

Chapter 14 – Heritage

Document Section Path	Archaeology HE01
Document Part Name	HE01

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>Heritage Impact Assessments - Thanet district is an archaeologically rich area and contains a large number of designated and local heritage assets, many of which may be impacted upon by the proposed allocation sites in the draft Local Plan. It is noted that in several instances (e.g. Policy P07 re. Eurokent) there is reference to a requirement to undertake archaeological assessment and to protect heritage assets as part of the development of the sites. In our view, the site allocations themselves should be subject to an assessment of the potential impacts on the heritage in and around the sites because they establish the principle of development which, in some cases, may harm the significance of heritage assets. This was noted several times in our letter of 16 March 2017 on the proposed revisions to the draft local plan but it is not clear to us that these assessments have been undertaken. The Council should note that in a number of recent cases where HIAs have not formed part of the site allocation policies of a draft plan, or been undertaken as part of the evidence base, progress through the adoption process of the draft local plan has been delayed to allow for this work to be carried out. Advice on site allocations in local plans and heritage is contained in the Historic England Advice Note 3: https://historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-in-local-plans/ (note this has not yet been updated in light of the revised NPPF but the principles contained within it are still supported).</p> <p>We suggest that the local plan does not provide a sound basis for decision making until such HIAs have been carried out, and it has been demonstrated that the significance of potentially affected heritage assets is safeguarded and any impacts are avoided or mitigated in an appropriate way. This may be carried out as a stand-alone assessment and submitted as part of a revised draft Local Plan or as an evidence document, in advance of the examination in public. In the absence of such impact assessments it is not possible for Historic England to determine that the allocation of sites and related policies are based on sound evidence about the likely effects on the historic environment.</p> <p>Historic England would strongly advise that the Council's own conservation staff are closely involved in the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic</p>		971		Email

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						<p>environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185). The Council should also consult with Kent County Council Archaeological Advise Service is, if it has not already done so, in view of the high potential for non-designated archaeology to exist in the history-rich environment of Th a net. This will be of particular benefit in relation to the HIAs that may be required for strategic and other allocated sites. These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p>				
Symonds	Margaret	55	Isle of Thanet Archaeological Society		Observation	<p>HE01 Archaeology:</p> <p>I understand that a review of National Planning Policy Framework regulations appear to downgrade the importance of the exploration and recording of archaeology on sites granted permission for development. In view of the requirement by the government to build 17,500 houses in Thanet, some of which may well be built on areas where there are hugely important archaeological remains, I would urge Thanet District Council to ensure that an Archaeological Condition is strictly imposed, carried out and reported on such sites, to avoid the loss of information about Thanet's rich heritage, which is unrivalled in Kent. This should of course include as a priority any development at the Manston Airport site, where I believe there are likely to be features dating back to the Bronze Age.</p> <p>IOTAS members have warned of situations known to them in other parts of Kent where there is lax enforcement of existing regulations. IOTAS has also been alerted to developments about to be granted planning permission, where an necessary Archaeological Condition had not been imposed, and this has had to be sought at the last minute.</p> <p>There is also an urgent need to address the issue of the storage of excavation archives, which includes artefacts found. At present all of the finds which are excavated by organisations other than the Trust for Thanet Archaeology are either stored outside the area (Canterbury Archaeological Trust and Swale and Thames Archaeology) or, more importantly, outside the County (Wessex, Oxford, Archaeology South East etc.), making this material very inaccessible (particularly if deposited in a salt mine, as the archive from East Kent Access is planned to be or already has been) for further research or especially for extracting material for display to the public. It would be welcome if the Local Plan recognised the issue and had a plan to attend to it. We suggest that there should be an aim for TDC to obtain a facility such as an industrial unit at a reduced rent on a less than fully utilised industrial park, or maybe the Council planners could negotiate</p>		146		Email

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						<p>the 'gift' of such a facility to TDC when discussing any future proposals for a large development of such sites. Once the material is stored locally it will be accessible to be used for display (temporary or more permanent, perhaps in other buildings, such as the Margate Museum), which will allow the Council to achieve its stated aim of:</p> <p>'The Council will promote the identification , recording, protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through management and interpretation'</p>				
Ward	Linda	157			Observation	The utmost care must be taken to preserve Thanet's rich archaeological heritage.		519		Web

Document Section Path	Development in Conservation Areas HE02
Document Part Name	HE02

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Lorenzo	Peter	37	The Broadstairs Society		Observation	The Society would like this policy to apply to Areas of High Townscape Value. AS part of Ramsgate's heritage Action Zone they will be using a Conservation Area Audit toolkit. The Society would like that same toolkit to be used to look at all current Conservation Areas, Areas of High Townscape Value and future Conservation Areas so that there is a consistency of approach and a consistent methodology.		290		Web

Document Section Path	Listed Buildings and their setting HE03
Document Part Name	HE03

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Alan Byrne/English Heritage		155			Object	14 - Heritage - Historic England welcomes and supports the section on and policies for heritage, which we think are generally robust. An exception is the omission of a specific policy for preserving and enhancing statutorily Listed Buildings as required by legislation and the NPPF, and in contrast to specific references to other designated heritage (i.e. scheduled monuments, conservation areas, registered parks and gardens). This may be remedied, to a large extent, by transposing most of the wording of paragraphs 14.9 and 14.10 into policy text. The Council should include a policy and supporting text on maritime heritage in the draft local plan in view of Thanet's coastal location and the potential for significant inter-tidal and underwater archaeology to exist. The presence of a number of protected wrecks off the coast of Thanet should be acknowledged in the draft plan.	An exception is the omission of a specific policy for preserving and enhancing statutorily Listed Buildings as required by legislation and the NPPF, and in contrast to specific references to other designated heritage (i.e. scheduled monuments, conservation areas, registered parks and gardens). This may be remedied, to a large extent, by transposing most of the wording of paragraphs 14.9 and 14.10 into policy text. The Council should include a policy and supporting text on maritime heritage in the draft local plan in view of Thanet's coastal location and the potential for significant inter-tidal and underwater archaeology to exist. The presence of a number of protected wrecks off the coast of Thanet should be acknowledged in the draft plan.	968		Email
Bacon	Joseph	255			Object	In line with all of the above, I suggest that there needs to be a concrete plan put in place to restore and rejuvenate the Cliftonville coastline in particular. At present there appears to be recognition of the importance of our heritage landscape, and key features such as the Winter Gardens and the Lido whilst not having a cohesive strategy to develop and look after the whole area. The coastline was created to be enjoyed as a whole, and so it must be considered once more, if visitors and locals are to make the most of this unique and special environment. We propose that there is an urgent need to protect and restore those heritage assets most at risk, and consider, through communication with the local community, how best amenities could be updated to accommodate modern lifestyles. I propose that the Newgate Gap shelter and management of the surrounding landscape will become a pilot project to show how this could be done, and our members would like to be included in any future discussions.		775		Web

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						I urge the council for a solid plan that put in place to restore and rejuvenate the Cliftonville coastline in particular, taking into account both the heritage of the area and the need for amenities to accommodate modern lifestyles. Our members would like to be included in future discussions on how to make this happen.				
Brain	Dayle	401			Object	LOCAL HERITAGE I cannot understand why listed status has not been sought for our heritage buildings: Theatre Royal, Winter Gardens, Tudor House, Margate Museum, and why funding has not been secured for their future. This is an absolute priority going forward: we cannot and must not lose what is essentially Margate. Couldn't some of the money secured for the Turner extension be used to repair/restore our heritage buildings?		1165		Email
Carter	Viv	176			Support	The number of listed buildings, and buildings of architectural interest were ones of the reasons we moved here- it is good to see the council protecting their survival, while recognising that, in order to survive, some sympathetic changes need to be made, if they are to be used in the future.		501		Web
Lorenzo	Peter	37	The Broadstairs Society		Observation	The Society hesitates to support this policy for the following reasons:- 1. The Council's approach to heritage is worrying - with other societies we sat in the Council Offices to learn of the proposal to review locally listed buildings. Even though no notes were taken at that meeting The Society was left with a promise that a report would be presented to Members about adhering to the new reviewed local list. No report was forthcoming and the Broadstairs and St Peters draft Neighbourhood Plan has instead taken up the cudgels and the Town Council and The Society have funded someone to review the local list we were given by Council officers. 2. The Society sat in the Council Offices at another meeting where we were introduced to consultants who were appointed to draft a Heritage Strategy. We were promised sight of a draft by Christmas 2017. We are still waiting. Subsequently, the Margate Society approached the Leader of the Council asking that the three societies		289		Web

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						<p>get involved in any preparation of such a Strategy. The Society has not seen any response.</p> <p>3. In 2015 there were Living Spaces Workshops to explore how heritage can assist regeneration. Again nothing has been published despite requests from societies.</p> <p>4.The Council must engage with societies and other stakeholders so that a Heritage Strategy is produced that not only secures Thanet's historic assets but uses them for the common cultural and economic good.</p>				
Shoul	Matt	402			Observation	<p>I wish to state that the ongoing work of FOCC - FRIENDS OF CLIFTONVILLE COASTLINE - being focused primarily on the architectural heritage, preservation & protection of Cliftonville's dilapidated, ignored & <i>at risk</i> built environment, <i>recognises a number of structures, other than the recently, albeit temporarily, 'saved' Newgate Gap Sea Shelter, some of which are listed</i>, which seem to require ongoing, vigilant protection by the community, or could be permanently lost through successive Council's short term-ism & lack of recognition of its legal obligations to its listed & vulnerable built heritage. It is of significant concern that community groups such as FOCC may fail to recognise all risks associated with preserving/maintaining/protecting local heritage structures, whether listed or not, given that the Draft Plan does not explicitly state the Council's commitment to honouring its legal obligations, regarding <i>listed</i> architectural & built environment heritage structures, as well as presently <i>unlisted</i> heritage structures, which have been left to decline physically through lack of Council funding from Central Government &/or inadequate prioritising of safeguarding our heritage built environment structures. The financial attraction of Developer's proposals, amongst other factors, may see Thanet, in particular Margate, permanently lose its architectural heritage, during this era of austerity & apparent short term-ism, r.e. insensitive &/or reckless development</p>		1176		Email
Staples	Mark	24			Observation	<p>In the interest of clarity and certainty, Thanet District Council should prepare a Local List of Non-Designated Heritage Assets as is provided by many other Local</p>	<p>Include a Local List of Non Designated Heritage Assets</p>	42		Web

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						Authorities as part of NPPF requirements				
Symonds	Margaret	55	Isle of Thanet Archaeological Society		Observation	<p>TDC has express an admirable desire to protect the special architectural or historic interest which led to a building being listed. IOTAS would also request that TDC ensures that listed buildings which TDC owns should additionally be protected by keeping these buildings in a good state of repair and not putting them on the Asset Disposal List.</p> <p>Ramsgate Maritime Museum is a particular cause for concern because of its state of repair and the absence of a responsible body willing to run it efficiently as a museum. IOTAS owns a number of artefacts from the wreck of the Stirling Castle on tile Goodwin Sands in the museum, which are gradually deteriorating as a result of lack of adequate care or suitable ambient conditions. This situation has been dragging on for some years and needs to be resolved promptly. Have the repairs to the tower been carried out since large pieces of masonry started fell off a year or so ago? As stated in the Draft Thanet Local Plan 14.13, a high-quality museum 'can aid economic regeneration and investment'.</p> <p>Can TDC also guarantee that as a local planning authority it has an up-to-date understanding of the local historic environment and its significance? It is surprising that sites such part of Vale Square, within a Conservation Area and which have been maintained long-term by residents, are designated to go for auction despite an offer from local users to buy it at the reserve price. We are pleased to hear that Vale Square has now been removed from the list for auction.</p>		147		Email

Document Section Path	Historic Parks and Gardens HE04
Document Part Name	HE04

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Dove	Clare	298			Observation	<p>The few parks there are in Thanet are much-needed spaces with mature trees. Thanet Trees proposes that where possible the remaining heritage features of the original designs in these spaces are sympathetically restored to create better urban wildlife havens. For instance in Dane Park, the fountains and the lake could be reinstated with the original Pulhamite rockery (that still exists) planted up with a host of new plants and trees. As well as providing a much more pleasant experience for local people this could become a draw for tourists who would be led away from the seafront to spend money in other parts of the town. It is imperative that the council dedicates enough funds to maintain these spaces for the wellbeing of all. Close to where I live on the East Cliff in Ramsgate, the lack of trees and sturdy planting along the promenade from George V1 Park to Madeira Walk has made this an impoverished and bleak expanse of tarmac and grass. The bandstand area with its outdated 'dance floor' could be translated into an ambitious sunken gardens, still enabling events, but weather proofing people's enjoyment of this area. Arklow Square, the apron to the Grade 1 listed Holy Trinity Church desperately needs its trees replacing and a few local residents are happy to return these gardens to the pleasure spaces they were intended to be.</p> <p>Reinstating ironwork, gates, water supply and lighting would be a fantastic enrichment to many areas. Community wardens, voluntary if necessary, could act as caretakers.</p>	Omits emphasising materials such as flint and the period aesthetics.	905		Web
Gregory	Amelia	316	Thanet Trees https://www.facebook.com/groups/2138824569723508/		Observation	<p>Historic Parks and Gardens: https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9435956</p> <p>The few parks there are in Thanet are much needed spaces with mature trees. Thanet Trees proposes that where possible the remaining heritage features of the original designs in these spaces are sympathetically restored to</p>		967		Email

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						create better urban wildlife havens. For instance in Dane Park the fountains and the lake could be reinstated with the original Pulhamite rockery (that still exists) planted up with a host of new plants and trees. As well as providing a much more pleasant experience for locals this could become a draw for tourists who would be led away from the seafront to spend money in other parts of the town. It is imperative that the council dedicates enough funds to maintain these spaces for the wellbeing of all.				
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Good!		605		Web
Symonds	Margaret	55	Isle of Thanet Archaeological Society		Observation	<p>TDC has express an admirable desire to protect the special architectural or historic interest which led to a building being listed. IOTAS would also request that TDC ensures that listed buildings which TDC owns should additionally be protected by keeping these buildings in a good state of repair and not putting them on the Asset Disposal List.</p> <p>Ramsgate Maritime Museum is a particular cause for concern because of its state of repair and the absence of a responsible body willing to run it efficiently as a museum. IOTAS owns a number of artefacts from the wreck of the Stirling Castle on tile Goodwin Sands in the museum, which are gradually deteriorating as a result of lack of adequate care or suitable ambient conditions. This situation has been dragging on for some years and needs to be resolved promptly. Have the repairs to the tower been carried out since large pieces of masonry started fell off a year or so ago? As stated in the Draft Thanet Local Plan 14.13, a high-quality museum 'can aid economic regeneration and investment'.</p> <p>Can TDC also guarantee that as a local planning authority it has an up-to-date understanding of the local historic environment and its significance? It is surprising that sites such part of Vale Square, within a Conservation Area and which have been maintained long-term by residents, are designated to go for auction despite an offer from local users to buy it at the reserve price. We are pleased to hear that Vale Square has now been removed from the list for auction.</p>		148		Email