Ramsgate CT12 6AY</p> <p>We act as planning adviser to Kent Property Management & Developments Limited ('our client'), and on their behalf, we write to formally submit representations to Thanet District Council's (TDC) draft Local Plan published for comment under Regulation 19 of the Local Planning England regulations 2012, which is on consultation until 4 October 2018.</p> <p>We specifically write in respect of Land adjacent to the former Manston Allotments, Manston Road, Ramsgate CT12 6AY ('the site'). The site's previous SHLAA reference is S452 and new SHLAA reference (July 2018) is SHLAA 087.</p> <p>The land freehold owned by our client was submitted to the TDC's "Call for Sites" exercise earlier this year. The site itself comprises former allotments, and whilst the majority of the site is greenfield land, part of the site is previously developed land comprising of a hard-surfaced parking and servicing area. The total site area is approximately 2.2 hectares (5.4 acres). The site is suitable and available for housing development within the next 5-years. It is a deliverable housing site.</p> <p>We write in support of the site's allocation for new housing development under Policy H01 and as shown on the draft policy map together with the site's inclusion on the list of housing site allocations in Appendix B. Following clarification from TDC, the site's allocation is listed as 'Land adjacent to the former Manston Allotments Manston Road Ramsgate' with a notional dwelling capacity of 80 units. The site name is different to that stated in the SHLAA Review July 2018.</p> <p>Therefore, for completeness, we would recommend that Appendix B is updated to state the site's previous or new SHLAA references against the site to ensure the allocation is clear.</p> <p>Emerging scheme proposals subject to pre-application discussions with TDC indicates that the site is capable of delivering circa. 100 units by responding to the density of</p>				
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					<p>development on the neighbouring site to the east, which has a density of approximately 50 dwellings per hectare and the varied density consented on the adjacent Manston Green site to the west. We note that the notional dwelling unit capacities are indicated for the proposes of total land supply and do not signify that consent will be granted for particular numbers of dwellings, and that capacity on sites will be considered in light of planning policy and development management considerations. However, we consider that in terms of planning for future housing land supply and delivery, it seems appropriate to increase the notional housing capacity of this site to 100 units.</p> <p>Policy H01 states that sites allocated for new housing development will be granted subject to consistency with indicative phasing in Appendix B. Appendix B sets out an indicative phasing plan for the site of 20 units in 2020/21, 30 units in 2021/22 and 30 further units in 2022/23. We are working towards the submission of a planning application for the site in mid-2019, and therefore, we support the indicative phasing for the site. If the notional housing capacity or allocation were to be increased to 100, we would recommend that the phasing remain between 2020/21 and 2022/23 (i.e. 30, 30, 40).</p> <p>Please would you kindly confirm receipt of this letter and provide any further correspondence in relation to the development site to Mark Thomson of these offices, together with any queries you may have. Thank you for your assistance.</p>					
Webb	Simon	8			Object	See below	I object to any further housing development in Birchington, Westgate, Garlinge or Hartsdown. These areas are already over developed and further development would blur the distinction between the separate towns/villages. It would also cause an unacceptable and unsustainable level of traffic and strain on already over	14		Web

							crowded hospitals, schools, social services and roads.			
White	C	450			Object	<p>SHLAA Ref: 376 Land to the west of Egerton Manor, The Street and land to the south of Margate Hill, Acol Pre-Submission Draft Local Plan (Regulation 19) This representation is submitted in relation to the above-mentioned site and under the Draft Thanet Local Plan to 2031 'Pre-submission Publication' under Regulation 19 of the Local Planning England Regulations 2012 (as amended), and further to the representation made as part of the Council's February 2018 'call for sites' process. This submission continues to promote the three land parcels at Acol (see accompanying site plan attached at Annex A) as suitable sites for future housing development and being suitable, either, individually or as one larger land parcel and when assessed against the sustainability objectives of current national policy and the emerging aspirations of the Planning Authority as evidenced by the draft Plan. This representation sets out the reasons why the Council, and a future Examining Inspector, will wish to reconsider the Council's SHLAA Assessment response which was, in summary: "The site lies outside the urban confines within the open countryside, in an unsuitable location, contrary to local and national policy." Since the Call for Sites process was undertaken, the National Planning Policy Framework (NPPF) has been revised and this will have, quite significant, relevance in how the representation site is assessed in terms of delivering sustainable rural housing development. Much of the information provided in the Call for Sites representation remains relevant Section 2 of the 'Call for Sites' Representation (attached at Annex B) sets out details of the site(s) and how they may come forward, either individually, or as a whole and so is not repeated here. The Basis of this Representation This representation is presented as an objection to the draft Local Plan which, it is</p>	Wish to appear to expand upon the representations made in light of the draft Plan's failure to have due regard to the National Planning Policy Framework and relevant PPG	1285	092 Banks Karen Rebus Planning.pdf (1.4 MB)	Email

					<p>submitted, is not sound as drafted. The Reasons for this being:</p> <p>a) The draft Plan is not positively prepared – as it fails to provide a strategy which is consistent with the over-riding objectives of achieving sustainable development (particularly for the rural areas);</p> <p>b) The draft Plan is not justified – and fails to provide an appropriate strategy, either (i) for rural communities or (ii) taking into account revised national guidance in promoting Government’s aims to increase housing numbers on smaller, more deliverable, sites;</p> <p>c) The draft Plan fails to demonstrate that it is effective – given the reliance on a number of large sites where significant infrastructure provision will be necessary and where, historically, housing delivery in Thanet is low, and</p> <p>d) The draft Plan is not consistent with national policy – as it does not consider the full potential of available and deliverable sites to enable the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>Revisions to the National Planning Policy Framework (NPPF) The long-awaited revisions to the NPPF were published on 24th July 2018.</p> <p>Paragraph 214, in discussing the Framework’s implementation, advises that the policies in the previous Framework will apply for the purpose of examining plans where those plans are submitted on or before 24 January 2019; such as the case here. However, whilst Paragraph 212 makes it clear that the policies in the revised Framework should be taken into account upon the day of its publication in making planning decisions, the policy also states that “... Plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.”</p> <p>Later, at Paragraph 217, the Framework advises that “the Government will continue to explore with individual areas the potential</p>				
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					<p>for planning freedoms and flexibilities, for example where this would facilitate an increase in the amount of housing that can be delivered.” In this regard, the Examining Inspector and all interested parties will, at the point of Examination, have knowledge of Thanet’s housing delivery rates, following the requirements of the revised Framework, at Paragraph 215, in relation to the Housing Delivery Test.</p> <p>Insofar as this representation is concerned, and to the potential to allocate, up to, 30 new homes to the edge of an established village, it is submitted that the recent NPPF revisions will be of relevance. These will, it is considered, need to be assessed in relation to recent Case Law which, since the submission of Mr White’s representation in February 2018, has been further clarified by additional Case Law in relation to that already cited.</p> <p>Further Representations</p> <p>The Plan’s ‘Vision’, setting out the Council’s aspirations to 2031 advises, inter alia, that “the villages [should] retain their separate physical identity, historic character and have vibrant communities with local facilities and services.” This vision is supported by Mr White but is a vision that cannot be met unless an appropriate level of new housing provision is considered alongside the principal aim of retaining the rural settlement’s characteristics. Vibrant communities need growth; growth that is commensurate to the size of the settlement in question and growth that will support the Government’s dual aspirations of locating housing where it would enhance or maintain the vitality of rural communities and in the form of small to medium-scale housing sites that can be quickly delivered (NPPF, Paragraph 68).</p> <p>We reiterate (from the February 2018 representation) that the recent closure of the remaining PublicHouse in Acol (recently confirmed, by way of planning appeal, as a non-designated heritage asset) and the</p>				
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					<p>closure of the shop and post office over recent years, is as a consequence of the lack of growth in the rural area, reducing the viability of rural businesses contrary to National and Local Policy objectives in seeking “thriving rural communities”.</p> <p>In this regard, Mr White continues to object to the Council’s rigid stance with regard to the Settlement Hierarchy, the background evidence to which fails to adequately provide any understanding why an extension to Acol has not been considered as an appropriate way forward in meeting a number of the former, and revised, national policy aims and objectives of sustaining rural communities. The Housing Topic Paper remains out-of-date and continues to, incorrectly, highlight that Acol is located within “an area where services are not available within 30 minutes within public transport” (page 19 of the May 2013 Topic Paper). It is evident that Acol is served by public buses, in close proximity to Birchington and Minster wherein a whole range of shops, facilities and services are available. The large, and expanding, Manston Business Park is located within walking and cycling distance of the village of Acol.</p> <p>The revised draft Plan, in seeking to accommodate the recently updated Objectively Assessed Housing Need (2017) fails to take opportunities to meet the needs of rural communities in providing housing choice and where this would provide opportunities for villages to grow and thrive (NPPF, Paragraph 78). Making a blanket and ill-informed general assessment that Acol is simply a village that is poorly served by services and facilities will not take into account the revisions to the NPPF and the Inspector is asked to consider the potential for ‘freedoms and flexibilities’ (Paragraph 217) in seeking the early delivery of some rural housing. We are mindful that the relevant revisions to the NPPF with regard to the provision of rural housing do not conflict with those relevant policy provisions of the 2012 Framework (former Paragraph 55) but simply seek to clarify the policy position of Government which, as it is set out in the NPPG: Paragraph:</p>				
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					<p>001 Reference ID: 50-001-20160519, is confirmed as:</p> <p>“Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”</p> <p>It is Mr White’s submission that such ‘evidence’ does not exist.</p> <p>Rural Housing, Case Law and NPPF, Paragraph 78</p> <p>“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”</p> <p>(Paragraph 78 of the NPPF)</p> <p>It is our understanding that the revisions to the former Paragraph 55 were, in part, as a consequence of the continued misinterpretation of Paragraph 55, by some Local Authorities, and clarification of the policy’s thrust as provided by relevant Case Law in (i) Braintree District Council v SSCLG & ORS [2017]</p> <p>(Annex C) EWHC and, more recently, (ii) Braintree District Council v SSCLG [2018] EWCA Civ. 610 (see Annex D).</p> <p>In summary, the ‘Braintree Case’ was first considered in the High Court. The judgment determined that a Planning Inspector, considering a Section 78 Planning Appeal, had correctly assessed a proposal for new small-scale rural housing scheme by opining that the development in question could not be considered as ‘isolated’ (in the countryside) because “there are a number of dwellings nearby”. Despite the Council’s submissions, in that case, that accessibility (of the application site) to services, facilities</p>				
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					<p>and employment opportunities would be poor, the High Court Judge in the Braintree case agreed with the Secretary of State that the word 'isolated' in Paragraph 55 of the NPPF should be "given its ordinary objective meaning of far away from other places, buildings or people; remote (Oxford Concise English Dictionary)".</p> <p>In further un-packing the aims and aspirations of (the former) NPPF Paragraph 55, the High Court Judge in the Braintree case identified that the policy's broader context is to promote the economic, social and environmental dimensions (now objectives) of sustainable development "and to strike a balance between the (former) core planning principles of "recognising the intrinsic character and beauty of the countryside" and "supporting thriving rural communities within it" (Paragraph 26, Annex C). The Judgement goes on, at Paragraph 27, to advise that meeting the aim of enhancing or maintaining the vitality of rural communities is not simply limited to the economic benefits:</p> <p>"The word "vitality" is broad in scope and includes the social role of sustainable development, described in NPPF 7 as "supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations". The Claimants restriction of an "isolated home" to one that is isolated from services and facilities would deny policy support to a rural home that could contribute to social sustainability because of its proximity to other homes."</p> <p>In this regard, the Justice had also considered what was meant by 'settlement' in the context of (former) Paragraph 55:</p> <p>"The immediate context is the distinction in NPPF 55 between "rural communities", "settlements" and "villages" on the one hand, and "the countryside" on the other. This suggests that "isolated homes in the countryside" are not in communities and settlements and so the distinction between the two is primarily spatial/physical".</p> <p>(Paragraph 25, High Court Judgement, Annex C)</p>				
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					<p>The Case was then the subject of further scrutiny in the Court of Appeal with the judgment handed down on 28 March 2018. A copy of the Judgement is attached at Annex D.</p> <p>In the Court of Appeal case, Justice Lindblom further considered the interpretation of (the former) Paragraph 55 and advised against the “over-interpretation” of policy which can distort its true meaning and thus lead to mis-interpretation, (Paragraph 27). In setting out the Court’s understanding of Paragraph 55, Justice Lindblom highlighted that the policy concerns the location of new housing development with the first sentence telling authorities where housing should be located and that this is “where it will enhance or maintain the vitality of rural communities”. Justice Lindblom went on to state that this demonstrates that the policy “... sees a possible benefit of developing housing in a rural settlement with no, or relatively few, services of its own” and that this “...does not limit the notion of “vitality” to a consideration of “services” alone.” In discussing the provisions of the policy that “enjoins” authorities to avoid “new isolated homes in the countryside” Justice Lindblom identified the distinction between places: “The contrast is explicitly and simply a geographical one. Taken in the context of the preceding two sentences, it simply differentiates between the development of housing within a settlement – or “village”– and new dwellings that would be “isolated” in the sense of being separate or remote from a settlement.</p> <p>Under the policy, as a general principle, the aim of promoting “sustainable development in rural areas” will be achieved by locating dwellings within settlements and by avoiding “new isolated homes in the countryside”. The examples of “special circumstances” given in the policy illustrate particular circumstances in which granting planning permission for an isolated dwelling in the countryside may be desirable or acceptable”.</p> <p>“But what is perfectly plain is that, under this policy, the concept of concentrating additional housing within settlements is seen</p>				
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					<p>as generally more likely to be consistent with the promotion of “sustainable development in rural areas” than building isolated dwellings elsewhere in the countryside. In short, settlements are the preferred location for new housing development in rural areas. That, in effect, is what the policy says”. (Paragraph 29, Annex D)</p> <p>It is acknowledged that both the High Court and the Court of Appeal judgements were made in relation to the decision-taking process. However, it is clear from the preceding text, and that which follows, that the judgements are relevant to how the Government’s rural housing policy is to be interpreted and, again, it is submitted that this needs to be reflected at the local level. In this regard, we return to Mr White’s objection to the way in which the draft Plan dismisses Acol as a settlement capable of accommodating some small-scale housing which will not fully balance the correct interpretation of NPPF 78, in this instance. As such we return to the Braintree Court of Appeal case:</p> <p>“What constitutes a settlement . . . is also left undefined in the NPPF. The NPPF contains no definitions of a “community”, a “settlement”, or a “village”. There is no specified minimum number of dwellings, or population. It is not said that a settlement or development boundary must have been fixed in an adopted or emerging local plan, or that only the land and buildings within that settlement or development boundary will constitute the settlement. In my view a settlement would not necessarily exclude a hamlet or a cluster of dwellings without, for example, a shop or post office of its own, or a school or community hall or a public house nearby, or public transport within easy reach”. (Paragraph 32, Annex D)</p> <p>And in relation to the interpretation of Government policy aspirations:</p> <p>“In any event, the interpretation of the policy that I consider to be right seems entirely consistent with the guidance on plan-making in paragraph 50-001-20160519 of the PPG, including the proposition that “settlements can play a role in delivering sustainable development in rural areas – and so blanket</p>				
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					<p>policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence".(Paragraph 37, Annex D)</p> <p>It is, therefore, Mr White's submission that the Braintree Judgements will support the reconsideration of the draft Plan's settlement hierarchy when applying the provisions of Paragraph 55 of the 2012 Framework and that revised at Paragraph 78. This is also relevant, it is submitted, when we consider the appropriate interpretation of Government policy in relation to rural communities.</p> <p>The promoted land parcels remain available for the delivery of housing within the first phase of the Plan period and continue to represent an excellent opportunity to "enhance ... the vitality of rural communities." Bringing the site(s) forward for housing will complement, and respect, the character of Acol whilst ensuring that the village maintains its separate identity in accordance with the Council's identified vision.</p> <p>List of Annexes [Please see attachment] Annex A – Site Location Plan Annex B – The February 2018 'Call for Sites' Representation Annex C - Braintree District Council v SSCLG & ORS [2017] Annex D - Braintree District Council v SSCLG [2018] EWCA Civ. 610</p>				
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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
.		408	Tesco Stores Ltd	Mark Buxton - RPS	Object	<p>We have concerns over the timescales and feasibility of the some of the sites currently being promoted in the Local Plan to meet the Council's OAN over the Plan period, and particularly the strategy to accommodate the 2,500 dwellings which need to be reallocated as a consequence of the deletion of a mixed use development at Manston Airport from the Proposed Revisions to the Local Plan.</p> <p>Housing allocation H02, Land north and south of Shottendane Road, has been allocated for up to 550 dwellings with the first dwellings proposed to be completed by 2021/22. However, the allocation states that any proposals will be judged and permitted only in accordance with a 'development brief and masterplan for the whole site' which, as far as we are aware, has yet to be produced.</p> <p>The Draft Local Plan also acknowledges that the development should incorporate and provide for highways improvements identified in the Thanet Transport Strategy. All infrastructure improvements are proposed to be delivered in parallel with the development but we consider it is doubtful whether the necessary improvements will come forward in time for the first units to be completed by 2021/22. Therefore, we consider that the Council is being optimistic with regard to when dwellings can start to be delivered on this site. This is also an increase of 300 dwellings from the allocation in the Preferred Option Revisions 2015 version.</p> <p>Once outline planning permission is secured, the site will need to be sold to a housebuilder if one is not already</p>	<p>Allocate a wider range of housing sites to make up the anticipated shortfall.</p> <p>Apply a more realistic housing trajectory in Appendix B in recognition of the planning status of the site.</p>	1182		Email

					<p>on board. Further time will then be required for the preparation, submission and determination of Reserved Matters applications, the discharge of pre-commencement conditions and other technical approvals. Infrastructure will then need to be provided before construction of homes is commenced. On average it takes a further 5-6 months for houses to be completed. The NLP report 'From Start to Finish' (November 2016) establishes that it takes on average 3.9 years from the first identification of a site to the submission of the initial planning application. NLP's report further finds that on average it takes more than 4 years for an application for over 500 dwellings to progress from the validation to the decision date of the first applications which permits the development of dwellings on site whether it be a full, hybrid or reserved matters application. This does not include the discharging of any pre-commencement conditions if required.</p> <p>Following the planning application being approved it takes on average a further 6-12 months for schemes of 500 up to 1,500 units to start delivering units on site. Therefore from validation to the delivery of the first units on schemes of over 500 units it takes on average at least 5.3 years.</p> <p>We therefore consider that this site (H02, Land north and south of Shottendane Road) is unlikely to be delivered within the proposed timescales set out by the Council. This in turn will have knock on effects for the total number of units which can be delivered on this site over the plan period, and particularly the next 5 years. We therefore contend the Local Plan is currently unsound as the Council is unable to demonstrate a 5 year housing land supply during the initial years post adoption and there are serious doubts that it will deliver sufficient dwellings across the plan period to meet the Objectively Assessed Need.</p>				
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						Therefore, the Council should consider allocating further sites for housing which can be delivered earlier in the plan period, including the land to the north (and south) of Millennium Way.			
Alan Byrne/English Heritage		155			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		940	Email
China Gateway International Ltd.		503	China Gateway International Ltd.	Abraham Laker - RPS	Object	China Gateway International Limited has concerns over the timescales and feasibility of some of the sites currently being promoted in the Local Plan to meet the Council's OAN over the Plan period and compensating for the 2,500-dwelling allocation being removed from the Proposed Revisions to the Local Plan. China Gateway International Limited has concerns over Strategic Housing Site Policies SP14 Birchington, SP15 Westgate-on-Sea, SP18 Land at Manston Court Road/Haine and Housing Allocation HO2 Land north and south of Shottendane Road. The reasons for these concerns are set out below; Housing allocation H02, Land north and south of Shottendane Road, has been allocated for up to 550 dwellings with the first dwellings proposed to be		1420	Email

					<p>completed by 2021/22. However, the allocation states that any proposals will be judged and permitted only in accordance with a 'development brief and masterplan for the whole site' which, as far as we are aware, has yet to be produced.</p> <p>The Draft Local Plan also acknowledges that the development should incorporate and provide for highways improvements identified in the Thanet Transport Strategy. All infrastructure improvements are proposed to be delivered in parallel with the development, but we consider it is doubtful whether the necessary improvements will come forward in time for the first units to be completed by 2021-22. Therefore, we consider that the Council is being optimistic regarding when dwellings can start to be delivered on this site. This is also an increase of 300 dwellings from the allocation in the Preferred Option Revisions 2015 version.</p> <p>Once outline planning permission is secured, the site will need to be sold to a housebuilder if one is not already on board. Further time will then be required for the preparation, submission and determination of reserved matters applications, the discharge of pre-commencement conditions and other technical approvals. Infrastructure will then need to be provided before construction of homes is commenced. On average it takes a further 5-6 months for the house to be completed.</p> <p>In conclusion we consider that the Pre-submission Local Plan is currently unsound as there are concerns still to be addressed over the delivery timescales of several of the Strategic Housing Sites and housing allocations. We consider these issues mean it is unlikely that the Council will be able to ensure the delivery of sufficient housing during the initial years of the new development plan to meet its increased Objectively Assessed Need.</p>				
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					Development of the three sites (Phases 1, 2 and 3) has the potential to provide a significant level of housing and employment opportunities, additional services and make a substantial contribution to the strategic vision and future growth of Thanet District as a whole. Accordingly, we strongly urge the Council to consider the inclusion of these sites as allocations within the emerging Local Plan.				
Davies	Julie	147	CPRE Kent		Object HO2 Land north and south of Shottendane Road, Margate. Comments on behalf of CPRE Kent Thanet District Committee. Object to the choice and size of strategic sites for housebuilding and consider that the Council should: Take account of environmental constraints (including best and most versatile agricultural land and water supply/quality) in setting its housing targets – which will moderate the need for loss BMV agricultural land to housing. Produce an up to date site viability assessment, transport strategy and up to date Infrastructure Delivery Plan (demonstrating costs and funding sources) prior to the EIP. Demonstrate, prior to the EIP, how the measures and proposals in the Local Plan and Transport Strategy can be implemented by the Council using statutory planning powers, and how likely it is that other public sector funding and private sector investment will be available. Demonstrate prior to the EIP how the Council is proactively identifying urban brownfield sites. Including how and whether the Council is in a position to be able to be able to facilitate the delivery of brownfield sites especially where there are land assembly challenges. Prepare a Sustainability Appraisal of all sites, so that the sites can be compared according to the extent to which they meet sustainability objectives prior to the EIP.		404		Web
Davies	Julie	147	CPRE Kent		Observation HO2 Land north and south of Shottendane Road, Margate. This site is referred to as being as		405		Web

						being a strategic allocation at paragraph 3.19 and is identified here as a non-strategic housing allocation.				
Davies	Julie	147	CPRE Kent		Object	<p>HO4 land fronting Nash Road and Manston Road.</p> <p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>object to this housing allocation and consider that the Council should:</p> <p>Take account of environmental constraints (including best and most versatile agricultural land and water supply/quality) in setting its housing targets – which will moderate the need for loss BMV agricultural land to housing.</p> <p>Produce an up to date site viability assessment, Transport Strategy and up to date Infrastructure Delivery Plan (demonstrating costs and funding sources) prior to the EIP.</p> <p>Demonstrate, prior to the EIP, how the measures and proposals in the Local Plan and Transport Strategy can be implemented by the Council using statutory planning powers, and how likely it is that other public sector funding and private sector investment will be available.</p> <p>Demonstrate prior to the EIP how the Council is proactively identifying urban brownfield sites. Including how and whether the Council is in a position to be able to be able to facilitate the delivery of brownfield sites especially where there are land assembly challenges.</p> <p>CPRE Thanet District Committee has commented on the Transport Strategy consultation stating that: “because of the inadequacy of information in the public domain and the failure of the Council to provide sufficient information, it has not been possible to understand how the Transport Strategy has been derived. Or how the investigation of transportation impacts of developments and the role of proposed transport infrastructure to alleviate future problems has been carried out by either Thanet District Council (as the Local Planning Authority) or Kent County Council (as the responsible Highway Authority).”</p> <p>As such it is not clear how the</p>	Policy HO4 should require an air quality assessment to demonstrate that the proposal would not prevent air quality targets being met in the shortest possible time.	406		Web

						road/junction improvements identified in the Transport Strategy are justified, or capable of being delivered. Accordingly, not only do we object to the unjustified loss of best and most versatile agricultural land – for the reasons cited in response to policy SP11 – that the Council has not demonstrated that this level of housebuilding is viable and deliverable given the substantial infrastructure and environmental constraints in the district; and that the Council should consider the extent to which the OAN can be met within the area, taking into account the substantial environmental and infrastructure constraints.			
Lee	A	133			Object	Agricultural farm land should not be release for large scale housing developments		332	Web
Martin	Christian	353		Iwan Jones - JIG Planning & Development	Support	<p>These representations are solely made in respect of Policy H02 - Land north and south of Shottendane Road.</p> <p>First and foremost, we endorse and fully support the residential allocation of the land north and south of Shottendane Road and for the land to become a Strategic Policy in the final version of the Local Plan.</p> <p>The Local Plan is prepared by Thanet District Council under the National Planning Policy Framework (NPPF) where the main principle is to achieve 'sustainable development'. This may defined as 'development that meets the need of the present without compromising the ability of future generations to meet their own needs'.</p> <p>In order that the needs of future generations are met, a sufficient supply of homes is required. Thanet District Council has high aspirations for growth as set out in the Council's Corporate Plan and Economic Growth Strategy. The Local Plan looks to support this by identifying, facilitating and helping to deliver the development required. The NPPF requires the Council to plan positively for economic growth and boost housing supply which is what the Plan seeks to achieve.</p>	<p>No changes are proposed to the wording of Policy H02. Indeed the Policy is fully supported as the allocation of the land at Shottendane Road is required by the Council so that it meets its OAN target.</p> <p>However, it is proposed that the land is delivered sooner and the following phasing delivery is suggested as an amendment to that currently shown at Appendix 2.</p> <p>2020/21- 30 dwellings 2021/22 - 90 dwellings 2022/23 - 90 dwellings 2023/24 - 90 dwellings 2024/25 - 90 dwellings 2025/26 - 90 dwellings 2026/27 - 70 dwellings</p> <p>A shorter programme is required so that the delivery of the land is financially viable for the development partner. A 6/7 year build-out programme is realistic and sensible for a 550 unit site. A 10-year programme as currently proposed by the phasing delivery at Appendix B is unnecessary and would detract development partners from becoming involved in the site as it would likely be financially unviable for them. That should be avoided at all costs and all efforts must be made to encourage and entice a wider range and choice of housebuilders to Thanet to deliver its housing provision.</p>	1045	Email

					<p>We endorse the Council's growth aspirations and to boost the supply of housing that will be required to accommodate the envisaged growth. To that effect, we can confirm that the land to the north and south of Shottendane Road is available and wholly supported to be allocated as a residential development site to contribute towards the Council's vision of growth and the required housing supply. We fully support the Council's desire for the land to become a Strategic Policy in the final version of the Local Plan. Moreover, the land is considered to be of fundamental importance in contributing towards the delivery of the objectives of the Local Plan. The Plan has a number of Strategic Priorities which set out what the Plan is seeking to do in order to achieve the Council's vision and deliver sustainable development for the district.</p> <p>Strategic Priority 3 is to provide homes that are accessible to, and suited to the needs and aspirations of, a settled and balanced community. The objectives to deliver this priority are;</p> <p>Plan for sufficient new homes to meet local community needs so that people have access to good quality and secure accommodation.</p> <p>Meet the housing needs and demands of a balanced and mixed community and to support economic growth.</p> <p>Increase the supply of good quality affordable homes.</p> <p>The land allocated and proposed for residential development of up to 550 homes at Shottendane Road would contribute towards the delivery of the above objectives.</p> <p>The Plan's housing strategy sets out how the Local Plan seeks to meet the housing needs of Thanet.</p> <p>One of the ways the Local Plan proposes to do this is by 'identifying sufficient and suitable land'. The land at Shottendane Road is suitable and available and will make a significant contribution to meeting the housing</p>				
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					<p>needs of Thanet.</p> <p>The Local Plan must allocate enough land to accommodate the amount of housing needed by 2031. This amount of housing is known as Objectively Assessed Need (OAN). The Local Plan allocates sufficient land to meet the housing target of the plan period. The land at Shottendane Road therefore plays an important part in ensuring that the Council meets its OAN. This further emphasises the need for housing on the land at Shottendane Road and that the site becomes a Strategic Policy in the final version of the Local Plan.</p> <p>Thanet's housing provision over the 20 year period up to 2031 is 17,140. This is a challenging target given that only 1,555 homes were delivered in the period 2011-16. The Council is therefore heavily reliant on the delivery of its strategic housing sites so that it fulfils its OAN. It is worth noting at this juncture that dialogue has already commenced with housebuilders in respect of the land at Shottendane Road so that a development partner is brought on board as early as possible to ensure the deliverability of the land in a timely and efficient manner.</p> <p>The phasing delivery of the land at Shottendane Road as shown by Appendix B of the Local Plan could be improved. It is considered that it is too back-loaded which could jeopardise the ability of the Council to deliver all its housing requirement to meet its OAN within the plan period. Indeed, the phasing delivery would see completion of the site in the final year of the Plan in 2031. In the event that any slippage was to occur, there would be a risk that part of the 550 allocation would not be delivered within the Plan period.</p> <p>Therefore a better balance in terms of the site's phasing delivery is required. As mentioned above, discussions are on-going in identifying the correct development partner for this site. This process will intensify over the coming weeks and months and it is the</p>			
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					<p>intention to secure the housebuilder within the first half of 2019 to coincide with the adoption of the Plan in the summer of next year. A planning application could therefore be submitted and determined in 2020. Consequently, it is considered that the first phase could commence a year earlier in 2020/2021 as opposed to 2021/22 as shown by the phasing delivery at Appendix 2. It is also felt that the duration of the phasing is too stretched and could be condensed to ensure a swifter and leaner delivery of the land. Furthermore, housebuilders tend to be discouraged by lengthy and protracted build out rates as it has a detrimental impact on their return on capital. If housebuilders cannot demonstrate a return on capital to the tune of 25/30% to their board, approval to acquire land will not be forthcoming and land will not be built upon. The annual build out rate therefore needs to be increased on this site to 90 units per year which would secure completion of the land in the year 2026/27 which would deem the site much more attractive to housebuilders.</p> <p>The draw of national volume housebuilders to Thanet is of fundamental importance to the delivery of the Local Plan's strategic housing sites and its housing provision of 17,140 dwellings. Without them, the Council will find it difficult if not impossible to meet its OAN. The phasing delivery for the land at Shottendane Road therefore needs to be shorter with an annual increase in numbers to that shown at Appendix 2. The NPPF at paragraph 67 advises that authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.</p> <p>From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely</p>				
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					<p>economic viability. Planning policies should identify a supply of:</p> <ul style="list-style-type: none"> a) specific, deliverable sites for years one to five of this plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. <p>The plan has followed due process in arriving at this pre-submission stage and strategic housing land availability assessments have been undertaken where the land at Shottendane Road was put forward.</p> <p>Subsequently, planning policies have been formulated that identifies a sufficient supply and mix of sites that are available, suitable and economically viable. The land at Shottendane Road meets all of this criteria.</p> <p>The test of soundness is set out in paragraph 35 of the NPPF. Plans are sound if they are:</p> <ul style="list-style-type: none"> a) Positively prepared - providing a strategy which, as a minimum, is consistent with achieving sustainable development; b) Justified - an appropriate strategy; c) Effective - deliverable over the plan period; and d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework. <p>It is our view that the Local Plan is sound as it meets all of the above tests of soundness.</p> <p>The land at Shottendane Road contributes towards the Plan's soundness as it would deliver significant housing numbers at 550 dwellings contributing towards the principle of sustainable development which is the ultimate purpose of the planning system.</p> <p>The land at Shottendane Road is available and suitable for residential development. Work is on-going to ensure its early deliverability through sourcing the correct development partner/housebuilder and it is our intention to keep the Council fully informed of our progress in this respect so that it can plan</p>			
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						accordingly. Furthermore, we will ensure that the development partner will work with the Council in the preparation of a development brief and masterplan for the whole site as required by Policy H02.				
Mayall	C	473	Southern Water		Object	<p>In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), Southern Water has undertaken an assessment of existing infrastructure capacity and its ability to meet the forecast demand for 550 new dwellings at this site. That assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development</p> <p>Since OFWAT's new approach to water and wastewater connections charging was implemented from 1 April 2018, we have adjusted our requisite site specific policy wording to align with the new charging mechanism. Despite changes to this mechanism, the need remains for recognition that there is limited capacity at this site's "practical point of connection", as defined in the New Connections Services and as a result, network reinforcement will be required in advance of occupation. This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Therefore, whilst a lack of capacity is not a fundamental constraint to development, new or improved infrastructure would need to be provided in parallel with the development.</p> <p>Southern Water has limited powers to prevent connections to the water and sewerage networks, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary</p>		1362		Web

					<p>infrastructure. Unless planning policies support delivery of necessary underground sewerage infrastructure there is a risk that it will not be delivered in parallel with the development, leading to an unacceptable risk of foul water flooding in the area to both new and existing residents. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>In addition, our assessments revealed that Southern Water's underground infrastructure crosses the site, and this needs to be taken into account when designing the site layout. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Southern Water is unable to support Policy HO2 as sound because it does not adequately support delivery of the local sewerage infrastructure necessary to serve this site in parallel with development. We consider that this is inconsistent with national policy, in particular paragraphs 109 and 157 of the NPPF. Accordingly, in line with the NPPF and National Planning Practice Guidance and to ensure sustainable development, we propose that the following criteria are added to Policy HO2 (new text underlined):</p> <p>Master planning will: [...] Ensure occupation of development is phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider [...]</p>			
Milimuka	Elle	358	GVA	Object	<p>This proposed allocation includes two rectangular sites on either side of Shottendane Road. The northern site is classified as 'Excellent' in the Agricultural Land Classification and the southern site is classified as 'Very Good'.</p> <p>The southern area has not been put forward for redevelopment by the</p>		1056	Web

						landowner, and has not been assessed in the SHLAA. There is therefore no evidence that the site is available, deliverable, sustainable or achievable. The 'northern' site was promoted by the landowner in the most recent Call for Sites for "maximum capacity of 364 homes at 35dph. Site area: 10.41 ha." No evidence is provided which demonstrates that the site is deliverable, sustainable or achievable.				
Solly	C	419			Object	It is unsure if this site has been considered as a strategic site in this publication of the plan. The phasing is not included as a strategic site which confuses this role this site is playing in the Local Plan strategy. This may affect highway and infrastructure improvements in terms of funding. Phasing of this is important as it could create traffic problems with other strategic sites and affect their viability. Likewise other strategic sites could affect market conditions and viability of this site.	The policy is not clear if it will be a strategic site, this should be clarified. Phasing to be considered in light of other Policies SP14 and SP15, in respect to highway upgrades.	1251		Email
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached submission from SPRU	see attached submission from SPRU	302	09.27.18.AB.K5022PS.GeneralRep.Final.pdf (739 KB)	Web
Stevens	Angela	163			Object	HO2 and HO3 are mostly unsuitable for housing as they are in very close proximity to Manston Airport, which is very likely to be reopened in the next couple of years!	TDC should not allow development to occur on HO2 and HO3.	683		Web

Non-strategic Housing Allocations HO3										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		941		Email
Greenacre (Thanet) Ltd		501	Greenacre (Thanet) Ltd	Simon Marks - Montagu Evans LLP on behalf of Greenacre (Thanet) Ltd	Support	<p>Please find enclosed on behalf of our clients Greenacre (Thanet) Ltd representations to the Regulation 19 consultation for the Draft Thanet Local Plan -2031. Greenacre (Than et) Ltd are the option holders in respect of land at Manston Court Road I Haine Road which is now the subject of Strategic Housing Policy SP18 and Housing Policy H03 (Land on west side of Old Haine Road, Ramsgate). For completeness, the client's option extends to half of the land subject to allocation H03. The combination of these site allocations is hereafter referred to as 'The Site'.</p> <p>Overview</p> <p>We wish to confirm our support for identification of land at Manston Court Road I Haine Road. Strategic Housing Site SP18 as an enlarged comprehensive allocation comprising up to 1,200 new dwellings and for land on the west side of Old Haine Road, Policy H03, which is allocated for up to 250 dwellings. In our opinion, the inclusion of The Site enhances the soundness of the Local Plan being the most justified and effective approach to support the Council in meeting its objectively assessed housing need. The comprehensive redevelopment of the Site, as proposed by policies SP18 and H03 represents the most effective strategy to ensure that the level of infrastructure necessary to support the planned growth is delivered in conjunction. This strategy would not be deliverable were a piecemeal approach to development pursued through smaller sites.</p>		1408		Email

					<p>A significant part of The Site is currently subject to an outline planning application for a mixed use development including up to 900 dwellings, commercial space, a primary school, local centre and associated infrastructure and landscaping (reference OL/TH/18/0261).</p> <p>We can confirm that The Site is, as required by the National Planning Policy Framework (NPPF), deliverable and can therefore make a significant contribution to the Council's five year housing supply, and the supply through later years of the plan period. The Site is:</p> <ul style="list-style-type: none"> • Available - Green acre (Thanet) Ltd have a controlling interest in the land subject of the policy allocations; • Suitable - the Site is in a sustainable location, in close proximity to Westwood Cross centre and well served by a variety of modes of transport; and • Achievable - an outline planning application has already been submitted for a mixed use development including up to 900 units on part of the Site. There is a realistic prospect that a viable housing development could be delivered on the Site within the next five years. It is anticipated that preapplication engagement could commence for the wider Site in the coming months. <p>Policy H03 - Land on west side of Old Haine Road. Ramsgate Greenacre (Thanet) Ltd support the allocation of site H03. The proposed Policy wording is considered appropriate to ensure the sustainable development of the Site with appropriate infrastructure.</p>				
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Non-strategic Housing Allocations HO4

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			Object	<p>Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.</p>		942		Email

Non-strategic Housing Allocations HO5										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		943		Email
Twyman	Paul	324			Object	HO5 - land fronting Park Lane Birchington should return to the original.	HO5 - land fronting Park Lane Birchington should return to the original.	995		Email

Non-strategic Housing Allocations HO6

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			Object	<p>Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.</p>		944		Email
Mayall	C	473	Southern Water		Object	<p>In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), Southern Water has undertaken an updated assessment of existing infrastructure capacity and its ability to meet the forecast demand for 34 new dwellings at this site. As per our previous representations at Regulation 18 stage, that assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development. Since OFWAT's new approach to water and wastewater connections charging was implemented from 1 April 2018, we have adjusted our requisite site specific policy wording to align with the new charging mechanism. Despite changes to this mechanism, the need remains for recognition that there is limited capacity at this site's "practical point of connection", as defined in the New Connections Services and as a result, network reinforcement will be required in advance of occupation.</p> <p>This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.</p>		1364		Web

					<p>Therefore, whilst a lack of capacity is not a fundamental constraint to development, new or improved infrastructure would need to be provided in parallel with the development. Southern Water has limited powers to prevent connections to the water and sewerage networks, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure. Unless planning policies support delivery of necessary underground sewerage infrastructure there is a risk that it will not be delivered in parallel with the development, leading to an unacceptable risk of foul water flooding in the area to both new and existing residents. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>In addition, our assessments revealed that Southern Water's underground infrastructure crosses the site, and this needs to be taken into account when designing the site layout. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Southern Water is unable to support Policy HO6 as sound because it does not adequately support delivery of the local sewerage infrastructure necessary to serve this site in parallel with development. We consider that this is inconsistent with national policy, in particular paragraphs 109 and 157 of the NPPF. Accordingly, in line with the NPPF and National Planning Practice Guidance and to ensure sustainable development, we propose that the following criteria are added to Policy HO6 (new text underlined):</p> <p>[...]</p> <p>Appropriately landscaped development and landscaping will be expected to incorporate a soft edge between the site and open countryside.</p> <p>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider</p>				
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Non-strategic Housing Allocations HO7										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		945		Email

Non-strategic Housing Allocations HO8

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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		946		Email
Twizell	Heather	512	Natural England		Object	Policy HO8 - Land south of Canterbury Road East, Ramsgate As stated in our response to the 2015 Preferred Options consultations we would query why this is the only site allocation policy in the Local Plan to require the development to 'address the need to retain and enhance trees and hedgerows for their biodiversity interest' as we believe it could probably be applied more generally.		1472		Email

Non-strategic Housing Allocations >HO9										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		947		Email

Cliftonville and Margate HO10

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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		948		Email
Bianchi	Tania	144			Support	<p>We have been living in Cliftonville for more than three decades.</p> <p>Regarding the urban fabric or street scene and environment cited in Policy HO10 - Cliftonville West and Margate Central: We suggest the heritage and amenity assets of Cliftonville are given the much needed and deserved care and attention, including funding and support for community initiatives (like the The Newgate Gap Project) .</p> <p>There is deep fondness for the Victorian and Edwardian architecture especially along the coastline (e.g. original shelters where walkers can take a rest while enjoying the green and the seaside panorama or the maintenance of unique historical buildings like Ethelbert Crescent) and also Art-Deco examples like the Lido Complex.</p> <p>Maintaining historic identity is an effective way to raise pride in the community, value and respect for the environment and attraction for tourism both for leisure and business events. For these reasons, we strongly advise the council to support and endorse community initiatives and property owners aiming to restore the built environment to its former grandeur which would then be seen as an asset and encourage further investment in this area.</p>		374		Web

Gregory	Amelia	119	Friends of Cliftonville Coastline		Observation	TDC acknowledge that Cliftonville west is one of Thanet's most deprived neighbourhoods, and states that there must be an objective to improve the urban fabric or street scene and environment. The Cliftonville Coastline is an integral part of this, if not the most important part of the environment, that can be improved to elevate the financial success, wellbeing and community cohesion of the area. Yet the plan does not discuss any any details. FOCC suggests that the the Cliftonville Coastline as a whole must be considered in detail, and that FOCC and its members must be consulted. The Newgate Gap Project could encompass a restored heritage shelter for all ages and events, formal gardens, wild spaces, community amenities for youths, a reinvigorated playground, sustainable power generation, artist collaborations, a fresh new Crazy Golf area, a cafe and beach storage facilities.	FOCC suggests a much more detailed and cohesive approach.	280		Web
Hudson	Pam	240	Mrs		Support	TDC acknowledge that Cliftonville West is one of Thanet's most deprived neighbourhoods, and states that there must be an objective to improve the urban fabric, street scene and environment. The Cliftonville Coastline is an integral part of this, if not the most important part of the environment, which can be improved to elevate the financial success, wellbeing and community cohesion of the area. Yet the plan does not discuss any details. FOCC suggests that the the Cliftonville Coastline as a whole must be considered in detail, and that FOCC and its members must be consulted. The Newgate Gap Project could encompass a restored heritage shelter for all ages and events, formal gardens, wild spaces, community amenities for youths, a reinvigorated playground, sustainable power generation, artist collaborations, a fresh new Crazy Golf area, a cafe and beach storage facilities. FOCC suggests a much more detailed and cohesive approach.		730		Web
Margate Estates		460	Margate Estates	Zena Foale-Banks - Nexus Planning	Object	Policy HO10 provides guidance around the objectives for residential development within Cliftonville and Margate Central. The policy provides a comprehensive set of objectives that would benefit future housing provision in these areas. We recommend that in addition to the four objectives set out, a fifth objective is added that promotes the optimisation of brownfield development, and comprehensive redevelopment of opportunity sites. In addition, there is a focus within the Plan on restricting the development of 1-bedroom units. We appreciate that this policy is applied to ensure the improvement of the overall quality of housing stock in certain deprived areas. We contend however, that this restriction should only be applied to developments involving the conversion of existing buildings, and should not be applied to new build development whereby the quality of the new-build development is guaranteed to be of a high quality.		1325		Web

Housing at Rural Settlements HO11										
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
.		311	St Johns College	Claire Mills - Savills	Support	<p>The allocation of 'Land at the Length, St Nicholas-at-Wade' in Table 9 is supported. The site is considered available, suitable and deliverable and to provide a valuable contribution to housing and supply, with the site envisaged to be completed within the next 5 years .</p> <p>The above is illustrated by the scheme obtaining outline planning permission in May 2018 for 25 dwellings. The landowner is currently arranging the sale of the site to facilitate the prompt submission of reserved matters and subsequent implementation of the planning permission. However, retaining the site as an identified allocation is considered crucial. In the unforeseen and worst case scenario where the existing planning permission lapses or should a future purchaser wish to submit a revised planning application, it is considered crucial that the site remains as an identified allocation to secure the principle of residential development at this location.</p> <p>For the sake of clarity, the final concluding paragraphs of the Committee Report associated with this approved outline planning application are provided below:</p> <p>'The provision of 25 dwellings would make a modest contribution to the District's housing supply, supporting economic and social dimensions of sustainable development, with employment provided through construction. All requests for contributions towards education, social, leisure and health care, have been agreed by the applicant, and 30% on-site affordable housing is provided, a new footpath along the site's boundary with The Length, as well as uncontrolled crossing points to The Length and an upgraded bus stop will also be provided via this development. Significant weight can, therefore, be attached to this application due to these social and economic benefits.</p> <p>In terms of the environmental dimension, the proposal would result in the loss of countryside, but would appear as a natural expansion of St Nicholas at Wade with limited impact upon the wider landscape area. The density of the proposed development falls below 30 dwellings per hectare, thus in keeping with the rural character of the area, and landscape enhancements are proposed including hedgerows and trees along the boundaries of the site. Kent Highways raise no objection in principle to the proposal, and the proposed access is considered to be both safe and suitable. Therefore overall limited environmental harm would result from the proposal.</p> <p>It is considered that, with safeguarding conditions and appropriate contributions and items secured via a S 106 legal agreement, that there would be no adverse impact of the development on ecology, archaeology, flooding or drainage. The reserved matters application(s) will consider detailed impact on living conditions of neighbouring occupiers, however the development of the site for the development submitted can be accommodated without resulting</p>	No changes are proposed.	957	061 Mills Claire Savills Table 9.pdf (268 KB)	Web

						<p>in a significant adverse impact to residential properties in the vicinity of the site.</p> <p>Therefore when considering the framework as a whole, the proposal constitutes sustainable development, as any harm is outweighed by the economic and social benefits from the proposal and therefore it is recommended that the proposal is deferred and delegated for approval by officer subject to the receipt of an acceptable Section 106 agreement that secures the stated heads of terms '.</p> <p>Source: Officer's Committee Report for OL/TH/17/1342 which was heard on 14/02/2018 .</p> <p>In light of the above context, it is considered the allocation of this site for development of this scale and nature is sound and a beneficial contribution to address the District's housing need.</p>				
Alan Byrne/English Heritage		155			Object	<p>Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.</p>		950		Email
Baxter	Nick	23	Baxter Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	<p>Please see attached Representations made on behalf of Baxter Farms Ltd on Policy HO11- Housing at Rural Settlements and New Proposed Housing Sites at Rural Settlements</p>	See attached Representations on behalf of Baxter Farms Ltd	39	Baxter Farms Local Plan Reprs Sept 2018.docx (1.7 MB)	Web
Baxter	Nick	23	Baxter Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	<p>See attached representations made on behalf of Baxter Farms Ltd</p>	See attached representations made on behalf of Baxter Farms Ltd	40	Baxter Farms Local Plan Reprs Sept 2018.docx (1.7 MB)	Web
Davies	Julie	147	CPRE Kent		Observation	<p>There appears to be some overlap between policy HO11 Housing at Rural Settlements and Table 9 Sites allocated for residential development at Rural Settlements and point (1) - listed after Table 9 - and policy HO18 Rural Housing Need.</p> <p>Most of the sites listed in Table 9 are for more than 10 dwellings and would provide some affordable housing. Point 1(2) after Table 9 requires development applications to demonstrate that engagement has taken place with the parish council to address how any affordable element to be provided</p>		412		Web

						can serve to address need arising in the relevant parish as a priority. This is similar to the approach set out in Policy HO18. Of the settlements with village confines only Acol has no housing allocation within or adjacent to it. We suggest that the two policies are merged.				
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Development within the confines of rural settlements is not always adhered to, if it is in the Local Plan why would this be so, development also occurs in places where there are very few community services available.		591		Web
Lee	A	133			Object	No large scale building/ housing development on agricultural and green space land		333		Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached submission from SPRU	See attached submission from SPRU	299	09.27.18.AB.K5022PS.GeneralRep.Final.pdf (739 KB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached submission from PTP	see attached submission from PTP	310	Land at Cliffsend, Ramsgate - TA (Final) 25-09-18.pdf (2.7 MB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	Allocate land west of Cliffsend, adjacent to the new Parkway Station as a Rural Housing/Community site to the Local Plan	See attached submission from CSA Landscape Overview and Concept Master Plan report.	690	2914_04_A Landscape Overview for land to west of Cliffs End, Kent_.pdf (7.9 MB)	Web

Housing at Rural Settlements Table 9 - Sites allocated for residential development at Rural Settlements HO12

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
.		311	St Johns College	Claire Mills - Savills	Object	<p>Allocating the site at Tothill Street, Minster for residential development is supported in principle.</p> <p>Savills (UK) Ltd act on behalf of St John's College who is the principal landowner of the site in question and can reiterate the availability and deliverability of the scheme. This is reflected with the imminent submission of an outline planning application, in accordance with this emerging allocation. This is due to be submitted in October 2018. This application has been the subject of detailed discussions with various stakeholders, including the Parish Council, local residents, Thanet District Council officers, the Environment Agency and Southern Water, as well as the highways and historic environment teams at the County Council.</p> <p>Detailed technical work has led to the compilation of a scheme for 214 homes at this allocation. Whilst fewer than the maximum quantum (250) indicated in Appendix B of the emerging Local Plan, this is a result of respecting and retaining certain archaeological finds in situ, as well as enabling the incorporation of suitable drainage measures, in liaison with the Environment Agency and Southern Water. Such factors reduce the net developable area, though leaving significant sections of public amenity space to the benefit of existing and future communities.</p> <p>Despite the difference in scale of</p>	<p>It is suggested that point 1) of draft policy H012 should be modified as follows in order to make the policy sound: 'Be informed by an archaeological pre-design evaluation and transport assessment. Vehicular access would need to be provided to Tothill Street and links southwards with existing development restricted to emergency, pedestrian and cycle routes in order to limit additional traffic movement in the vicinity of Monkton Road and High Street'.</p> <p>In order to make the policy sound, it is also proposed the spatial portrayal of the site allocation on the policies map is updated to reflect the boundary as shown on the enclosed plan (365_198_001 Rev A). Without this change to the allocation, an effective cemetery extension could not be safeguarded.</p> <p>It is also reiterated that the southern boundary of allocation H012, as shown on the policies</p>	924	#061 Mills Claire Savills Tothill St.pdf (1.0 MB)	Email

					<p>development between the submitted 214 unit scheme and the emerging allocation for 250 units, it is suggested that the 250 threshold for H012 (see Appendix B) can remain as indicated. Retaining a 'notional maximum' capacity of 250 units retains scope or the allocation to sustain a higher overall quantum in the event that technical constraints change. Whilst not anticipated, such an approach secures positive adaptability within the policy.</p> <p>Rather than submitting the full suite of documents comprising the planning application, these representations instead summarise the key components, supporting the deliverability of the allocation.</p> <p>Housing Size Type and Tenure Considerations</p> <p>The proposed scheme provides 214 much needed homes with scope to deliver the homes promptly following planning permission and reserved matters being granted. The proposed scheme is expected to secure 30% affordable housing to address local housing need. In terms of housing mix, the illustrative masterplan has taken into account the housing need identified within the 2016 SHMA, which considers both unit sizes, as well as character. The SHMA suggests greatest demand for 2 and 3 bedroom properties. The SHMA also indicates the need for different types of property is more balanced between detached, semi-detached, terraced and flat units. The illustrative masterplan has taken these proportions into account, though with a lower rate of apartments than identified in the SHMA due to the importance of referencing the character of the locality.</p> <p>A proportion of the homes on site will be restricted to no more than</p>	<p>map requires updating. The allocation boundary currently includes the pumping station controlled by Southern Water, as well as garages off Prospect Gardens within separate ownership. Such land has not been confirmed as available or deliverable and so should be removed from the intended allocation, as indicated on the enclosed plan.</p> <p>Significant technical work has been undertaken to support the proposed allocation and imminent outline planning application. This submission has made clear that certain phrasing within the proposed policy H012 is flawed and without modification, could undermine the soundness and ultimately the potential deliverability of the allocation. Given that the reasons for these issues have been identified as a result of much technical work, it is considered crucial that the College's representatives have the opportunity to participate and explain these issues fully and for the Inspector to be able to ask questions of clarification.</p>			
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					<p>1.5 storeys in height to take account of existing adjacent properties.</p> <p>The net density of the scheme is 30.5dph. The proposed density level is considered to provide a scheme that reflects its edge of settlement location and respects adjacent occupiers, with a far lower gross density at 16.5dph, indicating the substantial open space offer which is accommodated.</p> <p>Highways Considerations</p> <p>The proposed development will be accessed via a priority T-junction connecting onto Tothill Street on the eastern boundary. A detailed transport assessment has been undertaken, which has assessed the implications of this development on the surrounding highway network. This approach has been agreed with Kent County Council as local highways authority. The exception relates to what are defined as 'committed developments'. Since the final land use associated with any redevelopment at Manston Airport is not yet fixed, the transport assessment has not included this in the modelling exercise. The Planning Practice Guidance states as follows:</p> <p>'It is important to give appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty it will proceed within the next 3 years). At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval'</p>				
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					<p>(Reference 10: 42-014-20140306). The potential redevelopment at Manston Airport has not progressed to either a secured planning permission or an adopted allocation.</p> <p>Based on the transport assessment, including modelling 2023 'future year' it is apparent that the proposed development does not result in a 'severe' highway impact as set out in the NPPF.</p> <p>Instead, the vast majority of the junctions will remain within capacity. The exception is the Tothill Street arm of the roundabout to the north. As such, the proposal includes intended upgrades to this roundabout to reduce queuing in the AM and PM peak flows, which would be secured through a s.106 Legal Agreement. This would also result in wider benefits for the residents of Minster in the 2023 future scenario.</p> <p>In addition to the main site access, an emergency access is also included off Greenhill Gardens. Access will be restricted via a bollard to limit unauthorised access. However, the route will remain open for pedestrian or cycle movements and so strengthen the connectivity and accessibility to and from the site. This is in addition to the main site access, as well as further connections to be created to the PRow to the west. These connections promote access to services within Minster and integration between the existing community and the proposed development, hence broader social benefits.</p> <p>The imminent outline application will secure a commitment to a Travel Plan and is suggested to provide beneficial encouragement for future occupiers to utilise sustainable transport modes and</p>				
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					<p>potentially even change travel habits.</p> <p>In terms of public transport, the site benefits from close proximity to existing bus stops on Tothill Street, which are formalised and benefit from bus shelters. Such bus routes are readily accessible from the site. In addition to this, Minster has the substantial benefit of a train station within walking and cycling distance. This station provides services to Ramsgate and Canterbury West, as well as London Charing Cross and Ashford International. This station significantly strengthens the sustainability credentials of the settlement. It is also suggested that directing growth to sustainable settlements such as Minster, helps to support the existing services including the train station, bus services and other numerous commercial enterprises within the settlement. Such demand is important to retain the future vitality of such communities and the associated services.</p> <p>Open Space Landscape and Site Character</p> <p>The proposed development allows for a significant proportion of formal and informal open space. A total of 4.39ha of green space is provided on the illustrative masterplan (enclosed). The illustrative masterplan has also sought to show possible locations of play space to ensure that it is readily accessible to all within the future scheme, as well as connectivity to the existing community via Tothill Street, Greenhill Gardens and the existing PRow connection to Prospect Road.</p> <p>Specific open space provision is not fixed at this stage given the application will be submitted in putline. However, it is apparent</p>				
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					<p>that the proposed illustrative masterplan provides significant levels land variety of open space. In terms of broader landscape implications, a landscape and visual appraisal has been prepared. This assesses the existing landscape character, as well as short and long distant views and the impacts the proposed development may have in this context. The appraisal considers that views are generally limited. Whilst there will be a change to the local landscape character of the site, the illustrative masterplan and landscape principles illustrate a notable landscape buffer and opportunities for strengthened planting to reduce the landscape effects and enhance the wider environment.</p> <p>Site specific surveys of agricultural land grade have not been undertaken. However, the national mapping indicates that the site is anticipated to be Grade 1. This constitutes best and most versatile agricultural land and so its loss from agricultural production is identified as an impact resulting from the allocation. However, it is considered that the loss of this 14ha site is only a localised impact and not a significant loss when taken in the context of the extent of best and most versatile agricultural land within the wider locality. It is noteworthy that Natural England only become a statutory consultee to consider agricultural land loss when the loss exceeds 20ha. This is a clear indicator that the loss of 14ha of land can be concluded as a lesser impact.</p> <p>As part of discussions with local residents, it has emerged that a selection of properties with gardens backing onto this proposed allocation have access gates into the site. Evidence has not been</p>				
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					<p>supplied as to the length of time or permanence of these access points. It is reiterated that the landowners have not supplied authorisation for access onto their land. However, this point has nevertheless been considered within the proposals to ensure that the deliverability of the scheme is not in doubt. There is scope to include a pathway between the rear gardens of existing and proposed units to retain said access points should it be proven that the legislative requirements to secure access have been met.</p> <p>Ecology</p> <p>An ecological appraisal has been prepared. This identifies the habitats on site, the majority of which comprise intensive arable agriculture. There are also small sections of neutral semi-improved grassland with both native species poor and rich hedgerows with sporadic trees on site boundaries. Ruderal planting separates the two fields. The habitats on site were concluded as having low intrinsic ecological value. Potential interest for breeding birds and reptiles can be adequately addressed through precautionary construction measures and the scheme as a whole will incorporate wider ecological benefits including enhanced landscape buffers with native rich planting, opportunities for a variety of grasslands and bird boxes, bat boxes and timber piles. The report consequently concludes that no significant effects on protected species are anticipated. In terms of proximate statutory ecological designations, the most notable is the Thanet Coast and Sandwich Bay designations, with components designated as a SAC, SPA and Ramsar site and so of international significance. Depending on the designation in</p>				
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					<p>question, the qualifying features relate to breeding little tern and non-breeding birds (golden plover and turnstone) and coastal habitats. Given the proximity of these designations, as well as others set out in full in the ecological appraisal, discussions have been held with Natural England to discuss potential impacts of the scheme and consideration against the Habitat Regulations.</p> <p>The Council currently has an established mechanism through which mitigation for the Thanet Coast and Sandwich Bay SPA is sourced as a result of residential development. This seeks a standardised rate payable towards the Strategic Access Management and Monitoring Plan (SAMP), subject to identifying a specific project to ensure accordance with the CIL pooling restrictions. On the basis that the application site is a proposed allocation and is consequently accommodated within the overarching housing need that has been/will be tested, this provides confidence in soundness and the ability to secure adequate mitigation.</p>			
Alan Byrne/English Heritage		155		Object	<p>Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be</p>		951	Email

						appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.			
Bates	Alison	268			Object	<p>Policy HO12 - Land at Tothill Street, Minster</p> <p>In the November 2005 report by the then Planning Inspector for the existing Local Plan he made various compelling reasons as to why this particular parcel of land should not be included back then for any housing. Some of those still remain valid today and some of those reasons have in fact worsened between then and now with no signs that they could ever improve within the village.</p> <p>The village confines have been drawn deliberately tightly to protect urban and rural fringe from sporadic development. The line has been drawn around existing development excluding loose knit development and any open space for this reason. To extend the village confines here would unnecessarily harm the character of the area and it would also set a harmful precedent for further unnecessary development. Being outside the village confines would represent development in the countryside contrary to existing policies. The site is likely to consist of best and most versatile farmland loss and a housing development would have an unacceptable impact on the landscape qualities of the Wantsum Channel North Shore landscape area and on the A253/A299 as an Island Approach Route.</p>	829	Waiting_Restrictions_Minster_-_31-Aug-2018.jpg (1.1 MB)	Web

					<p>The problems with drainage and sewage for the village still exist with no signs of enhancement to accommodate even more housing than there is now.</p> <p>Traffic levels on Tothill Street are much higher and increasing. To add over 100 houses to enter and exit the proposed location on to Tothill Street will create even more problems than now. At various times, Tothill literally comes to a standstill and traffic will sit there queuing up until one driver gives way. If the A299 towards Ramsgate is closed, eg accident. Traffic will try and flow down Tothill and then out towards Ramsgate via Foxborough Lane. Unfortunately the width of this road is not great and any bus or lorry will straddle the carriageway. If one meets another they cannot pass. When such have come to a standstill there I have witnessed 4x4s drive off the road and then drive up the field to Laundry Road (to the north).</p> <p>Then there is elsewhere in the village, some side roads and the Buttsfield estate as well as the main thoroughfares: double yellow lines have been introduced in recent times and even more recently legislated for (see attached file - under 'Roads in Ramsgate' heading which are all in fact in Minster). A vast number of existing properties do not have any off-street parking. Life these days dictates that cars (and business vehicles for the self-employed) are necessary for most households and the only places they can park their vehicles is at the roadside and as near their particular houses as they can. More houses will mean more traffic which will mean more gridlock which will mean that KCC's only answer will be for even more yellow lines without meaningful consultation in the village pushing</p>				
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					<p>those vehicles a bit further out to somewhere they can park and nothing to alleviate the volume of traffic.</p> <p>Policy HO1 - Land at Foxborough Lane (south side), Minster</p> <p>In the November 2005 report by the then Planning Inspector for the existing Local Plan he made various compelling reasons as to why this particular parcel of land should not be included back then for any housing. Some of those still remain valid today and some of those reasons have in fact worsened between then and now with no signs that they could ever improve within the village.</p> <p>The village confines have been drawn deliberately tightly to protect urban and rural fringe from sporadic development. The line has been drawn around existing development excluding loose knit development and any open space for this reason. To extend the village confines here would unnecessarily harm the character of the area and it would also set a harmful precedent for further unnecessary development. Being outside the village confines would represent development in the countryside contrary to existing policies. The site is likely to consist of best and most versatile farmland loss and a housing development would have an unacceptable impact on the landscape qualities of the Wantsum Channel North Shore landscape area which includes the historic setting of the nearby Grade 1 Listed Abbey and Conservation Area. The site forms part of the countryside in which Minster is set. The undeveloped nature of this site is of importance in maintaining the open and pleasant rural character in this part of the village. Housing of the whole or part of this site would erode the</p>				
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					<p>pleasant open rural character contrary to existing policies.</p> <p>If built upon, any residents would have to negotiate Tothill Street and if by foot cross over it at a point with a limited northern sightline.</p> <p>If developed, it would involve extending the built-up area of Minster into open countryside, when currently the eastern extent of the village confines follow a generally regular north south line.</p> <p>Although the site has an existing hedgerow boundary between it and the adjoining land to the east, it would nonetheless, if allocated, be likely to generate additional development pressures on the agricultural land to its east and to its south. The site is is no sense enclosed by development.</p> <p>An Inspector dismissed an appeal for housing development on the site in 1991 and the Inspector in 2005 held similar views.</p> <p>His view was that the site itself is rural in character and relates more to the countryside outside Minster than to the village's built up confines, which are, broadly speaking, to the west. Despite any intended pedestrian link to Tothill Street, he considered the development would intrude into the countryside outside Minster and undermine the character and quality of the village, by being poorly related to the existing pattern of development and that it would harm the character of the adjoining countryside. The character of Foxborough Lane is that of a pleasant route through open country leading, at its end, into the village. The site, currently forms part of the open countryside approach, and contributes to the quality landscape.</p> <p>The problems with drainage and sewage for the village still exist with no signs of enhancement to</p>				
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					<p>accommodate even more housing than there is now.</p> <p>Traffic levels on Tothill Street are much higher and increasing. To add over 100 houses to enter and exit the proposed location on to Tothill Street will create even more problems than now. At various times, Tothill literally comes to a standstill and traffic will sit there queuing up until one driver gives way. If the A299 towards Ramsgate is closed, eg accident, traffic will try and flow down Tothill and then out towards Ramsgate via Foxborough Lane. Unfortunately the width of this road is not great and any bus or lorry will straddle the carriageway. If one meets another they cannot pass. When such have come to a standstill there I have witnessed 4x4s drive off the road and then drive up the field to Laundry Road (to the north).</p> <p>Then there is elsewhere in the village, some side roads and the Buttsfield estate as well as the main thoroughfares: double yellow lines have been introduced in recent times and even more recently legislated for (see attached file - under 'Roads in Ramsgate' heading which are all in fact in Minster). A vast number of existing properties do not have any off-street parking. Life these days dictates that cars (and business vehicles for the self-employed) are necessary for most households and the only places they can park their vehicles is at the roadside and as near their particular houses as they can. More houses will mean more traffic which will mean more gridlock which will mean that KCC's only answer will be for even more yellow lines without meaningful consultation in the village pushing those vehicles a bit further out to somewhere they can park and nothing to alleviate the volume of</p>				
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						traffic.				
Bates	Zoe	288			Support	<p>Policy HO12 - Land at Tothill Street, Minster</p> <p>In the November 2005 report by the then Planning Inspector for the existing Local Plan he made various compelling reasons as to why this particular parcel of land should not be included back then for any housing. Some of those still remain valid today and some of those reasons have in fact worsened between then and now with no signs that they could ever improve within the village.</p> <p>The village confines have been drawn deliberately tightly to protect urban and rural fringe from sporadic development. The line has been drawn around existing development excluding loose knit development and any open space for this reason. To extend the village confines here would unnecessarily harm the character of the area and it would also set a harmful precedent for further unnecessary development. Being outside the village confines would represent development in the countryside contrary to existing policies. The site is likely to consist of best and most versatile farmland loss and a housing development would have an unacceptable impact on the landscape qualities of the Wantsum Channel North Shore landscape area and on the A253/A299 as an Island Approach Route.</p> <p>The problems with drainage and sewage for the village still exist with no signs of enhancement to accommodate even more housing than there is now.</p> <p>Traffic levels on Tothill Street are much higher and increasing. To add over 100 houses to enter and exit the proposed location on to Tothill Street will create even more problems than now. At various</p>	Remove from Plan	844	Waiting_Restrictions_Minster_-_31-Aug-2018.jpg (1.1 MB)	Web

					<p>times, Tothill literally comes to a standstill and traffic will sit there queuing up until one driver gives way. If the A299 towards Ramsgate is closed, eg accident. Traffic will try and flow down Tothill and then out towards Ramsgate via Foxborough Lane. Unfortunately the width of this road is not great and any bus or lorry will straddle the carriageway. If one meets another they cannot pass. When such have come to a standstill there I have witnessed 4x4s drive off the road and then drive up the field to Laundry Road (to the north).</p> <p>Then there is elsewhere in the village, some side roads and the Buttsfield estate as well as the main thoroughfares: double yellow lines have been introduced in recent times and even more recently legislated for (see attached file - under 'Roads in Ramsgate' heading which are all in fact in Minster). A vast number of existing properties do not have any off-street parking. Life these days dictates that cars (and business vehicles for the self-employed) are necessary for most households and the only places they can park their vehicles is at the roadside and as near their particular houses as they can. More houses will mean more traffic which will mean more gridlock which will mean that KCC's only answer will be for even more yellow lines without meaningful consultation in the village pushing those vehicles a bit further out to somewhere they can park and nothing to alleviate the volume of traffic.</p> <p>Policy HO1 - Land at Foxborough Lane (south side), Minster</p> <p>In the November 2005 report by the then Planning Inspector for the existing Local Plan he made various compelling reasons as to why this particular parcel of land should not</p>				
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					<p>generally regular north south line. Although the site has an existing hedgerow boundary between it and the adjoining land to the east, it would nonetheless, if allocated, be likely to generate additional development pressures on the agricultural land to its east and to its south. The site is is no sense enclosed by development.</p> <p>An Inspector dismissed an appeal for housing development on the site in 1991 and the Inspector in 2005 held similar views.</p> <p>His view was that the site itself is rural in character and relates more to the countryside outside Minster than to the village's built up confines, which are, broadly speaking, to the west. Despite any intended pedestrian link to Tothill Street, he considered the development would intrude into the countryside outside Minster and undermine the character and quality of the village, by being poorly related to the existing pattern of development and that it would harm the character of the adjoining countryside. The character of Foxborough Lane is that of a pleasant route through open country leading, at its end, into the village. The site, currently forms part of the open countryside approach, and contributes to the quality landscape.</p> <p>The problems with drainage and sewage for the village still exist with no signs of enhancement to accommodate even more housing than there is now.</p> <p>Traffic levels on Tothill Street are much higher and increasing. To add over 100 houses to enter and exit the proposed location on to Tothill Street will create even more problems than now. At various times, Tothill literally comes to a standstill and traffic will sit there queuing up until one driver gives</p>				
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Bates	John	226		Support	<p>Policy HO12 - Land at Tothill Street, Minster</p> <p>In the November 2005 report by the then Planning Inspector for the existing Local Plan he made various compelling reasons as to why this particular parcel of land should not be included back then for any housing. Some of those still remain valid today and some of those</p>	Roads, services and general infrastructure cannot support more housing in large numbers. Additional housing fr Thanet better supported along the north Thanet coastal 'villages'	895	Web

					<p>reasons have in fact worsened between then and now with no signs that they could ever improve within the village.</p> <p>The village confines have been drawn deliberately tightly to protect urban and rural fringe from sporadic development. The line has been drawn around existing development excluding loose knit development and any open space for this reason. To extend the village confines here would unnecessarily harm the character of the area and it would also set a harmful precedent for further unnecessary development. Being outside the village confines would represent development in the countryside contrary to existing policies. The site is likely to consist of best and most versatile farmland loss and a housing development would have an unacceptable impact on the landscape qualities of the Wantsum Channel North Shore landscape area and on the A253/A299 as an Island Approach Route.</p> <p>The problems with drainage and sewage for the village still exist with no signs of enhancement to accommodate even more housing than there is now.</p> <p>Traffic levels on Tothill Street are much higher and increasing. To add over 100 houses to enter and exit the proposed location on to Tothill Street will create even more problems than now. At various times, Tothill literally comes to a standstill and traffic will sit there queuing up until one driver gives way. If the A299 towards Ramsgate is closed, eg accident. Traffic will try and flow down Tothill and then out towards Ramsgate via Foxborough Lane. Unfortunately the width of this road is not great and any bus or lorry will straddle the carriageway. If one meets another they cannot</p>				
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						<p>drive up the field to Laundry Road (to the north). Then there is elsewhere in the village, some side roads and the housing estate next to the Minster primary School as well as the main thoroughfares: double yellow lines have been introduced in recent times and even more recently legislated for (see attached file - under 'Roads in Ramsgate' heading which are all in fact in Minster). A vast number of existing properties do not have any off-street parking. Life these days dictates that cars (and business vehicles for the self-employed) are necessary for most households and the only places they can park their vehicles is at the roadside and as near their particular houses as they can. More houses will mean more traffic which will mean more gridlock which will mean that KCC's only answer will be for even more yellow lines without meaningful consultation in the village pushing those vehicles a bit further out to somewhere they can park and nothing to alleviate the volume of traffic. Roads, services and general infrastructure are inadequate to support more houses in the village of Minster. The primary school is at capacity and is restricted in expansion space.</p>				
Baxter	Nick	23	Baxter Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	Representations made on behalf of Baxter Farms Ltd on Policy Ho11- Housing at Rural Settlements; New Proposed Housing Sites at Rural Settlements and Table 9- Sites allocated for residential development at rural settlements.	See attached representations made on behalf of Baxter Farms Ltd	41	Baxter Farms Local Plan Reprs Sept 2018.docx (1.7 MB)	Web
Brown	Paul	496			Object	I am writing to you on behalf of our residents group in advance of any planning application being submitted in order to register our very deep concerns about the above proposal. We feel that we must do this now because of the extremely short consultation		1389		Email

					<p>period given by the agents for the land owners and to ensure that you are fully aware of the strong opposition to this proposal.</p> <p>To allow the building of such a major housing estate will see the largest single development ever in Minster with all the consequent pressures placed on the community.</p> <p>The current proposal is for 220 dwellings of various types and this, by any measure, can only have a significant impact on the local infrastructure, utilities and services; which in our opinion; they do not have the capacity to absorb.</p> <p>The additional traffic flow from a proposed new junction towards the top of Tothill Street, virtually opposite the Hillminster Estate, will only compound the congestion that already exists. Currently, at peak times traffic already queues down Tothill Street past the existing Hillminster junction in its attempt to gain access to the A299. Residents of the Hillminster Estate have taken to using Fairfield Road/Greenhill Gardens as a "rat run" in order to exit through Monkton to gain the A299/A28. It is clear that this proposal will not just affect Minster residents.</p> <p>The parcels of land under threat from this proposal have previously been acknowledged as being of grade 1 agricultural quality and are, therefore, part of an important finite land asset. With the United Kingdom in the process of leaving the European Union and our future trading positions uncertain, we should be protecting our best quality agricultural land for our food production now and for future generations.</p> <p>Further, this land contains an</p>				
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					<p>aquifer within its boundary. Central Government in its paper 'A Green Future: Our 25 Year Plan to Improve the Environment' puts great emphasis on the protection of our precious water supplies. Where does this proposed development fit into that aim? Once it's gone, it's gone.</p> <p>Under the 2006 Local Plan this land was specifically excluded from any development proposals, now it has been included as suitable under the draft local plan. How can this be? What has changed? Would this land have been included in the draft plan if the land owners had not submitted it? Whilst I can only speculate as to the land owner's motives, I am convinced that monetary gain came into it somewhere. Can that be a good enough reason to build on such a valuable asset?</p> <p>Why isn't preference being given to brown field sites over greenfield in order to protect grade 1 arable lands?</p> <p>How does this proposal go towards maintaining the "village gap" and Thanet District Council's professed aim of protecting the integrity of rural communities?</p> <p>How does this proposal protect the Wantsum North Shore view? This must be one of the finest prospects in all of north Kent. Is it to be lost to land owners greed?</p> <p>I accept that there needs to be new housing in Thanet, but to quote the Housing Minister - "the right houses in the right place".</p> <p>If this development goes ahead, you must ensure that it has fully planned infrastructure and that controls are in place as to the style and number of dwellings in order to meet the needs of this village community, to ensure that</p>				
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						it seamlessly integrates into the community and is not a carbuncle stuck on the edge of the village that would then struggle to function properly. Any development must not be about the land owners or any future developers monetary gain, it can only be, and must only be, about what is best for Minster.			
Cooper	Barbara	514	Kent County Council (KCC)		Object	Resilience and Emergency Planning: KCC recommends that the policy wording is amended as follows: "The Council will seek to approve applications that provide good quality and resilient accommodation that is needed to support the housing and care requirements of Thanet's community (including provision of facilities and services which will support independent living). Where such accommodation falls within Use Class C2, proposals will be expected to demonstrate they are suitably located to meet the needs of the occupiers including proximity and ease of access to community facilities and services, compatibility with surrounding land uses and their resilience to flooding and other potential risks."		1525	Email
Davies	Julie	147	CPRE Kent		Observation	Table 9. There appears to be some overlap between policy HO11 Housing at Rural Settlements and Table 9 Sites allocated for residential development at Rural Settlements and point (1) - listed after Table 9 - and policy HO18 Rural Housing Need. Most of the sites listed in Table 9 are for more than 10 dwellings and would provide some affordable housing. Point 1(2) after Table 9 requires development applications to demonstrate that engagement has taken place with the parish council to address how any affordable element to be provided can serve to address need arising in		413	Web

						the relevant parish as a priority. This is similar to the approach set out in Policy HO18. Of the settlements with village confines only Acol has no housing allocation within or adjacent to it. We suggest that the two policies are merged.			
eaves		188			Observation	Despite such conclusive evidence to the contrary the council persists in supporting the hopeless Manston airport. Another scheme in the pipeline, more uncertainty for residents and a wasted opportunity to develop it into something different. We have to put up with our villages being built on just so that Manston can be saved and its not good enough. We don't want a noisy dirty cargo airport. How does that meet the needs of a tourism and green based economy? why do the villages have to absorb all the extra housing? It is extremely muddled thinking. Caused by politics and not evidence.		544	Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Despite what is proposed for the development at Minster with regard to traffic measures it is felt that the impact on Monkton Road and then Monkton Street would be extremely detrimental.		593	Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	It is also felt that the development at Walters Hall Farm will have a detrimental impact on the village of Monkton in that it will irrevocably alter the rural nature of the village at the point of entry and also cause the loss of good quality agricultural land.		594	Web
Lee	A	133			Object	No buildings/change of use of agricultural land for building houses		334	Web
Mayall	C	473	Southern Water		Object	In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), Southern Water has undertaken an updated assessment of existing infrastructure capacity and its ability to meet the forecast demand for 250 new dwellings at this site.		1366	Web

					<p>As per our previous representations at Regulation 18 stage, that assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development</p> <p>Since OFWAT's new approach to water and wastewater connections charging was implemented from 1 April 2018, we have adjusted our requisite site specific policy wording to align with the new charging mechanism. Despite changes to this mechanism, the need remains for recognition that there is limited capacity at this site's "practical point of connection", as defined in the New Connections Services and as a result, network reinforcement will be required in advance of occupation.</p> <p>This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.</p> <p>Therefore, whilst a lack of capacity is not a fundamental constraint to development, new or improved infrastructure would need to be provided in parallel with the development.</p> <p>Southern Water has limited powers to prevent connections to the water and sewerage networks, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.</p> <p>Unless planning policies support delivery of necessary underground sewerage infrastructure there is a risk that it will not be delivered in</p>				
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					<p>parallel with the development, leading to an unacceptable risk of foul water flooding in the area to both new and existing residents. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>In addition, our assessments revealed that Southern Water's underground infrastructure crosses the site, and this needs to be taken into account when designing the site layout. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Southern Water is unable to support Policy HO12 as sound because it does not adequately support delivery of the local sewerage infrastructure necessary to serve this site in parallel with development. We consider that this is inconsistent with national policy, in particular paragraphs 109 and 157 of the NPPF. Accordingly, in line with the NPPF and National Planning Practice Guidance and to ensure sustainable development, we propose that the following criteria are added to Policy HO12 (new text underlined): <u>Proposals for residential development will be expected to [...]</u> 4) Phase occupation of development to align with the delivery of sewerage infrastructure, in collaboration with the service provider</p>			
O'Neill	Hugh	250		Observation	I have serious concerns about the drainage provisions for this development - we are on the coastal flood plain and the water table is not very far below the surface of the ground. During		762	Web

					<p>times of heavy rain, or when the sewage pumping station fails, water flows into cellars in the village causing damage and effort cleaning up. Any new development will add to this run-off to lower-lying properties and provision must be made to contain this water. This must take into account situations that are out of the ordinary - such as when the water table is just 6 inches below the surface of the field below - thus there is no capacity to absorb run-off through natural drainage and it must be contained.</p> <p>I also do not understand why you would choose strategic sites for housing development where there is no public transport, employment or shops. Anyone who lives here must have a car and must travel somewhere for anything. Surely housing growth in these areas should be left to normal planning procedures - your strategy should focus on areas where trains or regular buses provide good communication links to places of work and shops.</p>			
Ransom		153		Object	<p>Development on all these sites is not consistent with the policy of retaining Grade 1 farmland. The scale of development will prove detrimental to the character of the villages. Increased traffic will destroy the rural nature of the villages, with congestion caused by additional onstreet parking.</p>		580	Web
Solly	C	419		Object	<p>Point 1: 250 houses are allocated in this policy (the dwelling numbers are not included). Will deliver 75 affordable house (with the 30% requirement)</p> <p>It states in the Housing Levels for rural settlements document in the evidence base (as below) there is a need for 29 affordable homes. This policy over estimates this and could be deemed as over supply.</p> <p>Point 2: There is no provision for</p>	<p>The site due to being in the Rural area could be over scaled for development. The site delivers twice affordable housing as stated in the evidence base which could be deemed as over supply.</p> <p>Transport strategy should be assessed as a whole with the</p>	1253	Email

						<p>traffic assessment or strategy in the Transport plan. Minsters roads are in serious need to be upgraded if possible. Also the Minster roundabout is a busy roundabout and will be more busy in the future as most of the traffic going to and from Thanet will use this roundabout (especially if the traffic wants to go to Broadstairs, Ramsgate and Westwood). A transport strategy is required under this policy and road improvements to the road network will be required.</p> <p>Point 3: This site is on Grade 1-2 agricultural land, lesser quality land should be sought. Thanet is building 91% of houses on agricultural land. Land of lesser quality should be sought in as NPPF paragraph 112 states.</p>	<p>Transport plan due to the proximity of the Minster roundabout. Sites of lesser land quality (Brownfield) should be used instead NPPF para 112, and this policy deleted.</p>			
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached submission from SPRU	See attached submission from SPRU	300	09.27.18.AB.K5022PS.GeneralRep.Final.pdf (739 KB)	Web
Stevens	Angela	163			Object	<p>I object strongly to the number of houses being proposed in these tiny villages. The population of some is being increased by up to 50%, which is unthinkable! Narrow, country lanes surround these villages, so the roads are not fit to take hundreds of new residents or their cars.</p> <p>Tothill Street in Minster in particular, is already almost permanently gridlocked, especially during peak times. Due to the nature of many old terraced roadside cottages, residents' cars have to be parked in the road outside, so effectively most of Tothill Street is only a single lane, making 2-way traffic virtually impossible and even in the quietest times, traffic is very slow along the whole of Tothill Street, especially at the bottom end, close to the shops</p>	<p>Officers need to listen to their councillors, who reflect the resident's knowledge and opinions about certain areas. If residents see a potential hazard in the building of so many houses in their area and report it to councillors, who in turn report it to the officers, they should not be ignored! Sadly, at TDC that is what happens, to suit the officers, not the councillors or residents!</p>	684		Web

						and church. The other villages face similar problems.				
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Housing at Rural Settlements Table 9 - Sites allocated for residential development at Rural Settlements HO13										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		952		Email

Housing at Rural Settlements Table 9 - Sites allocated for residential development at Rural Settlements HO14

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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		953		Email

Housing at Rural Settlements Table 9 - Sites allocated for residential development at Rural Settlements > HO15										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		954		Email

Housing at Rural Settlements Table 9 - Sites allocated for residential development at Rural Settlements HO16

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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		955		Email
Mayall	C	473	Southern Water		Object	In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), Southern Water has undertaken an updated assessment of existing infrastructure capacity and its ability to meet the forecast demand for 40 new dwellings at this site. As per our previous representations at Regulation 18 stage, that assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development. Since OFWAT's new approach to water and wastewater connections charging was implemented from 1 April 2018, we have adjusted our requisite site specific policy wording to align with the new charging mechanism. Despite changes to this mechanism, the need remains for recognition that there is limited capacity at this site's "practical point of connection", as defined in the New Connections Services and as a result, network reinforcement will be required in advance of occupation. This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Therefore, whilst a lack of capacity is not a fundamental constraint to development, new or improved infrastructure would need to be provided in parallel with the development. Southern Water has limited powers to prevent connections to the		1368		Web

					<p>water and sewerage networks, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.</p> <p>Unless planning policies support delivery of necessary underground sewerage infrastructure there is a risk that it will not be delivered in parallel with the development, leading to an unacceptable risk of foul water flooding in the area to both new and existing residents. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>Southern Water is unable to support Policy HO16 as sound because it does not adequately support delivery of the local sewerage infrastructure necessary to serve this site in parallel with development. We consider that this is inconsistent with national policy, in particular paragraphs 109 and 157 of the NPPF. Accordingly, in line with the NPPF and National Planning Practice Guidance and to ensure sustainable development, we propose that the following criteria are added to Policy HO16 (new text underlined):</p> <p>Proposals for residential development will be expected to: [...]</p> <p>Phase occupation of development to align with the delivery of sewerage infrastructure, in collaboration with the service provider</p>				
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Housing at Rural Settlements Table 9 - Sites allocated for residential development at Rural Settlements HO17										
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			Object	Policy HO2 - Policy HO17 - many of the sites identified for non-strategic housing provision indicate quite substantial numbers of new homes may be built and that many will affect known heritage assets or as yet unidentified archaeological resources. A requirement for archaeological evaluation or consideration of heritage assets or settings is included in a number of the policies, but we suggest this should go further and that a broader heritage impacts assessment is undertaken in respect of each site which would inform the scale and quantum of development that may be appropriate. If such assessments have already been undertaken as part of the evidence base for the local plan, explicit reference to these should be made in the policies or supporting texts. We are unable to give support for these policies without a clear understanding of the nature and scale of impacts that may arise from the amount of housing indicated for each site.		958		Email

Rural Housing Need HO18

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		Observation	There appears to be some overlap between policy HO11 Housing at Rural Settlements and Table 9 Sites allocated for residential development at Rural Settlements and point (1) - listed after Table 9 - and policy HO18 Rural Housing Need. Most of the sites listed in Table 9 are for more than 10 dwellings and would provide some affordable housing. Point 1(2) after Table 9 requires development applications to demonstrate that engagement has taken place with the parish council to address how any affordable element to be provided can serve to address need arising in the relevant parish as a priority. This is similar to the approach set out in Policy HO18. Of the settlements with village confines only Acol has no housing allocation within or adjacent to it. We suggest that the two policies are merged.		414		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	There has been no affordable housing development in Monkton in recent years, all the recent housing development has been for large expensive houses that young people brought up in the village who would like to remain would have no hope of being able to buy, or even rent, and anyone who already lives here who might like to downsize is unable to do that either. There has also been no provision considered for assisted housing. It would appear that the developers profit overrides all other considerations and this is of no help whatever to rural communities.		596		Web
MEADEN	IAN	2			Support	How does the current and projected building developments in St Nicholas At Wade meet the stated obligations?The village is being drastically enlarged by building on agricultural land outside the village envelope. None of it is affordable by the average villager. How are we meant to have any faith in how the council operates?	SUGGEST YOU FOLLOW YOUR OWN GUIDELINES!!!!!!!	4		Web
Ransom		153			Support	Affordable housing should be restricted to local inhabitants with a proven link to the area.		581		Web

Agricultural dwellings HO19										
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
Johnson	Elisabeth	51	Monkton Residents Association		Observation	It would seem that in a rural community new agricultural dwellings are more appropriate than much of the development that has already been allowed, so this seems a rather strange policy.		597		Web

Care and Supported Housing HO20

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Johnson	Elisabeth	51	Monkton Residents Association		Observation	Specialist housing for older people, as stated before needs to be in all areas, not just the Thanet towns. People get older in rural areas too!		599		Web

Houses in Multiple Occupation including student accommodation HO21										
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
Solly	C	419			Support	Paragraphs 11.30 to 11.35: It appears that statements and policy are out of date, as the Canterbury Christchurch campus has now closed and being sold. Paragraph 11.34 refers to Broadstairs University. Paragraph 11.35 contains a measurement which may not be relevant.	Review of Policy and statements relating to the closure of Canterbury's Christ church, Thanet Campus (Broadstairs university)	1254	Solly CCCU.jpg (157 KB)	Email
Ward	Linda	157			Observation	Residential roads are already congested by the volume of parked vehicles.		511		Web

Gypsy and Travelling Communities HO22

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
Khan	G	222			Object	<p>Since stated 2013 Gypsy and Traveller Accomodation Assessment being conducted there has been an significant increase each year of gypsy / travellers incursions breaking padlocks/ fences / barriers on both public and private land to form their camps and then when moved on leave building rubble , human and animal excreta - fact and pictures of such in local papers .whilst occupied the local population are unable to enjoy / are intimidated and prevented using the amenity that was intended for them - few example facts Jackey Bakers , areas in Margate , manston ,Ramsgate Western Esplanade ,Eastern Esplande .At present there has been a encampment of caravans / cars / cables from generators and other detritus / rubbish on the Ramsgate eastern esplanade car park (nice view of sea l'd quite like please) for at least past 4 weeks - this car park has a chargeable fee to park . Again unable to use facility , it is a car park , not a campsite -I have been unable to park Vehicle would have to park in between caravans / generators/ cables and rubbish , if parking is attempted a crowd appear from caravans , feels rather intimidating and I do not see why I am expected to fund car parking here under such curcumstances) .This Travelling / Gypsy community is not contributing to or enhancing Thanet - the crime rate appears to increase when in residence -there has been a dramatic increase of these incursions - appears a travellers protest since planning application for a site in Ramsgate quite correctly rejected . The numerous traveller / gypsy illegal campsites in Thanet this year have impacted on residents and visitors enjoyment and use of these amenities , further the building , plumbing rubble , residential and human waste has been dumped when moved on . Thanet council via residents funding council tax then Cleans up all the filth /detritus etc left behind .</p>	<p>No need to provide Traveller / gypsy site in Thanet (area deprived enough) . Should be discouraged from travelling here not en route stopping place , lack of suitable work in area . Thanet council instead of taking a single court action every time to move gypsy /travellers on should apply for one order covering all council owned land to enable robust and rapid timely onward moving on of these numerous incursions which have directly impacted of residents amenity , enjoyment of area and left rubble , plumbing , building detritus , human and residential waste to be cleared at public expense . Thanet council should widely promulgate to residents which area of land it will permit Traveller / gypsy accommodated on prior , have a consultation with residents prior to permitting any land being used for such</p>	669		Web

					<p>Policy Ho22 stating the use of land to provide accommodation for gypsy and travellers will be permitted is not transparent - what land , where is this land sited and for how long will the gypsy / travellers be permitted to stay - will this not become a perminant gypsy / traveller campsite by stealth ?</p> <p>Thanet is not an en route stopping place for travellers /gypsies nor an area of readily available employment- it however does have a mild climate which may appeal , alongside public open spaces / amenities which are for the use specified - not a campsite where rubbish etc may be dumped .</p>			
Steel	Richard	43		Observation	In 2018 there have already been over 40 illegal traveller encampments in Thanet. It is untrue to state that Traveller encampments are only an occasional problem.	More specific commitment to the provision of accommodation for the travelling community is required.	94	Web
Wellbrook	Jacqui	20		Support	I refute the suggestion that there is “ only occasional camping” the camping appears to be continual and constant eg Manston, Dane Valley, Palm Bay. Isle of Thanet news reports 35 incursions so far this year?		36	Web

Making best use of the existing stock HO23 and HO24										
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
Duckworth		19			Observation	The imminent closure of Canterbury Christ Church University site at Broadstairs needs to be taken into consideration as part of the Local Plan. There is currently student accommodation there which could be modified or even used as emergency accommodation. This large site needs to be put to good use for Thanet. Would it be feasible for the teaching accommodation to be converted into residential accommodation? Will the removal of the courses have any impact on reducing the need for housing in Thanet as students will now be more likely to live in Canterbury.		31		Web
Margate Estates		460	Margate Estates	Zena Foale-Banks - Nexus Planning	Object	Policy HO24 identifies criteria by which development may be acceptable where it would lead to a net loss in housing stock. We consider that the policy would benefit from an additional criteria which identifies that where a scheme is proposed that would support a tourism use or function, then a change of use away from residential may be acceptable in some cases.		1326		Web

Fostering Homes HO26

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
Duckworth		19			Support	This is sensible. Fostering should be more evenly spread throughout the country. This would benefit all concerned.		30		Web
Wellbrook	Jacqui	20			Support	Having worked in this area with young people in care, I totally agree with this strategy. Parts of Thanet have become a dumping ground for highly vulnerable children and young people. Schools and resources are stretched to the limit		37		Web