

Chapter 15 - Climate Change

Document Section Path	15 - Climate Change CC01
Document Part Name	CC01

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
Environment Agency		449			Object	Policy CC01 -Fluvial and Tidal flooding This policy states: "Where there is no alternative to developing in an area identified as being at risk of flooding (Zones 2 and 3), the sequential test and exception test as set out in the NPPF will be applied. Development proposals in these areas will need a Flood Risk Assessment to be carried out by the developer." This policy needs to be re-worded to ensure that the Sequential Test (ST) is undertaken to identify the need for any development within FZ2&3. Only if the ST concludes that development in FZ2&3 is unavoidable should development proposals then proceed to the Exception Test. The ST also needs to take account of surface/groundwater flooding etc, not just FZ2&3 to reflect the increased emphasis on all forms of flooding within in the updated NPPF.		1286		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Why would any development be allowed in a flood risk zone, there is always an alternative, don't allow it.		606		Web
Ward	Linda	157			Observation	The agricultural land proposed for development at Birchington has been known to flood.		520		Web

Document Section Path	Surface Water Management CC02
Document Part Name	CC02

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Cooper	Barbara	514	Kent County Council (KCC)		Object	SUDS: The content reflects the need for consideration of maintenance arrangements, but it would be beneficial if the policy included the requirement that sustainable drainage systems "where possible, provide multi-functional benefits." This would reflect the approach within Thanet's green infrastructure policies for the provision of amenity and biodiversity in new development and would be consistent with the revised NPPF narrative.		1529		Email
Crutchlow	Mark	426			Object	A complete disregard of your own policy documents namely Policy cc2 relates to landscape character areas and the Central Chalk Plateau. At the rate you seem to want to build on Thanet there will be little or no "Character areas" left.		1217		Email
Environment Agency		449			Support	Policy CC02 - Surface Water Management This policy covers surface water drainage adequately for groundwater protection perspective. Para 15.8 - We are pleased to see the suggestion to promote the benefits of rainwater reuse and recycling.		1287		Email
Twizell	Heather	512	Natural England		Object	<p>Surface Water Management</p> <p>Paragraph 15.10 – we welcome the recognition in bullet point 3 that SuDS can contribute to sustainable development by combining traditional water management with opportunities for amenity, recreation and wildlife.</p> <p>Policy CC02 - Surface Water Management</p> <p>Paragraph 15.10 recognises the wider benefits of SuDS for people and wildlife and this should be reinforced in the policy text, to ensure appropriate features are designed into proposals from the outset. We would suggest something along the following lines: <i>'SuDs design, together with a robust long term maintenance plan should be considered as an integral part of the master planning and design process for new development and should include benefits for people and wildlife wherever possible.'</i></p>		1478		Email

Document Section Path	Coastal Development CC03
Document Part Name	CC03

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Environment Agency		449			Object	Policy CC03 – Coastal Development We support this policy but would suggest a slight rewording to clarify the requirement for an FRA within 40m of the coast regardless if the development is within FZ2 or 3 or not. This is to ensure development will not be affected by coastal erosion and/ or the impacts of wave overtopping. Please be aware that the Environment Agency has recently undertaken new modelling for the North and East Kent Coast and this can now be made available to update the SFRA and inform the LP. All planning decisions should be based on the best and latest information available. The Flood Zones should be updated to reflect the new modelling in November.		1288		Email
Latchford	Barry	45			Observation	This will be interesting in the future for Pleasurama.		111		Web
Twizell	Heather	512	Natural England		Object	<p>Policy CC03 - Coastal Development</p> <p>In our response to the 2015 Preferred Options consultation we raised the concern that coastal developments and defences can potentially prevent natural habitats responding to coastal change and thereby contribute to their loss as sea levels rise through a process known as coastal squeeze. Relevant habitats include mudflats, saltmarsh and shingle beaches. We would suggest including a third clause in this policy along the following lines:</p> <p><i>Proposals for new development within 40 metres of the coastline or clifftop must demonstrate to the satisfaction of the Council that it:</i></p> <ol style="list-style-type: none"> 1. <i>Will not expose people and property to the risks of coastal erosion and flooding,</i> 2. <i>Will not accelerate coastal erosion due to increased surface water run off before planning permission can be granted and</i> <p>3) Has considered the potential for impacts on natural habitats through the process of coastal squeeze or otherwise restricting the capacity of the coastline to adjust to sea-levelrise and climate change.</p>		1479		Email

Document Section Path	Renewable energy CC04
Document Part Name	CC04

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Alan Byrne/English Heritage		155			Object	Policy CC04 - reference to possible impact on heritage assets (bullet 5) is noted, but this could be extended to settings and views, as in Policy CC06.	Policy CC04 - reference to possible impact on heritage assets (bullet 5) is noted, but this could be extended to settings and views, as in Policy CC06.	973		Email
Behrendt	Mark	423	Home Builders Federation		Object	<p>Policy CC04</p> <p>The policy is not sound as it is not consistent with national policy</p> <p>Paragraph 96 of the NPPF specifically outlines that where it is unfeasible or unviable to provide decentralised energy supply then developers will not need to comply with the relevant local plan policies. To ensure consistency with the NPPF the Council should address this within policy CC04.</p> <p>Recommendation</p> <p>An additional line be added to the end of policy CC04 stating: "Where an applicant can show that the provision of renewable energy or micro-generation is either not feasible or would make the scheme unviable then this policy will not be applied."</p>	<p>Recommendation</p> <p>An additional line be added to the end of policy CC04 stating: "Where an applicant can show that the provision of renewable energy or micro-generation is either not feasible or would make the scheme unviable then this policy will not be applied."</p>	1213		Email
Cooper	Barbara	514	Kent County Council (KCC)		Object	Resilience and Emergency Planning: KCC recommends that this policy wording could potentially be amended to provider greater clarity as to what applicants will need to demonstrate		1530		Email
Twizell	Heather	512	Natural England		Support	<p>Policy CC04 - Renewable energy</p> <p>Natural England supports the inclusion of the caveat at clause 6 requiring renewable energy developments to take account of their impacts on local landscape and biodiversity assets</p>		1480		Email
Wheeler	Guy	113			Observation	<p>I wish, as a resident of Birchington on Sea, to raise my concerns and objections to the proposed local housing plan that has been presented by Thanet Council.</p> <p>The plan specifies a forecasted need for 17,140 houses to be built in Thanet, with 1,600 dwellings planned for fields adjacent to Canterbury Road in west Birchington.</p>		240		Email

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						<p>Councillors stated that the need for this number of new builds was as a result of the “Experian” commissioned report which forecasted economic growth over a twenty year period.</p> <p>When questioned, Councillors stated that the growth in the economy would be realised through two fundamental avenues, these being green tourism and green industry.</p> <p>Thanet Plan in General:</p> <ol style="list-style-type: none"> 1. No companies have been recorded as potentially showing an interest in Thanet in green technology or other aspects. 2. The use of green land, whether agricultural or green belt, would nullify their use as a tourist attraction and thereby destroying any potential growth in this sector and its associated support industries (hotel, catering and leisure support). 3. The Government are under increasing pressure from energy companies to remove the green levy placed on them, and this would effectively remove any central government support for fledgling green companies to engage in a start-up style endeavour. 4. A recent study has shown that green energy companies supplying solar panels for solar fields would only employ five full time staff and potentially around thirty part time employees, hardly justification for 17,140 homes? 5. Additional research has shown that solar panel fields are detrimental to the ground on which they stand (they starve it of natural light) and this in turn can render the land of little use if panels are later removed. 6. The use of solar panels is an eye-sore and will, without doubt detract from the appeal that is so vital to attract tourism. 7. One must not forget that Thanet’s re-generation rests with its ability to re-invent it’s tourism base and consequently any over development that detracts from this is at best an “own goal”. 8. In my experience in commissioning reports, such as that by Experian, one is always advised 				

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						<p>to seek a second opinion, usually by commissioning sub-reports on specific issues. This helps to qualify the validity of the main report. Has this been done by TDC?</p> <p>9. TDC's plans for Ramsgate port show how little regard is placed on the potential recovery of tourism in the area (A previously proposed concrete works is hardly a "day at the seaside"!)</p> <p>10. There is no evidence that the Isle has the means for "inward investment" and for TDC to suggest that this is a viable reason for more housing is fundamentally without evidence.</p>				

Document Section Path	Renewable energy Map 4 - Solar Parks CC06
Document Part Name	CC06

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Twizell	Heather	512	Natural England		Object	Policy CC06 - Solar Parks As we have stated previously this policy should include a further caveat that new solar parks must assess their impact on the Thanet Coast SPA and Ramsar site through the loss of functionally linked land and provide mitigation if required		1481		Email
Wheeler	Guy	113			Observation	<p>I wish, as a resident of Birchington on Sea, to raise my concerns and objections to the proposed local housing plan that has been presented by Thanet Council.</p> <p>The plan specifies a forecasted need for 17,140 houses to be built in Thanet, with 1,600 dwellings planned for fields adjacent to Canterbury Road in west Birchington.</p> <p>Councillors stated that the need for this number of new builds was as a result of the "Experian" commissioned report which forecasted economic growth over a twenty year period.</p> <p>When questioned, Councillors stated that the growth in the economy would be realised through two fundamental avenues, these being green tourism and green industry.</p> <p>Thanet Plan in General:</p> <ol style="list-style-type: none"> 1. No companies have been recorded as potentially showing an interest in Thanet in green technology or other aspects. 2. The use of green land, whether agricultural or green belt, would nullify their use as a tourist attraction and thereby destroying any potential growth in this sector and its associated support industries (hotel, catering and leisure support). 3. The Government are under increasing pressure from energy companies to remove the green levy placed on them, and this would effectively remove any central government support for fledgling green companies to engage in a start- up style endeavour. 4. A recent study has shown that green energy companies supplying solar panels for solar fields would only employ five full time staff and potentially around thirty part time employees, hardly justification for 17,140 homes? 5. Additional research has shown that solar panel fields 		241		Email

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						<p>are detrimental to the ground on which they stand (they starve it of natural light) and this in turn can render the land of little use if panels are later removed.</p> <p>6. The use of solar panels is an eye-sore and will, without doubt detract from the appeal that is so vital to attract tourism.</p> <p>7. One must not forget that Thanet's re-generation rests with its ability to re-invent it's tourism base and consequently any over development that detracts from this is at best an "own goal".</p> <p>8. In my experience in commissioning reports, such as that by Experian, one is always advised to seek a second opinion, usually by commissioning sub-reports on specific issues. This helps to qualify the validity of the main report. Has this been done by TDC?</p> <p>9. TDC's plans for Ramsgate port show how little regard is placed on the potential recovery of tourism in the area (A previously proposed concrete works is hardly a "day at the seaside"!)</p> <p>10. There is no evidence that the Isle has the means for "inward investment" and for TDC to suggest that this is a viable reason for more housing is fundamentally without evidence.</p>				

Document Section Path	Renewable energy Map 4 - Solar Parks CC07
Document Part Name	CC07

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Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Heritage: Although the Local Plan draft text recognises the heritage importance of the Richborough area (as in paragraph 14.3), KCC notes that Policy CC07 does not mention the heritage significance. Given the internationally important Roman remains at Richborough (including an extensive Scheduled Monument and surrounding remains of comparable significance), KCC recommends the following amendment:</p> <p><i>“Proposals for the development of renewable energy facilities at Richborough will be permitted if it can be demonstrated that the development will not be detrimental to nearby sites of nature conservation value or heritage assets, or that any potential effects will be fully mitigated”</i></p>		1531		Email