

Chapter 3 - Housing Strategy

Amount of Housing SP11																																					
Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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																											
.		St Johns College	311	Claire Mills - Savills	Object	<div><div>It is not considered that the windfall allowance identified is positively prepared or justified. Table 3 expects 225 units per annum (excluding the initial 3 years to avoid double counting planning permissions). However, the Council's published SHLAA (July 2018) explores historic windfall completions. For the last ten years, 2,141 windfall sites of less than 10 units have been delivered. Windfall completions of 10 or more units have totalled 1,749 in the last ten years.</div><div>Whilst the Council takes the pragmatic decision to exclude major developments of 10 or more units from historic windfall delivery, it is considered that too much reliance is placed on delivery of minor windfall schemes of less than 10 units in the land supply. It is evident that the emerging Local Plan comprises a number of minor allocations of less than 10 units, namely:</div><table><thead><tr><th>Allocation Ref Number</th><th>Address</th><th>Total Allocated (less than 10 units)</th></tr></thead><tbody><tr><td>S112</td><td>Adiacent to 8 Chapel Place, Ramsgate</td><td>6</td></tr><tr><td>S158</td><td>r/o 7-10 Marine Gardens- 5 Dwellings</td><td>6</td></tr><tr><td>S295</td><td>38, 38a and 42 8t Peters Road, Broadstairs</td><td>5</td></tr><tr><td>S322</td><td>Units 1-4 Monkton Place, Ramsgate</td><td>5</td></tr><tr><td>S467</td><td>Furniture Mart, Booth Place, Grotto Hill</td><td>9</td></tr><tr><td>SR45</td><td>1 Thanet Road, Margate</td><td>5</td></tr><tr><td>SS43</td><td>Magnet and Southern, Newington Road, Ramsgate</td><td>8</td></tr><tr><td>-</td><td>Shottendane Farm. Margate</td><td>8</td></tr></tbody></table></div>	Allocation Ref Number	Address	Total Allocated (less than 10 units)	S112	Adiacent to 8 Chapel Place, Ramsgate	6	S158	r/o 7-10 Marine Gardens- 5 Dwellings	6	S295	38, 38a and 42 8t Peters Road, Broadstairs	5	S322	Units 1-4 Monkton Place, Ramsgate	5	S467	Furniture Mart, Booth Place, Grotto Hill	9	SR45	1 Thanet Road, Margate	5	SS43	Magnet and Southern, Newington Road, Ramsgate	8	-	Shottendane Farm. Margate	8	<div><div>Table 3 should be updated to reduce the extent of windfall allowance to 200 per annum. This is considered a modest reduction but a fairer reflection of the circumstances relating to windfall for he District in the last 10 years.</div><div>The resulting 250 reduction in the windfall allowance should then be reallocated to new allocations o secure certainty and confidence in deliverability. It is suggested that a selection of small-medium allocations would best address this need, facilitating prompt delivery that can help immediately address housing need and so provide a suitable balance between the large strategic sites and smaller modest schemes.</div><div>St John's College own a number of additional smaller scale sites that are suitable, available and deliverable to address this need. These vary in capacity from providing 4 up to 120 homes. These sites have been submitted to Thanet District Council at various stages of the Local Plan production but summary principles are set out below.</div><div>Maior Sites (Capacitv for 10 or more Dwellinqs) Land east of Willetts Hill Monkton The site totals approximately 2.3 hectares and is considered to be suitable for up 50 dwellings. The Site is not subject to any landscape or heritage designations and it is considered that high quality development will enhance the existing site and its setting.</div><div>The site is accessed off Willetts Hill, which connects to the A253 to the north and already provides access to Collars Close, which is a small cul-de-sac on the opposing side of Willetts Hill. This is in addition to existing residential properties that front onto this road. The southern extent of Willetts Hill is consequently already benefiting from a residential character and so proposed development at this location would appear a natural extension to the existing settlement.</div><div>There are no on site constraints that could hinder the deliverability of the site. Whilst a Scheduled Ancient Monument (remains of an Anglo-Saxon</div></div>	936	<a href="#">061 Mills Claire Savills Table 3.pdf (1.5 MB)</a>	Email
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Whilst this may appear to indicate that a District has historically benefited from significant windfall, it is contested that this should be given such weight when calculating housing need and the assumptions that windfall will contribute to supply. The statistics are clearly flawed. In a scenario where a Local Plan is being prepared and adopted, the case is made that housing supply should plan for the scenario where a five year supply of deliverable sites can and will remain effective. In such circumstances, the presumption in favour would not be triggered and the proportion of windfall sites would inevitably reduce.</p> <p>It is appreciated that the Council has deducted major sites of 10 or more from the windfall allowance. However, the Council has made no acknowledgement of the fact that they do nevertheless allocate sites of less than 10 dwellings. One must consequently consider this and the fact that windfall sites are not necessarily a never-ending source, particularly if the Council assumes the majority to relate to brownfield land as claimed. It is not argued that a drastic reduction in windfall allowance is required. Instead, it is considered that the calculation of windfall is flawed. Whilst it is agreed as appropriate for the Council to not take into account the 3 most recent years of windfall in the supply totals to avoid double counting with planning permissions, the same should not apply when simply calculating the windfall average itself. It one uses the mean average for windfall completions from 2008/09 up to the latest evidence, which is 2017/18, it is clear that the evidence indicates an average of 214 windfall units per annum for schemes of 10 or less. The table is summarised below:</p> <table><tr><td>Year</td><td>Windfall Sites &lt;10</td></tr></table>	S46	Rear of 59-65 Harold Rd	9		Total	61	Year	Windfall Sites <10	<p>cemetery) is located circa 210m to the north east, the site is considered sufficiently distinct and separate from this designated asset. Furthermore archaeological investigations as part of any future planning application can ensure any potential artefacts within the site are adequately assessed and recorded.</p> <p>An overhead line crosses the site but this need not affect the layout of the scheme. It is anticipated that the line would be undergrounded as part of any future development.</p> <p>Monkton benefits from a primary school, public house and bus stops connecting to Minster to the east, which benefits from substantially more services including a railway station. As noted at paragraph 55 of the 2012 NPPF and paragraph 78 of the 2018 NPPF (which iteration applies will be influenced by when the LPA submit the Local Plan for Examination), the interrelationship between settlements should be acknowledged and the opportunity for development in one village to help support services in a village nearby.</p> <p>Land to the South of Monkton Street, Monkton Development of the land to the south of Monkton Street provides the opportunity for a high quality residential development on a small, well contained land parcel providing a natural extension to the settlement. The site totals circa. 1.2ha and is considered suitable to accommodate up to 20 dwellings. This is slightly less than typically expected for a 1.2ha site due to allowance made for the site shape. For instance, it is envisaged that dwellings would only be located on one side of the access road connecting onto Monkton Street until the site widens to the south. The site capacity also makes allowance for the retention of the copse to the south eastern corner of the site where pond (believed seasonal) is also located. Despite the proximity of field drains, it is reiterated that the site falls within flood zone 1, the zone 1, the zone to which development should be directed.</p> <p>The site is within the sole ownership of our client and is considered suitable, available and deliverable within the next 1-5 years. Furthermore, if one excludes the south eastern copse from the site area, it is evident that the site would be no more than 1ha. In the scenario where the submission timings of the emerging Local Plan mean that the 2018 NPPF applies, this site could consequently readily address the need for 10% of the housing requirement to be met through sites of 1ha or less.</p>			
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<p>In light of this and the fact that on the adoption of a Local Plan the extent of windfall schemes will likely reduce dramatically, it is considered more proportionate for the housing land supply in Table3 to assume 200 windfall dwellings per annum.</p> <p>It is also reiterated that year 2010-11 significantly affects the mean average with a total of 496 windfall units on schemes of less than 10 being a clear anomaly. If one excludes that year (as the highest quantum), as well as excluding the lowest figure (76 completions for 2012-13) for the sake of balance, this would reduce the average annual completion rate to 196 dwellings per annum. This further indicates the soundness of a modest reduction in the windfall assumption from 225 to ensure confidence in delivery.</p> <p>As noted at paragraph 48 of the 2012 NPPF and paragraph 70 of the 2018 NPPF, where allowance is made for windfall sites as part of anticipated supply, there should be 'compelling evidence' that they have been consistently available and will provide a reliable source of supply. Whilst the phrasing between these two iterations of the NPPF differ very slightly, the premise remains comparable. Which applies will ultimately</p>							<p>The site is well contained by its surrounding built and ....</p> <p>WORD LIMIT REACHED - PLEASE REFER TO ATTACHMENT FOR REMAINDER OF REPRESENTATION - SITES: LAND WEST OF WILLIETTS HILL - MONKTON LAND TO THE NORTH OF THE LENGTH - ST NICHOLAS AT WADE LAND AT CRUMPS FARM - ST NICHOLAS AT WADE LAND SOUTH OF MARGATE HILL - ACOL LAND TO THE WEST OF SHUART LANE ST NICHOLAS AT WADE, LAND OFF SUN LANE, ST NICHOLAS AT WADE</p>																									

						<p>be affected by when the local planning authority submit the Local Plan for Examination.</p> <p>In any event, it is not considered that there is sufficient confidence or compelling evidence that a rate of 225 dwellings per annum will be delivered in this scenario for the reasons set out above.</p>	<p>n agricultural barn is located further to the south. It is proposed that the existing track th</p> <p>nects the barn to Monkton Street w</p>			
.		Tesco Stores Ltd	408	Mark Buxton - RPS	Object	<p>In our representations to the Proposed Revisions to the Local Plan, we broadly welcomed the increase to 17,140 additional dwellings over the plan period. On behalf of our client, we consider that this represents a more accurate reflection of the total number of additional dwellings required across Thanet than the 12,000 additional homes previously identified in the 2015 consultation. This does though comprise a 43% increase in the level of need in the plan period, thereby necessitating a more flexible and proactive approach towards identifying suitable housing sites.</p> <p>In this context, we consider that Table 3 – Total Housing Supply, is over reliant on Windfall Sites which are proposed to deliver 225 units per year across the plan period (2011-2031). The Council should be aware of additional sites which are suitable to be allocated within the emerging Local Plan to avoid such a heavy reliance on windfall.</p> <p>We consider it would be more appropriate, under a plan-led system (as advocated by the NPPF), for the Council to identify and allocate sites now rather than relying on windfalls. Since windfall can include any sites not specifically identified in the local plan, it is inevitable that the level of windfall will increase where a local plan is out of date or unable to demonstrate a 5 Year Housing Land Supply. As the local plan progresses, and providing the Council is able to demonstrate and sustain a 5 Year Housing Land Supply, the level of windfalls should diminish over time.</p> <p>We therefore question whether it is realistic for this level of windfalls to be delivered year on year across the Plan period. Consequently, evidence of previous levels of windfall should not automatically be deemed “compelling evidence” (as required in paragraph 48 of the NPPF) or a reliable indicator of future trends.</p> <p>We note that based on the current total housing provision, approximately 26% of the total 857 dwellings required each year would be provided by windfall sites. We consider this represents an over- dependence on windfall sites being brought forward for development and the Council should instead be allocating additional sites. If this level of windfall allowance is to be carried forward in the Local Plan, we request that further evidence is provided to demonstrate that the allowance is realistic with regard to the housing evidence base (notably the Strategic Housing Land Availability Assessment), historic windfall delivery rates and expected future trends as required</p>	<p>Review the windfall allowance in Table 3, Total Housing Supply, as 225 units per annum sustained over a 10 year period is considered unrealistic and unsustainable; additional housing sites (such as land north of Millennium Way) should be allocated instead in accordance with a plan-led system.</p>	1186		Email

						<p>by the NPPF.</p> <p>We have previously identified that land north and south of Millennium Way would be suitable for a housing allocation and such an allocation would help with the housing supply and enable the Council to reduce its dependence on Windfall sites within the Local Plan.</p>				
.		The Mockett Trust Ltd	433	Mike Goddard - Goddard Planning Ltd	Observation	<p>The Case for a Residential Allocation – Former Gasholder Station Site, St Peters</p> <p>Introduction</p> <p>This statement accompanies our representations to seek the re-allocation of this former gasholder site as a housing allocation in the Local Plan. We explain the important history of the site as an allocation in both the adopted Local Plan and in the previous 2015 draft replacement for that Local Plan.</p> <p>We attach a plan identifying in red the land for which we seek this allocation (the area in blue is other land owned by the Mockett Trust Ltd).</p> <p>The Plan Pedigree - 2006</p> <p>The site has an important “plan pedigree”, with allocations in the current adopted Local Plan and in the previous 2015 draft local plan.</p> <p>Adopted Local Plan 2006</p> <p>The site is identified in the current 2006 adopted local plan as land to be retained for employment uses (appendix 1). It is part of a wider area on either side of the railway line known as Dane Valley Industrial Estate. The relevant policy EC12 requires land to be retained for employment uses falling within use class B1 and B8 in locations close to residential areas, with additional B2 use away from residential areas. In our view under this policy there might be a restricted use for B1 close to the existing residential areas but the majority of the site could be available for B1 or B2 . That local plan is now under review but it is still the development plan and decisions should be in accordance with the development plan unless material considerations indicate otherwise.</p> <p>Draft Local Plan – Preferred Options Consultations – January 2015</p> <p>The site was allocated in this document as a housing site (SS37) for a notional development of 60 dwellings (see appendix 2). Following that we submitted a planning application for the site and adjacent land. During its consideration an appropriate density of 12 units per acre was agreed with the council for our application. And subsequently the 2018 NPPF at paragraph 123 seeks a significant uplift in the average density of residential development in locations such as this. The site is approximately</p>		1265	<a href="#">Appendices.pdf (1.1 MB)</a>	Email

					<p>5.8 acres and therefore capable of accommodating 70 or more units.</p> <p>The draft Local Plan August 2018</p> <p>The former gas holder station site is within the urban boundary and therefore subject to draft policy SP21. This policy relates to development in the countryside and resists development outside of the urban and village confines. The site is located within the urban confines on the policies map of the draft Local Plan. We consider that development within the urban confines is acceptable in principle, but obviously subject to control over its content, use, detail and impact.</p> <p>However, in the current draft local plan, now under review, the site is no longer a housing allocation. It was removed by the council as it considered that its development for housing was ‘unsustainable’ due to the high cost of remediation. We now have revised figures for remediation which demonstrate that it is viable and deliverable. We deal with that in the next section.</p> <p>Is The Site Viable?</p> <p>We understand that the council chose to delete the site as a housing allocation from the 2018 draft Local Plan in view of information which it had received during the course of a planning application and subsequent appeal. This scheme was development on the former gasholder station site and on additional agricultural land within the green wedge. At that time, the anticipated cost of remediation was substantial and well beyond any capital receipts which could have been achieved by the development of the former gasholder station site alone.</p> <p>Consequently, enabling development beyond the area of the former gas holder station site was needed to finance the necessary remediation of the former gas holder land. The council considered that the former gas holder site on its own was therefore not deliverable. However, the owners of the land have now obtained information which was previously confidential and at the time of the application and appeal exclusively available to the former owners of the gas holder station and not the applicants/appellants. That information now demonstrates that the cost of remediation can be significantly less.</p> <p>This subsequent report was undertaken by the original owners’ consultants who had previously implemented an initial minimum requirement remediation on behalf of the National Grid in order to be able to sell the site for open storage use only. The more recent work has been undertaken by Advision ( part of Worley Parsons Group who undertook the original remediation of the site) and involves reviewing existing information relevant to land contamination, risk and liability on the former gas works gas storage site. The assessment (see appendix 3) has reviewed documentation and comes up with a</p>				
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					<p>remediation strategy and an overall reduced cost when compared to that originally advised by separate consultants who had undertaken a desk top exercise only (so the contingency cost was greater). This figure is considered in a viability assessment and covering letter provided by viability specialists Strutt and Parker (appendix 4). This development appraisal concludes that a scheme of 70 dwellings (12 units per acre as per the previous application ) is a viable proposition, delivering an appropriate return to the land owner and an acceptable margin to a developer. Such a development could also provide 23% affordable housing, a proportion previously considered acceptable by the council when dealing with the planning application and appeal on the larger site. The proposal would also deliver a package of Section 106 infrastructure contributions.</p> <p>The additional work in relation to the cost of contamination and the viability assessment by Strutt and Parker demonstrate that this site can deliver a viable development of housing.</p> <p>Brownfield First</p> <p>The site for which we seek an allocation is a former gas holder station. The site is hard surfaced and there are remnants of previous buildings. It is not part of countryside and is located within the identified built confines of the urban area.</p> <p>Government policy in the 2018 National Planning Policy Framework aims to make effective use of land (chapter 11). Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses whilst safe-guarding and improving the environment and ensuring safe and healthy living conditions. It requires strategic policies to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously – developed or brownfield land.</p> <p>Paragraph 118c) gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs and it goes on to say that it supports appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.</p> <p>Paragraph 118d) promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.</p> <p>Paragraph 119 encourages local planning authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers.</p> <p>Paragraph 123 requires plans to contain policies to optimise the use of land and meet as much of the identified needs for housing as possible. The NPPF refers to the need to seek a significant uplift in the average density of residential</p>				
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						<p>development.</p> <p>The recently published NPPF places even more importance upon the need to make effective use of brownfield land. The development of the former gasholder station site would achieve this objective.</p> <p>Policy SP11 and Housing Delivery</p> <p>The council has identified provision for a total of 17,140 additional homes up to the period of 2031. However, this aspiration in our view is unlikely to be achieved based upon past performance and the quantity and quality of sites which are proposed to be allocated. Over the last 5 years, the council has delivered little more than 300 dwellings per annum. It is very likely that delivery will fall well below 95% of the local planning authority's housing requirement, bringing with it the need to prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years. In our view, this may involve relaxing controls in certain areas to ensure adequate delivery (paragraph 75 of the NPPF). If it is to achieve more than 1,000 each year, more than trebling its current rate of delivery, it will need to take a more positive approach to development and not only grant permission but also make additional allocations on sites which are likely to be developed.</p> <p>Our assessment now demonstrates that the site can be remediated if it were to be released for housing development. There would be sufficient capital receipts to fund the cost of remediation. The site therefore has important historic local plan policy credentials, including the current adopted plan allocation for employment uses, a previous draft allocation for residential development and a location within the urban confines. The site is also a brownfield site and does not lie within the identified green wedge.</p> <p>Consequently, we ask the council to reconsider its decision to de-allocate the site and reinstate that allocation for housing. The site can be delivered and will contribute towards housing delivery in this sustainable location.</p> <p>Conclusions</p> <p>Our representations have explained the important development credentials of this site, its brownfield characteristics and its viability as a potential housing site. The council has previously considered this site acceptable for housing development. But it is deleted in the current draft solely on the basis that the council considered that the development of this site alone would not be economically viable. That concern and reservation have now been dealt with and resolved by the further work undertaken and by Strutt and Parker's demonstration that the site is viable.</p> <p>The site was previously a draft allocation at a time when the full extent of the council's housing need was substantially less than now. Furthermore, the recently published NPPF places even</p>				
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						greater emphasis upon the need to develop brownfield land first, increase delivery and raise densities. The site is currently a retained employment site within the adopted Local Plan and we simply request the council to replace that allocation with a housing allocation.				
.		St Johns College	311	Mark Hodgson - Savills	Support	We support this policy on overall housing numbers to be delivered over the plan period. We consider the notional delivery periods to be achievable over these timescales. However, we have some concerns over the number of dwellings to be delivered through windfall as set out in Table 3 of the Plan.		1297		Email
Agnew	Richard	Gladman	516		Object	<p>Policy SP11-Housing Provision</p> <p>As already set out above Gladman do not consider the housing provision of the Local Plan to be sound. We consider it will be necessary for the figure to be increased to take more account of the worsening market</p> <p>Further, we are concerned that currently this figure is expressed as a total as opposed to a The use of the term total would suggest that this is a ceiling or maximum figure. It is well established in Local Plans throughout the Country that housing requirements should be expressed as a minimum to ensure the Local Plan has sufficient flexibility to adapt to rapid change. Seeking to set a total figure could restrict otherwise sustainable development coming forwards, conflicting with the objectives of the Framework to significantly boost the supply of housing. We also have concerns regarding the approach the Council is taking in setting the plan period At present the plan period runs from 2011 to 2031 which will mean that on adoption this plan would have less than 12 years left. Such a short time period is contrary to the 15-year time frame for plans recommended in paragraph 157 of the NPPF.</p> <p>The proposed trajectory is not sound in seeking to delay the timeframe upon which the current backlog since the start of the plan period is addressed and is contrary to the approach established in PPG that backlog should be addressed within the first five years of the plan. We recognise that the Council would struggle to address a backlog in excess of 4,000 homes within five years however as a minimum the Council should be annualising its housing requirement to ensure this backlog is made up as soon as possible.</p>		1538		Email
Agnew	Richard	Gladman	516		Object	<p>Thanet's OAN</p> <p>Gladman raise strong objections to the assessment undertaken to establish the OAN for Thanet and state that the housing requirement is currently The assessment does not demonstrate the full objectively assessed housing needs of the district and underestimates housing needs.</p> <p>The minimal uplift to account for deteriorating market signals and affordability of housing in the district is disappointing and unlikely to have a significant effect on improving Whilst it may be the case that Thanet has some of the lowest house prices in the South East region, overall the South East region has a</p>		1546	<a href="#">gladman.pdf (225 KB)</a>	Email

						chronic affordability crisis. Affordability in Thanet has deteriorated since the publication of the Updated Assessment of Objectively Assessed Housing Need and an uplift in the region of 15% to account for market signals would be more effective and can be justified when looking at other local authority areas with similar affordability ratios to Thanet. As the Council is aware with the publication of the revised NPPF there will be a new standard method for calculating local housing needs going forward. A document published alongside the consultation paper suggested that using this new methodology Thanet would have a minimum housing requirement of 1063 dwellings per Whilst Government has made it clear alongside the publication of the revised NPPF that it is currently considered amendments to the new methodology Gladman would suggest that a further increase in the region of 20% to account for worsening market signals could also be justified. This would bring the proposed housing requirement more in line with the Government's new standardised methodology for calculating housing needs and minimise the necessity of an early review of the Local Plan.				
Alexander	Richard		189		Object	Local census figures show that Thanet's population in the years between 1961 and 2011 increased by around 33,000 and this has been satisfied by the building of roughly 350 new homes per year. A similar increase in the next 15 years would result in a requirement for 5,250 new homes, less than one third of what is proposed. Thanet has one of the highest rates of unemployment in the UK and successive councils have failed to make any inroads into this situation. How the current administration can claim "aspirations" to increase the job market sufficiently to justify over 17,000 new homes beggar belief. It would appear to a cynic like me that the housing figure has been dictated by Central Government and TDC have to somehow come up with the evidence to support it. The likely reason is that there is planned migration based on a desire to relocate benefit claimants from more expensive areas of southern England.	Provide a serious set of reasons why the population of Thanet will grow organically by such a large amount rather than base predictions on wishful thinking. This will necessitate far more concrete evidence of job creation prospects including where the employment opportunities will be located. If Thanet is full of houses where are the commercial centres to be built?	647		Web
Alexander	Christina		219		Object	The housing figures suggested are based on employment forecasts but historically Thanet has always had one of the highest unemployment rates in the UK. The plan is not specific with regard to where the new jobs are going to come from. To create sufficient jobs to provide employment for the new influx of people will prove, based on past experience, to be impossible. The only conclusion is that these new homes will be allocated to the unemployed from elsewhere in the UK.	Provide firm details as to where the new jobs will be created and base the forecast on this data rather than aspiring to create jobs just to justify a pre-ordained requirement.	666		Web
Alltoft	Wendy		196		Object	How can an area that already has traffic issues, long waiting lists for doctors and dentists, insufficient places in local schools look to add a further 17140 additional homes. One road can have roadworks in Thanet which causes the whole road infrastructure to grind to a halt. By adding such a high number of new homes many of which will have more than 2 cars per household will only make our small isle even more		574		Web

						busy. Thanet is just not set up for more homes not to mention the loss of our green areas where important agriculture is in place. I passionately object to such high numbers, why are the council not doing anything about the derelict, vandalised buildings in Thanet before building new properties which may be used for housing people who do not currently live in Thanet. Surely we should sort our existing properties to house the homeless or those on waiting lists IN THANET before looking outside the area.				
Austin	Patricia	Thanet Green Party	379		Object	We understand that Thanet has been given an allocation of new housing, but deplore the plans to build some of this on rural and greenfield sites as a result of the controversy over Manston. We believe the Manston site is by far the best location for substantial housing development and a business park to create jobs.		1116		Web
Barar			375		Object	<p>Location of Housing. 3.12 states “Outside of the urban areas is open countryside including high quality farm land and seven rural settlements. Thanet’s Green Wedges serve an important function by maintaining the physical separation between, and identity of, the Thanet towns and have been consistently protected from development by local plan policies. Thanet currently has a deficiency of natural and semi-natural green space of 153 hectares, and a deficiency of public parks and gardens of 38 hectares” However in the identification of SP14 as a strategic site, there appears to be a distinct lack of reference to this sort recognition in 3.13 which states “Identification and allocation of housing land has been informed by assessment of the sustainability of individual sites through the Strategic Housing Land Availability Assessment alongside the strategy for the planned location of homes whose key principles are to:-</p> <ul style="list-style-type: none"> <li>• optimise use of capacity from sites in the built-up areas of the coastal towns;</li> <li>• focus provision at sites abutting those areas; and</li> <li>• make modest provision at rural settlements to meet identified need for affordable homes and to provide locational choice at a scale compatible with their character and access to services and facilities.</li> </ul> <p>3.14 and 3.15 also appears to emphasise the momentum of identifying, strategic sites to build on without any consideration to 3.12. At this stage, I interpret the ‘Location of Housing’ policy statements 3.12 to stand alone from the others without any reference to the retention or creation of any green corridors / wildlife corridors within the classification of SP14 (Birchington) as a strategic site. I question this policies soundness therefore and it not being positively prepared or sustainable. Contrary to the evidence provided regarding the health benefits living in the countryside: <a href="http://news.bbc.co.uk/1/hi/health/4580190.stm">http://news.bbc.co.uk/1/hi/health/4580190.stm</a> and <a href="https://www.dailymail.co.uk/health/article-113948/Thehealth-benefits-great-outdoors.html">https://www.dailymail.co.uk/health/article-113948/Thehealth-benefits-great-outdoors.html</a></p>	I question this policies soundness therefore and it not being positively prepared or sustainable.	1077		Email

						<p>Also, I would like to draw attention to the Birchington Village Appraisal 2018 (see attached) which shows the majority of people who responded (69.78%) are greatly in favour of the preservation of green spaces. A 'Location of Housing' policy for strategic sites which takes into consideration green corridors / wildlife corridors will be far more amicable. Grade 1 agricultural Land preserved as green corridors / wildlife corridors can be reclaimed elsewhere for housing on brownfield sites in Thanet and /or the adjustment of SP14 to claim further land to build on away from current settlement borders.</p> <p>Strategic Housing Site Allocations. 3.17 states "The existing built up areas of the district will continue to deliver additional housing. However, a significant amount of greenfield housing land is required to meet the housing target. Assessment has revealed that some of the suitable and sustainably located greenfield sites identified are large and some are adjoining or in mutual proximity". However, 3.18 goes on to state that "The geographical extent indicated for individual strategic site allocations 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. This section identifies, and sets out policies for, housing sites of strategic significance to the Local Plan strategy". I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout. I would like to suggest that the majority of any allowance for greenfield land take to remain, on a strategic site, be in the form of green corridors / wildlife corridors around existing and proposed housing developments, for the reasons as detailed previously.</p>				
Bates	Zoe		288		Object	TDC should push back on Government which is something they are allowed to do on calculated figures and should also open dialogue with neighbouring authorities who are better situated and able to absorb some of Thanet's number. There is not enough employment to accommodate these additional houses.	offload numbers to adjacent authorities	843		Web
Behrendt	Mark	Home Builders Federation	423		Object	<p>SP11 - Housing Provision</p> <p>The housing requirement is unsound as it is not consistent with national policy. The Council state within policy SP11 that their objective assessment of housing need for the plan period 2011 to 2031 is 17, 140 new homes. This equates to 856 dwellings per annum (dpa). Our first concern with this policy is that the requirement has not been established as a minimum. It is important that the local plan recognises that its requirement is the minimum number of homes that need to be delivered and that should appropriate additional development lead to delivery above this amount it will be supported by the Council. In arriving at this final figure, the Council have used the 2014 sub national population projections as the demographic starting point and the made adjustments to take account of</p>	<p>Recommendation</p> <p>Given, the poor affordability in Thanet and the recent rapid increase in lower quartile house prices would suggest the need for a substantial market signals adjustment of at least 15%.</p> <p>Recommendation</p> <p>In order to make the plan sound the Council should, as a minimum, plan for an annualised housing trajectory to meet its remaining needs for the plan period.</p>	1203		Email

					<p>vacancies and second homes, increased migration from London and in response to market signals. Whilst the overall approach is in line with the methodology suggested in Planning Practice Guidance (PPG) we do not consider the Council to have taken sufficient account of market signals. Our assessment of the approach taken in the SHMA is set out below.</p> <p>Demographic starting point</p> <p>The Council is using the 2014 based sub national population projections as the starting point for assessing housing needs. These have been rebased to allow for consideration over the 2011 to 2031 plan period and results in per annum household growth rate of 773. At the time of the study these were the most up to date figures. However, as required by PPG, it will be necessary to consider the latest projections on household growth which were published on the 20th of September 2018. These show that over the next ten years that average household growth as being 764. Given the similarity in these growth rates we would consider the Council's suggested starting point to be a sound basis for assessing housing needs.</p> <p>London migration adjustment</p> <p>We welcome the inclusion of an adjustment to take account of the likely impact of higher migration from London. The poor delivery in the capital and poor affordability will inevitably lead to increased migration in future that will not necessarily be captured by past trends.</p> <p>Market signals</p> <p>The Council have increased its OAN by 19 dpa over the plan period in response to market signals. This represents a 2.3% increase, a level we would consider to be wholly inappropriate given the evidence presented by the Council in relation to the affordability of housing in Thanet. Since the publication of the PPG, the approach taken to market signals and the degree to which Councils have responded to these signals has varied considerably. The PPG provides no detail as to the how much of an uplift is necessary in relation to the market signals in an area. The only statement made in PPG at paragraph 2a-020 is that any increase in planned supply should be:</p> <p>"... by an amount that on reasonable assumptions and consistent with the principles of sustainable development, could be expected to improve affordability."</p> <p>However, this lack of clarity on market signals will be addressed with the introduction of the standard methodology as set out in the draft NPPF and PPG published earlier this year. Whilst this consultation and the methodology cannot be given any weight it does signal that the Government do not consider the current approach being taken by many local authorities to have been sufficient. If it had, then this change in approach would not have been necessary. Whilst the methodology will not be used to assess this plan it is helpful to understand the changes being made and why.</p>				
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					<p>The standard methodology requires uplift to be applied where affordability ratios show house prices to be more than four times local salaries then an uplift should be applied. The Government clearly considers that where house prices are more than four times salary then this is when house prices start to become unaffordable. The standard methodology proposes a formula that requires an uplift of 2.5% above the demographic base for every 1 point above the baseline affordability ratio. The baseline ratio was set at 4 and would mean that, for example, an area where the median workplace to house price affordability ratio was 8 would be required to provide an uplift of 25% on its base demographic projections. However, the formula has been capped so that those areas with the worst affordability would not be required to provide more than a 40% uplift over demographic projections of household growth.</p> <p>However, as stated above, we cannot consider the standard methodology when examining plans submitted up to 6 months after the publication of the draft NPPF. But it is important to consider the expectations of Government in relation to the quantum of housing its wants to see delivered each year in future. In his 2017 Autumn Budget Statement the Chancellor announced the Government's target for house building across the country stating:</p> <p>"I'm clear that we need to get to 300, 000 units a year if we are going to start to tackle the affordability problem, with the additions coming in areas of high demand."</p> <p>As we have outlined earlier in our representation the Government's commitment to this figure as being key to addressing affordability has also been reiterated in its response document to the revised NPPF (<a href="https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework">https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework</a>). The Government have stated that where population projections show a reduced rate of increase in the latest household projections they will revise the standard methodology accordingly in order to ensure the starting point in the plan making process is:</p> <p>" ... consistent with ensuring 300,000 homes are built by the mid-2020s"</p> <p>It will therefore be important that any plan that seeks to use the latest projections, even when submitted prior to January 2019, will need to take account of the Government's stated national target for housing delivery. If the Government are to achieve its aims of delivering this level of housing by the mid 20's, which it considers will improve affordability, it is clear that market signals uplifts need to be much higher than have so far been applied across the Country. In particular those areas with the worst affordability will need to see much higher uplifts if increased delivery is to be expected to improve affordability. In establishing what level of uplift is required to improve affordability the PPG has set out a range of indicators to be</p>				
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					<p>examined and states in paragraph 2a-020 that:  "A worsening trend in any of these indicators will require upward adjustment to planned housing numbers .. ."</p> <p>The market signals for Thanet shows that there is a worsening trend in a number of indicators. For example, the work place based lower quartile house price to lower quartile income ratio {LQ ratio) has increased from 4.80 in 2001 to 10.01 in 2017. House prices have also seen significant increases. Lower quartile house prices have increased from £56,000 in 2001 to £160,000 since 2017. What is also apparent within these trends is that whilst there has been a period of relative stability between 2009 and 2013, where house prices rose by just £3,000 these have increased sharply since 2013. During the last 4 years lower quartile house prices have increased from £120,000 to £160,000. This suggests that the Housing Market Area within which Thanet is located has not been providing sufficient homes to meet needs. Therefore, whilst we recognise that Thanet may be relatively more affordable than other areas in the HMA it is still under pressure and will require an appropriate uplift to address these concerns. Therefore, whilst the context of its position relative to its neighbours must be considered it is equally important to recognise the pressures on housing in Thanet and ensure an appropriate response is made.</p> <p>Paragraph 2a-020 of PPG makes it clear that Council's do not need to consider the precise impacts of any uplift but that it should be reasonable and expected to have an impact. An uplift of 19 homes each year is unlikely to have any discernible impact. The most often cited example has been the Eastleigh Local Plan where an uplift of 10% for market signals was considered appropriate by the Inspector. Eastleigh had similar LQ ratios to Thanet being just under 10 at the time the plan was examined. In other areas with affordability concerns the uplift for market signals have been higher where there have been similar affordability ratios. For example, at Braintree, where affordability ratios were similar to those in Thanet, a 15% uplift for market signals was considered sufficient to have a reasonable prospect of improving affordability.</p> <p>Recommendation  Given, the poor affordability in Thanet and the recent rapid increase in lower quartile house prices would suggest the need for a substantial market signals adjustment of at least 15%.</p> <p>Housing Trajectory  The Council are proposing to use a stepped trajectory which will see the Council deliver 4,500 homes between 2016 and 2021, followed by 5,500 between 2021 and 2026 and 5,585 in the remaining five years of the plan. This trajectory seemingly limits the Council's delivery for the first 5 years of the plan period (2011-2016) to what was delivered. This will in effect remove any backlog from the Council's consideration of its 5-year land supply. The Government have established in PPG that</p>				
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						<p>backlog should be addressed within the first five years of the plan. If the housing requirement is annualised across the plan period, this would leave an expected backlog on for 2018/19 of over 4,000 homes. This is significant and shows the level of under supply in Thanet in recent years and is the reason why the Government has been advocating the need for speedy plan preparation. In delaying the preparation of this plan the Council have failed to address the growing backlog of housing needs within the Borough that will inevitable be delivered much later than they were needed.</p> <p>We recognise that the Council would struggle to address this scale of backlog within five years. However, we would suggest that the Council as a minimum seeks to plan for a housing trajectory that meets remaining needs for the 2016 to 2031 period on an annualised basis and does not use the proposed stepped trajectory. Using the Council's assessment of housing needs this will require the Council to deliver an average of 1,039 homes each year for this period. Based on the Council's evidence this would deliver a 5.09-year housing land supply on adoption using the 'Sedgefield' approach to backlog and applying a 20% buffer to take account poor delivery in the past, as required by paragraph 47 of the NPPF.</p> <p>This approach would require the allocation of further small sites earlier in the plan period but would represent a more proactive, but reasonable, response to the scale of the backlog that is currently present in Thanet and one that is more consistent with national policy. Should a higher OAN be considered appropriate then further consideration will need to be given to the housing trajectory and 5-year housing land supply.</p> <p>Recommendation</p> <p>In order to make the plan sound the Council should, as a minimum, plan for an annualised housing trajectory to meet its remaining needs for the plan period.</p>				
Bilen	Hayley		478		Object	<p>I have concerns about the new housing being built in our Local area. Our roads cannot cope with the traffic at the moment, and parking to use the local shops is horrendous. I worry our schools will be over subscribed and Local children will have to bus out to neighbouring towns.</p> <p>I worry the local doctors surgery will be inundated and move out to a medical centre which the elderly will find difficult to get to.</p> <p>All these things will ruin our community for young and old alike.</p>		1344		Paper
Bolger	Christine		399		Object	<p>I wish to object to the draft local plan.</p> <p>Why do we need 20.000 houses? Are there really 20.000 families needing a home? Are some of these houses for housing for the London boroughs? If so Thanet will be severely disrupted and its whole character will be changed. Our legacy to future generations will be an urban sprawl.</p> <p>In Thanet we have Grade 1 Agricultural land producing amazing crops. We need to protect these crops as climate change,</p>		1161		Email



						<p>possible hostile nations not supplying us and our leaving the EU means that we need to be able to produce crops in the future. This development will destroy wildlife habitats including hedgerows and endangered species such as sky larks will be at risk.</p> <p>Infrastructure will not cope with a swell in Thanet's population. Southern water cannot cope with either drought or heavy rainfall when they have discharged illegal sewage into the sea. How will they cope with 20.000more houses.</p> <p>Thanet has the highest unemployment in Kent. With so many extra homes where will people find employment.</p> <p>Some alternative to building new houses maybe restoring the large number of long-term empty houses. Use brownfield sites or poorer quality land in preference to Grade 1 Agricultural land.</p> <p>Please reconsider the quantity of houses that are being proposed and where they may be built.</p>				
Brain	Dayle		401		Object	<p>HOUSING</p> <p>Thanet is the 3rd highest urbanised in Kent (27%) after Medway (28%) and Dartford (32%). Ashford is the lowest at 5% and Canterbury is 9% by comparison. However, the population density is comparable to Dartford, with 13 people per hectare, where the average population density for Kent is 4.1 people per hectare. Thanet has the second highest population density in Kent (after Dartford), and was already overcrowded by a factor of seven in 2013, and that figure can only have increased in the past five years.</p> <p>27% of Thanet is already built on (the whole county of Kent by comparison has 10.3%, and Oxfordshire 7.2%). We also have a mere 1% natural land.</p> <p>UK stats by comparison are 6% built on, and 35% natural land. Before I comment on water or infrastructure, anyone can see Thanet is already overcrowded.</p> <p>Grade 1 farmland once under concrete is lost forever. With Brexit looming we need to be able to produce more food ourselves and not be over reliant on food imports. Every 100 hectares of crops can soak up between 30 &amp; 60 tonnes of carbon per year: the more land we lose, the higher the pollution rates. And for every km2 of land developed in Kent, the average loss to the agricultural industry is £132,094 per year.</p> <p>Allocation Ref No 5411 - allocation of 32 dwellings Cottage Car Park, New Street. I am WHOLLY against this. This is an important car park in the Old Town in Margate where parking is at a premium, and is in constant use</p>		1163		Email
Bransfield	Sheila		456		Observation	<p>POLICY SP11 – HOUSING PROVISION</p> <p>17,140 additional homes by 2031 are unsustainable. Where will the water come from? How will sewage be disposed of? Where will the people work? How will Thanet's inadequate road system cope with the extra traffic? Where will the children go to school? With so many Doctors' surgeries</p>		1305		Email

						overcrowded and some closing, where will the new residents register? How will the QEQM handle a massive increase in workload, bearing in mind they are classed as being at breaking point? Many additional points need to be taken into consideration, which this Draft Local Plan appears to ignore.				
Brown	Stephen		110		Object	<p>Please accept this letter as formal letter of objection against the proposed 2, 500 houses-to be built in Westgate on Sea 21,000 houses across Thanet in total</p> <p>The reasons being:</p> <p>Lack of suitable infrastructure:</p> <p>1 Access - Only suitable roads for access are Minster Road and Victoria Avenue, both of which are purely residential, and are already gridlocked in the mornings and evenings. I experience this every day in journeys by car on this road; as it is I consider this to be one of the most dangerous roads to drive along in Thanet.</p> <p>2 Employment - There are no jobs, factories or large shops in Westgate &amp; Garlinge. Thanet is an area of high employment there is no industry. I am not convinced by projections of new jobs being brought to the area and can only see short term employment brought in the construction industry. Long term these proposals will lead to higher unemployment in the area.</p> <p>3 Margate hospital - The hospital is struggling to cope with Thanet's current population level and there are already long waiting lists; I have several severe health conditions including a heart problem which means I have plenty of experiences myself and of observing the queues of the people waiting to be seen at Queen Elizabeth Queen Mother hospital. The staff do an admirable job trying to manage this at the present time. The situation would greatly worsen if more houses are built in Westgate and Garlinge and I worry from a personal level how this would impact on me. The condition I suffer from Atrial Fibrillation puts me at a higher risk of suffering a stroke if the stroke units at Margate and Canterbury are closed down and I had to travel to William Harvey hospital in Ashford I believe this would put me in greater danger as all advice with strokes is to be treated as soon as possible time is of the essence in achieving a good outcome so another huge worry I have is that the stroke unit at my nearest hospital will be closed down.</p> <p>4 - Local GPs Surgery- The surgery in Westgate Bay Avenue is already over subscribed. Currently it has registered over the 10,000 patients it was built to serve and has been extended to it's full capacity . Westgate is not a suitable area to take such a huge expansion in population .</p> <p>5 Dental Surgery - There is only one private dental practice in Westgate so would be unable to support such a rise in population.</p> <p>6 Traffic Congestion across Thanet - Whereever you go in Thanet you get caught in traffic jams which causes stress and</p>		237		Paper

					<p>frustration to road users. You need to allow at least an extra half hour for any appointments to ensure being there on time. I am also concerned about the pollution all these stationery vehicles are producing.</p> <p>7 Water and Sewage - There is already inadequate water on the island, which often leads to water restrictions during in summer, and the sewage plant at Broadstairs has in the past had overspills into the local bays which is not good for tourism. Margate is just building this up with the Turner and Dreamland effect these proposals threaten to undo all the good work that has gone into regenerating Margate so far. The treatment plant is working at it's full capacity and would not cope with the proposed level of new housing across Thanet.</p> <p>7 Westgate has already more than reached it's population capacity. Thanet has already taken more than it's fair share of development and already has 3 times over the average for Kent 439. The Thanet average is 1368 which goes a long way to explaining the problems already covered in earlier points the traffic chaos, huge strain on the local health service providers at the hospital and in the local practices across Thanet. High levels of unemployment. There are around 2000 empty properties across Thanet which should be utilised to provide for local housing needs.</p> <p>Loss of valuable agricultral land and habitat for wildlife</p> <p>1 The fields at risk of being built on are prime agricultural land which serves a far more valuable purpose in it's currrent use to grow food. This scheme blatantly contradicts the government's plan for agricultural self suffiency post Brexit. If we can't grow our own food in this country we are going to have rely on costly food imports. Kent is the garden of England we should preserve our fields which are iconic parts of our landscape, it is a huge part of Kent's identity. Once we have lost this land we cannot get it back.</p> <p>2 The fields provide a habitltat for animals and insects. Birds use them to hunt or collect seeds and plants for food and small birds nest in the hedgerow. Every day I walk with my dog along the verges to the fields I see birds hovering above the fields they will lose this crucial hunting area if this plan is approved. Our green spaces are precious to our native species. One of the many birds that make their home in the fields on Minster Road are Skylarks which are protected and under threat. The hedgerow running beside the fields· provides pollen and nectar for bees and butterflies as we all know they are under threat from loss of habitat as well as pesticides.</p> <p>3 The fields and open space enrich our lives and are good for our well being. I can't imagine not being able to walk by them with my dog.· My wife and I treasure being able to pause on our walks and listen to the bees buzzing and the birds singing. They provide precious moments of calm and peace in an increasingly hectic and noisy world. With my health problems they offer a place of tranquility and beauty which is vital to me</p>				
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						<p>and I'm sure many other local people.</p> <p>Increased Risk of Flooding</p> <p>The fields help to soak up water from heavy rain without them the area could be at higher risk of flooding.</p> <p>I sincerely hope you will take the issues and points I have made in this letter into consideration when making your decision and will decide to reject this proposal. I also think there should be a government enquiry into this as once the land is gone as I have already said but can't stress this enough the decision cannot be reversed and we will have lost it forever. The Campaign for the Protection of Rural England rightly is opposed to the development of agricultural land. Please also consider this in your decision making.</p>				
Brown	Doug		116	Doug Brown	Observation	<p>I am making a representation on behalf of Mr Evans, Mr Walker and Mr McIntyre. All three are registered on your consultation system. They do not object to the plan per se, however they have concerns that housing policy SP11 leaves Thanet largely reliant upon strategic sites for housing provision. The complex nature of these sites and the requirement for them to provide significant infrastructure, including a new inner ring road means that it is likely that much of the strategic housing provision will be toward the end of the plan period. The previous search for sites has resulted in some areas of the district being identified as suitable for non strategic allocations. One such village is St Nicholas at Wade. All three representatives jointly own a site to the west of Down Barton Road and have asked me, on their behalf to submit the land in their ownership as a site that can be developed immediately to meet the requirement for 4,500 houses by 2021. This land is adjacent to land that has recently received planning permission and is a sustainable site. It is requested that consideration is given to amending the plan to include this site which is capable of providing approximately 20 houses.</p>	<p>There is a need to provide housing as soon as possible to meet immediate demand. This cannot be achieved through the strategic sites which will take some time to come onstream. additional sites should be provided within the areas already identified as suitable for non-strategic development. One such site is located at the west end of Down Barton Road, St Nicholas and I would like this site included as a non-strategic site for delivery before 2021 in the Local Plan. The site is identified on the attached plan.</p>	245	<a href="#">Location Plan of proposed residential site St Nicholas at Wade.pdf (283 KB)</a>	Web
Brown	Doug		116	Doug Brown	Observation	<p>I have been asked by Mr and Mrs Paul, who also own land at Down Barton Road St Nicholas to make a representation on their behalf on the basis that there is a need to provide housing as soon as possible to meet immediate demand. This cannot be achieved through the strategic sites which will take some time to come onstream. Additional sites should be provided within the areas already identified as suitable for non strategic development. Mr and Mrs Paul own land adjacent to that identified in my representation on behalf of Messrs Evans, Walker and McIntyre and would like their land added to the potential site in St Nicholas to help meet this shortfall in 5 year supply. The amended site plan showing the ownerships of the various areas is attached.</p>	<p>The addition of this site as a non strategic site capable of ensuring Thanet has a five year land supply and that early development can take place to address concerns in a possible housing shortfall in the short term because of the need for significant infrastructure to allow strategic site development.</p>	504	<a href="#">Location Plan of proposed residential site St Nicholas at Wade.pdf (295 KB)</a>	Web
Chapman	Brian		317		Object	<p>The Local Plan as now proposed requires the release of excessive areas of open Green Field land, and by the continued desire to see aviation uses return to the currently redundant airfield at Manston, a desire that effectively supports proposals made by RiverOak Strategic Partners', pays little or no attention</p>		969		Email

						<p>to the living conditions and residential amenities of residents of Ramsgate or to continued or new investment within the town. In addition the Councils proposals will have an adverse impact outside of the Local Plan area by placing increasing heavy goods traffic onto the South East road network.</p> <p>First I must lodge a fundamental objection to the amount of Green Field land that the Council is proposing to release for development, and to the location of these sites. The proposals appear to represent a piecemeal approach adding areas to the existing urban fringes in a somewhat ad hoc way which results in a number of smaller parcels of land being developed with less chance of providing sufficient infrastructure, in particular shops, health provision, schools etc. the release of one significant area for development allowing a purpose designed settlement would counter these failings.</p> <p>This add hoc approach of many smaller sites also leads to the loss of, in total, a significant area of agricultural land. This does not represent sustainable development.</p> <p>The Local Plan should support and give precedence to policies requiring the development of Brown Field sites, the protection of open countryside and agricultural land, and sustainability and should not be approved in its present form.</p>				
China Gateway International Ltd.		China Gateway International Ltd.	503	Abraham Laker - RPS	Object	<p>China Gateway International Limited, welcomes the increase to 17,140 additional dwellings over the plan period. China Gateway International Limited considers that this represents a more accurate reflection of the total number of additional dwellings required across Thanet, than the 12,000 additional homes previously identified in the 2015 consultation. This comprises a 43% increase in the level of need in the plan period, thereby requiring a greater need to advocate a flexible and proactive approach towards identifying suitable housing sites.</p> <p>It is our view that Table 3 – Total Housing Supply, is over reliant on Windfall Sites which are proposed to deliver 225 units per year across the plan period (2011-2031). The Council should be aware of additional sites which are suitable to be allocated within the emerging Local Plan and avoid such a heavy reliance on windfall.</p> <p>We also question whether it is realistic for this level of windfall to be delivered year on year across the Plan period. By their very nature, windfalls are sites which are not allocated in the Local Plan. As the Plan progresses and providing the Council can demonstrate and sustain a 5 Year Housing Land Supply (5YHLS) the level of windfall should diminish over time.</p> <p>We consider it would be more appropriate, under a plan-led system (as advocated in paragraph 15 of the NPPF), for the Council to identify and allocate sites now rather than relying on windfalls. Since windfall can include any sites not specifically identified in the development plan, it is inevitable that the level of windfall will increase where a 5YHLS cannot be demonstrated. It is important to recognise that in these</p>		1416	<a href="#">Laker China Gateway.pdf (588 KB)</a>	Email

						<p>circumstances that, when a 5YHLS can once again be demonstrated, the level of windfall should decline, even in the context of revised NPPF paragraph 68c, which requires LPAs to support windfall sites. Consequently, evidence of previous levels of windfall should not automatically be deemed compelling evidence of future trends.</p> <p>We identify that based on the current total housing provision, approximately 26% of the total 857 dwellings required each year would be provided by windfall sites. We consider this is over dependant on windfall sites being brought forward for development and the Council should instead be allocating additional sites. If this level of windfall allowance is to be carried forward in the plan, we request that further evidence is provided to demonstrate that the allowance is realistic regarding the Strategic Housing Land Availability, historic windfall delivery rates and expected future trends as required by the NPPF.</p> <p>China Gateway International Limited has previously identified that land at and to the east of Manston Business Park, through a phased delivery can support employment, mixed use and residential allocations which will help contribute to the employment and housing supply and reduce the dependency on windfall sites within the Local Plan.</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> <p>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.</p> <p>Accordingly, we strongly urge the Council to consider the inclusion of these sites as allocations within the emerging Local Plan.</p>								
China Gateway International Ltd.		China Gateway International Ltd.	503	Abraham Laker - RPS	Object	<p>Land at and to the East of Manston Business Park</p> <p>It is China Gateway International Limited intentions to put forward the sites identified as Phase 1, 2 and 3 for a mixture of employment, mixed use and residential developments across all three sites. These sites were previously submitted as part of the Call for Sites consultation 2018. However, the Thanet SHLAA (July 2018) Appendix G; Sites excluded at the early stage of the SHLAA process rejected land identified as Phase 3, which was proposed for residential development (see below extract).</p> <table><tr><th>Site Reference</th><th>Site Names &amp; Address</th><th>Town</th><th>Reason on reserve list</th></tr></table>	Site Reference	Site Names & Address	Town	Reason on reserve list		1423	<a href="#">Laker China Gateway.pdf (588 KB)</a>	Email
Site Reference	Site Names & Address	Town	Reason on reserve list											

					<p>ce</p> <p>S526 Land at Manston Business Park (east of existing BP) Manston Not in or adjoining built confines. Submission not seeking residential allocation</p> <p>Figure 1: Extract from SHLAA 2018 Update It is our view that Thanet District Council failed to understand that Phase 3 (Residential development) was linked to two other phases for development which sought to encompass a mix of various uses from employment, mixed use and residential. With the other phases taken into consideration, the justification within the SHLAA 2018 for the site to be allocated on the reserve list is viewed as unjustified, as Phase 3 will be within the built confines once the other phases are brought forward for development. If a future planning application submission is sought, it will be the intention of China Gateway International Limited to submit a comprehensive masterplan proposal which promotes a mixed- use site that can deliver significant benefits to Thanet. Further detail is identified below of the proposed three phases and how they tie into contributing to employment and residential land in the Manston area as well as the wider Thanet district. Phase 1 – Employment Uses Given the existing employment designation of the majority of the land forming Phase 1, and the previous grant of planning permission (ref: F/TH/08/0400) for commercial development, which was not implemented, it is considered that an employment use is the best use of land. It is not China Gateway International Limited’s intention to lose employment floorspace within the Land Allocation for Economic Developments (EC1), but instead enhance any future proposed employment development. This approach is in line with Policy SP04 of the draft Local Plan. Phase 2 – Mixed Use (Other Employment Generating Uses) Phase 2 is an area which is open, not currently developed and falls outside the employment designation. the view is taken that this open land provides a good opportunity to accommodate a mixed used development. The mixed uses proposed comprise A1/A2 and potentially C1 uses. This approach will provide a positive transition from employment use (Phase 1) to a mixed-use development (Phase 2). These uses will provide employment generating uses, which maintains the employment allocation of these areas as well as providing the opportunity for the introduction of other services that can support the Manston Business Park, potential future use and development of Manston Airport and the wider area of Thanet. It is acknowledged that the recommended uses will generate an</p>			
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						<p>increase in transport movements. However, the site benefits from being located on a Strategic Route (Policy SP47), which will aid in providing the necessary infrastructure to support these mixed-use developments.</p> <p>Phase 3 – Residential Development</p> <p>It is envisaged that Phase 3 will provide a predominantly residential development. This transitioned approach from west to east of employment uses to mixed use and then to residential development ties in well with the current pockets of development across all three Phases. This method provides a natural progression of residential development, which integrates with the recent residential developments along Spitfire Way (B2190) and beyond into Manston. Furthermore, given the proximity to Manston Airport it is proposed that careful consideration is given to this boundary and through sensitive design principles it may be possible to incorporate a landscaped buffer with housing developments set further back, to facilitate the creation of sustainable residential neighbourhoods. As this part of the site is contained within the Chalk Plateau, the intention will be to enhance the environmental character and adhere to the criteria of Policy SP23 of the draft Local Plan.</p> <p>As mentioned previously, all three phases are located along Strategic Routes (Policy SP47) which will provide the necessary infrastructure to accommodate future development within this locality and provide good accessibility and connectivity to the local services and the wider surrounding area of Thanet District. An indicative masterplan is attached to illustrate how the three phases for employment, mixed use and residential development will be allocated across the site.</p> <p>Conclusion</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> <p>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.</p> <p>Accordingly, we strongly urge the Council to consider the inclusion of these sites as allocations within the emerging Local Plan.</p>				
Cleaver	Gillian		403		Object	<p>Objection to the Local Plan</p> <p>There is no evidence for the increase in housing numbers. I feel the local council is trying to offload responsibility for these</p>		1172		Web



						<p>increases in numbers, because of Central Government instructions, but Central Government has said that it is down to local councils to specify quota. This is contradictory!</p> <p>The local infrastructure as at present, hopelessly inadequate, so especially could not cope with anywhere near the proposed number of houses. With the effects of austerity, we know that County Councils are having to slash budgets in all areas, so this would not bode well for the provision of any upgrading of road systems in Kent to accommodate any rise in population, brought about by the building of houses and subsequent influx of population.</p> <p>I do not feel that the Council has any interest in local opinion, in particular with regard to the loss of Grade A farmland. To build on this land I feel, would be a massive folly. Once it is built on, it is lost forever. We have a responsibility to future generations to preserve this land for the production of food, as regardless to the perpetual demands of housing for a rising population; open land for food production is finite.</p> <p>We also have to consider the chalk plateaus to accommodate drainage for our existing population, and again cannot afford to cover these areas with concrete. We also have to consider loss of habitat for wildlife and local flora.</p> <p>Thanet should also be considered as having a unique status, as we are surrounded by the sea, and do not have the abilities to spread or have respite space in other directions.</p>				
Coe	D.J.		476		Object	<p>I would like to object to the local plan for the following reasons: We do not have the infrastructure to support over 1,000 homes, as there are not enough jobs, schools, doctors surgery's not to mention the affect on extra traffic, sewage, local services and water pressure, also access/exiting from build sites.</p>		1341		Paper
Cooper	Barbara	Kent County Council (KCC)	514		Object	<p>Emergency Planning and Resilience: HOUSING STRATEGY KCC recommends the minor amendment to the paragraph to respond to the need for communities to be resilient as well as sustainable.</p> <p>"The Council's Housing Strategy seeks to create resilient and sustainable communities, recognising the need for Thanet's residents to have access to high quality housing which they can afford."</p>		1499		Email
Corsby	Dave		331		Object	<p>As a Thanet resident I see the Thanet Local Plan as a plan to help meet the UK's desperate need nationally (if not locally) for additional housing. It is a plan that will ruin Thanet by forcing a massive house building programme on a community that does not want it or need it. the Plan contatins no worthwhile benefits for Thanet other than measures that might partly relieve new problems posed by additional housing.</p> <p>The United Kingdom is not self sufficient in respect of food. Forty percent of our food is imported. Only five percent of farm land in the home counties is classified as top grade (grade 1 and 2). Thanet's agricultural land is all rated top grade. In view</p>	<p>Soundness of the Draft Plan</p> <p>The draft plan is not sound because to meet the Government targets the local authority have allocated only 25% of new homes on previously developed land with the shortfall to be met by greenfield or undeveloped land. The national interest would be better served by this top grade agricultural land being retained for promoting food self sufficiency. There seems no logical reason why the plan should have targets for</p>	1010		Paper

						<p>of the paucity of top grade agricultural land in the UK it should be teated as a precious asset. Agricultural land is lost forever if you build on it.</p> <p>The National Planning Policy Framework sets out planning policies for England. But in practice Section II on Making Effective Use of Land encourages local planners to promote a use of land that meets the needs for homes.</p> <p>The framework makes no mention of the need for greater self sufficiency in food production.</p>	housebuilding but no targets for promoting greater self sufficiency in food production.			
Davies	Julie	CPRE Kent	147		Object	<p>CPRE Kent object to the level of housebuilding and considers that:</p> <p>the Council has not demonstrated that this level of housebuilding is viable and deliverable given the substantial infrastructure and environmental constraints in the district; the Council should consider the extent to which the OAN can be met within the area, taking into account of the substantial environmental and infrastructure constraints. In particular, CPRE Kent considers there is no reason why the loss of best and most versatile agricultural land should be accelerated to increase housebuilding. Part of the Local Plan preparation process is to consider whether it is necessary to moderate the OAN (the starting point) to take account of constraints; and Swale Borough Council prepared a study titled 'value of best and most versatile agricultural land in Swale' and a similar piece of work would be helpful for Thanet.</p> <p>CPRE Kent is concerned at the level of housing proposed and considers that there are mitigating reasons why the objectively assessed housing need should not be provided for in full. The recent ONS population projections &amp; estimates suggest a lower population than that used by the Council and the recent ONS household projection shows a reduced household need. The construction industry has not delivered this scale of development. A very high proportion of land in the District is in Grades 1 and 2 agricultural land value which in our view should be safeguarded from development. Kent is 'severely water stressed' and the District has high levels in Kent of Mortality attributable to PM&lt;75 (3.01). These concerns are expanded upon below.</p> <p>Population and Housing</p> <p>The 2012 NPPF requires the local planning authority to use their evidence base to ensure that their Local Plan meet the full, objectively assessed needs for market and affordable housing as far is consistent with the policies set out in the Framework [1]. The Local Plan's objectively assessed housing need, based on the 2014- based population projections is given as 17,140 for the period 2011-2031. This reflects the consultants forecasts which are "based on an updated assessment of migration trend based population projections (2014) and the labour requirements supporting the Council's aspirations for economic and employment growth."</p>		382		Web

					<p>The components of population change for Thanet District indicate that annual change has been declining since 2014. Natural change remains negative, net internal migration and net international migration have been on the decline since 2013. This is reflected in the 2016-based ONS Sub National Population Projections which forecast that population growth 2011-2031 will be less than that forecast in the 2014-based projections. The ONS 2016-based household projection for the 2011-2031 period, based on the 2016-based population projection, at +14,811 is 6% lower than the 2014-based projection, indicating that the OAN of 17,140 is greater than required.</p> <p>Housing completions</p> <p>The plans identified housing need of 17,140. Policy SP11 Housing Provision sets out the following notional delivery:</p> <table><tr><th>Period</th><th>Number</th><th>Annual average</th></tr><tr><td>2011-16</td><td>1555</td><td>311</td></tr><tr><td>2016-21</td><td>4500</td><td>900</td></tr><tr><td>2021-26</td><td>5500</td><td>1100</td></tr><tr><td>2026-31</td><td>5585</td><td>1117</td></tr></table> <p>Kent County Council net dwelling completions data [2] indicates that the annual average for the five year period to 2016/17 was 325 down on the 10 year average 469. Both are well below the notional annual average for the post 2016 periods. The highest annual completions were 889 achieved in 2010/11.</p> <p>The County Council’s Housing Information Audit suggests that the low completion rates are not due to lack of permissions. Information on dwellings not started, dwellings under construction and net dwelling completions for the past ten and five years indicates that around a third of permissions were under construction or completed. This suggests that there is insufficient demand for the scale of housing proposed.</p> <table><tr><th>Period</th><th>Dwellings not started</th><th>Dwellings under construction</th><th>Dwelling completions (net)</th></tr><tr><td>2008-17</td><td>65.5%</td><td>11.5%</td><td>23.0%</td></tr><tr><td>2013-17</td><td>66.3%</td><td>9.3%</td><td>24.4%</td></tr></table> <p>The Rt Hon Sir Oliver Letwin MP identifies the fundamental driver of build out rates once detailed planning permission is granted for large sites appears to be the absorption rate – the rate at which newly constructed homes can be sold into the local market without materially disturbing the market price [3]. This suggests that increasing housing numbers to reduce house price is unlikely to be effective.</p> <p>Vacant dwelling stock</p> <p>It is noted that Table 3 Total Housing Supply refers to 173 empty homes brought back into use and the desire to bring a further 357 back into use. KCC Housing Stock 2017 document</p>	Period	Number	Annual average	2011-16	1555	311	2016-21	4500	900	2021-26	5500	1100	2026-31	5585	1117	Period	Dwellings not started	Dwellings under construction	Dwelling completions (net)	2008-17	65.5%	11.5%	23.0%	2013-17	66.3%	9.3%	24.4%				
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					<p>indicates that at 2017 there were 2,341 vacant homes in the District of which 771 were long term vacant. Greater effort should be made to bring as many vacant homes back into use as this will reduce the need to identify land, and in particular greenfield land, for development.</p> <p>Best and Most Versatile Agricultural Land</p> <p>The Agricultural Land Classification system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England; Subgrade 3a also covers about 21% [4]. Indicating that the remaining 58% of all farmland is in Grades 3b, 4 and 5.</p> <p>Best and most versatile land is a limited resource that will be required for generations to come to help feed the Country. Continuing security of food supply will be an important issue for future generations supporting health and social well-being.</p> <p>The 2012 NPPF at paragraph 112 requires local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. The paragraph continues that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. This approach is taken forward in the updated NPPF at paragraph 170 b) and footnote 53.</p> <p>This approach is reasonable for districts which have a mix of land in all Grades.</p> <p>Thanet, however, does not follow the national picture. Natural England data shows the following position:</p> <table><tr><td>Grade 1</td><td>44.2%</td></tr><tr><td>Grade 2</td><td>17.3%</td></tr><tr><td>Grade 3</td><td>4.5%</td></tr><tr><td>Grade 4</td><td>0.0%</td></tr><tr><td>Grade 5</td><td>1.2%</td></tr></table> <p>This shows that 61.5% is classified as Grades 1 and 2 compared to 16.9% for England. Grade 3a is not identified and thus amount of best and most versatile agricultural land could be higher at 61.5%. There is limited land in Grades 3, 4 and 5. The Grade 3 agricultural land tends to lie in the River Stour Valley or on the north west shoreline where it is shown on the proposals map as being in Flood Zone 3 and Marshes landscape Character Type where draft local plan policies CC01 and SP23 are applicable. The Grade 5 agricultural land is at Cliff End where it is shown to be NNR, SAC, in Flood Zone 3 and Marshes landscape Character Type where draft local plan policies G101,</p>	Grade 1	44.2%	Grade 2	17.3%	Grade 3	4.5%	Grade 4	0.0%	Grade 5	1.2%				
Grade 1	44.2%																		
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						<p>SP25, SP23 and CCo1 are applicable.</p> <p>The objectives of Local Plan Strategic Priority 1 include supporting a sustainable rural economy, recognising the importance of best and most versatile agricultural land. The revised NPPF 2018 paragraph 118 requires planning policies to recognise that underdeveloped land can perform many functions, such as for food production.</p> <p>In our view the very high proportion of agricultural land designated as best and most versatile agricultural land (BMV) suggests that Thanet should be treated as an exception and that BMV should as an urgency be safeguarded from any form of development.</p> <p>Water Supply</p> <p>The Environment Agency has recognised that Kent is ‘severely water stressed’. The scale of development should take into consideration the effect of new housing and employment on water supply, including that required by agriculture.</p> <p>Air Quality</p> <p>The Council recognises that air quality is an important factor in overall health. The development strategy should not worsen air quality, be that in the existing AQMAs or elsewhere in the borough, but should improve matters. Where levels are exceeded plans need to be put in place to enable compliance at the soonest possible date (Client Earth (No. 2) judgement (02/11/2016)). It should not rely on the hope that future technologies, such as electric vehicles, will reduce air quality to a level that complies with Article 23. The Kent Public Health Observatory Air Quality Report April 2018 for Kent Districts sets out that the ‘Mortality attributable to PM&lt;75 (3.01))’ is 20.1 per 100,000 population. This is the highest in Kent.</p> <p>It will be important for the plan to assess all potential allocation sites to ensure that development of sites both individually and collectively will not worsen matters. Consideration should be given to the impact of known and emerging development beyond the borough boundary that will result in additional traffic on the borough’s roads.</p> <p>Housing capacity</p> <p>The SHLAA Review July 2018 sets out that the total number of dwellings for a site were based on a broad requirement of 35 dwellings per hectare. This is low density suburban. A letter from the Rt Hon Sajid Javid MP to Crispin Blunt MP in April 2018 set out that where there is a shortage of land for meeting housing needs, local planning authorities will be expected to use minimum density standards to make the most of the land available, and to make full use of under-utilised sites that could provide homes, and using airspace above existing properties to build upwards [5]. This approach has been taken forward in the updated NPPF. It would be helpful for the plan to include a policy encouraging higher density where appropriate to reduce the need for loss of best and most versatile agricultural land.</p> <p>[1] National Planning Policy Framework 2012 paragraph 47 first</p>				
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						bullet point [2] KCC Housing Information Audit Kent Local Authorities Residential Land Supply 2016/17 7th December 2017 Edition Table 1 Kent: Dwelling Completions (net) all sites. [3] Letter dated 9th March 2018 to the Chancellor of the Exchequer and the Secretary of State for HCLG [4] Natural England Technical Information Note TIN049 Agricultural Land Classification: protecting the best and most versatile agricultural land Second edition 19 December 2012. [5] Letter dated 27 April 2015				
Dawson	Emma		320		Object	<p>Building on A1 Agricultural land, What considered argument could be put to be beneficial to Thanet residents. Taking away rich soil, currently being farmed when our need for farming will be even greater after the outcomes of our countries exit from the European Union. There are plenty of other Brown field sites which would equally serve the need for some of the house shortages in Thanet. We do not need 17140 houses, because inward migration has slowed and will do even further after Brexit. The real need we have in Thanet is for social housing with social rents, council housing for people that already currently live in Thanet waiting on the housing lists for better accommodation or those that are sofa surfing in Thanet. The waiting lists for council housing is approx 2,000 add the sofa surfing residents to this figure, which likely to be unknown. We have areas that have very poor housing stock in the private rental sector, in parts of Thanet we have high levels of deprivation and we have a large waiting list of families waiting to be housed in housing that meets a living standards. We will also need starter homes for young people attempting to climb the housing ladder but in reality those young people require jobs. Thanet currently has very high unemployment, some of the local jobs are topped up with working tax credit because of low wages and rents still require being topped up because rents are too high. This adds to the reason behind building further homes for social rents, because people still cannot afford the rents even if they are working full time. We do not need an excess of 4 and 5 bedroom houses as these will attract out of area buyers and this is where our infrastructure and water supply and school placements and need for dentists and doctors and appointments at hospital, will begin to implode.</p> <p>The local plan was rushed to enable it to be ready in time, in my view, with the difficulty the plan has in that it has become divisive over the Airport DCO and the additional housing planned on the Manston site. The written plan in my view has had to be pieced together but it doesn't fit well. The two transport plans which are trying to fit either outcome the Airport or the Housing and business development. The plan in my view is attempting to piecemeal these two contradicting outcomes and which makes the plan unsound.</p>		975		Email
Dunn	Danielle	Broadstair	499		Object	Our previously submitted comments have not been		1397		Email

		s & St.Peter's Town Council				incorporated. Housing densities are still too high, on added sites. Town Council recommendation is for 25 per hectare.				
Everest	Penny		179		Observation	<p>Thanet has beautiful sandy Blue Flag beaches with distinctive and individual towns for tourism (one of its main sources of employment). Margate, Broadstairs, Ramsgate, Westgate-on-Sea and Birchington need to keep their individuality to continue to attract tourists. However, the proposed increase in housing will not allowag for them to keep their individuality. Thanet will become one urban ugly sprawl. Not attractive to tourists. The green wedges between the towns will disappear. It is important to have green open spaces for health and well being and planting trees will help reduce pollution.</p> <p>The existing roads will become congested and create more pollution as more cars will be using them. Birchington Square and the St Lawrence Roundabout in Ramsgate are already known 'black spots'. Yes, a new road has been planned (Transport Plan) to take some of the congestion from the A28 across to Westwood Cross but there is no guarantee that the funding will be forthcoming from KCC and developers to build this road and it all takes time. I can foresee that the houses will be built first and the proposed road not being ready.</p>		510		Paper
Everest	Michael		210		Object	<p>The total number of proposed new houses of 17,140 is based on unsound figures. The birthrate is falling in Thanet. The Office for National Statistics (ONS) figures for 2017 show a decrease on the projected figures for 2016.</p> <p>The average density of population in Thanet is 1,368 compared with Dover at 368 and Canterbury at .531 and the population in Westgate-on-Sea right now is 2,800!!! higher than the rest of Kent and if these houses were to be built this would double the density. If these houses are required by Government then I feel they should be distributed evenly throughout Kent not forced upon Thanet. Yes local houses for local people not for the over-spill from London.</p> <p>These houses are to be built on prime farming Green Belt Land at a time when it is most likely the UK will need this land to produce more crops due to post-Brexit. This Green Belt Land should be secured for farming only.</p> <p>Based on this number of houses the following would be affected and reach an unsustainable standard:</p> <p>Roads - would be overcrowded and congested. Present roads in towns could not be widened. The proposed new road mentioned in the Transport Plan has no guaranteed funding from KCC and developers. Would it ever be built? Congested roads would create pollution and cause delays to important emergency services.</p> <p>Schools - Two primary schools in Westgate (St Crispins and Chartfield) are already oversubscribed and underfunded.</p> <p>Health Services - Hospitals, Ambulance Service, Doctors, Dentists</p>		638		Paper

					<p>Water Supplies - Southern Water have imposed hosepipe bans in recent years.</p> <p>Sewerage and Drainage- Southern Water have frequently discharged sewage into the sea!! Totally unacceptable.</p> <p>Policing - More pressure on the Police Service which is barely coping at present.</p> <p>Fire Service would be further stretched.</p> <p>The proposed increase in housing would jeopardise most of Thanet's coastline which is designated as a Site of Special Scientific Interest (SSSI), a Special Area of Conservation or Special Protection Area. by the risk of run-off and drainage water/sewage being discharged into the sea by Southern Water when it is stormy. They are unable to cope at such times with the present housing levels.</p> <p>Settlements - Birchington, Westgate, Margate, Broadstairs and Ramsgate have limited sections of green belt between these villages and need to keep their individuality and characters to continue to attract tourists, tourism being one of the main area of employment. Thanet proudly have six wonderful sandy Blue Flag beaches.</p> <p>I feel strongly that if this number of houses is forced upon Thanet, it would spoil the area and create the many problems I have mentioned.</p>				
Favell	Dorothy		490	Object	<p>Many of the local Councillors from the top down have stated that 17200 homes are being imposed on Thanet. I believe this is false. The NPPF places “The emphasis upon local authorities to produce a local plan that objectively identifies and then meets the housing, business and other development needs of an area”. It is my understanding that this allows local authorities to determine their own needs so the argument used by several councillors, including the leader, that “the government sets the target” rings untrue and is an attempt to “pass the buck”. A letter from The Rt. Hon. Eric Pickles supports this. This letter says that the new homes bonus also applies to long-term empty homes brought back into use. When questioned at the Birchington Parish Council consultation about the 4,000+ empty properties in Thanet we were categorically told that the government excluded them and only new builds were an accepted part of the housing allocation. So, yet more untruths from TDC? Or do they really think we aren't going to find these things out? I take great issue in the way Thanet District Council have arrived at their assertions. I suspect it has a lot to do with the amount of money they will be paid under the New Housing Bonus payments from Government. I do not believe they have fulfilled their duty to consult the public properly or taken notice of residents’ views. This is my personal view.</p> <p>Next we come to the loss of Grade 1 prime agricultural farmland. Thanet has some of the best farmland in the UK. I refer you to the <a href="#">http link</a></p>		1363		Email



					<p><a href="http://protectkent.org.uk/news/thanet-local-plan-consultation-views-matter/">http://protectkent.org.uk/news/thanet-local-plan-consultation-views-matter/</a> with the summary of CPRE Kent's position on the Thanet local plan. Everything they say in the summary, in their response to the local plan and their covering letter I agree with and you must take into account as they represent my views. Once it's gone, farmland can never be "re-made". It doesn't form anywhere else (other than by knocking down developments). An extract from NPPF -</p> <p>How can planning take account of the quality of agricultural land? The National Planning Policy Framework expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. This is particularly important in plan making when decisions are made on which land should be allocated for development. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The Agricultural Land Classification provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. Natural England provides further information on Agricultural Land Classification. The Agricultural Land Classification system classifies land into five grades, with Grade 3 subdivided into Sub-grades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations. Natural England has a statutory role in advising local planning authorities about land quality issues.</p> <p>in TDC's local plan 1998 they said this " OBJECTIVES (1) TO PROTECT THE BEST AND MOST VERSATILE AGRICULTURAL LAND FROM IRREVERSIBLE DEVELOPMENT, IN THE INTERESTS OF LONG TERM CONTINUED AGRICULTURAL PRODUCTION; (2) TO SUPPORT APPROPRIATE FARM DIVERSIFICATION MEASURES TO BROADEN FARM INCOME, AND ENABLE FARMING OPERATIONS TO BE CONTINUED; AND (3) TO ENSURE THAT FARM-RELATED DEVELOPMENTS DO NOT PREJUDICE THE LANDSCAPE AND OTHER OBJECTIVES OF THIS PLAN. " and this " 11.11</p> <p>Agricultural land concerns have been dominant in determining planning policies and decisions in Thanet for many years. Thanet's farmland ranks as some of the best and most versatile productive land in Kent and in the South East, by virtue of both the high soil quality, and the extensive and continuous nature of the land in production. As a national food resource in the terms of PPG7, it therefore merits long term protection from irreversible development. " page139</p> <p>onwards<a href="http://www.thanet.gov.uk/PDF/ADPTDPLAN.pdf">http://www.thanet.gov.uk/PDF/ADPTDPLAN.pdf</a></p> <p>Please see this link</p> <p><a href="https://www.google.co.uk/url?sa=t&amp;rct=j&amp;q&amp;esrc=s&amp;source=web&amp;cd=5&amp;ved=0CDkQFjAE&amp;url=http%3A%2F%2Fpublications.naturalengland.org.uk%2Ffile%2F4424325&amp;ei=ER_eVJWFBrKR7Q">https://www.google.co.uk/url?sa=t&amp;rct=j&amp;q&amp;esrc=s&amp;source=web&amp;cd=5&amp;ved=0CDkQFjAE&amp;url=http%3A%2F%2Fpublications.naturalengland.org.uk%2Ffile%2F4424325&amp;ei=ER_eVJWFBrKR7Q</a></p>				
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					<p>blw4HYBA&amp;usg=AFQjCNFuBj-zblqfz8SvbtUrozHOpIDuEA&amp;sig2=4aPjB-JkByV_mnbE2CfUgw&amp;cad=rjt</p> <p>There is a world food shortage. How can TDC allow the building on prime Grade 1 agricultural land when people need to be fed? The farms surrounding Birchington are regularly cropped – at the moment they contain winter wheat and rape. Two crops a year are often sown, wheat, broccoli, cauliflowers, rape, sunflowers and potatoes being the usual crops.</p> <p>This is from <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/brownfield-land-soils-and-agricultural-land/#paragraph_026">http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/brownfield-land-soils-and-agricultural-land/#paragraph_026</a></p> <p>Guidance Natural Environment Brownfield land, soils and agricultural land Paragraph: 024 Reference ID: 8-024-20140306</p> <p>Can brownfield land have a high ecological value? It can do. A core principle in the National Planning Policy Framework is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. This means that planning needs to take account of issues such as the biodiversity value which may be present on a brownfield site before decisions are taken.</p> <p>Defra has published information on Open Mosaic Habitats, a specific type of habitat that is of high ecological value and which occurs on brownfield land. Where insufficient information is available, survey work may be appropriate to assess ecological value before decisions on development are taken.</p> <p>In addition, planning may need to take account of contamination Revision date: 06 03 2014 Related policy National Planning Policy Framework Paragraph 111 Paragraph 120</p> <p>Paragraph: 025 Reference ID: 8-025-20140306</p> <p>Should planning take account of soil? The National Planning Policy Framework states that the planning system should protect and enhance valued soils and prevent the adverse effects of unacceptable levels of pollution. This is because soil is an essential finite resource that provides important ‘ecosystem services’, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution.</p> <p>As part of the Government’s ‘Safeguarding our Soils’ strategy, Defra has published a code of practice on the sustainable use of</p>				
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					<p>soils on construction sites, which may be helpful in development design and setting planning conditions.</p> <p>Revision date: 06 03 2014</p> <p>Paragraph: 026 Reference ID: 8-026-20140306</p> <p>How can planning take account of the quality of agricultural land?</p> <p>The National Planning Policy Framework expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. This is particularly important in plan making when decisions are made on which land should be allocated for development. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The Agricultural Land Classification provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system.</p> <p>Natural England provides further information on Agricultural Land Classification. The Agricultural Land Classification system classifies land into five grades, with Grade 3 subdivided into Sub-grades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations. Natural England has a statutory role in advising local planning authorities about land quality issues.</p> <p>Thanet District Council must do more to identify and utilise existing brownfield, poorer quality land, surplus land and, if necessary, to force landowners whose land/property has remained unused/derelict for several years to either build or sell.</p> <p>To conclude, I have left out many of the points raised in the local plan, not because I agree with them, but because my main personal concerns are that the proposed use of agricultural land in Birchington should be taken out of the plan, I am questioning the need for 17,200 houses overall, I am disputing the number of jobs forecast, and I advocate Manston Airport remaining as a functioning airport with only aviation related activities.</p> <p>Other documents used in the writing of my objections:</p> <p><a href="https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans">https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans</a></p> <p><a href="http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf">http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf</a></p> <p><a href="http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf">http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf</a> (what a shame TDC did not</p>				
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						<p>produce such a worth document!)</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf</a></p> <p><a href="https://excel.office.live.com/x/ExcelView.aspx?FBsrc=https%3A%2F%2Fwww.facebook.com%2Fattachments%2Ffile_preview.php%3Fid%3D647776915348424%26time%3D1425678079%26metadata&amp;access_token=100001906038614%3AAVI7q2PpQZw2J70YinGV7HCb-Dd95VZml8avXRsgEl4h8g&amp;title=Country+of+birth+tables+2008+to+2012.xlsx">https://excel.office.live.com/x/ExcelView.aspx?FBsrc=https%3A%2F%2Fwww.facebook.com%2Fattachments%2Ffile_preview.php%3Fid%3D647776915348424%26time%3D1425678079%26metadata&amp;access_token=100001906038614%3AAVI7q2PpQZw2J70YinGV7HCb-Dd95VZml8avXRsgEl4h8g&amp;title=Country+of+birth+tables+2008+to+2012.xlsx</a></p> <p>This document shows how immigration is affecting the population of the UK – in Thanet we have had an upsurge of immigration in recent years. This is affecting the availability of jobs, and the availability of housing. It is my contention that immigration, which was unfettered during the last Labour administration, and which the coalition government have done little to contain, is having a direct impact on Thanet and the drafting of this local plan. Why should the settled local population have to put up with the consequences of failed government policies? If this link does not open see attached document.</p> <p><a href="http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalplanning/815640/">http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalplanning/815640/</a></p>				
Field		Dane Valley Woods	178		Object	<p>Housing provision increase at the cost of increased traffic, reduction of open spaces and farmland and further environmental pressures on an already overdeveloped and urbanised landscape is not something to be blindly supported, especially if migration-based population trends alter?</p>		521		Web
Francis	Vincent		448		Object	<p>I writing to object to the proposals as set out in Thanet's Local Plan</p> <p>I am struggling to understand the amount of housing planned for us in Thanet, every document I have seen does not support this amount of housing. Even in TDC's plan you have stated that a number of jobs will be created, which is clearly not enough for the amount of housing you want built. Thanet's unemployment as is well documented is some of the highest, in Kent, the highest. If you build all these extra housing without adequate jobs, the area is likely to become a huge unemployment area. Thanet's population is actually decreasing, the only reason why the figures are increasing are due to people moving into the area. I am at odds to understand why our Local Plan is taking this into account.</p> <p>As for Birchington, the increase in housing is far above the recommended amount of housing for a village, this will turn Birchington into a town. We also do not have adequate</p>		1278		Email

					<p>infrastructure in place to handle 1000 new houses, which would be build on Grade 1 agricultural land, which in itself is madness. The local Doctor's can not cope as it is, so how will you allocate all these extra people? The air quality in Birchington will also become an issue, the Square is a main link and is clogged at times &amp; getting worse. Station Road is clogged and getting worse, do you actually think about people having to live in this area at all?</p> <p>Thanet is an area that is considered a potential drought area, you will be making this worse, can our water &amp; drainage cope with these houses? I would like to see proof that Thanet will not be blighted with this increase in housing &amp; that TDC are not gambling with our quality of life.</p> <p>I list below some of the main concerns in bullet point form:-</p> <p>1) Housing increases are not fully evidence based. Being told "the Government says so" does not reflect the actual local population growth figures.</p> <p>2) The existing and planned infrastructure is woefully inadequate to cater for such a large increase in population on a relatively small coastal peninsular.</p> <p>3) in regard to point 2 my concerns are that there is insignificant funding available to pay for it all.</p> <p>4) Scant regard to local concerns that have been ongoing since the last draft plan went out to consultation especially in regard to the loss of Grade A farmland.</p> <p>5) 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.</p> <p>6) Manston Airport - somewhat out of your hands now with the DCO in progress but kicking the can down the road for the last 4 years and not actually robustly supporting the important asset and a "unique selling point" for Thanet, Kent AND the South East raises concerns that plans for the site that do not involve aviation have been pre-determined. This leads many including myself to question just how much of this plan, now out for "consultation" has also been pre-determined and therefore whatever the residents say will be ignored and carried out anyway?</p> <p>It boils down to a simple matter of trust. Is this a local plan for local people? Or a hastily cobbled together plan that ticks boxes?</p>				
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						It should be commented that the process has not included people or considered them, it was commented that the engagement with the public should be improved from the feedback in the 2015 consultation, now we are now at the publication stage, no improvement has been made!				
Gale	Roger	Parliament of the United Kingdom	149		Object	This observation is made in the light of representations received as the Member of Parliament for North Thanet and of local knowledge.	I suggest a reappraisal of the number of houses planned in the light of likely realisation of the build-out and, particularly, local rather than out of area need between now and for the duration of the plan.	408		Web
Georgiou	Nicholas		42		Object	<p>Huge over-development of housing that would detrimentally effect the area; it's Character, massive increase in traffic, How many 'brown sites' have been identified?</p> <p>I wish to register my strong objection to the proposed housing development at Westgate and other arears of Thanet.</p> <p>This "Local Plan" has everything to do with meeting a National Strategy for house building, rather than meeting local needs, which are quite modest.</p> <p>The proposed new house builds are of such a high figure as to alter the character of the area.</p> <p>I believe that the area cannot support these proposals and would make the following points:</p> <p>The loss of grade 1 and 2 agricultural land</p> <p>There is certainly not the "local demand" for these house numbers</p> <p>Both Water supply and waste disposal for this increase is not realistic</p> <p>School places do not exist to take the increase in demand</p> <p>Doctors and Dentists cannot meet the increased demand</p> <p>The huge increase in traffic would be detrimental to the environment and health</p> <p>An "aspirational" number of new jobs is not evidence</p> <p>Thanet already has a very high level of built up area compared to other areas</p> <p>The Government should be encouraging the use brown sites and the refurbishment of existing poor housing stock to help meet demand</p> <p>Proposed developments do nothing to enhance the rural economy and is against TDC policy to protect the character, quality and our natural environments</p>		93		Paper
Giddins	Rod		62		Object	<p>The draft Local Plan proposes an additional 17,140 dwellings, including 1,600 for the village of Birchington. The evidence for this is drawn largely from a report by G L Hearn in January 2017 (the Updated Assessment of Objectively Assessed Housing Need). This uses the Office of National Statistics (ONS) sub-national population projections which indicate an increase of Thanet's population of 20% over the plan period to 2031, including a higher net out-migration from London than originally envisaged.</p> <p>My view is that the basis for the number of houses required is fundamentally flawed:</p>		161		Email

					<p>The methodology does not take into account the fact that Thanet is bounded on the north and east by sea and that any development outside existing urban settlements has to be inland to the west and south, contained within the local authority's boundari</p> <p>Thanet is a small local authority area covering just 39 square miles with an existing population density of 3543 people per square mile. This compares with the neighbouring authorities of Dover with a population density of 950 per square mile and Canterbury with 1250 per square mil In their Local Plans both authorities are proposing to build fewer houses than is now proposed for Thanet.</p> <p>House prices in Thanet remain below the average for the South East and the national average but, in terms of affordability, house price to income ratio at 37 is higher than others due to the lower wage economy in Thanet. This would appear to underpin the need for greater impetus to be given to economic regeneration. However, in the report by G L Hearn they state that, inter alia, "there is no need to increase housing provision...to support the economy" (see paragraph 2.7 and Table 14). They go on to state that their housing needs assessment "is not a housing target and does not take account of land supply, development and environmental constraints or infrastructure". (see paragraph 2.17).</p> <p>The Housing Strategy emphasises the importance of providing quality housing and this is welcomed as some recent developments (e.g. at Westwood) have produced monotonous, bland terraced housing which does nothing to enhance the street scene or local environment.</p> <p>The Plan has identified 540 empty properties in the district but the local authority is slow to act in bringing these back into beneficial housing use for local people. The Plan should give greater emphasis to this issue and include more robust policies to prevent properties being vacant for more than a reasonable period (e.g. 1 year).</p> <p>It is clear from the Plan that the housing demand in Thanet is largely driven by out-migration from London. Houses in Thanet are much more affordable for people living and working in London and there are two statements in the Local Plan which support my view. Firstly, under the Job Growth Strategy (see paragraph 1.18) it states that inter alia "Improved rail links could expand commuting out of the district". Secondly, Policy SP45 concerning the proposed new parkway railway station at Cliffsend, is supported by the statement "Thanet has the potential to become a more attractive location for people employed in London seeking to live in a more pleasant environment" (see paragraph 6.17).</p> <p>To summarise, the housing policies in the Local Plan do not take into account the special circumstances of Thanet as a densely populated coastal area and therefore the housing target methodology is flawed</p>				
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						<p>will do little to increase the number of affordable homes for local people</p> <p>will encourage more out-migration from London and commuting back into the capital, pushing up house prices whilst having a detrimental effect on existing local public services</p> <p>will enable development of very important agricultural land for housing (see below)</p>				
Gimes	Alan	Alan Gimes	374		Observation	<p>This letter and its contents are intended to be submitted to the relevant Planning Inspector who will be responsible for the examination of the recently published Local Plan.</p> <p>Would you be kind enough to acknowledge receipt of this letter and of its transmission to the Planning Inspectorate in due course?</p> <p>I am requesting this action because of the increasing reluctance of the Council Officers to engage with its residents on contentious matters, its inability to consider the views of residents and its dilatory approach to matters of accountability and transparency.</p> <p>Outlined below are my considered observations and responses to aspects of the local Plan. Soundness.</p> <p>I believe that the plan is unsound because it has not been prepared in a positive manner.</p> <p>Quote from policy SP11 "Housing provision is made for 17,140 additional homes over the 20- year period to 2031. This reflects forecasts based on an updated assessment of migration trend-based population projections (2014) and the labour requirements supporting the Council's aspirations for economic and employment growth."</p> <p>In relation to employment prospects, it has relied solely on an over optimistic report dated 2012 (Experian) to project an employment gain of 5000 jobs and thence 17000 plus housing requirement.</p> <p>The report itself states this is very optimistic and suggests a more considered figure of 3100. Great reliance on a fully functioning Airport and seaport form the basis of these figures. There is huge doubt on the viability of both these sites to produce this level of employment.</p> <p>There has been no evidence of any alternatives being put to the public for consideration, I consider this a fundamental fault in the preparation of the plan.</p> <p>The infrastructure requirements.</p> <p>It is the stated intention of this Local Plan that infrastructure improvements be made by the developers in terms of 5.106 agreements and possibly the use of the Community Infrastructure Levy. The road infrastructure requires considerable improvements to support such a significant increase in housing.</p> <p>This approach is fundamentally flawed as it relies upon developer's willingness to provide the required infrastructure</p>		1075		Paper



					<p>and could therefore adversely affect the viability of each proposed site.' Developers have particular skills in avoiding provision of 'off site' infrastructure.</p> <p>This is particularly relevant to the proposed "inner ring road" where many Individual developers are involved; Thanet District Council has limited influence on bringing the infrastructure requirements together in a timely or effective manner.</p> <p>This will result in a piecemeal approach to the delivery of a sustainable infrastructure for the proposed level of housing.</p> <p>Given this level of reliance upon developer contribution I firmly believe that this is not a sustainable strategy and again the council has not explored alternatives.</p> <p>It therefore fails on the economic test of sustainability.</p> <p>In such a compressed land area, the proposal of 17000 additional houses within Thanet does not represent sustainability for the future. Thanet is the second most densely populated part of Kent and about 90% of the proposed housing is on Grade 1 prime agricultural land.</p> <p>The over reliance on optimistic aspirations without reference to updated population figures provided by the ONS will inevitably have a negative effect on the overall sustainability of the plan and its delivery. There appears a reluctance on the part of the council to seek other ways promoting future sustainability and this approach means that the plan is unjustifiable in its current form.</p> <p>I believe also that the environmental impacts of this approach will be detrimental to Thanet. Take for example the Landscape Assessment, within its pages, insistence on protecting the northern slopes of the Wantsum Channel are made. Much is made of the need to preserve the natural beauty and uniqueness of them, yet the strategic sites 5512/436 are located on this area with no indication of mitigation, screening or design concepts to be followed.</p> <p>These sites show the contradictions within the plan not only in relation to the landscape Assessments but with the stated provision of rural housing in Minster. The proposed housing numbers for Minster are way above historical development and are destined to become bolt on dormitory estates built for market speculation rather than an evidenced need for rural housing.</p> <p>It therefore fails on the social and environmental tests of sustainability.</p> <p>Given my remarks about infrastructure delivery I cannot see that the council can claim this plan is effective or deliverable within the time frame.</p> <p>General observations.</p> <p>As an overall observation the plan presents as repetitive, contradictory and far more optimistic than reality demands.</p> <p>If Thanet District Council had been more pragmatic in their use</p>				
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						<p>of figures the number of houses needed would be more realistic and possibly more deliverable.</p> <p>At this time local councils do not build houses and this vast number can only be delivered by developers who will demand the most advantageous benefits and the least contribution to that infrastructure. That could well result in a much lower delivery of affordable houses in an area that needs them.</p> <p>Thanet is not a high value area and all the current social indicators show a minor growth in employment, minor increase in population and increase in benefit claimants together with an increasingly gridlocked road network.</p> <p>Many parts of it are sensible and self-evident, but many are well beyond the ability of the council to deliver.</p> <p>I have taken part in the previous consultations and public presentations and have been left with the enduring impression that the only representations the council have taken notice of are developers and landowners. This plan relies heavily on out of date data for its conclusions and as such does not have the support of the residents.</p> <p>They have never sought to present other pragmatic alternatives or engage in meaningful consultations.</p> <p>I am far from alone in holding this view of Thanet District Council.</p> <p>On this plain evidence the projected housing numbers are fanciful, unsustainable and will not be delivered. The Plan is not sound in its current form</p>				
Goldsmith	E		443		Object	<p>Re the 'new development'</p> <p>Objections - no infrastructure - sea on 3 sides!</p> <p>Country lanes now use as 'rat runs'.</p> <p>Pollution - well above average.</p> <p>Jobs - in Thanet??</p> <p>Water surrounded by sea - but not enough water.</p> <p>Police, apart from the Ramraiders Day and the Olympic Torch passing through I've seen one policeman in Birchington in 16 years!</p> <p>Doctors - a wait of 6 weeks to see my own doctor. I may see a doctor, but next month he's gone - I need some continuity</p> <p>Hospitals - waiting lists - you wait 5-6 weeks then its cancelled</p> <p>How do we cope with Londons unwanted?? I was born and bred here. I've seen changes you wouldn't believe but these new plans spell suicide for our Isle. Upgrade in crime and homelessness.</p> <p>For evidence</p> <p>Walk along Canterbury Rd anytime after 7.30am.</p> <p>Stand in Birchington Sq and try to breathe.</p> <p>See the school reports.</p> <p>Try to visit a doctor or hospital.</p> <p>The evidence is there for all to see!</p> <p>I live in an almost retired close. Up to 5 yrs ago everyone had a car (except me) now everyone who has moved in in the past five years has at least 2 cars in 40 bungalows. We had an 50%</p>		1270		Paper

						<p>increase in cars - that's just one small place!!</p> <p>The Boom yrs of the Americans at Manston and Pfizers at Sandwich have gone its downfall all the way these days until we finally drown in the chaos you choose to make.</p>				
Goodban	Rex	R A Goodban & Son	236		Support	<p>Infrastructure and services are very unlikely to to be adequate for this level of development, leading to the loss of quality of life anf health provision</p>	<p>Reduction id proposed housing or phase in over a longer period. Identify further funding with less reliance on developers.</p>	717		Web
Grantham	Michael	Concrete Solutions	504		Object	<p>The Previous version of the local plan suggested a provision of 12000 houses. This has risen to 17,140. Studying the historic rise in population in can be seen that in 2011 a sudden rise occurred - I suspect due to migrants from Europe, which is unlikely to be repeated given the forthcoming BREXIT. See graphs attached at the end of this submission. Both graphs suggest a 2031 population for Thanet of around 150,000 - a rise of some 25000 from 2011. At a national average occupancy rate of 2.3 per household that suggests a need for perhaps 11,000 more houses and not the suggested 17140. I would challenge the evidence base for the higher number?</p> <p>The fact is that Thanet is already much more densely populated than the surrounding areas with some 27% of the land area developed, compared to dramatically lower numbers for the surrounding areas (closer to 9%). Thanet does not have the infrastructure to deal with another 40,000 people and their cars. Westwood is already gridlocked at peak times. QEQM cannot cope properly already with A&amp;E and would be simply swamped with such a massive increase. Similary Doctors, Dentists etc are already struggling to cope. The sewerage system won't cope, there is unlikely to be sufficient water available to provide for such numbers ... the list goes on. Thanet should ONLY be building enough houses to cope with its own population rise. And it most certainly shouldn't be building on Grade 1 Agricultural land as is currently proposed. [See attachment for population graphs]</p>	<p>A plan allowing for housing numbers much closer to the originally proposed 12,000 houses would be much more reasonable. And detailed consideration for avoiding building on Agricultural land where at all possible. A detailed consideration is also required as to how infrastructure will cope with an increased population and their cars and how sufficient provision will be made for hospitals, doctors, dentists etc.</p>	1414	<a href="#">#228 Grantham M Extract.JPG (34 KB)</a>	Email
Green	David	Mr	470		Object	<p>My main concern is in regard to the unrealistic and environmentally damaging high target for land allocated for new housing set at 17,140.</p> <p>This has risen from 12,500, which was the calculation 4 years ago purely because of changes to the way Government has decreed these things should be calculated. We do not wish to challenge the way these formula have been applied, but would suggest that there are unique aspects of Thanet that the Council should have taken into account. A one size fits all formula might be ok for middle England, but should not be applied uncritically in relatively remote coastal areas such as Thanet without detailed consideration.</p> <p>Thanet's geography, as a remote peninsular, with just effectively two roads on and off "the island", places large constraints upon the area's ability to generate employment. The logistics mean that employers can usually find more advantageous locations nearer to the M25. Despite promises, KCC and Government have failed to address this constraint.</p>		1336		Web

						<p>Even commuting to find work is constrained to travelling to Dover, Canterbury or Ashford areas or to brave the escalating costs and hassle of rail to London.</p> <p>For these reasons we believe that the plan's target of 5,000 new jobs is wholly unrealistic. Thanet has no large scale employers, and even some of its lesser ones such as local government, retail, hospital, the port and airport are closing or retracting. We see nothing in the plan that convinces us that the Council plans will address this. Our one bright spot, tourism, is notoriously fickle and uncertain.</p> <p>We would advocate no more than 3000 jobs being a realistic expectation which would mean that the housing target should be reduced. We do not think the area will attract large numbers of people relocating here to work.</p> <p>The housing target also seems to fail to take into account the large increases in housing planned for our neighbouring districts, Dover, Canterbury and Ashford. Because of better employment opportunities, we believe that these will inevitably meet some of Thanet's housing need.</p> <p>It is entirely unacceptable that against council officer's advice, the local plan fails to address the future of the derelict airport site at Manston. The unviability of this site as an airport is dealt with elsewhere; however the current owners have submitted plans to the council that would provide the area with real opportunities to develop a sustainable development with employment, recreation and housing on brown field land.</p> <p>We believe it is wrong to identify so many green field sites in the plan which comprises grade 1 agricultural land (up to 15,000 homes proposed on such green field farmland or 80% of the total). Such land is a vital asset to the people of Thanet. Government policy is to maximise use of brown field sites. This plan does not do so.</p> <p>We do not believe that house builders will actually be able to build the target amount of new housing in Thanet – Our previous delivery of housing falls short of this with target averaging 678 units a year 2006-11 and from 2011 to 2016 311 per year. There are currently sites with planning consent for over 2,000 homes which have yet to commence development. There are also 2,488 empty and second homes within Thanet. Inevitably, in this situation, quality will suffer. The danger, in allocating so much land for housing development, is that development will be very piecemeal. Numerous small developments will occur, contributing little to the much needed infrastructure that makes for sustainable communities.</p> <p>Furthermore, the plan concedes that Thanet faces serious water supply and water quality issues, likely to increase in the future. Southern Water in their document "Water futures in the South East" say "River flows could fall 35% as population &amp; climate changes bite, Extreme droughts could be over 50% worse than current systems may be resilient to. On their latest figures Thanet is currently reliant on 2.7 Ml/d transfer of water</p>				
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						<p>from other regions, expected to rise to 17.6 Ml/d by 2050, a rise of 600%. Meeting this threat will incur costs that will be a constraint to further development. In fact it is obvious that the political decision to re-allocate sites for 3700 houses, at the last minute in the process of plan development, because of the political failure to address the Manston issue, has impacts on infrastructure, transport and social, including health and education, which have not been properly assessed.</p> <p>Thanet has a chronic need for social housing to rent by the indigenous population. As at March 2018, there were 2447 households on the housing register, broken down as follows;</p> <p>1203 households require one bed  594 households require two beds  458 households require three beds  157 households require four beds  35 households require five bedrooms or more</p> <p>This can only be provided by the council or providers purchasing land, or more likely through section 106 agreements with developers. We would like to see the needs of indigenous residents better reflected in the plan.</p>				
Hart	J		225		Observation	<p>Draft Local Plan 2018</p> <p>Thank you for your circular letter of 22 August on the submissions of comments on the above Plan, to be forwarded to the Planning Inspector. Once again, little time has been allowed for the proper consideration of the numerous matters worthy of discussion, and so I will comment on only a few of them.</p> <p>My submission (copy enclosed for ease of reference) on the earlier 2015 Draft covered various subjects, but I do not detect that the revisions made in the updated Draft have answered all of the problems to any extent. One ray of hope is that the Transport Strategy has now finally been issued. However, it remains to be seen whether the required new roads would indeed appear before the provision of any substantial numbers of new houses.</p> <p>Central Government Policies</p> <p>I realise that Thanet DC has to follow the edicts of Central Government in many of these matters, notably in the apparently arbitrary allocations of numbers of new houses in each local authority area, but the consequent increase from 1000 to 1600 new houses for Birchington could only exacerbate the likely problems in our area.</p> <p>Use of Agricultural Land</p> <p>My enclosed comments included reference to the inexplicable decision of Central Government not to protect Grade One Agricultural Land from development, a provision which still beggars belief. The inability of the UK to feed itself has not reduced in the last three years, and now we face the prospect of Brexit, which surely could only increase the problem.</p> <p>I can only hope that the Inspector, when he/she considers these proposals in the light, inter alia, of the requirement for</p>		682	<a href="#">John Hart.pdf (302 KB)</a>	Paper

						<p>"Consistency with National Policy", would make some comment on the rationality (or rather the lack of it) of that particular policy.</p> <p>Other Important Matters My previous submission was not able to cover several other significant areas of public services. On this occasion, I would like to outline a few of them. Education: The local Primary and Secondary schools are both up to capacity. Health: The local QEQM Hospital in Thanet cannot cope with present numbers, and finds it very difficult to recruit staff. The Birchington Medical Centre also suffers from the same two problems. Social Service s: Central Government requirements for reduced expenditure are necessitating withdrawals of provision by Kent CC at a time when the numbers of the elderly are increasing. Water: East Kent has experienced the lowest rainfall in the UK, and as far as I am aware, current discussions with the local Water Company have not yet led to any specific proposals.</p>				
Hartley	Tricia	Ramsgate Town Team	510		Observation	<p>Housing: We would like to see the Plan focus on the potential to use small infill sites in various parts of Ramsgate to provide much-needed low-cost housing, and to tidy up some unloved corners with sympathetically and appropriately designed new buildings. We recognise that such sites may not be attractive to developers, particularly if they sit within conservation areas, so co-operative plans and incentives may need to be considered. We congratulate the Council on the success of its No Use Empty strategy. We would like to see this extended to include commercial premises capable of conversion to housing. We strongly suggest that the Plan should prioritise the creation of 3-storey blocks of good-sized flats with shared outdoor space rather than the creation of many identical box-like small houses with little architectural merit. Such flats could follow a design code that makes them appropriate in amongst the Georgian and Victorian architecture of Ramsgate and neighbouring towns, enhancing the streetscape rather than detracting from it. We remain convinced that brownfield sites must be used for housing, even if this proves more expensive per unit to build, rather than use greenfield sites that will create ribbon development between the villages and our towns. We understand that a Local Plan should be evidence-based. All the evidence indicates clearly that Manston is not viable for any sort of aviation use, and should be used for housing and the proposed business park which will bring much-needed jobs into the area. We are disappointed that political considerations have removed clarity on this from the Draft Plan.</p>		1438		Web
Henderson	Hazel		469		Object	I am opposed to the proposal of the amount of housing		1333		Pape

						<p>suggested on the farmland in Westgate.</p> <p>The farmland is even more important to the local community more than ever before due to Brexit. We need to get back to a more sustainable way of life.</p> <p>I am also against the amount of houses suggested as we cannot cope as it is at doctors surgeries. So much so, you can only complain or speak to a doctor concerning one issue or problem.</p> <p>The length of waiting for an appointment is ridiculous as it the wait already on an already over stretched QEQM.</p> <p>This is just the tip of the iceberg - we do not have the facilities - water waste to cope as it is. We have no jobs for the existing people of Thanet.</p> <p>Pollution will increase! I moved here for health! Our beaches will become even more at risk of pollution.</p> <p>Thanet is not big enough not broad enough for this ridiculous increase. So I totally oppose the entire local plan. I feel you think small term + of your pockets rather than long with the isle in mind.</p>				r
Holden	Michael		49		Object	<p>I am so incensed at any proposal to built more houses in Thanet, especially having seen the figures used to justify the proposals, as those figures and forecasts are either fictitious or hypothetical (and way overestimated).</p> <p>My reasons for my strong opposition are as follows:</p> <p>1 No Thanet residents will benefit from them (born and bred residents that is), and my family will still not be allowed access to the Housing list. It is social housing for Thanet residents that is needed, but only when the last reason on my list is satisfied.</p> <p>2 The proposal is to build, concrete, and tarmac over prime farmland, the like of which is not found in many parts of the country. This land is capable of sustaining 3 or 4 crops per year, if sensibly rotated, and in the not too distant future will be essential for Britain.</p> <p>3 As the Government figures (declared) show, Thanet is already more densely populated than any other borough in Kent, other than those on the M25 and within it. To allow an influx of more people (I am of the opinion that the London boroughs are very aware of this, if not funding it), would be totally irresponsible. Tell the London people to build on Hyde Park, it is not as precious as prime farmland, and that farmland is just precious to us as Hyde Park is to them.</p>		116		Paper
Hume	Alister	Hume Planning Consultancy Limited	341		Object	<p>Following the removal of Policy SP05, the "top-up" sites which have been hurriedly compiled by the LPA as replacement / alternative housing allocations to the earlier proposed allocation at the former Manston Airport site largely represent extensions to existing draft allocations, as reflected in the revised 'Table 2'. The most recent Call-forSites exercise undertaken by the LPA in February 2018, as well as those undertaken previously, have identified opportunities for reasonable alternative development options to accommodate the redistribution of this housing provision to support Thanet's future growth. It is however submitted by HPC that the Local</p>		1024		Email

						Plan in its current form has fallen short of sufficiently scrutinising these other development options, and considers that more sustainable urban-extensions such as those put forward on Land to the South and West of Chilton School, Cliffsend (SHLAA 372 and SHLAA 373), and on Land Adjoining QEOM in Margate, have not been properly assessed or tested. For these reasons, it is asserted that the Local Plan is unsound.				
Johnson	Elisabeth	Monkton Residents Association	51		Observation	At the present time the housing provision in rural areas has not addressed the need for affordable housing and this is something which it is felt should be of a much higher priority.		125		Web
Jordan	Susan		161		Object	We are an area of deprivation yet are having more and more housing which will not cater for our local population. We are a small area and yet are expected to have an extortionate amount of houses built. Manston is desperately needed to bring in jobs and training and also tourists. Please do not allow our open spaces to be covered in concrete and think of the overload on schools, hospitals and Doctors.		462		Web
Lamb	Kyla	Minster Parish Council	373		Object	<p>Overall Future Sustainability: Minster Parish Council does not believe that the provision of 17,000 houses is sustainable for this district. We have attempted to outline the issues of economic prospects and transport infrastructure above and it is our considered view that the reliance on questionable outcomes and aspirations will have a negative effect on the overall sustainability of this plan.</p> <p>Equally, the delivery over the time period of this plan represents 2.5 to 3 times the historical house building figures for the district. It would have been far more beneficial for the district to have adopted a more realistic approach to economic drivers and the provision of transport infrastructure to produce a deliverable level of housing development. Such an approach is supported by more recent ONS population predictions and up to date social research.</p> <p>The Experian report which Thanet District Council uses in preparing this plan encourages investment in tourism and agriculture.</p> <p>The Local Plan itself speaks of protecting character, quality and function of Thanet's rural settlements.</p> <p>Yet recent financial decisions by Thanet District Council mitigate against tourism and 91% of the proposed developments in this plan are on Grade 1 or 2 very productive agricultural land.</p> <p>Thanet is recognised to be a water stressed area, both in terms of sustainable water supply and the difficulties with waste disposal.</p> <p>It is already the second most densely populated in area in Kent, yet with less investment and employment opportunities.</p> <p>The proposed level of housing would therefore be used by</p>		1074		Paper



						significant numbers of people migrating into the area. The lack of employment means that either these additional houses will have a dormitory function where most of the occupants will be travelling out of the area to work, or we have large numbers of people, often elderly, displaced from London Boroughs, hugely increasing the demand on social care and medical facilities. The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. More specifically to our parish, the Landscape Character assessment speaks of the Wantsum North Slopes (Ref.B1.) and the views across the former channel-side villages as being a unique setting. Yet the land identified for development in Minster in the Local Plan forms part of these slopes and directly overlooks this 'unique' setting. The planned development would destroy these views and appears to be contrary to Thanet's own policy.				
Latchford	Barry		45		Observation	You have already undermined your proposals by eradicating the mixed development proposals for Manston which is a brownfield site and would offer 4,000 homes with supportive infrastructure. Instead you have proposed moving the building of houses without supporting infrastructure around villages which include greenfield sites. A disastrous and unnecessary move.	Acknowledge that the proposals for Manston are logical and practical and avoids the building of houses with no supportive infrastructure around villages and greenfield sites which would also be an additional load on existing community support.	107		Web
Lee	A		133		Object	The population/housing in the area is not being met by the community facilities in place and are buckling. Thanet is an island, we welcome day trippers and visitors but cannot expand the population by people relocating into the area.		324		Web
Lorenzo	Peter	The Broadstairs Society	37		Observation	One hopes that now that ONS has taken over the production of projections they, too, will be adhered to as, according to their figures, the number of households in England is projected to increase by 4.0 million (17%) over the next 25 years from 22.9 million in 2016 to 26.9 million in 2041 which equates to 159,000 additional households each year compared to the 210,000 previously projected. As time goes on the the number of houses needed in THanet should decrease rather than increase..		288		Web
Mairs	David	Mr	455		Object	I welcome the opportunity to engage with and contribute to development of the Thanet Local Plan. I consider the draft Local Plan to be unsound as there is insufficient emphasis on the creation of employment to sustain the population growth envisaged. The saga of the Manston airport site and the political game-playing that has regrettably accompanied it have clouded many of the issues pertinent to Thanet, one of the most deprived areas in the country. My greatest concern is the potential housing target to be imposed on the district. This has risen remorselessly in recent years from 7,000 to an eye-wateringly high (if only rumoured) 17,000. I am aware housing targets have been contested across the UK, but it is difficult to stress how damaging such a potentially high figure would prove to Thanet		1302		Web

						<p>The district has suffered for decades some of the highest levels of unemployment in the country and it is difficult, if not impossible, to see how gainful employment could be found to support such a staggering increase in households, if the 17,000 figure were to be adopted.</p> <p>To put it another way, Thanet, with its low-skilled, low-paid economy, cannot provide enough work for the people already living here – how could it expect to meet such a vast new demand for employment?</p> <p>Rather than tens of thousands of new homes, the district needs greatly improved career opportunities – an aim the local authority, of whichever political hue, has never come close to achieving.</p> <p>In addition to this, the district has one of the highest concentrations of Grade 1 agricultural land in the region. Not only is this likely to be of increasing importance to the country's food need but it provides one of the few consistent sources of local employment.</p> <p>Further, the open space that such farmland provides is critical to the amenity and well-being of those who live in Thanet – at 27 per cent, the second most urbanised district in the county, according to a study by the BBC and University of Sheffield.</p> <p>Then consider that Thanet, like much of Kent, is subject to some of the highest levels of water stress in the country and the unsustainability of a vast growth in housing is apparent.</p> <p>The issue of Objectively Assessed Need has been well aired, but a quick scan of housing targets nationwide shows Thanet could be in line for a disproportionately high figure, a situation exacerbated by the fact that it is just about the district least able to cope with it.</p> <p>A figure of 17,000 new homes – or indeed anything close to that – would have nothing to do with local need and everything to do with housing an incoming population, largely, I presume, from the capital. Again, what would those people do for work? I accept a need for new housing in Thanet but at a reasonable, sensible and proportionate level; a figure between 7,000 and 10,000 would be appropriate. It is pertinent to note that Thanet District Council has historically adopted higher housing targets than deemed necessary by central government. Whatever the reasons behind this, such an approach has drastically failed the district, evidenced by its sorry position in multiple indices of deprivation and social mobility.</p> <p>I appeal to your team to help deliver what is best for Thanet, not simply what meets political diktat. If this process is not carried out with that principle in mind, the future for Thanet looks desperate.</p>				
Manktelow	Paul		437		Object	<p>Our farming land which is all around us was not meant to be built on it's for produce and animals to graze. In these troubled times with Brexit our land is ripe for growing to keep this country good for our farmers who when allowed can produce the best food available. We no their are plenty of vacate homes</p>		1262		Email

						<p>been left and run down why not rejuvenate these for our young people to purchase and realistic prices or realistic rents not letting some people getting rich at the expense of others which always seems the case. Our village has a small doctors which just about can see it's residence/dentist the same schools so on and so on let alone roads having to have to put up with more traffic - we don't want a by pass either this is the garden of Eden so they say - let's keep it that way.</p>				
Margate Estates		Margate Estates	460	Zena Foale-Banks - Nexus Planning	Object	<p>Policy SP11 identifies the amount of additional housing that Thanet is expected to cater for during the Plan period up until 2031, and it is clear that there may some challenge in delivering that housing. Paragraph 3.12 establishes that there is limited land within the District remaining for new housing provision. Furthermore, the NPPF identifies that 'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land'. We therefore consider that additional text should be included in the supporting text that endorses the optimal development of brownfield sites across the district, where appropriate, for residential development.</p> <p>For example, the supporting text at 3.13 could be updated in bold as follows:</p> <p>Optimise use of capacity from brownfield sites in the built up areas of the coastal towns</p> <p>The Area Specific Housing Objectives for Cliftonville West and Margate, as included within Table 4 of Policy SP11, identify that there is a desire to create a mixed use, inclusive and settled community through improvements to the quality and configuration of residential accommodation. The table further identifies a second objective to apply public sector intervention to pump prime private sector investment.</p> <p>We consider that in addition, an objective should be included to increase the overall amount of housing stock within Margate, particularly on brownfield and opportunity sites.</p>		1319		Web
Matthews	Sylvia and Philip		365		Object	<p>We write to object in the strongest possible terms to the ridiculous proposals to build 17,000 houses in Thanet. We live in a deprived area where unemployment is high and poverty is becoming endemic. The infrastructure at present is inadequate. There is a shortage of Doctors, Dentists, schools and others who are vital to our standard of living - especially hospital provision.</p> <p>The huge increase in the population that these new houses will bring means that the present unsatisfactory situation will become far worse. Not a good recipe for the regeneration of Thanet.</p>		1062		Paper
McCulloch	Andrew		44		Support	<p>The Plan states that the area will need 17,140 new houses before 2031. No-where does it adequately explain the methodology behind this estimate. I doubt whether 17,140 new</p>		98	<a href="#">WRSE Water graph.jpg (64 KB)</a> <a href="#">AMcC letter to</a>	Web

					<p>families have moved into the area in the past 15 years and I must therefore question the planners' calculations.</p> <p>In the Council's own words, "Thanet's business parks have taken time to develop, and there remains a significant amount of undeveloped employment land." This implies that businesses have been unwilling to set up here which begs the question why this was not pointed out to the DHCLG when they imposed their arbitrary housing figures.</p> <p>17,140 three-person families will require 14,300 tonnes of extra water PER DAY, and that is before pipeline wastage. Putting this into perspective it is a volume equivalent to a standard sized football pitch flooded to a depth of 6½ feet. Not only does it have to be supplied, it has to be removed; something at which Southern Water have proved themselves to be particularly inept.</p> <p>We have enough trouble with water supply at the moment and the February 2013 Phase 2B report by WSRE stated that "All areas supplied by the six water companies have been formally designated as areas of serious water stress. In parts of the South East of England the limited water availability, combined with density of population and growing demand for water places stress on the environment." As can be seen from the graph below, the south east of England is already in deficit with water supply, our only hope at the moment being that Normal Year Annual Average (NYAA) conditions exist every year. Even then, the projections are that even that hope will fade by 2037. The other curves on the graph are:</p> <p>Dry year annual average (DYAA), Dry year critical period (DYCP), and Minimum deployable output (MDO)</p> <p>The full report is available on <a href="http://wrse.org.uk/sites/default/files/pdfs/WRSE_Phase_2B_Final_report_24Apr2013.pdf">http://wrse.org.uk/sites/default/files/pdfs/WRSE_Phase_2B_Final_report_24Apr2013.pdf</a> Although I am sure that planners are already aware of it.</p> <p>Southern Water report an average personal water consumption of 266 litres per person per day, a figure that is slightly lower than that recorded in our house. Assuming that each of the 17,140 new houses consists of three people, this means that Southern Water will have to find an additional 13,677,720 litres of water PER DAY by 2031. That is before we allow for wastage. That is nearly fourteen thousand tonnes of EXTRA water per day just for Thanet; a volume equivalent to a space 137 metres long by 10 metres high by 10 metres wide, or a standard football pitch flooded to a depth of 6½ feet. Every day!</p> <p>By TDC's own admission, groundwater from the chalk rock beneath Thanet is used to supply water for drinking water, agriculture, horticulture and industry. It also feeds the springs</p>			<a href="#">Sajid Javid January 2018 RD.pdf (465 KB)</a>	
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						<p>that emerge along the coast and near the marshes. Thanet's groundwater is extremely vulnerable to contamination as substances (natural substances and man-made chemicals) are able to pass rapidly through the thin soils and the natural fissures (cracks) in the chalk rock to the groundwater below the ground surface. Once the chalk and groundwater is contaminated at a site by a substance it can take decades to clean up. The Council and the Environment Agency have worked hard to prevent contamination by consistently applying groundwater protection policies to any proposed land-use changes in Thanet to reduce potential future impact. Under the Water Framework Directive (WFD), the 'Kent Isle of Thanet Groundwater Body' has been classified as poor status for the groundwater quality and quantity. The groundwater is impacted by nitrates, pesticides, solvents and hydrocarbons at levels that are of concern. I find it hard to believe that we are to impose even more stress upon an already overworked and damaged system</p> <p>All the water supplied has to be removed. The Southern Water drainage system cannot cope with peak demands at the moment – another 14 million litres per day will overwhelm it. The issue will not be the drains laid by developers but the removal through the existing drainage system outside the new developments.</p> <p>I propose that consent for the first tranche of 4,500 houses, on identified brown field sites, is forthcoming. During this period the estimates for housing requirements is revisited in light of current experience, and a revised estimate of new housing requirements to 2031 is made. If need falls short of estimate then the second tranche of housing is cancelled. A similar process to continue over the further two periods, so that we don't end up with a lot of very rich and happy builders and a lot of empty new houses.</p>				
Mcintyre	Peter		114	Doug Brown	Observation	Please see suggested change to plan proposed below	There is a need to provide housing as soon as possible to meet immediate demand. This cannot be achieved through the strategic sites which will take some time to come onstream. additional sites should be provided within the areas already identified as suitable for non-strategic development. I and my neighbours own one such site at the west end of Down Barton Road, St Nicholas and would like this site considered as a non-strategic site in the Local Plan.	243	<a href="#">Location Plan of proposed residential site St Nicholas at Wade.pdf (283 KB)</a>	Web
Milimuka	Elle	GVA	358		Object	<p>The latest Draft Local Plan proposes to 'redistribute' the 2,500 homes previously allocated at the former Manston Airport Site to the following strategic sites:</p> <ul style="list-style-type: none"> <li>• An additional 600 dwellings at Birchington, as an extension of the previous draft allocation;</li> <li>• An additional 1,000 dwellings at Westgate, as an extension of the previous draft allocation;</li> </ul>		1051	<a href="#">SHP Enc3 GVA analysis of Option 2 Housing sites.pdf (1.7 MB)</a> <a href="#">SHP Enc4 GVA housing statement.pdf (2.6</a>	Web

						<ul style="list-style-type: none"> <li>• An additional 500 dwellings at Westwood, as an extension of the previous draft allocation at Manston Court Road/Haine Road;</li> <li>• An additional 550 dwellings at a new strategic site north and south of Shottendane Road.</li> </ul> <p>The allocation of these sites for housing would (if developed) result in the loss of greenfield, agricultural land predominantly classified as 'Excellent' in the Agricultural Land Classification. As these sites would involve a more 'piecemeal' approach to housing delivery, it is also unlikely they would be able to create sufficient critical mass to deliver the infrastructure necessary to mitigate their own impact and are therefore likely to place additional pressure on existing local facilities and services.</p> <p>We also question whether these sites are capable of delivering the quantum of homes proposed over the plan period. We summarise our client's representation on each proposed strategic allocation below.</p>			MB)	
Miss P A Smith			395		Observation	<p>I find it difficult to separate the issue re number of houses into different points of key concern are the proposed number allocated along the Manston\Haine,Westwood area. The number has increased as the Manston quota has been reallocated. However it does not resolve the considerable problem that in a few square miles 4000 houses are proposed which will all feed on to the same roads which are already grid-locked, no requirement of developers to provide arterial roads and solve the problem. There needs to be another major access north of the area to alleviate Margate/Broadstairs traffic.</p>	I am unable to suggest alternative wording as it covers too many sections, both housing and infrastructure.	1272		Paper
Mulley	Sylvia		102		Object	<p>Please accept this letter as a strong objection to the proposed at S 1 - S2 houses to be built at Westgate, Garlinge and other agriculture areas of Thanet for the following reasons:-</p> <p>Thanet is a small area and cannot sustain such a high proportion of housing and the high proportion of traffic that would ensue.</p> <p>With proposed housing also to be increased at Westwood Cross, the exit roads out of Thanet, which are already gridlocked at peak times, would become impassable. This would make it very difficult for people living in St Peters and Broadstairs to exit the island.</p> <p>With the proposed closure of the Stroke Unit at the QEQM it would make the journey to Ashford from these areas impossibly lengthened, putting lives at risk. We are at peak capacity with regards to schools, hospitals, doctors surgeries and dentists.</p> <p>To build enough schools etc to encompass the increase in population because of the proposed building of 17,000 houses (say 2 adults and 2 children to each home) would equal a further 34,000 adults and 34,000 children on the island. How would we ever be able to find qualified teachers, doctors and nurses to enable a safe level of care and good education, when</p>		225		Paper

						<p>it is difficult at the present population numbers to keep our schools, hospital, dentists and doctor' surgeries fully staffed. These proposals will permanently damage the basic character of Westgate and Garlinge and the rest of Thanet to such an extent that they will not be recognisable as small towns and villages, but one large built up area.</p> <p>The building of houses proposed on Minster Road, both sides, on beautiful arable farm land should never be allowed. We will need our prime agricultural land, of which some of the best in UK is to be found in Thanet, to grow more crops for home consumption. With the forthcoming Brexit inevitable, we will need to be able to produce more crops to save on proposed tariffs which could be imposed by Brussels.</p> <p>Water, and the disposal of waste would be a monumental task for the proposed addition of 68,000 children and adults. And when these 34,000 children grow up, where will they live, and work.</p> <p>There is a shortage of jobs in Thanet. Does that mean that the 34,000 extra adults will all be living on the state?</p> <p>On these ground I again state I object most strongly to the proposed building of 17,000 houses in Thanet. It is obvious that we will have to build for future generations, but certainly not at this high level.</p>				
Newing	April	Dover District Council	322		Observation	<p>Strategic Housing Market Assessment (SHMA)</p> <p>In its response dated 20 March 2017, DDC detailed its position in relation to the findings of TDC's Strategic Housing Market Assessment (2016), specifically the disagreement regarding the identified Housing Market Area (HMA) of Thanet, Canterbury and Dover. This differs to DOC's SHMA (2017) that identifies a HMA of Dover and Shepway as most appropriate for the Dover District.</p> <p>With regard to paragraph 9.7 of the Duty to Co-operate Statement (2018) and paragraph 3.4 of the draft Local Plan to 2031, the District Council confirms that a meeting was held between TDC, DDC and GL Hearn to discuss the above matter. However, to date, no final agreement has been reached on the extent of the HMA boundaries and therefore the District Council's position on this still stands.</p> <p>Whilst the matter regarding the HMAs is still outstanding, DDC supports TDC's approach to meet its own housing requirement as outlined in paragraph 9.9 in the Duty to Co-operate Statement (July 2018).</p>		978		Email
Newman	Katrina		396		Object	<p>I'm writing to show my objections to the proposal of 17,400 houses to be built in Thanet... . I'd like to Identify issues, such as gridlocked roads, over stretched hospital, poor gp services, basically services under pressure, air pollution, light pollution, endangering wildlife, losing grade 1 agricultural land... 17400 houses may mean 60,000 extra people.</p> <p>This is counterproductive for the area and I strongly object.</p>		1158		Email
Orton	Geoff		323		Observation	<p>It is commonly understood that the Plan's housing allocation is an imposition by Marsham Street without regard to the local</p>		984		Email

					<p>realities – most obviously the refusal to accept that no coherent Plan is possible until the question of Manston Airport is resolved one way or the other.</p> <p>The previous administration thought that 12,000 houses with an Airport was unrealistic – an increase to 17,000 puts Thanet at 50% above an average allocation (circa 365 districts into 4 million houses) but of course the Chief Planner's methodology has been revealed by the ONS as flawed and is overstating the overall household formation rates by at least a third. The ETHPOP population projection of c 5% increase in Thanet may very well prove 'ambitious' if 'other things are equal'.</p> <p>Thanet's own population is flatlining – presumably a reflection on the lack of jobs (which explains the highest rates for empty properties south of the Wash). The Institute for Economic Affairs ascribed low investment to low wages and low skills. The Select Committee on Housing last November (Helen Hayes MP RTPI) put it to the then Minister that 'economy comes first'. He agreed. It is not clear where Marsham Street sees the jobs coming from : the Centre for Cities has recently forecast 30% job losses in 'left behind' districts (and the Bank reckons more like 50% 'technological redundancy is in prospect.) Thanet would need something like 15,000 jobs to stand still. 17,000 houses implies 40 to 50,000 extra population presumably needing at least another 15,000 jobs. Even with the Airport Thanet is in trouble jobwise.</p> <p>In order to attract investment Thanet needs a vigorous upskilling and reskilling programme – the loss of the Broadstairs Campus and downsizing at the local FE College indicate that this not going to happen – so no great investment may be expected. Our schools are struggling and aslready occupy too many low positions in the national league tables.</p> <p>The Resolution Foundation identified the three most vulnerable sectors in the 'Fourth Industrial Revolution as Care, Retail and Public Sector. The earlier draft LP talked of a 'robust public sector' which rather undermined its credibility (do 'they' not read the papers ?) and the present offering seems to think that Thanet needs more 'shelf space' and ignores the online revolution (certainly 'they' do not read the papers.) Apart from the presently (long) empty retail properties Westwood Cross itself will need radical rethinking as a 'brownfield-in-waiting.'</p> <p>The LP hasn't quite grasped the importance of 'heritage' to the local economy – despite the recent public announcement of the Dreamland 'Sea View Hotel' Group of their wish for more attractions to reinforce all-year-round business. TDC has resolutely refused to engage on Local Listing, refused to publish the Living Spaces Workshops Report from 2016, refused to join progressive districts like Sevenoaks in implementing the Community Infrastructure Levy, refused to set up a Heritage Working Party following those workshops last year – this does not augur well for any meaningful consultation. Our 'cultural offer' is our great strength.</p>				
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						<p>So, economically unsustainable – socially unsustainable (Marsham Street have clearly not seemingly taken much heed of Thanet's position in Deprivation and Social Justice Indices) and I daresay physically unsustainable (others will no doubt dilate on the transportation problem let alone water and sewage.)</p> <p>Despite well-meaning aspirations from Ministers in the past about 'Beautiful In My Back Yard' and 'anti-bolt-on estates' expressions such noble ideals have not filtered through to the backwoods : witness the Salmestone development nodded through and early back-tracking on viability at Briary Close. We are not going to get the 'affordable to rent' that is actually required for local needs – we may very well get a lot of bankrupt developers and even more despoiled prime agricultural land</p> <p>However, perhaps some are waking up : the County Council Network has recently tumbled to the need for 'infrastructure' before housing and that should include skills = employment = housing demand. Which is no more than what Big Ears observed to Noddy all those years ago when the latter wanted to put the roof up first 'in case it rains'. That lesson seems to have been forgotten. Unless of course the 'imports' to fill the housing are not jobseeking ? But that may not do much for social balance ?</p> <p>Powerhouse Thanet to rival the Oxon/Cantab Arc ? East Kent Engine to balance the Midlands ? It seems an unlikely Vision from Central Planning but they declined the and the community would have liked a constructive dialogue with Marsham Street but the suggestion was declined – indicating a lack of much faith in their own algorithms perhaps (justifiably so according to the ONS.) 'Right Homes in Right Places' doesn't ring true in struggling Thanet.</p> <p>Thank you for your attention. A proper Local Plan can be devised once the Airport (including Parkway) and even Port Ramsgate issues are 'solidified' : Bob Bayford's present predicament is understood.</p>				
Pannell	janet		498		Object	<p>What I do want to say is that I am concerned about the plan to build at least 17,000 new homes in an area which already has the 2nd highest density in Kent (Dartford being the highest with 14.8 people per hectare) with approx 13.7 people per hectare. Ashford, on the other hand has approx 2.2 people per hectare. (Taken from KCC Business Intelligence Statistical Bulletin 2017 (census based), as published by ONS on 28/6/18 called '2017 Midyear Population Estimate of Total Population of Kent Authorities'. The Thanet average no of people per km2 is 1368, whereas the Kent average is 439. Apparently Westgate, where we live has over 2,800 people per km2 (so the proposed allocation of 2,000 new homes there will increase the density even more and almost double the population there). Overcrowding leads to violence/criminality, which we have enough of in Thanet,</p>		1393		Paper

					<p>particularly Ramsgate/Margate.</p> <p>Also we can't see that Thanet needs 17,000 new homes. A lot of people appear to travel out of Thanet to work. I understand the Plan hopes to see a total of 5,000 new jobs in the district by 2031 but the figure planned seems way too high, especially as population numbers in the future are based on the Hearn Report, which does not appear to be a true representation of the current population as it estimates an annual increase of 1365 rather than the ONS 16/17 figure of 533. There is a feeling these numbers have been 'bumped' up to legitimise migration from London to Thanet. We understand that a lot of homes at Westwood were built, particularly for London Councils to move residents to, so getting them off their waiting lists. This all puts extra pressure on local schools and health services, in particular.</p> <p>Post Brexit, I think we should be looking at even more self-sufficiency in England not losing prime agricultural land to housing. The Food of Agriculture Organisation of United Nations estimates the minimum land required to feed a person is 0.5 of a hectare; in Kent only Ashford has a population density that meets that requirement. The land mass of Thanet is only 10,334 hectares, whereas Ashford has 58,062 hectares. Ashford has roughly 118,000 people as opposed to roughly 134,000 here in Thanet. Thanet already has to buy in food from outside the area, which increases the price. (Based on date 2011 census/ONS) and the carbon footprint.</p> <p>It seems to me that there are many existing unused/run-down properties in the area of Thanet that could be refurbished to create new homes for people, should they be needed - especially for those on lower incomes - who would find the cost of a new house on a development too expensive and the level of Council Tax, in particular, an extra burden each month as they are usually at Band C at least. Use Brown Field Sites, where available, of course.</p>				
Proctor	C		491		<p>Object</p> <p>The Local Housing plan will not work and will be detrimental in so many ways. The Government requires councils to increase the number of houses in relation to the needs of LOCAL people. According to the statistics in the Local Plan, 1555 homes have already been built. The uptake of new houses at Westwood Cross was slow and obviously was not required by local people because families from a London borough have already moved into them. Is that in keeping with the Government directive? It follows, that if we are building for local needs up until 2031, the figure of 17140 homes required, is grossly over- estimated.</p> <p>I understand that our council is under great pressure to keep services running with little resources, but the housing figure is far too high. The temptation to increase housing to accommodate the London overspill may be O.K. for London but the result will be devastating for the Isle of</p>		1365		Paper

						<p>Thanet. I have no problem with building new affordable homes for local people. Our hospital cannot cope with local demands and is also losing services to Canterbury and Ashford, meaning patients having to travel much further for treatment G.P. practices and Social Services are already stretched to breaking point The roads on the Isle of Thanet are congested. New houses and associated road changes have already ruined the Westwood Cross area.</p>				
Ptarmigan Land and Millwood Designer Homes		Ptarmigan Land and Millwood Designer Homes	493	Joshua Mellor - Barton Willmore LLP	Support	<p>3.1 Paragraph 17 of the NPPF 2012 requires that every effort should be made to objectively identify and then to meet the housing, business and other development needs of an area, as well as to respond positively to wider opportunities for growth.</p> <p>3.2 The draft Local Plan confirms the Thanet Strategic Housing Market Assessment (SHMA, January 2016) and Updated Assessment of Objectively Assessed Housing Need (mistakenly identified as ‘September 2016’ in draft Local Plan, but actually January 2017) establishes the Council’s housing requirement.</p> <p>3.3 The January 2017 SHMA update identifies a full Objectively Assessed Need (OAN) for 17,140 dwellings over the plan-period (2011 – 31), equating to 857 dwellings per annum. The full OAN includes uplifts to the demographic need starting point to address inwards migration from London and affordability.</p> <p>3.4 We support the Council’s identification of its full OAN including relevant uplifts in line with the requirements of the NPPF.</p> <p>3.5 Whilst the Local Plan is to be assessed against the criteria contained in the NPPF 2012 and therefore will avoid the requirement to adopt the Government’s Standard Method we are mindful of the requirement of para 33 of the NPPF 2018 which notes:</p> <p>Policies in local plans.... should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary.... Relevant strategic policies will need updating at least once every five years if their applicable local housing needs figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. [emphasis added]</p> <p>3.6 The current Standard Method for calculating housing needs results in a higher OAN for the District of 1,070 dwellings per annum (on basis of 2016-based household projections). In light of this, there may be a need for an early review of the Local</p>		1377		Email

						<p>Plan to address increased housing needs.</p> <p>3.7 The Council identifies it is seeking to meet its full OAN, recognising the following housingsupply:</p> <ul style="list-style-type: none"> <li>• Completions (April 2011 – March 2018) – 2,182 dwellings;</li> <li>• Empty homes brought back into use 2016/17 – 89 dwellings;</li> <li>• Empty homes brought back into use 2017/18 – 84 dwellings;</li> <li>• Planning permissions – 4,294 dwellings;</li> <li>• Proposed Local Plan allocations – 8,939 dwellings;</li> <li>• Windfall allowance – 2,250 dwellings; and</li> <li>• Empty homes allowance – 357 dwellings.</li> </ul> <p>3.8 The above sources of delivery result in an over-provision of 1,195 dwellings against the OAN requirement of 17,140 dwellings, resulting in a total supply of 18,335 dwellings. Whilst no detail is provided within the draft Local Plan as to why the Council is seeking to over-provide, this approach is nevertheless supported and provides an effective and flexible strategy for development which will help achieve the Council’s growth aspirations and reduce the risks of under-delivery.</p> <p>3.9 To meet its growth requirements, the draft Local Plan provides a positive plan-led approach, with allocations delivering the majority of future supply. This approach is supported and consistent with national policy.</p> <p>3.10 The Council acknowledges there are a number of constraints to growth across the District which limit where development can be located, including the District being surrounded by coastland, the location of internationally and nationally important nature conservation designations and areas at risk of flooding.</p> <p>3.11 Whilst the Council’s strategy seeks to first optimise use of sites in the existing built up area(i.e. brownfield sites), there is insufficient brownfield land available to meet the housing requirement. The Council’s Brownfield Register identifies land available for circa. 1,700 dwellings on brownfield sites (excluding the former Manston Airport site, as discussed below), of which circa. 620 dwellings already have permission and the remaining are proposed Local Plan allocations.</p> <p>3.12 As detailed in para 3.13 of the draft Local Plan, the residual level of housing growth, not being met by brownfield land, will mainly be delivered by suitable and available housing land on sites abutting the built-up area. This approach is supported and is consistent with the sustainable</p>				
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					<p>development principles of the draft Local Plan and national policy.</p> <p>3.13 The draft Local Plan identifies 5no. 'strategic sites' (those in excess of 500 dwellings) to deliver 6,800 dwellings across the plan-period, on sites adjoining the built-up area boundary.</p> <p>3.14 Whilst this will require a significant level of greenfield land to meet the housing target, as acknowledged in para 3.17 of the draft Local Plan, the allocation of strategic sites provides the opportunity to "deliver development at a scale that will serve both to facilitate a step change in delivering the type of homes required to meet need and secure the infrastructure required to support them". This includes the delivery of the Inner Circuit link road, a key element of the proposed Local Plan strategy.</p> <p>3.15 We support the Council's acknowledgement, at para 3.24, that Birchington is a "sustainable location for new development, with good access to local services, including local schools and other community facilities, as well as convenient transport options to the rest of Thanet and locations outside of the district" and the subsequent allocation of a Strategic Site for housing delivery and to assist in the delivery of the Inner Circuit link road.</p>				
Pugh	Wendy		398		<p>Object</p> <p>I am very opposed to all these houses because:</p> <p>Insuffient hospitals. I waited two years for an operation, then my family clubbed together and paid for it privately.</p> <p>Insufficent schools. Neither of my grand chidlrne got into the school of their choice or the shcool nearest their homes. This means I have to do the school run every day.</p> <p>Insufficient doctors - I have chronic illnesses and often have to wait 3/4 weeks to see a GP.</p> <p>The infrastructure is not good enough - especially the roads - there are always traffic jams.</p> <p>There is not enough water.</p> <p>There are not enough jobs. More people on welfare. People on welfare do not pay council tax!</p>		1160		Email

						<p>All these problems will get worse and worse with more homes and more population.</p> <p>The local plan is ridiculous.</p> <p>I would like to see thre airport back and more jobs.</p>				
Quinn Estates		Quinn Estates	477	Paul Burley - Montague Evans LLP	Observation	<p>We have been instructed by our client, Quinn Estates, to write following previous submissions in relation to the Local Plan. In those submissions our client advocated the allocation of land adjacent to Yoakley House in Margate for specialist older people's accommodation and residential development. We note that in the Regulation 19 version local plan the site is not proposed to be allocated, however.</p> <p>We enclose the previous submissions which describe in detail the benefits of the proposal which include the delivery of high-quality purpose-built older peoples' accommodation and a contribution to meeting the need for homes in the local area. We note that in the Regulation 19 draft and in respect of housing delivery, the Council is relying on a lower 'need' than that which would result from a calculation using the Government's standard methodology. Thus the real 'need' is greater than that which is being planned for.</p> <p>Furthermore, the Council is relying on a significant number of historic planning permissions to meet the need, yet there is no real analysis of whether or not these are 'deliverable'.</p> <p>On that basis we once again request that the Council gives consideration to including land adjacent to Yoakley House in the new Local Plan.</p> <p>We would be grateful if our client could appear at the forthcoming examination in public.</p>		1342	<a href="#">Yoakley, Quinn Estates.pdf (2.1 MB)</a>	Email
Read	Chris	South Thanet Constituency Labour Party	344		Object	<p>South Thanet Labour's main concern is in regard to the unrealistic and environmentally damaging high target for land allocated for new housing set at 17,140. This has risen from 12,500, which was the calculation 4 years ago purely because of changes to the way Government has decreed these things should be calculated. We do not wish to challenge the way these formula have been applied, but would suggest that there are unique aspects of Thanet that the Council should have taken into account. A one size fits all formula might be ok for middle England, but should not be applied uncritically in relatively remote coastal areas such as Thanet without detailed consideration.</p> <p>Thanet's geography, as a remote peninsular, with just effectively two roads on and off "the island", places large constraints upon the area's ability to generate employment. The logistics mean that employers can usually find more advantageous locations nearer to the M25. Despite promises, KCC and Government have failed to address this constraint. Even commuting to find work is constrained to travelling to Dover, Canterbury or Ashford areas or to brave the escalating</p>		1033		Web

					<p>costs and hassle of rail to London.</p> <p>For these reasons we believe that the plan’s target of 5,000 new jobs is wholly unrealistic. Thanet has no large scale employers, and even some of its lesser ones such as local government, retail, hospital, the port and airport are closing or retracting. We see nothing in the plan that convinces us that the Council plans will address this. Our one bright spot, tourism, is notoriously fickle and uncertain.</p> <p>We would advocate no more than 3000 jobs being a realistic expectation which would mean that the housing target should be reduced. We do not think the area will attract large numbers of people relocating here to work.</p> <p>The housing target also seems to fail to take into account the large increases in housing planed for our neighbouring districts, Dover, Canterbury and Ashford. Because of better employment opportunities, we believe that these will inevitably meet some of Thanet’s housing need.</p> <p>It is entirely unacceptable that against council officer’s advice, the local plan fails to address the future of the derelict airport site at Manston. The unviability of this site as an airport is dealt with elsewhere; however the current owners have submitted plans to the council that would provide the area with real opportunities to develop a sustainable development with employment, recreation and housing on brown field land.</p> <p>We believe it is wrong to identify so many green field sites in the plan which comprises grade 1 agricultural land (up to 15,000 homes proposed on such green field farmland or 80% of the total). Such land is a vital asset to the people of Thanet.</p> <p>Government policy is to maximise use of brown field sites. This plan does not do so.</p> <p>We do not believe that house builders will actually be able to build the target amount of new housing in Thanet – Our previous delivery of housing falls short of this with target averaging 678 units a year 2006-11 and from 2011 to 2016 311 per year. There are currently sites with planning consent for over 2,000 homes which have yet to commence development. There are also 2,488 empty and second homes within Thanet</p> <p>Inevitably, in this situation, quality will suffer. The danger, in allocating so much land for housing development, is that development will be very piecemeal. Numerous small developments will occur, contributing little to the much needed infrastructure that makes for sustainable communities.</p> <p>Furthermore, the plan concedes that Thanet faces serious water supply and water quality issues, likely to increase in the future. Southern Water in their document “Water futures in the South East” say “River flows could fall 35% as population &amp; climate changes bite, Extreme droughts could be over 50% worse than current systems may be resilient to. On their latest figures Thanet is currently reliant on 2.7 Ml/d transfer of water from other regions, expected to rise to 17.6 Ml/d by 2050, a rise of 600%. Meeting this threat will incur costs that will be a</p>				
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						<p>constraint to further development. In fact it is obvious that the political decision to re-allocate sites for 3700 houses, at the last minute in the process of plan development, because of the political failure to address the Manston issue, has impacts on infrastructure, transport and social, including health and education, which have not been properly assessed.</p> <p>Thanet has a chronic need for social housing to rent by the indigenous population. As at March 2018, there were 2447 households on the housing register, broken down as follows;</p> <ul style="list-style-type: none"> <li>● 1203 households require one bed</li> <li>● 594 households require two beds</li> <li>● 458 households require three beds</li> <li>● 157 households require four beds</li> <li>● 35 households require five bedrooms or more</li> </ul> <p>Plus a rise year on year of the numbers of rough sleepers. This can only be provided by the council or providers purchasing land, or more likely through section 106 agreements with developers. We would like to see the needs of indigenous residents better reflected in the plan.</p>				
Repsch	John		126		Object	<p>3.1 "Expected population growth". If Britain comes out of the EU, population growth will be a lot less than expected. Suitable land cannot possibly include Grade 1 farmland. To use any of this land for building on would be totally irresponsible. The grey urban area around Thanet's coast is increasing its width at the expense of the decreasing green at the centre. If we don't start using foresight now we will have nothing but urban sprawl to bequeath to future generations.</p> <p>"Supporting the re-use of empty properties" Yes. We should also:</p> <ol style="list-style-type: none"> <li>1. Disallow properties to remain empty for more than 6 months.</li> <li>2. Use brownfield sites.</li> <li>3. Use financial incentives to encourage sole occupants of large properties to down-size.</li> <li>4. Encourage the conversion of empty rooms above shops into flats.</li> <li>5. Encourage the letting out of flats and bed-sitting rooms.</li> </ol> <p>3.2 "in-migration (including from London)" Off-loading hundreds or thousands of people from homeless waiting lists in London boroughs could cause big difficulties:</p> <ol style="list-style-type: none"> <li>1. Local people are already fearful that their own properties will not be secure.</li> <li>2. The people arriving may not like the new way of life in Thanet, where the quiet of this area contrasts acutely with the noise and frenzy they would be leaving behind. They would be bringing with them completely different cultures and, in a worst case scenario, could produce the kind of gang warfare which is currently bringing violence and death to the streets of London.</li> <li>3. Unemployment in Thanet is the highest in Kent. There are not enough jobs available to cater for such a large influx, especially outside the tourist season.</li> </ol>		407		Web



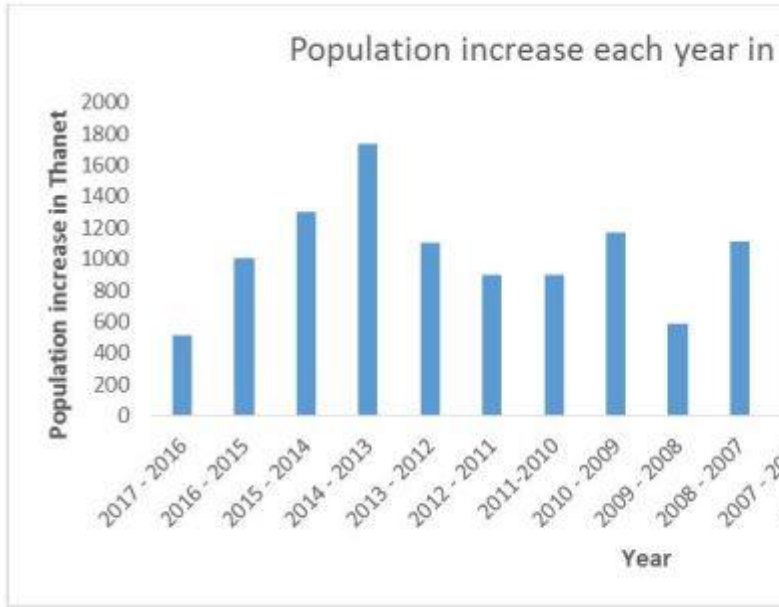
						3.5 Space for housebuilding is finite. If we build over all our fields, there will come a time when there is no space left. Then the in-comers will simply go elsewhere. It's because building in Thanet continues to go on, that in-comers continue to come in.				
Schembri	Angela	RPS Planning & Development Ltd	387		Object	<p>RSP is wholly supportive of the Council's decision to no longer allocate the Manston Airport site for a new mixed-use settlement. For the reasons set out in RSP's representations to the Proposed Revisions to the draft Thanet Local Plan (Preferred Options) January 2017 (set out in our letter dated 17th March 2017), a new settlement on the airport site would not be sustainable or deliverable.</p> <p>RSP is aware of the hybrid planning applications by Stone Hill Park Limited (the airport owners) for mixed-use, housing-led redevelopment of the Manston Airport site (TDC application references OL/TH/16/0550 and OL/TH/18/0660). At the time of writing, both applications remain to be determined by TDC albeit that the deadline for a decision on the 2016 application expired on 20th October 2016 (nearly two years ago). The Council does not want to prejudice the outcome of the Manston Airport DCO application and has chosen not to allocate the airport site for any specific purpose in the new Local Plan. Bringing housing forward on the Manston Airport site is no longer part of TDC's housing policy. However, RSP are mindful of the airport owner's redevelopment aspirations for their site and their position that TDC's housing evidence base and policy response are not robust particularly in respect to objectively assessed need (OAN) and land supply matters and the role that the Manston Airport site can make in meeting development and especially housing needs. To provide further evidence in support of RSP's recommendation that there should be a policy which safeguards Manston Airport for aviation uses in the interests of proper planning in accordance with NPPF advice, RSP have prepared a report which assesses the Council's deliverable supply of housing land against the housing targets necessary to meet the OAN for housing. This RPS report entitled Thanet District Local Plan : Updated Review of Housing Land Supply and Housing Need (October 2018) is provided as Appendix 1. It concludes that based on TDC's up-to-date evidence base, that there is currently sufficient deliverable housing land capacity in Thanet District plus sufficient flexibility without the Manston Airport site, to deliver the Council's housing need for the Plan period 2011-2031. Consequently, the airport site is not required to deliver the Council's housing strategy.</p> <p>It is noted in the TDC Duty to Cooperate Statement (July 2018) that both Dover District Council and Canterbury City Council have raised concerns about the level of employment land surplus identified in the draft Thanet Local Plan (paragraph 9.11). This is despite TDC removing some 30 hectares of older employment land from the supply to provide new housing sites.</p>		1140	<a href="#">213 Schembri Angela RSP.pdf (2.7 MB)</a>	Email

						<p>The TDC Employment Land Review (2010) is old and one could argue that it should be updated to provide a current position on the employment land supply in the District. However, and on the assumption that Dover District and Canterbury City Council's concerns are correct, it would suggest that TDC could remove more employment land from the supply to provide more housing sites, thereby demonstrating that there is absolutely no need for the Manston Airport site for housing. This also raises the question as to whether the Council's Housing and Employment Strategies are aligned.</p>				
Scott	Jane	Finn's	452		Observation	<p>Introduction</p> <ul style="list-style-type: none"> <li>▪ This representation is in response to the Thanet District Draft Local Plan Reg 19 Consultation, October 2018. Please accept this as a response to Draft Policy SP11 and as a new site option, part of a larger site previously submitted in this Local Plan process.</li> <li>▪ This parcel of land forms part of site SHLAA Reference 356 and comprises 11 acres (4.4 ha). The representation is made on the joint instruction of the developer &amp; landowner.</li> <li>▪ Following discussions with the landowner, the developer is interested in building out this site and has a local Housing Provider, with the funds to allocate, interested in providing the affordable housing element of the scheme.</li> <li>▪ This parcel of land is now submitted as a separate site option that we request is considered as a separate deliverable and sustainable residential development which can be quickly built out to help to address housing need.</li> </ul> <p>Location</p> <ul style="list-style-type: none"> <li>▪ The site consists a contained parcel of land just outside Birchington and connected to Birchington by road, bus, cycle and pedestrian paths.</li> <li>▪ It adjoins existing residential development in Brooksend and Thanet Earth, which has recently expanded.</li> </ul> <p>Services</p> <ul style="list-style-type: none"> <li>▪ The main residential built confines of Birchington lie 600m in a north easterly direction. Birchington is a well-established and well serviced settlement with a good range of facilities including shops, restaurants and services, as well as a library, a primary school and just on its eastern side, a large secondary school. Brooksend has its own shop which is due to expand &amp; include an ATM Cash Machine.</li> <li>▪ The site benefits from good connectivity to community</li> </ul>		1299	<a href="#">109 Scott Jane Site Plan.pdf (339 KB)</a>	Email

					<p>amenities and public transport –</p> <ul style="list-style-type: none"><li>o Mainline Rail Station, including HS1 serving London - accessible within 10 minutes by bicycle</li><li>o Bus stops with services run at 15 minute intervals &amp; serving 5 routes – adjacent the site</li><li>o Pedestrian &amp; Cycle paths - adjacent the site</li></ul> <p>▪ Therefore, this location is considered to be sustainable, with good pedestrian and cycle access into Birchington centre and the local primary and secondary schools.</p> <p>Deliverability</p> <p>▪ Following discussions with the landowner, a developer is interested in building out the site and has a local Housing Provider interested in providing the affordable housing element of the scheme. The land benefits from being within a single ownership.</p> <p>▪ The National Planning Policy Framework July 2018 (the Framework) recognises the important contribution that small and medium sized sites can make to meeting the housing requirement within an area and that such sites are often built-out relatively quickly (paragraph 68).</p> <p>▪ In Thanet’s case, smaller housebuilders remain happy to build out sites of 100 houses or less and this is supported by the ongoing build out of several smaller sites across the Thanet District.</p> <p>▪ In locational terms, the Thanet area is less attractive to the major housebuilders, at the present time. Several large sites of over 1,000 dwellings within Thanet are proposed to be allocated for residential development.</p> <p>▪ Deliverability of sites is given high priority, with the Framework advocating local planning authorities ‘make a realistic assessment of likely rates of delivery’ when allocating large sites (Framework, paragraph 72(d)).</p> <p>Utilities</p> <p>▪ Mains water, gas, electric and foul drainage are adjacent in the Highway/the land ownership.</p> <p>Agricultural Land</p> <p>▪ The Framework seeks to address the loss of ‘best and most versatile’ agricultural land. The land in question is of poor quality, with little top soil over the chalk, resulting in well below average crop yields and in some years crop failure.</p> <p>Highways &amp; Pedestrian safety improvements</p> <p>▪ There is a recognized issue with pedestrians using Seamark</p>				
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						<p>Road, running to the south of the site, to walk to work at Thanet Earth.</p> <ul style="list-style-type: none"> <li>▪ Development of this site would enable highway improvements to Seamark Road and the provision of a pedestrian and cycle path to improve pedestrian access to Thanet Earth &amp; the bus network.</li> </ul> <p>Summary With an interested developer and housing provider available, this single ownership site is available and can be delivered quickly within the first years of the Plan period to help bolster housing provision within Thanet, in a location which has excellent pedestrian and cycle links to local shops, schools and services within Birchington.</p>				
Scott			511		Object	<p>1 Executive summary The Draft Thanet Local Plan - 2031 - Pre-Submission Publication, Regulation 19 is unsound for a number of reasons. Firstly, the objectively assessed housing need (OAHN) has been calculated including unusual peaks in internal migration and is therefore inflated. The consultants GLH have also inflated it further using questionable assumptions. The figures also do not take into account the reduction of immigration from the EU which will reduced the OAHN. Using calculations based on ONS figures, the OAHN should be reduced from 17.1 k to at least 13k because of the inaccuracies with the population projection figures, and then should be reduced further to 12.25k when taking Brexit into account (cautious estimate) or to 10.8k (stronger effect of Brexit). The OAHN should be recalculated using the most recent population projection figures and by taking an average from a larger range of years e.g. average of the population increase for 10 consecutive years rather than 5 consecutive years. It should also take into account the predicted effect of Brexit on the international migration to Thanet which mainly consists of EU citizens. Secondly, the vast majority of houses in the Local Plan are allocated on grade 1 agricultural land, which is contrary other Government policies regarding food security and soil health. The OAHN should be reduced and therefore the area of farmland that is allocated should then be reduced. The National Planning Policy Framework states that the Best and Most Versatile Land should be used as a last resort and therefore reductions in the OAHN should be removed from this agricultural land first. The plan is not sound with regards to environmental sustainability and the sustainability policies of NPPF due to the massive areas of agricultural land that will be destroyed. Thirdly, the process by which the allocations have been chosen has been weighted by a need to use section 106 monies to pay for a new road on the Isle of Thanet, as funding could not be</p>		1440		Email

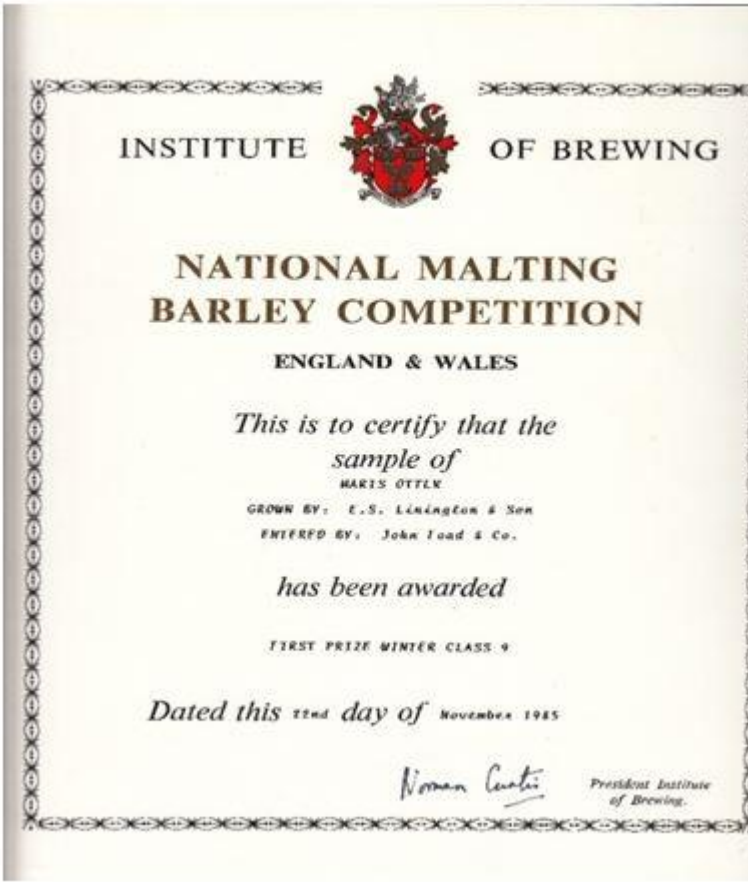
					<p>accessed from elsewhere. The choice of the allocations in this way is very questionable. Also, as the majority of the s106 money will be use to fund a major infrastructure project, it will leave little for local community. TDC has stated that all monies will be used as s106 and not as a Community Infrastructure Levy (CIL). This is particularly unfair as a Neighbourhood Plan is being written in Westgate-on-Sea which can increase the CIL contributions.</p> <p>The plan should be rethought with regards to housing allocations being based on local need and sustainability, rather than based on the need to collect monies for the new road system.</p> <p>Fourthly, the whole process was not consulted on properly. The foundations of the local plan is based on the views of approximately a hundred people in 2013. They were consulted on the possibility of around 7,000 houses being built in Thanet. There should be a full new consultation as the answers people gave in the first consultation in 2013 are now not valid due to the massive increase in OAHN.</p> <p>Furthermore, the computer system was problematic over the last consultation period, leading to representations being lost. This included the representation sent to TDC by the Westgate-on-Sea Town Council, who has a receipt that it was received. It became clear that TDC had not read it when the green spaces put forward by the Town Council were not added to the subsequent draft Local Plan. The TDC Planning Manager apologised that they had lost the representation. How many more had they lost?</p> <p>The Local Plan should be withdrawn, comprehensively reconsidered and redrafted to reflect the lost representations made and take on board the views of the community.</p> <p>Lastly, the whole process of TDC local planning has been top down, despite the Government promoting neighbourhood engagement in planning e.g. through a Neighbourhood Plan. This process did not have an inch of Localism in it and in my view, the Localism Act is dead.</p> <p>Furthermore, not only is the OAHN over inflated causing unnecessary damage to the local communities and environment, but the plan is undeliverable at present without a fully integrated infrastructure, transport plan and fully costed implementation programme.</p> <p>1.1 The Objectively Assessed Housing Need</p> <p>The OAHN has been created from population projections based on population increases between the years 2009 - 2014. It was suggested by the 2014 based ONS figures that Thanet's population will increase by 1200 every year, however the population only increased by approximately 509 in 2016-2017 (Figure 1-1).</p> <p>The population projections are over-estimated due to the fact that the projections are made using just a 5 year span between 2014 – 2009 and one of these years (2013-2014) had an</p>			
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					<p>unusually high increase (1734 people) in population compared to other years.</p> <p>If the average population increase was taken over the whole of graph from 2001 – 2017 the figure would be 894 people each year, &gt;300 less than the projections.</p> <div data-bbox="1110 365 1837 932"><table><caption>Population increase each year in Thanet</caption><tr><th>Year</th><th>Population increase</th></tr><tr><td>2017 - 2016</td><td>500</td></tr><tr><td>2016 - 2015</td><td>1000</td></tr><tr><td>2015 - 2014</td><td>1300</td></tr><tr><td>2014 - 2013</td><td>1734</td></tr><tr><td>2013 - 2012</td><td>1100</td></tr><tr><td>2012 - 2011</td><td>900</td></tr><tr><td>2011 - 2010</td><td>900</td></tr><tr><td>2010 - 2009</td><td>1150</td></tr><tr><td>2009 - 2008</td><td>600</td></tr><tr><td>2008 - 2007</td><td>1100</td></tr></table></div> <p>Figure 1-1 Population increase per year created from ONS figures UK mid year estimates 2017<a href="https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland">https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland</a>. See table MYE 5 line 307.</p> <p>Using 894 as the increase in population each year, this would give an increase in population of 17,880 over the 20 year period, instead of the 24,000 that the ONS projects. These figures have approximately 3,000 added to them due to the aging population giving the calculated approximate figure of 20,800 people over 20 years (17,880 + 3,000). If 2 people live in each house this would give an OAHN of 10,400. I know that TDC are adding on a couple of thousand houses as housing rate has been slowed in recent years so this would give us a final OAHN of 12,400. Even if 1.6 people live in each house this would only give an OAHN of 13k.</p> <p>Interestingly this is similar to the number of houses that the Local Plan began with back in 2015. Because the figures used the ONS figure 2014 based, the population projections were skewed and Thanet has been allocated an overinflated and unfair number of houses.</p> <p>As well as the inflated figures caused by this method, GLH consultants also added to the OAHN using questionable assumptions regarding extra movement from London. TDC was assured by London Boroughs that they would address their own OAHN and it is unfair that Thanet should have to increase the OAHN to cater for the lack of planning in London, forcing people to move out of the city. It is clear that people have</p>	Year	Population increase	2017 - 2016	500	2016 - 2015	1000	2015 - 2014	1300	2014 - 2013	1734	2013 - 2012	1100	2012 - 2011	900	2011 - 2010	900	2010 - 2009	1150	2009 - 2008	600	2008 - 2007	1100			
Year	Population increase																													
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					<p>always migrated to Thanet, however these extra figures added to the OAHN by the consultants is an unsound way of calculating the OAHN.</p> <p>Over the period of 2002 – 2014 the average international migration each year was 300. In Thanet this international migration is mainly made up of European citizens. If Brexit was to reduce this number by just a third to 200 people each year this would mean that 1,200 less European Citizens will come to Thanet to 2031 (100 people x 12 years (2019 – 2031)). This is important as the OAHN could be reduced by 600 houses if 2 people live in each house. If the ratio is 1.6, the OAHN would reduce by 759 houses.</p> <p>If Brexit was to reduce the figure even more, to just 100 people coming to Thanet every year, then 2,200 less people would be included in the population projections, which would be a decrease of 1392 houses from the OAHN.</p> <p>This is important because large areas of agricultural land will be destroyed in the Local plan and any reduction in the number of houses should be removed from the agricultural land first. The OAHN should be recalculated and the reduction in allocation should be taken from the agricultural land first.</p> <p>Using the calculated figures above, the OAHN should be reduced from 17.1 k to 13k because of the inaccuracies with the population projection figures and then should be reduced further to 12.25k when taking Brexit into account (cautious estimate) or to 10.8k (stronger effect of Brexit).</p> <p>The OAHN should be recalculated using the most recent population projection figures and by taking an average from a larger range of years e.g. average of the population increase for 10 consecutive years rather than 5 consecutive years.</p> <p>It has been suggested by the Planning Manager that if housing numbers were reduced they would not be taken off of the “Strategic Housing sites” on the agricultural land. This would break the only legal protection for grade 1 agricultural land as stated in the NNPF. The housing on the agricultural land should be removed first and foremost as the NPPF states that the best and most versatile land should be only be used as a last resort.</p> <p>1.2 The loss of significant tracts of Grade 1 agricultural land</p> <p>In the Thanet Local Plan all of the strategic sites are allocated for agricultural land. Building on grade one and grade two agricultural land, or any agricultural land, is unacceptable. This is more so now than ever before. The Food and Agricultural Organisation for the United Nations (FAO) explains:</p> <p>“to provide for a (predicted worldwide) population of 9.7 billion in 2050, food production will need to increase from the current 8.4 billion tonnes to almost 13.5 billion tonnes a year” (FAO, 2017)</p> <p>We will need much more food in the future and therefore building on our top quality farmland is a very short sighted method of planning for housing.</p> <p>The FAO goes on to explain that:</p>				
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					<p>“Eighty percent of the additional (food) required to meet demand in 2050 will need to come from land already under cultivation.”</p> <p>In other words, agricultural land will need to become even more productive than it already is. This shows how ludicrous it is to build on this land under cultivation in Thanet.</p> <p>Many residents of Thanet are against the building of houses on the agricultural. It needs to be valued and viewed as a precious commodity. As building on the soil will cause irreversible destruction of the farmland, when it is gone, it will be gone forever.</p> <p>Trevor Mansfield of the UK Soil Association has written:</p> <p>“We believe that high quality agricultural land should be preserved for growing and protected from development both now and in the future. Good quality agricultural land is invaluable - It is the fundamental resource on which human life depends and protecting and improving the health of our soil is more important today than it ever has been. In the UK it’s estimated that we lose 2 million tonnes of soil a year through erosion (see Defra’s 2009 Safeguarding Our Soils); yet it can take more than 500 years to generate an inch of soil. Soil stores 10 times more carbon than the forests. Climate change will bring even greater challenges in the future, with increased pressure due to waterlogging and drying, affecting the productive capacity of soils”.</p> <p>He points out that soil is the resource on which life depends and so protecting it is vitally important. He goes on to explain that it can take almost half a century to produce an inch of soil. How sad it would be to see our soils destroyed as if they were of no value.</p> <p>Global Climate Change is a real issue caused by man-made increases of greenhouse gases such as carbon dioxide in our atmosphere, and this will affect everyone in the world. Soils store large amounts of carbon and help with balancing our carbon cycle. They also assist with flood mitigation preventing flooding (POSTnote 484 in POST, 2015).</p> <p>The Parliamentary Office of Science and Technology conducted research into the importance of soils in the UK and concluded:</p> <p>“Around 95% of food production relies on soil. The global nature of the food system makes soil health (or quality) an international concern. Soils filter and store water, support agriculture and other plant and animal communities, and harbour a quarter of the world’s biodiversity”.</p> <p>Soil quality is of international concern. Not only do soils have a multifunctional purpose, but they also harbour a quarter of the world’s biodiversity.</p> <p>The land at ST1 and ST2 in Westgate-on-Sea is grade 1 agricultural land and has produced award winning crops (Figure 1-2).</p> <p>People might question the sanity of those who thought that</p>				
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					<p>building on this land was a good idea whilst conducting the SHMA a few years ago, including Quex Estates themselves. The Linnington family has lovingly fertilized and nourished the soil. They have prevented the soil from eroding and decreasing in fertility, which has been the fate of many other soils across the world; over half the world’s agricultural land is subject to soil erosion (POST, 2015). Destroying the soil now would undo all their hard work to sustain this precious resource.</p> <div data-bbox="1142 478 1840 1302"></div> <p>Figure 1-2 Certificate for Barley crops</p> <p>The National Planning Policy Framework states that the best and most versatile land (Grade 1-3 soils) “is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations”.</p> <p>Protecting soil presents an opportunity to address simultaneously several global challenges such as food security, climate change, water security, waste management and biodiversity loss (POST, 2015).</p> <p>We must protect and value this finite resource and build only the very smallest number of houses on the agricultural land. We need it for growing food in a world of ever increasing population and demand on food supplies.</p> <p>The in combination effect of such a large housing allocation in Thanet will impact the birds and wildlife of the area significantly.</p>			
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						<p>The loss of significant open spaces and associated birds and wildlife in the local plan together with the loss of agricultural land means that the plan is not sound with regards to the sustainability section of the NPPF.</p> <p>The Local Plan does not meet the criteria in the sustainability section of the NPPF.</p> <p>The OAHN should be recalculated and some of the housing allocation should be taken off of the agricultural land.</p>				
Scullion	Shelley		275		Object	<p>I am against the local plan as I believe it is not fit for purpose. the The amount of housing is excessive and to build on grade A land shows very poor judgement. The town centers are full of empty shop's and derelict buildings, surely they should be used first.</p> <p>Thanet has always had high unemployment and poor infrastructure. I see in the local plan there are no firm commitments to build better roads and bring jobs to the area. Another concern is the lack of rainfall in the area. We have less rainfall than Rome, even the water companies admit that they will struggle to supply the area with clean water with the amount of housing proposed. There have also been problems coping with sewerage in the past during storms and raw sewage has been discharged into the sea to prevent flooding, ruining our beautiful beaches.</p> <p>The grade A fertile land which can grow two crop's a year may be needed in the future when we leave the EU. We may need to be more self sufficient once we leave and if it is concreted over it will be gone forever. I hope you will take time to consider all the local people's arguments. I am a 61 year old lady who has lived in the local area all my life and have seen many changes over the years, not all for the better and feel this local plan would be disastrous for the area.</p> <p>Yes we need more houses but please please use the brownfield sites first.</p>		817		Email
Scullion	George		315		Observation	<p>I believe the local plan to be flawed.</p> <p>Firstly the number of houses seem to be rather excessive. Assuming the forecast is correct and we build 21000 new houses and each has an average of three occupants, the population of Thanet will increase by some 30 to 40%.</p> <p>The demands that would be put on all services would be tremendous. Schools, medical facilities, welfare budgets, transport, water resources and infrastructure would all be put under severe strain. There has been a lot of talk about tackling these issues but nothing substantial has been put forward. Nobody has said they would definitely fund any of the aforementioned. I feel that development would take place and we would be left to sort out any issues once those concerned have made their profits.</p> <p>We are all aware of the employment situation in the area so where would the 5000 jobs being spoken about come from. It's no use including construction jobs as they will not be there once the contracts are completed.</p>		949		Email

						To build on such high quality agricultural land would also be a mistake. With the impending Brexit due to be completed next year who can say what our future needs in being able to sustain ourselves independent of outside influence. Surely it would be best to err on the side of caution and retain valuable quality farmland, after all there is more than enough brownfield sites which could be put to good use within the local towns. I feel that the costs of developing these are not in the interest of profit seeking developers.				
Shonk	Trevor	Ramsgate Town Council	93		Observation	(Statement of need,) needed houses, unaffordable (Doctors) (Hospitals) (Dentist) (Infrastructure), ROADS 106 agreements are I see are open bribe Save our farmland. The best agriculture grade one. Greenbelt. Government imposed housing. Cliffsend. No way to Parkway Station up grade the North Kent Line. Don't spend £21 million use it on town areas re King St. High St M/Gate Manston Green./ land banking) – smother of the best agricultural land statement of need. As I said before Manston Airport kept as a regional airport, its an asset. Government has got it wrong again As I long standing local resident my concerns are as stated, food before (concrete) This best agricultural land in (Thanet) and the pressure is on all of Thanet B/Ton/Westwood X, Broadstair, Westgate when we have thousands of empty properties land banking etc. old industrial sites KCC to much influence on and around Thanet. My thoughts only.		214		Paper
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.		772		Web

Solly	C		419		Object	[See attachment]	The provision needs to be checked and to see if it is deliverable in the plan period. The stepped approach is a risk especially on the larger site. ONS household projections show a large difference to estimates data, that shows that housing need is over estimated in the projections.	1209	<a href="#">Solly SP11 comments.pdf (2.7 MB)</a>	Email
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached submission from Strategic Planning & Research Unit (SPRU)	See SPRU submission	283	<a href="#">09.25.ER.K5022PS. HousingLand Supply.Final.pdf (885 KB)</a> <a href="#">09.27.18.AB.K5022 PS.GeneralRep.Final.pdf (739 KB)</a> <a href="#">09.25.ER.K5022PS. Housing Requirement.Final.pdf (1.2 MB)</a>	Web
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Planning Consultants Ltd	Object	Chapter 3 representations made by SPRU	see attached submission from SPRU	303	<a href="#">09.27.18.AB.K5022 PS.GeneralRep.Final.pdf (739 KB)</a>	Web
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached submission by PTP Transport Appraisal	See attached TA from PTP	306	<a href="#">Land at Cliffsend, Ramsgate - TA (Final) 25-09-18.pdf (2.7 MB)</a>	Web
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Planning Consultants Ltd	Object	Having submitted evidence from SPRU on housing need, distribution, the Councils Sustainability Assessment and submissions on the Transport Appraisal; we have attached a submission from CSA on the Landscape Overview and Concept Master Plan for land West of Cliffsend as a strategic and sustainable housing and community extension to Cliffsend and serving the proposed New Parkway Station. This site has not been properly considered by the Council through its evidence base and should be allocated in the Councils Local Plan.	See attached report from CSA.	686	<a href="#">2914_04_A Landscape Overview for land to west of Cliffs End, Kent_.pdf (7.9 MB)</a>	Web
Stevens	David		175		Object	Policy SP11 – Housing Provision I am writing to object to the revised OAN figure of 17,140 for the period 2011 to 2031. In January 2016 GL Hearn produced the Strategic Housing Market Assessment for TDC. In this document GL Hearn based their calculations on the 2012-based sub national population projections data from ONS and DCLG. Using the data from 2031 of a projected population of 158,500, GL Hearn produced an OAN figure of 15,700. In September 2016 GL Hearn produced an update on their SHMA which was based on the 2014-based sub national population projections. GL Hearn stated that:	The whole housing allocation needs to be changed and must be done in consultation with neighboring authorities.	558	<a href="#">uknppaccuracyreport2015tcm774127221.pdf (1014 KB)</a> <a href="#">Figure 1_ Household estimates and household projections, England, 2001 to 2018.jpg (51 KB)</a>	Web

					<p>“These projections show stronger growth than the previous 2012 projections ...”</p> <p>As a result the OAN figure was raised to 17,140, an increase of 1,440 which equates to a 9.1% increase. This is somewhat surprising as the 2014-based sub national population projections give a Thanet projected population in 2031 of 161,500, which is only a 1.9% increase.</p> <p>I would also question the original figure arrived at by GL Hearn (based on 2012 data) as it involves an uplift of 4% for migration when the evidence produced in Table 11 (page 49) does not support such an assertion. Indeed, the trend is for a decrease in migration rather than an increase. As GL Hearn state:</p> <p>“Expected levels of migration show relatively little change over time. When compared with the past trends, the migration figures look to be reasonable. For the whole of the projection period (2014-31) the average level of migration is expected to be around 1,116 people (net) per annum. This figure is similar to the level seen in past trends (1,074 per annum on average from 2001 to 2014 and 1,186 per annum for the past five years).”</p> <p>Since the ONS and DCLG (now MHCLG) projections have already taken migration trends into account the uplift is unnecessary and removing this would produce a lower more realistic OAN of 15,100 based on 2012 data. Using 2014 data should give an increase of 1.9% resulting in an OAN of 15,387.</p> <p>Population projection is not an exact science and is based primarily on past trends. This is illustrated in Figure 14 (page 41) where, depending on which 5 year period you choose, you can project a population in Thanet in 2031 anywhere between 152,000 and 159,000. The Office for National Statistics produced the “National Population Projections Accuracy Report, July 2015” (see attachments) and in it they state:</p> <p>“It is acknowledged that projections become increasingly uncertain the further they are carried forward and it is noted that long-term projections should be used with caution”.</p> <p>To add more uncertainty to the mix, the 2016-based sub national population projections have just been released and these put the projected population for Thanet in 2031 as 159,800 which is 1,700 less than the 2014 figure. The ONS have also just released household estimates for the period 2001 to 2018 which show a much lower growth in house numbers than even the 2016 projections. (see figure 1 in attachments)</p> <p>To try and achieve a more robust projection I used the census data from ONS for the last 50 years to help identify the trend in Thanet population change. There have been peaks and troughs ranging from just over 1,000 increase in one ten year period to just over 11,000 in another 10 year period. However there has been an average increase of 12,200 people for each 20-year period.</p> <p>Using this information it would project a population for Thanet in 2031 of 146,386. Using the government figure of 2.09</p>				
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					<p>persons per dwelling this would reduce the OAN by about 6,000 dwellings.</p> <p>What is clear to me is that the whole process of producing the OAN for Thanet must be questioned.</p> <p>Finally, I would question the whole validity of the revised Thanet Local Plan on the grounds that TDC appear to have failed in their legal Duty to Cooperate.</p> <p>In January 2015, Thanet District Council (TDC) opened their public consultation on the Thanet Local Plan Preferred Options. Dover District Council, which is an adjoining authority, took the opportunity to express their opinion on the plan.</p> <p>It is very clear from the response by DDC that TDC did not carry out its Duty to Cooperate:</p> <p>“The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.” DCLG Guidance March 2014</p> <p>Appendix 1 of the 2015 report contains the following regarding the failure to cooperate:</p> <p>“For instance, the Council has not been involved in or consulted on the evidence base that has formulated the proposed housing figure (total 12,000, p. 53), the employment growth and job predictions (a minimum of 5,000 additional jobs, p. 28) or the proposed provision of retail floor-space (34,300 sq. m of comparison goods and 3,941 sq m of convenience goods, p. 35). Moreover, there has been no up-to-date evidence base published with the Plan (such as a Sustainability Appraisal or Habitat Regulations Assessment) which could have informed our response.”</p> <p>It goes on to say:</p> <p>“It is extremely disappointing that as a neighbouring Local Planning Authority, Thanet District Council has not entered into a constructive, active dialogue with officers from Dover District Council prior to the publication of the Preferred Options Thanet Local Plan. It will be essential that Thanet DC engages in a constructive active and on-going dialogue with officers and Members of Dover District Council from now on, especially on cross- boundary issues and strategic matters.”</p> <p>Following the elections in May, the new UKIP run council engaged G. L. Hearn to produce a “Thanet Strategic Housing Market Assessment” which was published in January 2016. The document makes a number of recommendations but two are particularly relevant.</p> <p>1) TDC should include DDC in their HMA:</p> <p>For practical purposes in planning for housing provision, GL Hearn would recommend use of a ‘best fit’ to local authority boundaries to housing market areas. The ‘best fit’ HMA would comprise the three authorities of Canterbury, Dover and</p>				
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					<p>Thanet.</p> <p>2) TDC has a Duty to Cooperate:</p> <p>In finalising the Local Plan for publication, Thanet District Council should engage with the other Local Planning Authorities (LPAs) to consider how housing need is being met across the Housing Market Area. It would be advisable that a Background Paper is prepared and agreed with the other LPAs to demonstrate how housing need is being met across the HMA in line with Paragraph 47 in the National Planning Policy Framework.</p> <p>Despite the legal Duty to Cooperate; the warning to TDC by DDC in their 2015 response and the clear advice by G L Hearn to Cooperate it seems that TDC appear to have once again failed to carry out their Legal Duty to Cooperate with DDC.</p> <p>TDC undertook a Consultation on their revised Local Plan which ended on 17th March 2017. DDC has produced a report, which was unanimously agreed by DDC Cabinet, and has been submitted to TDC.</p> <p>The report is very critical of the Thanet Local Plan on a number of issues but fundamental to those is, yet again, the lack of cooperation.</p> <p>It is clear from reading the report that DDC feel that TDC have not carried out their Legal Duty to cooperate:</p> <p>“It is extremely disappointing that as a neighbouring Local Planning Authority, Thanet District Council has not entered into a constructive, active dialogue with DDC under the Duty to Co-operate prior to the publication of the draft Local Plan in terms of the future of Manston airport given that the future of the airport is a strategic cross boundary issue.” Page 527 of the report.</p> <p>This failure to carry out their Legal Duty must cast serious doubt on the validity of the TDC revised Local Plan:</p> <p>“The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further.” DCLG Guidance March 2014.</p> <p>It is not clear whether this situation has been resolved since the new administration took over and it should be noted that the present administration inherited much of this Local Plan and have not had the time to correct the numerous errors. However, I object to this aspect of the plan.</p>					
Stevens	Angela		163		Object	<p>The government algorithm for working out the number of houses required does not fit all areas of the UK in the same way. Thanet DC did not write to the MHCLG about Thanet’s unique situation and the small Isle of Thanet certainly doesn’t need 17,000 new homes built on it. As stated b6 TDC at the beginnng of this new Local Plan, Thanet consists of 3 main coastal towns and attractive rural villages. It also has an airport with a DCO at the pre-examination stage. Thanet has only built</p>	<p>The National Policy for Housing states that local authorities should state their own local needs. I don’t consider that TDC has done this. They have blindly followed the government’s algorithm without even attempting to persuade the government to accept Thanet’s actual housing needs!</p>	603		Web

						around 350 houses on average per annum over the past 10 years, so the numbers quoted for Thanet are ridiculous! There are also numerous planning projects and empty buildings already earmarked for housing, so only around 9000 more houses are needed. The 2,500 on the airport site were quoted as being a “windfall” so are not needed. Nor should building on prime grade 1 and grade 2 agricultural land be allowed either!				
Streatfield	I M		181		Observation	<p>Objection Ideas for the Local Plan</p> <p>Your list of objections are spot on and you have covered ALL major details. I fully agree with them, and the restoring of run down properties seems to be an excellent alternative.</p> <p>Whilst I do appreciate that housing is greatly required in Thanet, there is not enough infrastructure and amenities to warrant this. I also feel that .....</p> <p>There will not be enough Surgeries, Doctors and Nursing staff, also Dentists and Libraries to provide all the extra people who will eventually live here. The QEQM hospital will surely not have enough medical personnel, beds or rooms so will not be able to supply treatment that is badly required. In my Surgery alone, we have to wait up to 3 weeks before we get an appointment to see a Doctor.</p> <p>With the climate change we are experiencing over these past years, especially this summer, we will not have enough water for everyone.</p> <p>Extra schools will be badly required, including teachers and extra staff.</p> <p>Losing more countryside to housing will be devastating for ALL wildlife, hedgehogs, butterflies, bees to name a few, and all different birds.</p>		526		Paper
Sutton	Stephanie		92		Object	<p>It seems almost criminal to destroy prime agricultural land to build houses on especially with global warming and "Brexit" looming. In small places like Garlinge, Westgate and Birchington it will increase the population tenfold and if past building projects are anything to go by i.e. St Augustines and Westwood Cross there will not be infrastructure put in place, namely roads, drainage, DR's, schools, increased hospital staff etc.</p> <p>There are many thousands of properties all over the country which should be used before new buildings are erected, but if you have to build why not find a large area of brownfield and build a new town like Milton Keynes in Bucks, which is very successful and will also provide employment of which there is very little in Thanet.</p> <p>The most important point is our agricultural land as we are losing more and more farms to building, where food could soon be our priority so please use your powers to pressurise developers to build elsewhere. I am sure they could make more money building a new town.</p>		212		Paper
Sykes	Anthony		31		Object	<p>These figures are just plain stupid and not based on any suitable evidence. The notion that we need people to move to the area to support growth in jobs is living in cloud cuckoo land.</p>	Reduce the number by at least half. Ensure that houses are only built to satisfy local needs. Current development at Westwood has stalled so lessons need to be learned.	55		Web



						The result of this imposed target for homes will just import unemployment to the area. It is therefore not sustainable.				
Thompson	Andrew	Canterbury City Council	162		Support	<p>In particular, we welcome that the draft plan intends to provide for the objectively assessed housing needs in full within Thanet District. Given the introduction of the Government's standardised methodology for calculating housing needs however, we understand that this will be likely to necessitate an early review of the Local Plan to ensure that housing needs continue to be met over the period to 2031. We would also draw attention to the Canterbury District SHMA (2018) <a href="https://drive.google.com/drive/folders/15ZIK7vu068sr4hacc8cbNS4hCsUeJCp">https://drive.google.com/drive/folders/15ZIK7vu068sr4hacc8cbNS4hCsUeJCp</a> which concludes that the Canterbury District Housing Market Area (HMA) is distinct from the Thanet HMA. Although we acknowledge that there may be some overlap at the edges of each HMA, it is not considered that all of Thanet District is within the Canterbury District HMA. We would welcome the opportunity to agree this position within a Statement of Common Ground.</p> <p>A stepped approach to the housing trajectory, that would allow for the delivery of the strategic sites, is supported; in particular given the significant role that the proposed strategic sites will play in meeting housing needs. Very large development sites, with significant infrastructure requirements, are likely to incur longer lead-in times than small and medium sized developments and therefore a stepped approach is necessary to ensure that housing supply can be maintained in the early years of the Local Plan.</p>		473		Email
Trotter	AR & PJ		388		Object	<p>HOUSING PROVISION</p> <p>The Local Plan calls for 17140 houses to be built in Thanet by 2031. The Governments formula for calculating this figure does not take into account the " remote" location of Thanet and it's sub standard transport links with the rest of Kent. The 2011 Census stated that the population of Thanet was 138000. If the new houses are built this will increase the population of Thanet by at least 25% to approximately 175000. Although the plan calls for 30% affordable housing there is no provision for the building of social housing for people on the Council's waiting list. The building of the houses seems to be dependent on supply and demand and there is no guarantee that the developers will build the houses. We have the scenario at the moment that planning permission was granted 10 years ago to build 1000 houses between Westwood Cross and Nash Road Margate. At present the developer has only built about 80 houses under Phase 1. Thanet has become the dumping ground for problem families from other areas. It is quite likely that this will continue and new houses will not be purchased by local families to reduce the Council's ever growing waiting list.</p>		1143		Paper
Tuffs	Jo		79		Observation	By 2031, Thanet will be even more of an anonymous blob of identical characterless houses with no distinction between the towns - if this plan goes ahead. Far better to use Manston		196		Web

						airport for a new eco-town and fulfill the housing quota that way. There is something very distinct about the views of the coast from Pegwell that should be protected. It may only be a view but it adds to the quality of life.				
Turner	Lee		481		Object	First of all I object as there is not enough Doctors, Dentist, School to take on all the extra people in these said houses you so wish to build there is not enough parking for residents that already love around here. Our Doctors Surgery Dentist, Schools & hospital are already Run to the maximum, so where are all these extra people going to go you are also taking away all our beautiful Fields & Scenery that we enjoy walking on with are doggies and taking in all the beauty & seeing all the Wild life as well as are the bats we see where are all the beautiful wildlife supposed to go to live. Also the slow worms that are on our fields I know at the end of the Day this will all come Down to money & peoples Voices will mean Northing to you as always		1347		Paper
Twyman	Paul		324		Object	In Chapter 3, para 3.13 should revert to the original version. Table 2 should return to the original or, better still, should be replaced with more robust and appropriate housing demand and supply statistics. Chapter 3, 3.17 and 3.19 should revert to the original The coverage of housing matters in the supporting documentation is of remarkably poor quality. The Strategic Housing Land Availability Assessment is naïve, it displays a misunderstanding of statistical techniques, and despite caveats adopts an underlying "set in concrete" approach to housing demand and supply. While one recognises that the authority has to follow national policies - not to say "diktats" - rather than respond to local circumstances, one is reminded of the late Professor Self, who commented on one complicated cost/benefit analysis that it was "nonsense on stilts". One particularly odd feature of the assessment is that, without explaining why, it restricts the detail to Thanet, Canterbury and Dover Districts - while for many other local government coordination purposes the East Kent region includes Ashford. This inevitably skews the results in what I would argue is a bias towards developer-led, excessive, housing provision.	In Chapter 3, para 3.13 should revert to the original version. Table 2 should return to the original or, better still, should be replaced with more robust and appropriate housing demand and supply statistics. Chapter 3, 3.17 and 3.19 should revert to the original	991		Email
Walker	Melvyn		115	Doug Brown	Observation	see comment below	There is a need to provide housing as soon as possible to meet immediate demand. This cannot be achieved through the strategic sites which will take some time to come onstream. additional sites should be provided within the areas already identified as suitable for non-strategic development. I and my neighbours own one such site at the west end of Down Barton Road, St Nicholas and would like this site considered as a non-strategic site in the Local Plan. The site is identified on the attached plan	244	<a href="#">Location Plan of proposed residential site St Nicholas at Wade.pdf (283 KB)</a>	Web
Walker	Melvyn		115	Doug Brown	Support	I am making a representation on behalf of Mr Friend of East Northdown Farm and Mr Miles of East Northdown House. They do not object to the proposed Local Plan per se, however they have concerns relating to policy SP11 leaves Thanet largely reliant upon strategic sites for housing provision. The complex	The inclusion in the Local Plan of the site identified on the attached plan to help meet the need for 4,500 houses by 2021.	512	<a href="#">submission plan.pdf (255 KB)</a>	Web

						<p>nature of these sites and the requirement for them to provide significant infrastructure, including a new inner ring road for Thanet, means that it is unlikely that much of the Strategic housing provision will not be until the latter part of the strategic plan period.</p> <p>Mr Miles and Mr Friend jointly own a site of approximately 1.4 hectares that is capable of immediate development in a comprehensive form. The site is considered to provide the potential for a development of up to 14 large houses in grounds, designed in a form that takes account of their rural Conservation Area location, taking their cue from the character of historic buildings and spaces in proximity of the site. This will also help meet the need for larger units in the Local Plan, a need that is less easily met on large strategic sites. The provision of units at an early stage will help the District meet its 5 year housing supply and to provide 4,500 units by 2021, a target of Policy SP11.</p> <p>The attached plan identifies the site in question, it would be the subject of a Master Plan to ensure it fits into the character and form of its Conservation Area setting.</p>				
Walker	John	The Ramsgate Society	231		Object	<p>Comments on Chapter 3: Housing Strategy; SP11 Housing Numbers</p> <p>3.1 The Draft Plan proposes that provision be made for 17,140 additional homes during the 20 year period from 2011 to 2031. This represents an average new build figure of 857 per annum. Is this level of new building needed, and is it a realistic target? Questions can be raised about how the figure of 17,140 was arrived at. The methodology used by central Government has changed in order to increase the numbers nationally, and how they should be allocated between different areas of the country. This change has increased Thanet's new housing requirement by about 4500 for the 20 year time-line, or 225 per annum on average. There is, however, little point in taking issue with the figure produced by the updated methodology: it is what it is, and given the Secretary of State's criticism of, and action taken against, TDC for its late production of the Local Plan, it is very unlikely that the figure could be changed.</p> <p>3.2 Whatever the "true" figure should be, the evidence of the last decade or so suggests that these planning targets are highly unrealistic in terms of actual delivery: in the period immediately before the current 20 year time-line (2006-2011), an average of 678 new units per year was achieved, nearly 200 per year less than the Draft Plan's average annual target; in the period 2011-2016 the figure fell sharply to an average of 311 per annum. These figures, and the tables provided in the Draft Plan showing the phasing of the allocations in five year tranches up to 2031, show that the annual new build for the remainder of the period (2016-2031) would need to be something between 1000 and 1100 units per year, far beyond anything which has been achieved for decades.</p> <p>3.3 This does not therefore seem either credible or</p>		705		Web

						<p>environmentally sustainable, particularly if the large, brownfield Manston site is not available for a concerted, balanced house-building programme, and TDC has to rely on allocating a multiplicity of smaller, mainly greenfield sites on the periphery of existing towns and villages, where vigorous objections to such plans are very likely. Indeed, the reallocation of the houses originally allocated to the Manston site to other places has already caused protests in Westgate and Garlinge where their original allocation of 1000 new homes was increased by another 1000.</p> <p>3.4 The Draft Plan does acknowledge the problem: “The existing built up areas of the district will continue to deliver additional housing. However, a significant amount of greenfield housing land is required to meet the target.” The reality is that about 15,000 homes are being proposed to be built on prime agricultural land, to the detriment of the amenity and open space which such areas represent and are enjoyed by the people of Thanet as a whole. This is in clear contradiction to the NPPF policy which has a statutory requirement to prioritise brownfield sites for new development, which TDC has chosen to ignore in favour of reopening of the airport.</p>				
Wall	David		451		Object	<p>As a Birchington resident I strongly object to the proposed housing plan.</p> <p>Firstly the plan falls way short of explaining where all the funding for infrastructure is coming from or if it has been secured.</p> <p>Where are all the 5000 jobs coming from ? whilst there will be some increase while the houses and roads get built, what then? we are going to have close to that number of new people moving here, even taking away those that will be allocated social/affordable housing, there is still going to be nowhere near enough jobs.</p> <p>Traffic is going to become so congested that the whole of the Thanet area will come to a standstill.</p> <p>My main objection is that to take perfectly good open farm land before looking to regenerate old and unused land property in Thanet Particularly Margate and Ramsgate is quite frankly unbelievable.</p> <p>I strongly object</p>		1293		Email
Ward	Linda		157		Support	<p>I believe that the latest figures from the MHCLG show that the number of households are not growing as previously projected so it appears that a substantially lower number of new homes will be needed - more like 11, 000 than 17,000 - none of which should be built on agricultural land.</p>	Basing estimates on more up to date projections.	441		Web
Ward	Linda		157		Object	As previous comment.	As previous comment.	442		Web
Ward	Linda		157		Support	As above.	Use of up to date information	443		Web
Way	John	Thanet Area Committee	32		Observation	<p>The new objectively assessed need for additional dwellings-members consider this assessment of need is no longer applicable as population projection figures must now be brought Into line with the effect that Brexit will have on the need for housing for an immigrant</p>		67		Paper

						population from EU countries.				
Webber	Beau	Save Manston Airport association	192		Object	SMAa have examined Government housing statements and regulations carefully, and including houses already built, can find no justification for the proposed additional housing numbers in Thanet.		552		Web
Webber	Beau	Save Manston Airport association	192		Object	<p>Policy SP11 – Housing Provision</p> <p>I am writing to object to the revised OAN figure of 17,140 for the period 2011 to 2031.</p> <p>In January 2016 GL Hearn produced the Strategic Housing Market Assessment for TDC. In this document GL Hearn based their calculations on the 2012-based sub national population projections data from ONS and DCLG. Using the data from 2031 of a projected population of 158,500, GL Hearn produced an OAN figure of 15,700.</p> <p>In September 2016 GL Hearn produced an update on their SHMA which was based on the 2014-based sub national population projections. GL Hearn stated that:</p> <p>“These projections show stronger growth than the previous 2012 projections ...”</p> <p>As a result the OAN figure was raised to 17,140, an increase of 1,440 which equates to a 9.1% increase. This is somewhat surprising as the 2014-based sub national population projections give a Thanet projected population in 2031 of 161,500, which is only a 1.9% increase.</p> <p>I would also question the original figure arrived at by GL Hearn (based on 2012 data) as it involves an uplift of 4% for migration when the evidence produced in Table 11 (page 49) does not support such an assertion. Indeed, the trend is for a decrease in migration rather than an increase. As GL Hearn state:</p> <p>“Expected levels of migration show relatively little change over time. When compared with the past trends, the migration figures look to be reasonable. For the whole of the projection period (2014-31) the average level of migration is expected to be around 1,116 people (net) per annum. This figure is similar to the level seen in past trends (1,074 per annum on average from 2001 to 2014 and 1,186 per annum for the past five years).”</p> <p>Since the ONS and DCLG projections have already taken migration trends into account the uplift is unnecessary and removing this would produce a lower more realistic OAN of 15,100 based on 2012 data. Using 2014 data should give an increase of 1.9% resulting in an OAN of 15,387.</p> <p>Population projection is not an exact science and is based primarily on past trends. This is illustrated in Figure 14 (page 41) where, depending on which 5 year period you choose, you can project a population in Thanet in 2031 anywhere between 152,000 and 159,000. The Office for National Statistics produced the “National Population Projections Accuracy Report, July 2015” (see attachment) and in it they state:</p> <p>“It is acknowledged that projections become increasingly uncertain the further they are carried forward and it is noted</p>	As indicated above the OAN must be revised downwards in line with all the latest data and ideally in consultation with other Local Authorities.	616	<a href="#">uknppaccuracyreport2015tcm774127221.pdf (1014 KB)</a> <a href="#">Figure 1_Household estimates and household projections, England, 2001 to 2018.jpg (51 KB)</a>	Web

					<p>that long-term projections should be used with caution". To add more uncertainty to the mix, the 2016-based sub national population projections have just been released and these put the projected population for Thanet in 2031 as 159,800 which is 1,700 less than the 2014 figure. ONS have also just released household estimates for the period 2001 to 2018 and these show a much lower growth than even the 2016 projections. (see Figure 1 in attachments).</p> <p>To try and achieve a more robust projection I used the census data from ONS for the last 50 years to help identify the trend in Thanet population change. There have been peaks and troughs ranging from just over 1,000 increase in one ten year period to just over 11,000 in another 10 year period. However there has been an average increase of 12,200 people for each 20-year period.</p> <p>Using this information it would project a population for Thanet in 2031 of 146,386. Using the government figure of 2.09 persons per dwelling this would reduce the OAN by about 6,000 dwellings.</p> <p>What is clear to me is that the whole process of producing the OAN for Thanet must be questioned.</p> <p>Finally, I would question the whole validity of the revised Thanet Local Plan on the grounds that TDC appear to have failed in their legal Duty to Cooperate.</p> <p>In January 2015, Thanet District Council (TDC) opened their public consultation on the Thanet Local Plan Preferred Options. Dover District Council, which is an adjoining authority, took the opportunity to express their opinion on the plan.</p> <p>It is very clear from the response by DDC that TDC did not carry out its Duty to Cooperate:</p> <p>"The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters." DCLG Guidance March 2014</p> <p>Appendix 1 of the 2015 report contains the following regarding the failure to cooperate:</p> <p>"For instance, the Council has not been involved in or consulted on the evidence base that has formulated the proposed housing figure (total 12,000, p. 53), the employment growth and job predictions (a minimum of 5,000 additional jobs, p. 28) or the proposed provision of retail floor-space (34,300 sq. m of comparison goods and 3,941 sq m of convenience goods, p. 35). Moreover, there has been no up-to-date evidence base published with the Plan (such as a Sustainability Appraisal or Habitat Regulations Assessment) which could have informed our response."</p> <p>It goes on to say:</p> <p>"It is extremely disappointing that as a neighbouring Local</p>				
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						<p>Planning Authority, Thanet District Council has not entered into a constructive, active dialogue with officers from Dover District Council prior to the publication of the Preferred Options Thanet Local Plan. It will be essential that Thanet DC engages in a constructive active and on-going dialogue with officers and Members of Dover District Council from now on, especially on cross- boundary issues and strategic matters.”</p> <p>Following the elections in May, the new UKIP run council engaged G. L. Hearn to produce a “Thanet Strategic Housing Market Assessment” which was published in January 2016. The document makes a number of recommendations but two are particularly relevant.</p> <p>1) TDC should include DDC in their HMA:</p> <p>For practical purposes in planning for housing provision, GL Hearn would recommend use of a ‘best fit’ to local authority boundaries to housing market areas. The ‘best fit’ HMA would comprise the three authorities of Canterbury, Dover and Thanet.</p> <p>2) TDC has a Duty to Cooperate:</p> <p>In finalising the Local Plan for publication, Thanet District Council should engage with the other Local Planning Authorities (LPAs) to consider how housing need is being met across the Housing Market Area. It would be advisable that a Background Paper is prepared and agreed with the other LPAs to demonstrate how housing need is being met across the HMA in line with Paragraph 47 in the National Planning Policy Framework.</p> <p>Despite the legal Duty to Cooperate; the warning to TDC by DDC in their 2015 response and the clear advice by G L Hearn to Cooperate it seems that TDC appear to have once again failed to carry out their Legal Duty to Cooperate with DDC.</p> <p>TDC undertook a Consultation on their revised Local Plan which ended on 17th March 2017. DDC has produced a report, which was unanimously agreed by DDC Cabinet, and has been submitted to TDC.</p> <p>The report is very critical of the Thanet Local Plan on a number of issues but fundamental to those is, yet again, the lack of cooperation.</p> <p>It is clear from reading the report that DDC feel that TDC have not carried out their Legal Duty to cooperate:</p> <p>“It is extremely disappointing that as a neighbouring Local Planning Authority, Thanet District Council has not entered into a constructive, active dialogue with DDC under the Duty to Co-operate prior to the publication of the draft Local Plan in terms of the future of Manston airport given that the future of the airport is a strategic cross boundary issue.” Page 527 of the report.</p> <p>This failure to carry out their Legal Duty must cast serious doubt on the validity of the TDC revised Local Plan:</p> <p>“The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The</p>				
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						<p>Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further.” DCLG Guidance March 2014.</p> <p>It is not clear whether this situation has been resolved since the new administration took over and it should be noted that the present administration inherited much of this Local Plan and have not had the time to correct the numerous errors.</p>				
Wetherill	Louise		400		Object	<p>I think that Thanet does not need the predicted amount of houses. Thanet is already over populated and the housing projection is seriously flawed.</p> <p>I believe the housing is not for the general population of thanet and the housing would not be affordable at all. The housing is for profit making business only. These people will build houses that destroy our land and destroy our countryside and wildlife, make huge profits and then leave us with the mess that they have created.</p> <p>Unfortunately the way this plan has been communicated to the Thanet Population is poor to non existant and the majority of the population are completely unaware of it. Many people do not even know how to use a computer, let alone respond to the local plan by using one.</p> <p>One of the most disadvantaged areas in the country is being further disadvantaged by poor communication and information.</p> <p>The roads in thanet are unable to cope currently, with gridlock throughout Thanet. It is impossible to get GP appointments, dentists and all resources are running on empty.</p> <p>We need to protect our Grade 1 agricultural land, our farmland is precious and should be treated so. In Birchington, our village is unique and full of character, we do not wish to be inundated with housing.</p> <p>If 17400 houses are built, we are talking about 60,000 extra people... We do not have the infrastructure, we do not have jobs, schools, hospitals, water or essential services... We are a small area and do not have the capacity for all these houses.</p> <p>Our way of life will be comprimised and will be unrecognisable. We will suffer.</p> <p>Air pollution will vastly deteriorate. We will not be able to supply water to everyone.</p> <p>I wish that all empty properties and wasteland in the country could be used and Kent did not suffer any further.</p> <p>I hope that the people that seem to force these plans on us, would consider our area properly and see that this is not acceptable.</p> <p>I hope that Thanet is looked at properly and stops being treated as a dumping ground.</p>		1162		Email
Whitehead	C		467		Object	<p>My objection to the plan are as such</p> <p>- Kent is the Garden of England and we need, in my opinion, all the agricultural and possible</p>		1331		Pape r



						<ul style="list-style-type: none"> <li>- Food not homes</li> <li>- The area is congested enough and more people would challenge the present infrastructure.</li> <li>- My concern is also for a strain on the water table if we made room for further people</li> </ul>				
Whittingham	Chris		464		Observation	<p>I write very concerned about the number of houses in the proposed local plan in Birchington Westgate Garlinge (Westbrook) Just as we will shortly be coming out of the EU it seems very unwise to build on grade 1 agricultural land, also roads, water, medical services could not support this extra number of residents. - Where are the jobs for the extra people? The schools at present are fully stretched.</p> <p>Do hope consideration will be given to the above and other vital services to present local residents</p>		1324		Paper
Wilson	Geoff		363		Observation	<p>I write to express my deep concern over the planning proposals currently under consideration throughout the Isle of Thanet which I consider highly inappropriate for the area.</p> <p>Whilst I am aware of the importance and need for developments across the UK I do feel that the proposals for this area are ill considered for the following reasons:</p> <p>These developments would require support from schools, social services, road services, hospital and medical support, all of which are struggling to supply current needs and would certainly not be able to cope with the extra demands.</p> <p>Our natural resources would be totally stretched, for example, our water supplies and sources have been under review for some years so the authorities are fully aware of the threat of water shortages across Kent. Plans for new reservoirs have been shelved and we are constantly reminded to conserve water and threatened by hose pipe bans, imagine the situation if new developments increase the demand on the current resources.</p> <p>Thanet is blessed with some of the finest agricultural land in England, a precious asset that we must protect and develop for our current needs and future generations, not only for food production but the local employment it provides. Allied to this would be the threat to the wildlife across the Isle.</p> <p>Thanet is lacking in large employers, industry and commercial services, sadly suffering some of the highest unemployment in the South East. Surely the influx of new homes and families would add to this problem, we need to provide for the needs of our existing populous not make the situation worse. Can we not use existing properties to appease demands from Whitehall?</p> <p>In conclusion, it seems that in the absence of a thorough assessment of the impact this would have on the environment these proposals are an example of local government pandering to central government who themselves have little or no knowledge or concern for areas such as ours.</p>		1060		Email
Wilson	Patricia		432		Object	<p>I write to express my deep concern over the planning proposals currently under consideration throughout the Isle of Thanet which I consider highly inappropriate for the area.</p>		1250		Email

						<p>Whilst I am aware of the importance and need for developments across the UK I do feel that the proposals for this area are ill considered for the following reasons:</p> <p>These developments would require support from schools, social services, road services, hospital and medical support, all of which are struggling to supply current needs and would certainly not be able to cope with the extra demands.</p> <p>Our natural resources would be totally stretched, for example, our water supplies and sources have been under review for some years so the authorities are fully aware of the threat of water shortages across Kent. Plans for new reservoirs have been shelved and we are constantly reminded to conserve water and</p> <p>threatened by hose pipe bans, imagine the situation if new developments increase the demand on the current resources. Thanet is blessed with some of the finest agricultural land in England, a precious asset that we must protect and develop for our current needs and future generations, not only for food production but the local employment it provides. Allied to this would be the threat to the wildlife across the Isle.</p> <p>Thanet is lacking in large employers, industry and commercial services, sadly suffering some of the highest unemployment in the South East. Surely the influx of new homes and families would add to this problem, we need to provide for the needs of our existing populous not make the situation worse. Can we not use existing properties to appease demands from Whitehall?</p> <p>In conclusion, it seems that in the absence of a thorough assessment of the impact this would have on the environment these proposals are an example of local government pandering to central government who themselves have little or no knowledge or concern for areas such as ours.</p>				
Wraight	Kenneth	1959	141		Support	Build on manston northern grass area for a start and relocate small units at business parks into a larger park that's only partly used		361		Web
Wright	Robert & Beatrice		447		Object	<p>For the attention of the Inspector of Thanet's Local Plan 2018</p> <p>While we accept that a certain amount of houses need to be built in Thanet, we strongly object to the total amount proposed in the Local Plan, and our reasoning is as follows:</p> <p>The Plan envisages 17140 houses.</p> <p>If one multiplies the above figure with the average family unit of 2.58 ( as per ONS 2010 census), one arrives at an increase in population of 44221.2, add this to the existing population of 141300 ( in 2017) and one gets a population for the year 2031 of 185521.2.</p> <p>Now the ONS projection for 2031 is 159792.5 which means that there is an excess figure of 25.728,7 souls.</p> <p>If we now divide this figure by the base family unit of 2.58 one arrives at a figure of 9972.36 excess houses foisted on Thanet.</p> <p>Take that last figure away from the 17140 proposed in the Plan, based on ONS population projection, Thanet will only require 7168 new houses NOT 17140</p>		1277		Email

						<p>While the above is not the only objection to the Plan, it is the most telling that the projected figures are WRONG.</p> <p>Finally, having followed closely the progress of the Local plan for the past few years, we have grave concerns about employment and road infrastructure in the Isle, as KCC are incapable to provide adequate road at present. Section 106 moneys should not exclusively be used for roads, it should benefit the wider population.</p> <p>We wish to submit these objections and are prepared answer any questions that the Inspector may have.</p>				
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General Housing Policy Requirements SP12

Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
.		St Johns College	311	Mark Hodgson - Savills	Object	<p>This policy sets out a series of criteria which all allocated residential sites must comply with. A number of these are related to the provision of utilities such as providing a connection to the sewerage system and allowing future access to water supply infrastructure for maintenance and upsizing purposes. There are no equivalent references to other utilities such as gas or electricity. The water companies have statutory powers and obligations to provide their services and so these criteria serve no purpose in planning policy terms. Likewise the provision of digital infrastructure is not within the remit of developers and this can only be delivered by the communications providers.</p> <p>This policy also requires a mix of housing types to be provided including care and supported housing in accordance with Policy SP19. There is limited information available about the requirement for care and supported housing and so this would need to be dealt with at planning application stage provided it does not affect overall housing numbers.</p> <p>The policy also requires all sites to provide an assessment of a site's functionality in relation to the Thanet Coast and Sandwich Bay SPA. It is unclear why this is necessary if all sites have to contribute to the Strategic Access Management and Monitoring Plan in any event.</p> <p>It is unclear what is meant by providing a Statement of Social Impact when this could be addressed within a Planning Statement. Community facilities provision is set out in the strategic policies for the allocations and it is not considered necessary to provide a specific statement on these issues when they can be appropriately covered in any Planning Statement. There is also a requirement to provide community business space for which no justifying evidence is provided.</p> <p>The policy also states that:</p> <p>A Heritage Impact Assessment will be required at the masterplanning stage for the strategic sites to assess any cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources.</p> <p>Any planning application for a strategic site would need to be</p>	<p>[See comment above - formatting unavailable here]</p> <p>Acting for a strategic site landowner we would welcome the opportunity to put our view in person to the Inspector.</p>	1298		Email

						<p>accompanied by a Heritage Impact Assessment. It is not clear from the above why a Heritage Impact Assessment is specifically required at the masterplanning stage which is presumably meant to tie in with the development brief and masterplan. Development briefs and masterplans are informed by various assessments including heritage assessments and therefore it is not considered necessary to specifically highlight heritage as a particular assessment that is required.</p> <p>Policy SP12 - General Housing Policy</p> <p>Proposals for residential development on sites allocated in this plan must:</p> <ol style="list-style-type: none"> <li>1. Provide one electric car charging point for every 10 parking spaces provided in communal areas, or one charging point to be provided for every new dwelling with parking provision within its curtilage</li> <li>2. Retain existing boundary features where possible</li> <li>3. Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider</li> <li>4. Allow future access to the existing water supply infrastructure for maintenance and upsizing purposes</li> <li>5. Provide for the installation of digital infrastructure</li> <li>6. Provide for the installation of Fibre to the Home (FTTH)</li> <li>7. Contribute towards the Strategic Access Management and Monitoring Plan to meet the requirements of SP26</li> </ol> <p>Additionally, proposals for 10 or more units must:</p> <ol style="list-style-type: none"> <li>1. Provide an appropriate mix of dwellings (including care and supported housing) to meet the requirements of Policy SP19</li> <li>2. Make every reasonable effort to accommodate any self-build requirements included in the Councils self-build register</li> <li>3. Provide affordable housing to meet the requirements of Policy SP20</li> <li>4. Provide accessible homes to meet the requirements of Policy QD05</li> <li>5. Include an assessment of the site's functionality as a roosting or feeding resource for the interest features of the Thanet Coast and Sandwich Bay SPA Special Protection Area, including areas within 400m of the development site's boundary, and provide mitigation where necessary.</li> </ol> <p>A Statement of Social Impacts will be required for developments of 50 or more dwellings, addressing any needs for community facilities identified in the Infrastructure Delivery Plan. Strategic Sites will also be expected to provide complementary uses such as community business space.</p> <p>A Heritage Impact Assessment will be required at the masterplanning stage for the strategic sites to assess any cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources.</p>				
Alan			155		Observati	Policy SP12 - General Housing Policy - we note the reference in		432		Emai

Byrne/English Heritage					on	this policy to the requirement to prepare a Heritage Impact Assessment "at masterplanning stage"; in our view this is too late in the process of site allocation as the principle of development will have been established without appropriate understanding of, or safeguarding for, the significances of heritage assets impacted by any development that takes place on the site (see note below on HIAs).				I
Barar			375		Support	<p>General Housing Policy Requirements - Policy SP12 - General Housing Policy. This policy states "Proposals for residential development on sites allocated in this plan must", moving to point number 2 "Retain existing boundary features where possible". I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout. Thereafter this policy goes on to stipulate "Additionally, proposals for 10 or more units must:" and then on to point number 5 "Include an assessment of the site's functionality as a roosting or feeding resource for the interest features of the Thanet Coast and Sandwich Bay SPA Special Protection Area, including areas within 400m of the development site's boundary, and provide mitigation where necessary". The GOV.UK website offers guidance on 'Protected Sites and Species' (<a href="https://www.gov.uk/topic/planning-development/protected-sitesspecies">https://www.gov.uk/topic/planning-development/protected-sitesspecies</a>) and one of the subsections, gives guidance on planning and development as it applies to 'Land Species'. There are several plants and animals which are indigenous to our greenfield land which are worthy of conservation even in the midst of housing development of sites deemed as 'Strategic'. Green corridors / wildlife corridors will sustain this natural heritage for future generations and provide a 'benchmark' for large scale housing developments, sympathetic to the landscape. It is a feeling the majority of Birchington residents share with 67.17% indicating in the Birchington Village Appraisal 2018 (see attached) that the 'Landscape must be respected'. As previously mentioned, the positive benefits of preserving our natural environment, is conducive to the health and well-being of people who live in that vicinity (<a href="https://www.theguardian.com/sustainable-business/protect-nature- conserve-health-wellbeing">https://www.theguardian.com/sustainable-business/protect-nature- conserve-health-wellbeing</a>). This policy concludes, "a heritage Impact Assessment will be required at the masterplanning stage for the strategic sites to assess any cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources". I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout.</p>		1078		Email
Behrendt	Mark	Home Builders Federation	423		Object	<p>Policy SP12 - General housing policy This policy requires all residential development allocated in the plan to ensure the provision of digital infrastructure and the installation of Fibre to the Home. Government has made clear its intentions in a number of documents such as set out in Fixing the Foundations, the Housing Standards Review, planning</p>	<p>Recommendation The HBF recommend that the policy is deleted.</p>	1207		Email

						<p>practice guidance and the Written Ministerial Statement of 2015 that they are looking to reduce red tape associated with planning. The Written Ministerial Statement is clear that local planning authorities should not set in their emerging Local plan any additional local technical standards or requirements relating the construction, internal layout or performance of new dwellings, as these issues will be dealt with more appropriately by Building Regulations.</p> <p>Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks. It is not considered appropriate for Thanet to seek additional local technical standards over and above this requirement. The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as highspeed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF establishes that local planning authorities should seek to support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.</p> <p>The HBF consider that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.</p> <p>Recommendation</p> <p>The HBF recommend that the policy is deleted.</p>				
Blackburn	Camilla	Kent Wildlife Trust	385		Object	<p>Site allocations will need to show due regard has been given to:</p> <ul style="list-style-type: none"> <li>• Protection of section 41 habitats (no net loss) and s41 species</li> <li>• Due consideration has been given to opportunities for the creation of semi-natural habitat and restoring, enhancing, protecting and reconnecting ecological corridors (net gain)</li> <li>• Indirect impacts on protected sites/habitats and species, including recreational use, are managed and appropriately mitigated for</li> </ul>	<p>Site allocations will need to show due regard has been given to:</p> <ul style="list-style-type: none"> <li>• Protection of section 41 habitats (no net loss) and s41 species</li> <li>• Due consideration has been given to opportunities for the creation of semi-natural habitat and restoring, enhancing, protecting and reconnecting ecological corridors (net gain)</li> <li>• Indirect impacts on protected sites/habitats and species, including recreational use, are managed and appropriately mitigated for</li> </ul>	1134		Email
Cooper	Barbara	Kent County Council (KCC)	514		Object	<p>Provision and Delivery of County Council Community Services: Development shall provide necessary financial contributions towards the construction of associated Education facilities and services relating to Adult Social Care, Community Learning, Youth Service and Libraries.</p> <p>KCC welcomes the recognition of the need for digital infrastructure to be installed in new homes and the focus on full fibre-connections (fibre-to-the-home). This is consistent with the</p>		1500		Email

						recent position set out in the Government's recently published Future Telecoms Infrastructure Review. Emergency Planning and Resilience: KCC recommends that TDC consider the inclusion of a requirement for new housing developments to make a provision of renewable energy, or micro-generation as part of the proposals, and the requirement for wildlife habitat features to be included as appropriate within proposals.				
Davies	Julie	CPRE Kent	147		Observation	Point (1) - provision for electric cars should be made more explicit to ensure that superfast charging points (of at least 50kW) be installed, rather than trickle chargers (which can take up to 12 hours to fully charge an electric vehicle).	Amend point 1 to refer to superfast charging points (of at least 50kW).	383		Web
Davies	Julie	CPRE Kent	147		Object	Comments on behalf of CPRE Kent Thanet District Committee. An additional policy is needed on housing density to ensure the effective use of brownfield and greenfield land (to reduce pressure for the release of green field land/and best and most versatile agricultural land. The SHLAA Review July 2018 sets out that the total number of dwellings for a site were based on a broad requirement of 35 dwellings per hectare. This is low density suburban. The revised NPPF 2018 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies avoid homes built at low densities (paragraph 123). Given our concern on the loss of greenfield land, and in particular best and most versatile agricultural land, it would be helpful to include a policy that helps make effective use of land through encouraging higher housing densities. See also 2012 NPPF paragraph 47 which allows Councils to set their own approach to housing density to reflect local circumstances.		384		Web
Gale	Roger	Parliament of the United Kingdom	149		Object	This submission is made in the light of representations received as the Member of Parliament for North Thanet, local knowledge, discussions with Ministers and reality	While the Draft Local Plan has been overdue the current version has been prepared in haste and with insufficient reference to the need to, first, use all available and soon to become available brownfield sites before granting the use, for building, of high-quality agricultural land. Thanet has an over-provision of sites earmarked for industrial use and no account has been taken, in the agricultural hinterland of Birchington, Westgate and Garlinge, of the probable future availability of MoD sites that should be used to mitigate the use of farmland for housing. The original inclusion, by the previous administration, of Manston Airfield, now entirely properly the subject of an application for a Development Consent Order in the national interest as an airfield, in a Draft Plan has distracted attention from other suitable sites for housing. It is my considered view that this aspect of the work needs to be re-visited.	410		Web
Giddins	Rod		62		Observation	Policy SP12 sets out some specific requirements and I suggest an additional one as follows: "Front gardens with off street parking should be constructed with permeable materials to reduce the		163		Email



						risk of flooding”. There is much evidence to suggest that paving over front gardens has contributed to flooding in some areas and also significantly harmed local environments.				
Holton	Susan		139		Observation	When will Manston Green houses be built? Planning permission has been granted but if the DCO goes through then surely this would fall within a potential Public Safety Zone for the airport. If they are not built then even more houses will need to be allocated somewhere else. Too many houses are going on greenfield land already. The same thing with the airport site, if it isn't used then other less suitable sites around Thanet will end up being used.		349		Web
Johnson	Elisabeth	Monkton Residents Association	51		Observation	As previously noted the mix of dwellings, including care and supported housing and affordable housing does not seem to feature anywhere in any of the plans for the rural areas, even where these are for fairly large developments of many more houses than 10 as planned for in Minster and this policy should therefore be adhered to.		126		Web
Jones-Hall	Samara		295		Object	The draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.	<p>The Local Plan must support the mixed-use development of the former Manston airport site and allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development.</p> <p>This is line with Objective 2 of the Department for Environment: Food and Rural Affairs single developmental plan updated 23 May 2018, the National Planning Policy Framework updated July 2018 and its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05</p> <p>Commercial aviation is not viable at the Manston site.</p> <p>A 24/7/365 cargo hub will blight tourism, regeneration, economy, heritage, employment growth and health of Thanet residents.</p> <p>Further, the impact of and congestion on road vehicles and HGVs used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent’s road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet’s and Kent’s villages, towns and businesses is unacceptable nor has it been subject to a Health Impact Assessment; and - nor have travel times for all East Kent stroke victims to reach stroke unit in time as the nearest stroke unit is likely to be moved to William Harvey Hospital in Ashford been addressed.</p> <p>Further, it is a brownfield site which could be used to meet a significant proportion of district’s housing needs instead the draft Local Plan (endorsed by Thanet District</p>	881		Web

						<p>Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>Further, Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must continue to back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism. A 24/7/365 cargo hub will blight - slow or reverse - this economic growth and employment growth.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Jones-Hall	Samara		295		Object	<p>The draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>The Local Plan must support the mixed-use development of the former Manston airport site and allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development.</p> <p>This is line with Objective 2 of the Department for Environment: Food and Rural Affairs single developmental plan updated 23 May 2018, the National Planning Policy Framework updated July 2018 and its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05</p> <p>Commercial aviation is not viable at the Manston site.</p> <p>A 24/7/365 cargo hub will blight tourism, regeneration, economy, heritage, employment growth and health of Thanet residents.</p> <p>Further, the impact of and congestion on road vehicles and HGVs used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent's road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet's and Kent's villages, towns and businesses is unacceptable nor has it been subject to a Health Impact Assessment; and - nor have travel times for all East Kent stroke victims to reach stroke unit in time as the nearest stroke unit is likely to be moved to William Harvey Hospital in Ashford been addressed.</p> <p>Further, it is a brownfield site which could be used to meet a significant proportion of district's housing needs instead the draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+</p>	882		Web

							<p>houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>Further, Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must continue to back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism. A 24/7/365 cargo hub will blight - slow or reverse - this economic growth and employment growth.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Latchford	Barry		45		Object	The amount of houses with no supporting infrastructure being build around the villages and greenfield sites is not necessary as 4,000 of them along with supportive infrastructure could be built together with other facilities supplying recreation and much needed employment at Manston, which is a brownfield site.	Accept that the mixed development proposal for the brownfield site at Manston is the most sensible solution for 4,000 house with supportive infrastructure and reduce the number of houses with out supportive infrastructure around villages and greenfield sites accordingly.	108		Web
Margate Estates		Margate Estates	460	Zena Foale-Banks - Nexus Planning	Object	Policy SP12 provides guidance around housing development. The policy comprehensively addresses the requirements of larger scale residential development and residential development on allocated land. Upon review of the policy, we consider that the policy does not go far enough in promoting residential development on appropriate brownfield land and appropriate opportunity sites. It is considered that thesesites should be a preferential location over and above residential development on Green Belt sites.		1320		Web
Mayall	C	Southern Water	473		Observation	<p>Southern Water is the statutory water and wastewater service provider throughout Thanet District. In line with paragraph 162 of the National Planning Policy Framework and the National Planning Practice Guidance, at various stages of the consultation process, Southern Water undertook assessments of the existing capacity of its infrastructure and its ability to meet the forecast demand for each of the residential development sites allocated in the Local Plan. Southern Water notes that points 3 and 4 of Policy SP12 incorporate policy criteria previously requested in relation to specific housing allocation sites, and it should be noted that these criteria will apply to some, but not all site allocations. In addition, the wording of criterion 3 requires updating to reflect recent changes to the way in which developers are charged for new water and wastewater connections (see <a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a> for further information).</p> <p>Since OFWAT's new approach to water and wastewater connections charging was implemented from 1 April 2018, Southern Water has adjusted its requisite site specific policy wording for Local Plans, to align with the new charging</p>		1338		Web

					<p>mechanism. Despite these changes, the need remains for recognition that there is limited capacity at identified sites' "practical point of connection", as defined in the New Connections Services and as a result, network reinforcement to accommodate new development at those identified sites would be required in advance of occupation, to avoid the risk of foul flooding.</p> <p>We therefore set out our updated policy provisions in section 4 below, and in addition to this have added criterion 3 to the relevant site allocations within strategic policies SP15, SP16 and SP18, and policies HO2, HO6, HO12 and HO16 in order to identify those sites to which these requirements apply. Representations on these policies are included as part of Southern Water's response to this consultation.</p> <p>In order to ensure this policy is up to date with regard to new infrastructure connections charging implemented in April 2018, and to align with the relevant housing allocation policies in the Plan, Southern Water requests the following amendments to Policy SP12 (new text underlined):</p> <p>Proposals for residential development on sites allocated in this plan must:</p> <p>[...]</p> <p>Provide a connection to the sewerage system at the nearest point of adequate capacity, Where required, phase occupation of development to align with the delivery of sewerage infrastructure in collaboration with the service provider</p> <p>4. Allow future access to the any existing water supply and/or wastewater infrastructure for maintenance and upsizing purposes.</p> <p>[...]</p>					
Millwood Designer Homes Limited		Millwood designer Homes Limited	508	Anna Gillings - Gillings Planning Ltd	Object	<p>Although the principle of this policy is supported, as drafted it is currently overly restrictive and does not allow for site specific circumstances to be taken into account. Specifically, in respect of requirement no.5 and no.6 which relate to the installation of digital infrastructure and Fibre to the Home. The policy should allow for local site matters to be taken into account, particularly where the provision is not in the control of a site promoter or developer. The policy should therefore allow for exception (reflecting the provision in subsection 2 relating to boundary conditions).</p> <p>Further, the policy is inaccurately drafted as it duplicates the provisions of other policies unnecessarily in respect of the requirement for 'complementary uses such as community business space'. The site specific policies allow for complementary uses, as appropriate to each site. There is no requirement for a general statement within this overarching policy.</p>	<p>The policy should be amended to read:</p> <p>“5. Provide for the installation of digital infrastructure, where possible</p> <p>6.Provide for the installation of Fibre to the Home (FTTH), where possible”</p> <p>“A Statement of Social Impacts will be required for developments of 50 or more dwellings, addressing any needs for community facilities identified in the Infrastructure Delivery Plan. [delete - Strategic Sites will also be expected to provide complementary uses such as community business space.]”</p>	1430	<a href="#">Gillings Millwood .pdf (74.4 MB)</a>	Web
Ptarmigan		Ptarmigan	493	Joshua	Object			1385		Web

Land and Millwood Designer Homes		Land and Millwood Designer Homes		Mellor - Barton Willmore LLP		<p>6.1 Alongside policies to allocate sufficient land to meet the Council's growth requirements over the plan-period, the draft Local Plan includes policies guiding how decisions should be made by the Council. Once adopted the Local Plan will replace the 'saved' policies of the Thanet Local Plan (2006). Where necessary we comment on the soundness of proposed policies.</p> <p>6.2 Policy SP12 (General Housing Policy) sets out a number of policy requirements for residential developments, to apply for all sites allocated for residential development allocated by the plan. Generally, the policy requirements are supported, requiring provision of relevant infrastructure and/or mitigation to support development and the strategic priorities of the plan. However, it is questionable whether a specific policy requirement is necessary to support self-build, with no publicly available information provided to demonstrate this need. The lack of this creates uncertainty regarding any self-built plot requirements. Furthermore, the policy notes an 'expectation' for strategic sites to provide complementary uses "such as community business space". No specific requirement for such use is included within any of the strategic site allocations, the majority of which only support 'small scale convenience retail provision' (the exception being Westgate providing a district centre) and therefore are unlikely to support this 'expectation'. In these regards, the policy is not considered to be justified and should be amended to ensure it is found "sound".</p>				
Ransom			153		Object	The road infrastructure to support such a large number of houses is lacking. Thanet is on a peninsula and therefore has limited road access, there being only three major roads into the urban areas. The impact of thousands more vehicles in this restricted area will be catastrophic. It currently takes about 30 minutes during off-peak times to drive from Broadstairs to the boundary of Thanet. Given that many people work outside the area, the roads will become completely clogged with traffic. Road infrastructure and future traffic problems are not being taken into account when allocating houses to the villages.		424		Web
Repsch	John		126		Support	<p>3.12 "Thanet currently has a deficiency of natural and semi-natural green space of 153 hectares." That line alone should be enough to make TDC turn on the Government and refuse to ruin any more of the homeland of Thanet's 140,000 people.</p> <p>3.13 "Make modest provision at rural settlements." 1,600 new homes in Birchington isn't modest. It would utterly destroy Birchington's character. If each home holds 3 to 4 people, that could be over 5,000. That's a half on top of Birchington's current population, making 15,000. Nor will it be modest if the buildings are houses, not bungalows.</p>		409		Web
Repsch	John		126		Object	SP12, No.3 - 1		736		Web

					<p>Since 2011 there have been numerous instances of rainfall causing raw sewage to be released into the sea around Thanet and ending up on beaches.</p> <p>2. More housing and roads will mean more paved surfaces, which can increase risk of flooding.</p> <p>3. 70% of Thanet's needs are met by underground aquifers, according to the Environment Agency and CPRE.</p> <p>4. Kent is one of the driest parts of England. High population is increasing the pressure on water supply.</p>				
Skerratt	Michael		254		<p>Object</p> <p>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.</p>		773		Web
Solly	C		419		<p>Object</p> <p>Point 1: Table 3 (Paragraph 3.15) appears to contain housing data from 2018 for which only the AMR 2017 is available, rough calculations suggest 228 houses was built 2017/18.</p> <p>Point 2: The local plan is proposing that population will step up because of the policy making in the local plan. This is not true and not evidenced in the ONS projections; population in 2017 is also lower than the projection which shows a count of 900 less people in Thanet. With population not being realised this will also alter the demand for housing and its timing/phasing.</p> <p>Point 3: The decision making in getting to the local plan has not been positive. In 2015 many questions and comments was raised about allocating housing in Westgate and Birchington. There were questions on viability mainly due to the issues of many infrastructure issues. Mainly the road network requires funding levels which may not be attainable by development alone. Development on Grade 1 agricultural land was a large objection by the communities of Westgate, Garlinge and Birchington. There is concern of the effectiveness of the ICRIS (Inner Circuit Route Improvement Strategy) and if it will be fully completed and funded for. Infrastructure is questioned on</p>	<p>Westgate, Birchington, Westwood, and Minster should not be allocated extra due to the decision making on the local plan, it is unsound and unpopular with the local communities. The sites at Birchington and Westgate should be considered if they are needed at all due to the slowdown of population growth, the stepped approach on housing delivery and the loss of the Best and Most Versatile Agricultural land (mainly of Grade 1). The strategy is flawed due to the decision making on issues surrounding deleted policy SP05.</p> <p>Brexit will have an impact on the economy and housing market, there is no mitigation for this scenario.</p> <p>Issues with Policy SP11 should be considered as this has an effect on this policy.</p> <p>Provision as stated for capital costs for Kent Police.</p>	1214		Email

						<p>Policy SP01 which should be read together with comments in this policy.</p> <p>Point 4: It appears that the traditional Agricultural economy is not represented in this local plan and there is no mitigation on the loss of Farmland in Birchington, Westgate and Garlinge. The fields are producing a yield at least twice a year and offer the large open landscapes that North Thanet has. It is clear that the communities of Westgate and Birchington do not want to lose the Greenfield land to housing. The scaling of the allocation was not agreeable in 2015, and with the increase of the allocations this has strengthened opposition especially with local councillors and Member of Parliament. This objection has been the same in St Nicholas, Minster, Salmestone ward and Cliffsend.</p> <p>Point 5: The decision on the land at Manston airport was not positively prepared. Deleted Policy SP05 has had a negative impact on the progress of the local plan due to indecision. In 2015 a action plan was policy, in 2017 to develop housing and commercial mixed use and now in publication no policy at all. The council has gone through 2 CPO processes which were not progressed. So the matter now will be decided by the DCO process which is moving to the examination phase. The choice of adding more housing in Birchington, Westgate, Westwood and Minster was not popularly voted in July 2018 and was weighted on the likelihood of a successful DCO for which is not controlled by the local plan. This is still highly debatable especially coinciding of the publication of the plan with no further amendments possible.</p> <p>Point 6: Intervention in November 2017 by the Secretary of State has not allowed positive preparation of the plan due to the issues stated in point 5 above. A further decision is to be made by the secretary of state: In a letter dated 23rd March 2018 it states within the letter that:</p> <p>“We also made clear that decisions on intervention will be informed by the wider planning context in each area (specifically, the extent to which authorities are working cooperatively to put strategic plans in place, and the potential impact that not having a plan has on neighbourhood planning activity). I gave the District Council the opportunity to put forward any exceptional circumstances by 31 January 2018, which, in the Council’s view, justifies the failure to produce a Local Plan under the Planning and Compulsory Purchase Act 2004 regime. I have considered carefully the Council’s letter of 31 January 2018. In summary, in January 2018, the District Council resolved to reject the recommendation of officers to publish the draft Local Plan and is therefore failing to meet its deadline for publication of a Plan, in accordance with your published Local Development Scheme. The Council has failed to meet milestones in published Local Development Schemes at least five times since 2004. The District Council’s argument to justify this failure sets out two inter-related circumstances – the</p>				
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						<p>local debate over the future of Manston Airport and the need to undertake further work to identify alternative sites after the Plan failed to proceed. I consider that these are not exceptional circumstances – other authorities have dealt with uncertainty about the future of large sites. In terms of the intervention criteria, Thanet have failed to make progress on planmaking, the policies do not appear to be up to date and there is high housing pressure. At the current time this is an authority where intervention would have the greatest impact by accelerating Local Plan production. The Council does not have an up to date Local Development Scheme, whilst I note the suggestion from your officers that your Council intends to update the scheme.”</p> <p>“Having considered the Council’s representations and the Government’s policy set out in the November 2017 Written Ministerial Statement and the housing White Paper, I have decided to continue with the intervention process. As discussed at our meeting on 6 February 2018 this will involve a team of experts, led by the Chief Planner, providing me with further advice on next steps. My officials will be in contact with your officers to discuss the next steps. My officials will also begin formal discussions on the options of inviting Kent County Council to prepare a Local Plan for Thanet and with the neighbouring authorities on the possibility of directing a Joint Plan, as part of considering whether to use my statutory powers and if so which ones.”</p> <p>Letter from The Rt Hon Sajid Javid MP Secretary of State for Housing, Communities and Local Government 23rd March 2018 <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693941/Annex_A3_-_Thanet.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693941/Annex_A3_-_Thanet.pdf</a></p> <p>There is uncertainty on whether the plan is sound (due to the airport debate) and whether the secretary of state will use powers over Thanet Council in creating a local plan.</p> <p>Point 7: Brexit on March 29th 2019 will have an effect on the economy as warned by the Bank of England, with a worse case showing the house market values could drop by a third.</p> <p>Point 8: Many points have been raised on the OAN on policy SP11, especially when it is target driven (contrary to the localism act) SP11 has a knock on effect on this policy (SP12), which could mean the large strategic sites will not be deliverable.</p> <p>Point 9: Kent Police raised concerns on new development and provision for police infrastructure should be met (please see Point 5 on SP01 on this).</p>					
Stevens	Angela		163		Observation	My concern with housing is that, if a large plot of land is sold off in plots requiring fewer than 10 houses, no infrastructure will get done. Thanet roads are already gridlocked due to lack of proper infrastructure and too much building.	Insist that developers (with TDC/KCC) ensure infrastructure is adequate at all times.	615			Web
Sykes	Anthony		31		Object	The plan is flawed as it cannot ensure water supplies to current housing and certainly cannot deal with the sewage.	limit the number of dwellings to the ability to supply services.	56			Web
Taylor	Jeanne	Lee Evans	304	Jeanne	Object	See attached Statement	See attached Statement	887	<a href="#">Objection</a>		Web



		Planning		Taylor - Lee Evans Planning					<a href="#">to Policy SP12.doc x (21 KB)</a>	
Twizell	Heather	Natural England	512		Object	<p>3 – Housing Strategy</p> <p>Paragraph 3.9 – Natural England notes that the Local Plan makes housing provision for 17,140 additional homes over the 20 year period to 2031.</p> <p>Policy SP12 - General Housing Policy</p> <p>We would query whether the reference to Policy SP26 in clause 7 of this policy only serves to confuse matters. ALL net increases in residential development within Thanet District will be required to contribute to the SAMM Plan whether they are sites allocated in the Local Plan or windfalls. SP26 makes this clear but we have some concerns that reading SP12 it might seem as though this only applies to allocation sites.</p> <p>The policy also contains a requirement for developments of 10 or more units to assess the development site’s functionality as a feeding or roosting resource for the interest features of the Thanet Coast and Sandwich Bay SPA (which currently contains a typo, being referred to as the Thanet Coast and Sandwich Bay SPA Special Protection Area). We welcome this additional protection but would like the opportunity to discuss with your authority how it could be further refined to make it less onerous for developers as many developments at the lower end of the scale i.e. ~ 10 units (particularly if they are urban infill) are highly unlikely to have any impact on land functionally linked to the SPA. The main species of concern here is golden plover and these birds have a preference for large, arable fields. It should certainly be recognised, perhaps in the supporting text, that for many developments such an assessment can be light touch and will not necessary require bespoke survey work.</p> <p>We are also slightly concerned by the reference to a 400m buffer around development sites when assessing impacts on SPA functional land. The evidence for this distance is not immediately clear but from reading the HRA it appears it may stem from the 400m buffer which was enshrined in various levels of policy protection covering the Thames Basin Heaths SPA in Surrey. If this is the case then much of the evidence underpinning this distance is not applicable to use of functionally- linked land by golden plover. For example it was intended to reduce the risk of cat predation (not a significant issue for overwintering adult waders as it is for the young of ground-nesting heathland birds) and of new residents simply walking to the SPA to recreate (much of the functionally-linked land used by golden plover is arable land in private ownership with any public access confined to rights of way). Therefore, while we welcome the recognition that building on an area of functional land would not only result in direct loss but would be likely to make some of the surrounding habitat less suitable as well, we feel that requiring assessment of a 400m buffer around</p>		1451		Email

						all developments of 10 units or more is an over-precautionary approach.				
Ward	Linda		157		Observation	There should be no building on agricultural land.		444		Web

Strategic Site Policies SP13 - Manston Green										
Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
Alan Byrne/English Heritage			155		Object	<p>Policy SP13 - Policy SP18 -Strategic Housing Sites - notwithstanding the mentioning of heritage assets within the individual site allocation policies and the requirement to have regard to them in preparing development proposals, we are concerned that insufficient prior assessment of potential impacts on those assets has been undertaken in advance of the site allocations. We are unable, therefore, to fully understand the likelihood or otherwise of impacts occurring that harm (or indeed preserve or enhance) the significance of the assets.</p> <p>For this reason, Historic England is unable to support these policies as they are currently drafted and suggest HIAs are carried out to inform the policies in advance of the EIP. The policies may have to be redrafted in light of the assessments if potential for harm is identified. (See also the not below on HIAs).</p>		928		Email
Barnett	Adrian		77		Object	<p>These comments are in reference to Manston Green which is mentioned in the Draft Thanet Local Plan under reference SP13 in Section 3 or should it be reference SS33 as stated in Appendix B.</p> <p>In Section 3 the plan states the site is part Draft Thanet Local Plan's strategic development. It is intended to have 785 houses and that planning permission has been granted though it is not stated where to find details of the plan on the Thanet planning database (R/TH/15/0250). Now it also states elsewhere in Section 3 and also in Appendix B that the 785 houses do not count to total number of dwellings included in the Draft Thanet Local Plan. I was told over the phone by a member of staff working on the Plan it is because the plan should only count dwellings where planning permission has not yet been granted and this is not the case regarding the Manston Green development even though as far as I know no work has yet taken place. I would have thought it was more important to count the dwellings where planning permission had been granted rather than for something that is possibly ephemeral so it might never happen, but then I don't make the rules for the Draft Thanet Local Plan.</p> <p>There a contradiction between the way the Manston Green development has been treated in the Draft Thanet Local Plan and in the way many smaller developments have been treated. One example is a 91 Klingsgate Avenue mentioned in Appendix B. Here there is development well under way, where planning permission was initially granted in 2015 and</p>	It cannot be objectively prepared if it has been prepared in an inconsistent way. The change required in this particular instance would be to include the count of the number of dwellings in the overall count in the plan and adjust the plan accordingly.	193		Web

						finally updated in August 2017 ( F/TH/17/0537). Unlike Manson Green this development is included in the count of the number of dwellings included in the draft plan. This is not a unique example. I have checked some others 49-50 Hawley Square (F/TH/15/0097), 139-141 High Street, Ramsgate (F/TH/15/0087) and 44 Canterbury Road, Margate ( F/TH/15/0278). I have no idea whether work has started on these sites but the point is they all have been granted planning permission, they are all mentioned in Appendix B and all the dwellings they include are included in the overall count of properties stated in the plan. There are many other references to potential developments in Appendix B with references to the Thanet planning database. From what I have seen I must assume that they will all have been granted planning permission too. As housing must be one of the more important parts of the Draft Thanet Local Plan it must be of concern to us all the inconsistent way in which dwellings have been counted, If the 785 houses from Manston Green were included in the count of dwellings for the plan it is possible even likely that a different number of houses would be shown for the other strategic development sites. As such I do not believe Section 3 or Appendix B are fit for purpose,				
Cooper	Barbara	Kent County Council (KCC)	514		Object	PRoW and Access Service: KCC recommends the inclusion of the following text into the policy: Incorporate and provide for connections and improvements to existing PRoW and cycle networks facilitating walking, cycling and public transport to, from and within the site. To incorporate and provide for connections and improvements to existing PRoW network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.		1501		Email
Davies	Julie	CPRE Kent	147		Object	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.		385		Web

						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.				
Hampton	Gillian Frances		158		Object	<p>I am objecting to this proposal because</p> <p>1 The land is grade one arable land is presently used farming vegetables..when we leave Brexit we will need to produce more of our own food and the tendency at present is people want to buy homegrown products. Along with others I support local greengrocers and butchers.</p> <p>2 Thanet schools, St Crispins and St Saviours in Westgate are full to capacity and have no grounds to expand on. Birchington primary school is also full to capacity. Extra 2 forms is not going to be enough and where are you going to build them.</p> <p>3 Birchington Medical centre...I do not even know who my doctor is To my knowledge only the partners are full time the rest are part time. Where are you going to get GPs for the extension</p> <p>4 Thanet is a deprived area with very little manual work. the biggest employers appears to be Public Services and this is constantly being reduced. Houses with no employment prospects is a false economy. Even retail jobs are being reduced.</p> <p>5 Cliftonville multi occupancy housing encourages other councils to use them as there overflow. These should be demolished and proper new self contain apartments/family houses should replace them They will never be hotels again and just become ghettos.</p> <p>6 Services are being reduced at QEQM hospital particularly the ongoing consultation about Stroke amenities. QEQM A&amp;E has struggled since A&amp;E was taken away from Canterbury a larger population will become untenable</p> <p>7 Birchington is a Parish Village and it could lose its identity</p> <p>8 Social Services are under pressure with cut backs from the government</p> <p>9 Any new residents that are unemployed will be claiming housing benefit</p> <p>10 There is no mention of new buildings for disabled people.</p> <p>To sum up, there is not enough work to provide for these household, there is not enough room in the local schools, The QEQM is under pressure and probably be unable to provide stroke services and Ashford Hospital is more than 45 minutes away, Birchington surgery does not have enough full time GPs. We do not need more homes to house the overflow from other towns when none of the above is available</p>	<p>No new buildings on arable farm land.</p> <p>Demolish Victorian hotels that are used as multioccupancy and create ghettos and build apartments and family homes in there place and thereby give those living in these multioccupancy buildings somewhere decent to live. Assure whatever new builds appear are not for London overflow as we have nothing to offer, eg work places, GPs Social services, Extra NHS services. Do not build one house until everything , new schools, GPs and work placements are in place.</p>	437		Web

Johnson	Elisabeth	Monkton Residents Association	51		Observation	It is hoped that the minimisation of the impact on views will indeed happen and it is noted that an extended bus service is planned at a time when rural areas are threatened with loosing their bus services!		127		Web
May	Raymond		238		Object	This development, of 785 houses with a potential 2,500 residents, starts at around 500 metres from the end of the Manston runway and directly under the flight path. The Council supports future aviation use at Manston. The only economically viable plan would be for a 24/7 freight hub. Surely no-one in their right mind would consider such a proposition; putting those residents at serious risk from noise and air pollution, not to mention the affect on the proposed primary school and the value of homeowners' properties. National policy on housing does not promulgate building new housing estates adjacent to airfields whose local councillors want that airfield developed.		744		Web
moore	helen		36		Object	The proposal for such a large number of new houses does not take into consideration that all the local schools are full, there are not enough doctors to see patients within a reasonable time scale, social services are inadequate to cover such a large increase in population, the water aquifers are running dry and there aren't enough jobs for local people at the moment so there will be a lot of hostility to large numbers of new people coming in to an already underfunded area.		72		Web
Repsch	John		126		Object	SP13. 3.24 "Developers will need to work with relevant healthcare providers to ensure adequate provision is made..." This is already inadequate in providing Thanet with sufficient schools, social services, surgeries, hospitals. QEQM hospital cannot cope with current demands. Nor can the Birchington Medical Centre.		737		Web
Rhodes	Ian	Cogent Land LLP	282	Leo Scarfe - Icen Projects	Observation	Please see attached cover letter		825	<a href="#">181004 Draft Local Plan (Reg 19) Consultation reps.pdf (250 KB)</a> <a href="#">Appendix A2 Approved outline Masterplan. pdf (1.2 MB)</a> <a href="#">Appendix A1 - Site Location Plan.pdf (362 KB)</a> <a href="#">181004 Land</a>	Web

									<a href="#">at Manston Green Representations Presubmission_Publication_Comments_Form_Aug_2018.pdf (354 KB)</a> <a href="#">Appendix A4 - revised Illustrative block masterplan.pdf (2.1 MB)</a> <a href="#">Appendix A3 - Manston Green - Hain Rd Realignment (11-T019_37B) (003).pdf (339 KB)</a>	
Samme	Linda	Manston Parish Council	16		Object	Manston Green is a very large development which will affect traffic and local residents.		267		Web
Shonk	Trevor	Ramsgate Town Council	93		Observation	<p>(Statement of need,) needed houses, unaffordable (Doctors) (Hospitals) (Dentist) (Infrastructure), ROADS</p> <p>106 agreements are I see are open bribe</p> <p>Save our farmland. The best agriculture grade one.</p> <p>Greenbelt. Government imposed housing.</p> <p>Cliffsend. No way to Parkway Station up grade the North Kent Line. Don't spend £21 million use it on town areas re King St. High St M/Gate</p> <p>Manston Green./ land banking) – smother of the best agricultural land statement of need. As I said before</p> <p>Manston Airport kept as a regional airport, its an asset.</p> <p>Government has got it wrong again</p> <p>As I long standing local resident my concerns are as stated, food before (concrete)</p> <p>This best agricultural land in (Thanet) and the pressure is on all of Thanet B/Ton/Westwood X, Broadstair, Westgate when we have thousands of empty properties land banking etc. old industrial sites KCC to much influence on and around Thanet.</p> <p>My thoughts only.</p>		216		Paper
SITCH	IAN	Mrs	39		Object	I have been reading parts of this plan for Birchington and find them badly prepared. The intention of building up to 1600 dwellings would up the population by 48% if each		88		Web

						<p>property had 3 occupants and 64% if there were 4 per household which is far to much for the village.I would also like to know how water will be supplied to all the new homes and businesses in Thanet when water is already in short supply. I agree that homes need to be built and Birchington should share in its responsibility but the number of properties planned is far greater than should be reasonably be expected.</p> <p>I read that it is down to the developer to negotiate with Birchington Medical Centre to increase the property to meet increased medical needs but this is no good unless General Practitioners can be found to fill the vacancies. As GP practices are closing because doctors cannot be found and surgeries are in short supply in this area would it not be more prudent to employ first and not wait until to late.</p> <p>A two form entry primary school is to be built but where will the children go after as secondary education is at a premium in Thanet already and may mean children having to travel unacceptable distances.</p>				
smith	edward		273		Support	The traffic in birchington is already bad, you will only be adding to the congestion		814		Web
Solly	C		419		Object	<p>Planning permission has already been approved. It also appears that viability was not tested when this was approved as funding for the road in the application has not been met by the developer completely</p> <p>News story:  <a href="https://theisleofthanetnews.com/2018/02/01/manston-green-development-awarded-2-5million-government-funding/">https://theisleofthanetnews.com/2018/02/01/manston-green-development-awarded-2-5million-government-funding/</a>            Phasing for the first phase was given 2016-2021 and work has not started however, there are no phasing requirements in this publication even though the policy states this. Delivery of this site could be affected by the Manston Airport DCO, as the site is in close proximity to the airport site and landing strip.</p>	Phasing of this development should be stated in appendix B, as this should be compared with other sites in the local plan.	1216		Email
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached submission from SPRU	See attached submission from SPRU	301	<a href="#">09.27.18.AB.K5022PS.GeneralRep.Final.pdf (739 KB)</a>	Web
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Planning Consultants Ltd	Observation	Proposed new Housing site. Omission Site: Land west of Cliffsend, Kent. See attached Landscape Overview and Concept Master Plan.	New proposed Strategic Allocation: Land West of Cliffsend, Kent. See CSA submission attached.	689	<a href="#">2914_04_A Landscape Overview for land to west of Cliffs End, Kent_.pdf (7.9 MB)</a>	Web
Stevens	Angela		163		Object	SP13. This planning application was turned down many times when it was called Manston Green, due to its	Call in this dreadful Manston Green project! Nor should our villages have hundreds of	617		Web



						proximity to Manston Airport. Then, when the new and inexperienced UKIP council took over on the strength of reopening Manston Airport, this planning application was resubmitted, but was called East and West of Haine Road and was passed, much to the angst of many councillors when they realised what they'd passed! Now, suddenly, it is Manston Green again. I object most strongly to this project, especially as the airport is likely to reopen once the DCO has been granted. The road from Lord of the Manor to Westwood Cross is already at crawling pace daily. This project is dreadful and should not be allowed to progress! If officers lived locally they would agree!!!!	houses built by them. The whole ambiance of rural Thanet is going to end up as one big urban sprawl, satisfying London overspill. There is NO need for so many houses for local people!			
Ward	Linda		157		Support	There should be no building on Agricultural land.		445		Web
Ward	Linda		157		Support	Any road building must be in place before house building is allowed to start.		446		Web

Strategic Site Policies SP14 - Birchington

Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
.		Tesco Stores Ltd	408	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>The contribution being sought from Strategic Housing Site SP14 Birchington has increased from 1,000 dwellings to 1,600 dwellings in the Pre-Submission Local Plan. We consider that there is little justification provided for the increase of 600 dwellings at this site. The first 50 units are expected to be delivered in 2019/20 but with no planning application submitted we consider this to be extremely optimistic, and indeed, unrealistic. There are a number of matters which need to be addressed before any planning permission is granted. This includes the provision of a new link road, a serviced school site, appropriate noise mitigation on development in the northern edge and integration with the open countryside.</p> <p>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. We therefore contend from the evidence provided within NLP's Start to Finish Report it is unlikely that the strategic sites at Birchington (SP14), Westgate on Sea (SP15), and Manston Court Road/Haine Road (SP18) will deliver units by 2019/20.</p> <p>We therefore consider that this site (SP14, Birchington) 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 the 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</p>	<p>Provide a robust justification in the draft Local Plan for increasing the housing allocation at Birchington by 600 units or otherwise reduce the allocation to 1,000 units and allocate a wider range of additional housing sites to make up the shortfall.</p> <p>Apply a more realistic housing trajectory in Appendix B in recognition of the planning status of the site.</p>	1187		Email

						<p>adoption and there are serious doubts that it will deliver sufficient dwellings across the plan period to meet the Objectively Assessed Need.</p> <p>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.</p>				
Alan Byrne/English Heritage			155		Object	<p>Policy SP13 - Policy SP18 -Strategic Housing Sites - notwithstanding the mentioning of heritage assets within the individual site allocation policies and the requirement to have regard to them in preparing development proposals, we are concerned that insufficient prior assessment of potential impacts on those assets has been undertaken in advance of the site allocations. We are unable, therefore, to fully understand the likelihood or otherwise of impacts occurring that harm (or indeed preserve or enhance) the significance of the assets.</p> <p>For this reason, Historic England is unable to support these policies as they are currently drafted and suggest HIAs are carried out to inform the policies in advance of the EIP. The policies may have to be redrafted in light of the assessments if potential for harm is identified.</p> <p>(See also the not below on HIAs).</p>		1001		Email
Alexander	Richard		189		Object	<p>Birchington has neither the infrastructure nor the healthcare provision to cope with existing levels of population let alone an influx of 3,200 people (based on two people per household). Birchington Square is a bottle neck and suffers extremely poor air quality and the draft plan provides no clue as to what is to be created to address this (e.g. plans for a ring road?). The provision of a road between the A28 and Minnis Road will create a rat run for motorists going to Minnis Bay and the traffic lights at the Minnis Road railway bridge will cause tail backs through the new housing development and back onto the A28. The existing medical practice does not seem to be able to retain GPs (there are only 2 full time principals) so increasing the size of the facilities will only exasperate patients further. Building on agricultural land will diminish the groundwater supply and could in certain places cause localised flooding.</p>	Set out precise proposals for managing the inevitable increase in traffic, particularly relating to Birchington Square. Provide evidence that assurances are in place to safeguard QEQM hospital and, preferably, expand the provision of healthcare in Thanet.	650		Web
Alexander	Christina		219		Object	<p>The traffic through Birchington at peak times is too heavy for Birchington square resulting in traffic build up and air pollution. Greater levels of activity will only make the matters worse, the plan does not address this crucial factor. The provision of link roads will not change the traffic problem but the planned link between the A28 and Minnis Road will result in a greater level of traffic using the traffic lights at the Minnis Road railway bridge, which will inevitably lead to traffic jams. The existing medical centre barely copes with its work load because it only has 2 full time GPs. This understaffing will be worse with extra patients, regardless of how large the building is.</p>	The problem of coming into Thanet needs to be addressed before any development considerations take place.	670		Web
Allardye	D		338		Observation	<p>We are surrounded by grade 1 agricultural land (soil quality amongst the top 5th in the country. This land is needed for food, and biodiversity.</p> <p>Extra housing would mean extra demands on QEQM hospital and local schools.</p> <p>Air pollution will increase due to higher levels of traffic on the roads.</p> <p>Building work would mean constant noise and dust. Local residents with health problems may be affected.</p>		1020		Paper
Amer	Diane		404		Object	<p>Location of housing</p> <p>Birchington has a unique village community which should, I believe, be afforded protection from the sheer number of proposed houses on our border. Whilst I understand the need for new housing stock the approach should be in proportion to the number of residents already living here and take into account the age range of people living in the village. Birchington has</p>		1175		Web

					<p>historically been classed as a 'retirement village' and therefore a lot of the amenities are geared to this age group. A new development of retirement houses should be considered as well as starter homes for new families. However, priority should be given to existing Thanet residents in the first instance.</p> <p>Traffic</p> <p>The new houses will also impact on the already busy Birchington Square which has peak time traffic congestion and a high level of pollution. I note that the developer will need to build a primary school but I assume traffic will still need to use the existing route to King Ethelbert secondary school as there is no mention of a new secondary school. I am not certain therefore of the soundness of the Local Plan in relation to increased traffic through Birchington and that enough thought has been done with reference to relief roads around the village. In addition are the funds already in place for the roads identified as needing improvement?</p> <p>Should Manston development (Stone Hill Park) go ahead as a mixed use site then this will create even more of an issue as there will be additional traffic if residents want to shop at Birchington. Station Road in Birchington is at peak capacity for most of the day as it currently stands. Where will the additional parking be catered for as there is no additional land to be found near to the shops.</p> <p>Grade 1 agricultural land</p> <p>I am sure that there are brownfield sites, such as land adjoining Manston (not including the airport, which may reopen) which have not been examined properly and could be better utilised for housing as the road infrastructure is largely already in place. In addition should Manston reopen as an airport these houses would be strategically placed to enable the workforce to get to the airport easily. With all the unknowns of Brexit looming we should retain as much Grade 1 land as possible to ensure that we are as self sufficient as we can be in our food production. Once this valuable resource has been built on it will be gone forever. Kent is known as the "Garden of England" so Grade 1 agricultural land should be protected at all costs.</p> <p>Water resource</p> <p>Thanet does not get much rainfall and according to climate change statistics our summers are due to get drier and hotter. With this in mind are there plans in place to supply water to all of these homes in times of drought? The existing residents of Birchington (and Thanet) will be the ones that have to live with the consequences of this for the future. I attend the Local Plan meetings and we have had no concrete answers from Southern Water as to how the situation will be managed.</p> <p>Doctors and Hospitals</p> <p>In Birchington we have to wait sometimes 3 weeks for a routine appointment. The QEQM hospital has one of the worst A &amp; E waiting times in the country. With such an influx of new residents this will only get worse. The Thanet area is classed as one of high deprivation which, statistically shows that people that live in these areas have poorer health. With this in mind a new Hospital should be built before completion of all the new houses I worry that this will not be the case and again it is people that already live here that will suffer.</p> <p>The number of houses should be looked at again to see if the infrastructure and natural resources can support this both now and in the future as what we</p>			
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					do will have an effect on everyone.				
Antonio ni	P		484		Object An increase in population, due to house building would result in overcrowded roads Problems with inadequate surgery facilities Problems with hospital availability Increased usage of already limited water supplies Problems with waste water Demand for school places Building on prime agricultural land should be avoided as we try to become self-sustaining in food + crop production. After the building work has ceased unemployment will increase		1350		Paper
Austin	Virginia		3		Observation I refer to the plans for increased housing at Birchington with particular reference to education provision. It should be born in mind that, even without new housing provision, schools in Thanet are full and more places already need to be found.  There is no mention of the need for secondary education provision; the local secondary school, King Ethelbert, is already heavily oversubscribed. How is this to be managed?  At what stage of development is the primary school to be built? This needs to be at an early stage to prevent overcrowding at Park lane Primary school.		6		Web
Barar			375		Observation Since the presentation of the original 'Local Plan' was tendered by Thanet District Council for consultation and feedback by Thanet residents, it has invariably attracted a great deal of negative strong feelings and objections formany reasons. The cost, feasibility, necessity and practicality of the proposed areas to be developed, have all been discussed at length. Furthermore, the current Pre-Submission Publication Local Plan regulation 19 (23/08/18) has as well. However, while none of us, honestly wish for further development of our village on the scale quoted in the original 'Local Plan' to go ahead, there is a dire need for affordable housing to accommodate the next generation of Birchington residents. Likewise, a great many of us, wish for the tranquillity and natural scenery in and around our village, to be protected as far as possible. Therefore, whilst we have to accept that a measured and hopefully, well thought out housing expansion will happen in the next few years around Birchington, the green field and countryside surrounding our village, needs equally, to be reciprocally subject to a measured retention also as 'Green Corridors / Wildlife Corridors'. For the avoidance of doubt, the term 'Green Corridors / Wildlife Corridors' in this representation, are one and the same as they are separate titles for natural land serving a duel purpose. The quintessential character of our village must be retained and these natural areas should be enjoyed by all village residents, whether as an open space for informal recreation, or as a green view. Therefore 'softening the edges' of proposed housing developments (new next to the old) with footpaths, cycle paths, areas convivial to indigenous wildlife and countryside views, will become managed areas of Birchington that will preserve a tranquil quality to our village. There is a varied mix of agricultural land and open spaces currently.	The publication of the 'Draft Thanet Local Plan – 2018 – Pre-Submission Publication, Regulation 19 contains several pointers towards the proposed housing development of Birchington and calls into play, the 'soundness' of this local plan to which I wish to make the following representations.	1076	<a href="#">083 Bara John Birchington attachment.pdf (769 KB)</a>	Email

					<p>This landscape provides the beautiful backdrop to the built areas. In a different layout as a ‘green buffer’ between developments, these should remain undisturbed in their current, un-manicured, natural surroundings. Please review the maps of Birchington below which are the original ‘Local Plan’ drafts from Thanet District Council which are self-explanatory. The present Local plan tendered for consultation and representations, has a slightly expanded map (SP14) to accommodate the increase in proposed housing units (1600), however the principle of maps shown below, still applies. [See plans in attached document].</p> <p>The modification of the original proposal affords views across the fields and countryside for existing and potential residents of the village • Views towards and from Birchington • Retention of some existing pockets of Open Space • Public Footpaths/cycle paths with potential to be designated as bridleways • Places of natural interest • inclines and slopes within Birchington • Access to public open spaces • Consideration for cyclists, dog walkers, pedestrians and equestrian users. I would like to propose to maximise the ‘softening of the edges’ of any proposed housing developments, with the width of all ‘unmanicured’ green corridors / wildlife corridors to be up to 100 metres. It may be feasible to return some of these corridors back to agricultural use to sustain the local economy and provide variance in crop cycles. It would continue to provide the unaltered natural backdrop that surrounds Birchington currently.</p> <p>I appreciate that the retention of such swaths of natural land, will encroach on the projected housing numbers planned on strategic sites, however to offset this shortfall, I would like Thanet District Council and/or the relevant Planning Authorities, to consider alternative nearby sites, where land is identified and is currently being used, as anything other than ‘grade 1’ agricultural land, for housing development. For example, several areas adjoining the Manston Airport site could be considered. The proposal for the retention of Manston Airport as a freight/passenger terminus is a sound one and will contribute positively towards the local economy and job market. Such alternative housing development areas would ideally require a sustainable and existing conurbation infrastructure - Manston already has that. In the interests of expediency at this time, I suggest sustainability tests be conducted accordingly. In conclusion with SP14 in mind, such a compromise measure, would allow the projected housing target numbers to still remain achievable, ethical and urbanisation pressure along the boundaries of strategic sites would be alleviated and an ergonomic housing expansion would still be possible with the retention of Birchington’s character and natural heritage in green corridors / wildlife corridors in a more convivial, Local Plan proposal.</p> <p>The publication of the ‘Draft Thanet Local Plan – 2018 – Pre-Submission Publication, Regulation 19 contains several pointers towards the proposed housing development of Birchington and calls into play, the ‘soundness’ of this local plan to which I wish to make the following representations. Further in this document, I have explained how any shortfall in strategic housing land to develop, can be recouped by the developers to still achieve their 1,600 houses target for Birchington. All my following representations are in green font for the avoidance of doubt.</p> <p>See attached file for complete submission</p>				
Barar			375	Object	<p>Strategic Site Policies 3.23 states “Birchington is a large village with an existing population of approximately 10,100. It has a good sized and well-functioning</p>	On that basis, I wish to question the soundness of the overall policy on the basis of it not being positively prepared and	1079	083 Bara John	Email

					<p>commercial centre which serves the surrounding residential community. The village has a train station with routes to Margate, and the rest of Thanet as well as Faversham and London, with regular bus services running to Canterbury. Birchington Square lies on the main route to Margate for those travelling into the district from the west, and as such at peak times suffer from traffic congestion. This has also resulted in the area suffering from higher levels of air pollution". The policy continues "Policy SP14 - Strategic Housing Site – Birchington". Land is allocated for up to 1,600 new dwellings at a maximum density of 35 dwellings per hectare net at Birchington. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site including provision within the site of:</p> <p>1) a new link road to serve the development and extending from Minnis Road and the A28,</p> <p>2) a minimum of 14 ha of open space</p> <p>3) a fully serviced site of 2.05 ha (to be provided at the cost of the developer) for a two-form entry primary school".</p> <p>I wish to express my concern at such a largescale local plan development and question its soundness on the basis of if it is positively prepared enough and its effectiveness. The creation of a new link road from Minnis Road and the A28 will be a questionably feasible solution to the 'rush hour, school runs and bank holidays' towards the additional amount of vehicles on the road serving Canterbury, Birchington and Margate that a housing expansion of 1,600 dwellings will bring. Evidencing this is the statement within policy SP14 (above) which states "Birchington Square lies on the main route to Margate for those travelling into the district from the west, and as such at peak times suffer from traffic congestion". 60.53% of people who responded in the recent Birchington Village Appraisal 2018 (see attached) cited that 'greater control of traffic' was desirable. 60.43% felt that there should be no 'rat runs' in the village and 63.47% wanted for pollution to be minimised - pollution (air and noise) will only be exacerbated with such a condensed development, to the west of the village. Electric vehicular technology is still in its infancy regrettably, therefore I question "Policy SP14 - Strategic Housing Site – Birchington" sustainability upon completion. As a side issue but one worth mentioning, point number 2 "a minimum of 14 ha of open space" is a welcome provision however the statement would benefit from clarification from developers before the masterplanning stage in that front lawns, gardens or closes of manicured landscaping would not be conducive to the true definition of green corridors / wildlife corridors where our natural habitat, thrives on its own on the edges of farmland. Furthermore "5) the need for integration of development and landscaping to enable a soft edge between the site and open countryside", implies only a soft edge between the site and open countryside with no provision for green corridors / wildlife corridors between existing and proposed housing developments. This is evidenced as an undesirable option in the recent Birchington Village Appraisal 2018 (see attached). On that basis, I wish to question the soundness of the overall policy on the basis of it not being positively prepared and therefore not effective (deliverable).</p>	therefore not effective (deliverable).		<a href="#">Birchington attachment.pdf (769 KB)</a>	
Barton	Jean		101	Object	<p>I am writing to oppose the Local Plan for housing sites at Westgate-on-sea, Garlinge and Birchington.</p> <p>First I fail to understand why the term 'Local' is used to describe this plan, it neither represents the needs of the local people or any growth in our</p>		224		Email

					<p>population. This plan only represents the needs of other areas who have failed over the years to make adequate provision for their growing housing problems.</p> <p>I have lived in Thanet all of my life and moved back to Westgate-on-Sea from Margate six years ago, back to the home I was brought up in. Over the years my family and I have witnessed the tragic loss of several delightful, architecturally stunning buildings to the greed of various developers in our lovely little town by the sea. Local bodies were not quick enough to award these historic buildings with listed status and now they are gone forever.</p> <p>The proposal to build thousands of houses on Grade 1 agricultural land adjacent to these three communities is in my view barbaric. Our local farming community is precious and should be awarded protection not only for the preservation of local jobs, wildlife and for our future but once that Grade 1 agricultural land is built on there will be no turning back. In the words of Franklin D. Roosevelt ‘A nation that destroys its soils destroys itself’.</p> <p>Southern Water has already stated that water supplies “half of demand” by 2030 and will be looking to encourage customers to use less even though here in Kent we the customers are among the most water efficient in the UK.</p> <p>Southern Water on the other hand is the worst water company for complaints as broadcast recently on local radio from official statistics. It has been stated by Southern Water that Westgate does not have the capacity to either supply water or dispose of waste water for the number of housing proposed in the earlier Local Plan, even greater numbers of houses on the new Local Plan can only exacerbate this problem.</p> <p>If the Government dictates to local Councils, these houses should be built then the infrastructure should be put in place first and funding supplied by the Central Government. Road building should be completed before house building starts. Thanet’s roads are greatly congested and many in desperate need of repair. When repairs are made or when one main road is closed for repair, installations or accidents there is mayhem on all other roads with traffic at almost standstill.</p> <p>The strain on the local Doctors (oversubscribed by 200 patients already), Dentists, Hospital, Mental Health Unit and Police would be unbearable. The A &amp; E Department at QEQM. is already overstretched and now we have looming over us the loss of the stroke emergency care to Ashford a good hours drive away if the traffic allows.</p> <p>Our local primary schools cannot accommodate the number of applicants each year as the population stands at present and the promise of another infant school for Westgate quite honestly does not quell my fear for the future educational needs of this area.</p> <p>In the new local plan the projected new jobs in Thanet is 5,000 and the planned additional housing is 17,500 meaning probably a 35,000 addition to the population. These projections only spell one thing; many thousands of people either unemployed or having to commute out of area. If Westgate-on-Sea has the additional 2,000 houses as in the new local plan that equates to 4,000 people trying to exit Westgate to get to their place of work because it will not be in Thanet.</p> <p>Westgate-on-Sea has a small Railway station with no parking facility so good luck to any commuters with your walk to the station and back after your long day at the office.</p>			
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						<p>Finally, Should any of the proposed housing go ahead the very least that should be demanded is a park. There is not one park in either, Westgate, Garlinge or Birchington . There are two or three recreation grounds (NOT Parks) and in consideration to the fact that you will be removing the local open space which is a requirement to maintain the quality of life, it is vital that part of the plan for Westgate, Garlinge and Birchington incorporates at least one decent sized park. Not much to ask when you consider that Margate has the luxury of three parks.</p> <p>Please rethink your plan. If more housing is absolutely needed, which I doubt, especially the numbers, they should be placed in an area that has easier access to out of the area i.e. The Thanet Way.</p>				
Belt	M		483		Object	<p>The whole idea of all these houses on agricultural land is ridiculous, we need this precious land for food and we are certain that our services could not cope, things are bad enough already.</p> <p>There are also many empty properties &amp; brownfield sites around Thanet already which could be made into affordable homes. This should be a priority before any valuable agricultural land is ruined. We have already lost land with the building of Thanet Earth.</p> <p>Our roads are already very busy and would struggle to cope with the large extra volume of traffic.</p> <p>As long term residents of Birchington we feel that this short sighted proposal would impact negatively on the people of Birchington for generations to come. These houses would not even be far local people – our own young people would not be able to afford to buy them.</p>		1349		Paper
Blight	Ken		427		Object	<p>There are far too many houses in the local plan for Birchington and they should not be built on prime agricultural land. There are few young local people that need houses or can afford them. There is no work in the area, the schools are full and the GP surgery is struggling. This is a very ill conceived plan and is not at all suitable for this area.</p>		1219		Email
Bottali	Denise	1962	325		Object	<p>I would like to register my objection to the Local Plan, with regards to housing being built on grade 1 agricultural land at Garlinge, Westgate and Birchington on the grounds that no such development should be given permission on land that is used to grow our food, especially with the uncertainty of Brexit looming. You should be using all brown field sites (apart from Manston) and compulsory purchasing empty and derelict homes across the Isle and renovating these for local people awaiting housing instead of lining the pockets of developers and playing into the hands of London's social cleansing, of which the Isle of Thanet cannot sustain such an increase in it's population.</p>		998		Email
Bradley	Alan		488		Object	<p>the proposed land is Grade A agricultural land. Use of brownfield sites would be more appropriate. Many areas throughout Thanet, especially Ramsgate &amp; Margate, shops boarded up, the old police station and Gasboard opposite Aldi's in Ramsgate, left for years and total eyesore, surely accommodation could replace just these 2 areas alone.</p> <p>It is a great place to love but please don't make it a concrete jungle.</p>		1354		Paper
Bransfield	Sheila		456		Observation	<p>POLICY SP14 –STRATEGIC HOUSING SITE – BIRCHINGTON</p> <p>When considering the impact of the proposed Birchington site upon the junction of Manston Road/Park Lane and Acol Hill, the priority should be altered. In a 2006 study, CPRE suggested that Park Lane and Manston Road should be a continuous carriageway. They suggested chicanes at the top of Acol Hill to deter through traffic. Kent Highways agreed in principle, but had</p>		1306		Email

					no available funds. When Columbus Avenue is extended, traffic should be directed to its Manston Road entrance.				
Brearey			60		Object I would like to state my view regarding the strategic site earmarked to allocate 1,600 new dwellings for Birchington-on-Sea. I feel that this plan will destroy the unique look and feel of Birchington and damage the tight knit community. There are 3 single track roads which are some of the main arteries in Birchington (Park Lane, The bridge over the train line at Birchington station and Minnis Road) they will either need to be widened or extra main roads will need to be added which will take up more farm land and again alter the current picturesque Birchington. If these Thanet towns and villages are to keep being enlarged then we will lose the reason visitors have for visiting. I believe that coastal Towns and Villages should be looked after, respected and protected for future generations. Why change and ruin a Village which seems to be working pretty well with no boarded up shops and a supportive customer community.		159		Web
Bushell	H		384		Object I wish to object to the local plan for Birchington Policy No: SP14 Surely council officials cannot expect a village as small as ours to cope with all of the extra properties and residents that this proposal will make? Our local doctors are already overstretched, what impact will thousands more residents have on this service? We in Thanet already have the highest unemployment so if 1600 extra houses are to be built that will be at least 1600 (but more likely to be 3200 + with two employees per property) more jobs needed in the immediate area as the proposed tenants may be homeless from London. The loss of farmland will also create a loss of jobs for current residents . Thanet has in the past had a hosepipe ban implemented due to a shortage of water. Where will this crucial amenity come from for so many more homes? Our roads are already congested in Birchington to the effect that we have great difficulty in getting out onto the Canterbury Road due to the immense volume of traffic. The extra houses will create an even larger volume of traffic to an area (The Square Birchington) which is already classed as the most polluted in Thanet. Add to this the extra traffic to the school where Park Lane cannot withstand the already heavy traffic and parking which in turn creates large problems when cars are parked in side roads allowing for little or no access to emergency vehicles. The development will have a serious effect on the landscape and wildlife by being built on Grade 1 Agricultural Land. Our 'village' will no longer be classed as such, as Birchington will be forced to become a 'town', something that was fiercely fought against by Birchington residents some 25+ years ago.		1131		Paper
C A Wilkinso n			435		Object Food, Special Soil & Countryside 1. This is Grade 1 agricultural land. The soil quality is amongst the top 1/5 in the country (CPRE) 2. Only 60% of food consumed in UK is home-grown. This is expected to fall to 53% by 2040s (NFU 2018) which will have serious implications for the economy & unemployment (NFU). It is reasonable to try and halt the decline in self sufficiency and reversing it. but that won't be done by building over the land (NFU) 3. Future generations would be deprived of Thanet's remaining countryside. Our legacy would be urban sprawl 4. The extent of the proposed 1,600 homes for Birchington would radically		1259		Paper

						<p>alter the villages character.</p> <p>5. 85% of people in 2015 wanted to see supermarkets selling more British farm grown foods (NFU)</p> <p>Biodiversity</p> <p>A development such as this would destroy wildlife habitats including hedgerows and trees. Endangered species would be at greater risk.</p>				
China Gateway International Ltd.		China Gateway International Ltd.	503	Abraham Laker - RPS	Object	<p>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.</p> <p>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;</p> <p>The contribution being sought from Strategic Housing Site SP14 Birchington has increased from 1,000 dwellings to 1,600 dwellings in the Pre-Submission Local Plan. We consider that there is little justification given for the increase of 600 dwellings. The first 50 units are expected to be delivered in 2019/20 but with no planning application submitted we consider this to be extremely optimistic and unrealistic. There are several matters which need to be addressed before any planning permission is granted. This includes the provision of a new link road, a serviced school site, appropriate noise mitigation on development in the northern edge and integration with the open countryside.</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> <p>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.</p> <p>Accordingly, we strongly urge the Council to consider the inclusion of these sites as allocations within the emerging Local Plan.</p>		1417		Email
Claris			459		Observation	<p>My husband and I have lived on the Canterbury Road for 42 years. We've loved the open view from the back of our house - Grade 1 Agricultural land stretching across almost as far as minnis bay.</p> <p>We've watched the farm machinery and workforce work year after year; potatoes, cauliflowers, sweetcorn etc, our own home grown crops - not something flown in from the other side of the world!</p> <p>Only 60% of the food consumed in the uk is home grown, we need to grow more not less. Taking this valuable farmland and filling it with properties will cut our growing capacity and make us less independent. Do we want this after Brexit?</p> <p>Birchingtons population is 10,000 and our schools and Doctors are struggling to cope (you're lucky to get to see a Doctor these days!) The hospitals are mush the same, they can't cope, patients are sent to other hospitals outside</p>		1311		Paper

						<p>the local area for minor operations!</p> <p>How on earth are they going to take on more patients when they are not coping now with what they've got?</p> <p>We have a struggle here in the summer with water shortages, more houses will add to this problem. Also the roads get choked up with traffic especially in the summer, this corner of England is not going to benefit with so much property</p> <p>The Local Plan to Build at least 12,000 new homes in Thanet, with Birchington and Westgate being expected to give up Greenbelt land for this purpose - grade 1 farmland - it's a SIN.</p> <p>If this goes ahead our village and community will be changed forever.</p> <p>SAD!</p>				
Clement son	Richard		259		Object	<p>The local infrastructure is not capable of supporting this amount of development because:</p> <p>Already Southern Water are talking about a shortage of water.</p> <p>In addition to the shortage of water is the problem of waste water and sewage ending up on our beaches when flash floods have occurred. This has a devastating effect on our tourist industry and jobs.</p> <p>There are insufficient medical facilities and a shortage of doctors. It takes three weeks to get an appointment and we are constantly being told that the Hospitals are running to over capacity.</p> <p>It seems to me that the number of houses proposed for Birchington is not for the benefit of Thanet residents but to provide housing for overspill from London councils like the Westwood Cross development.</p> <p>Grade 1 Agricultural land should not be built on.</p>	Houses should be built on brown field sites or land of a lesser quality than Grade 1 agricultural land. We owe it to the next generations to preserve this land.	787		Web
Clifford	Stephen		497		Object	<p>I have lived in Thanet all my life, 65 years. I have lived in my bungalow 41 years. I have witnessed many changes not many have been for the best. Having worked hard all my life I wish to enjoy retirement in what i call home.</p> <p>Having clear uninterrupted views across beautiful farmland to Minnis Bay &amp; Reculver I was under the impression that this A1 farmland would never be built on. I know this isn't a good reason alone for not building on, but for me and many others it is a good reason why we live here.</p> <p>Over the years I have noticed how difficult it is to drive from one part of Thanet to another. The roads are such poor quality now and with more road users, can only get worse. Roadworks on main arterial roads cause chaos, longer journey times and more pollution. We do not have the infrastructure to support these houses. One hospital, doctors, dentists, schools + the public sector are overwhelmed. (I have to travel to Herne Bay for a dentist) The Council have been notified by the water company that it cannot cope and will lead to shortages and hosepipes bans.</p> <p>The quality of life will be seriously impacted and make it miserable for everyone and I am seriously against the amount of homes proposed for the Thanet Area</p>		1391		Paper
Coombs	Joshua		292		Object	<p>The loss of farming land to housing will increase unemployment, especially after Brexit.</p> <p>The sites on brooksend fields have a significant water table and wells/holes in the area with underground natural underground streams. There is also a potential risk identified of an surface water flooding and an event occuring every 75 / 100 /or 1000 years. This is due to the above and raised groundwater levels.</p> <p>This development would destroy biodiversity, wildlife habitats including</p>	The inclusion of the Brownfield sites that were not included but allocated.	876		Web

					<p>hedgerows. Endangered species such as sky larks will be at greater risk. The sites proposed would not be for local need but for those moving from London. Affordable homes would be allocated to those from Lewisham which would increase crime, fear, drugs. These sites must be for local need. 15,000 houses alone could mean 4 people per house, that's an extra 60,000 people who need jobs, schools, hospitals, water and other essential services. This would increase Thanets population by a third. There is already currently inadequate provisions of schools social services and public transport. Birchington Medical Centre and QEQM Hospital cannot cope with current demands. Furthermore the threat of the closure of the stroke unit would be consequently disastrous.</p> <p>Thanet is vulnerable to water shortage and rainfall which is what CPRE have also said aquifers are low at the times of drought, increasing probability of hosepipe bans. Incidentally water bills may rise. Since 011, there have been numerous reports to Southern Water being able to cope with the rainfall and fined for illegal discharges onto our beaches and shorelines in Thanet which has a negative impact on tourism and health implications.</p> <p>Widespread Concrete makes more water run into drains. This water requires more filtering. and heavy rainfall can cause flooding.</p> <p>Planting lots of trees and lots of landscaping with help reduce the flooding issues across the Isle of building in these other areas must happen.</p> <p>Houses cannot be built on this particular land due to Public Rights of Way and Registered Public Bridleways around the perimeter and across either side and the middle of the fields. There is also an ancient monument on the fields. It is understood that the land owned by Cambridge University and The Church was gifted by Quex Estates previously by Powell Cotton to the people of Birchington at the time and believed to have a restrictive covenant on its use. The SP14 strategic site and allocation of land is Grade 1 agricultural land. This housing allocation with the right infrastructure would be best placed on the former Manston Airport Site with mixed development including the 1600 proposed in Birchington.</p> <p>There are brownfield sites that have been identified but not included in the Local Plan when the plan was passed to consultation by Thanet District Council. As such I believe the Plan is Unsound and not positively prepared.</p> <p>Other alternatives on the housing numbers:</p> <ol style="list-style-type: none"><li>1) Restore run down properties and bring them back into use. There are well over 1000 long term empty properties in the district. This is more sustainable as uses less greenhouse gas than a new build.</li><li>2) Disallow current properties to remain empty for more than six months.</li><li>3) Use financial incentives to encourage building on brownfield sites.</li><li>4) Other financial incentives to encourage sole occupants of large properties to down-size.</li><li>5) Encourage conversion of empty rooms above shops.</li><li>6) Encourage renting of flats and bed-sitting rooms</li><li>7) Housing could instead be built in the midlands and the North, where brownfield sites in previous mining villages abound, as do rugged sites which are unsuitable for agriculture.</li><li>8) When considering development proposals, poorer quality land is to be used in preference to land of a higher quality.</li></ol>			
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						The allocated land is heritage environment and open land. Which is landscape character area - wantsum north shore. This would be development in the countryside (urban and Village confines) This would be in my view overdevelopment of the area and right next to a conservation area.				
Cooper	Barbara	Kent County Council (KCC)	514		Object	<p>Provision and Delivery of County Council Community Services: KCC would like to see the following text removed, and replaced with:</p> <p>“5) a fully serviced site of 2.05ha (to be provided at the cost of the developer) for a two -form entry primary school”</p> <p>5) An area of regularly shaped land within the development of no less than 2.05ha to be transferred at nil value to the County Council for the purposes of providing a Two Form Entry Primary School. The site to be adequately serviced by the developer, including utilities and highway access.”</p> <p>PRoW and Access Service: KCC recommends the inclusion of the following text into the policy:</p> <p>Incorporate and provide for connections and improvements to existing PRoW and cycle networks facilitating walking, cycling and public transport to, from and within the site.</p> <p>To incorporate and provide for connections and improvements to existing PRoW network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.</p>		1502		Email
Corsby	Gillian		57		Object	<p>Policy SP14 - Strategic Housing Site - Birchington - I object because overwhelming rejection by locals to building on Grade 1 and 2 agricultural land in previous consultations has been totally ignored despite the democratic process. Residents have been given a shorter period to comment on a vastly increased amount of paperwork and previous comments which we expected to be submitted to the Inspector will not be passed on.</p> <p>The National Planning Policy Framework para 112 says that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land ..... and should seek to use areas of poorer quality land in preference to that of higher quality.</p> <p>After recent water shortages caused problems on many farms why would the Council suggest building on Grade 1 agricultural land which has a stream from which the farmers pump water into a network of pipes for watering crops. The farmer says that the soil is so good he could grow anything. It is absurd that such a large area of top grade agricultural land should be sacrificed for house building when there is land less valuable for agricultural purposes available beyond Thanet’s boundaries.</p> <p>The planning authorities have not demonstrated significant development of agricultural land is necessary and have ignored the need for greater self sufficiency in food production. With 40% of our food imported we need to produce more not less in the UK, especially with impending Brexit.</p> <p>The number of houses proposed is excessive and does not appear to take into account the density of housing already in Thanet or that being a coastal area all traffic has limited ways to leave the 'island'. The single carriageway A28 to Canterbury is often congested and it is an exaggeration to call road access to and from the M25 and London via the A256 and the A299 Thanet Way as 'excellent'.</p> <p>The proposed new road from the A28 going through the proposed development on the farmland to Minnis Road is a bad idea. The road appears</p>	<p>Use brownfield sites and save Grade 1 and 2 agricultural land for food production. The infrastructure changes proposed come nowhere near solving the issues already causing problems in the area. These need to be addressed before building more houses.</p> <p>The Office for National Statistics has revised down its previous estimate for housing, made in 2014, which suggested that 210,000 new households would be formed per year in England, to 159,000 per year. The overall number of houses required of Thanet should be challenged before coming to a final decision.</p> <p>Build new towns villages instead of adding new housing on already heavily populated areas and ruining communities by turning villages into towns.</p>	150		Web

					<p>to join Minnis Road between the Medical Centre and the traffic light controlled single lane under the railway line. This means that any incoming traffic diverted from the A28 to get to Minnis Bay will, especially in the summer months, sit in a queue emitting fumes while it waits to get on to the Minnis Road and through the tunnel.</p> <p>The Plan is based on the Government's tunnelled vision approach to national housing needs and not on each local areas actual needs or circumstances.</p>				
Corsby	Dave		331	Object	<p>The local plan allocates land for 17,000 new dwellings with 5,300 of them in Birchington, Westgate and Westwood on top grade agricultural land. The national Planning Policy Framework does not specifically identify self sufficiency in food production as a requirement for planning authorities to consider but advises that where significant use of agricultural land is necessary to meet allocation targets local authorities should seek to use poorer quality areas.</p> <p>The guidance does not meet the unusual situation in Thanet where almost all the land allocated for housing development is precious top grade agricultural land. None of the farmland in Thanet should be built on. Any shortfall in housing requirements should be met by using brownfield sites and rugged sites in the north which are unsuitable for agriculture.</p> <p>The present plan is based on a blinkered approach that we must have extra houses even if that means permanently destroying top grade agricultural land which is needed to provide self sufficiency in food supply.</p> <p>The comprehensive considered Local Plan for Thanet is flawed by a misconception that the additional houses have to be tacked onto existing conurbations. The proposals are unfairly onerous to Birchington with 1600 houses and Westgate with 2000 houses allocated while Minster, Monkton, St Nicholas, Cliffsend have escaped with relatively few additional houses.</p> <p>Instead of further pressure on existing Thanet communities no consideration or provision has been given to the alternative of building new and largely separate communities with access which would not put pressure on existing transport and services in Thanet.</p> <p>It would be better for new house building to be undertaken in the areas:</p> <ul style="list-style-type: none"> <li>• North from Potten Street towards Plum Pudding Island with independent direct access to the Thanet Way (A299);</li> <li>• West of St Nicholas towards Wagtail and Marshside with independent direct access to the Thanet Way (A299);</li> <li>• Between Minster/Monkton and Richborough with independent direct access to the A253 between Gore Street and Monkton and or access to the A256;</li> <li>• South of St Nicholas in the areas surrounding Down Barton Road and Summer Road extending towards independent access to the A299 and A28.</li> </ul> <p>It is difficult to understand why the Plan seems set on spoiling the existing Thanet towns and villages when the alternative of creating new independent hamlets would largely avoid this. Is it that tagging onto existing infrastructure is easier simpler quicker and more lucrative for developers? A look at the map shows that new hamlets at say Potten Street, Wagtail, Down Barton and Ebbsfleet would pose a less undesirable outcome than the present proposals. The suggested house building programme appears to be a short term fix which will create a permanent deterioration.</p>		1012		Paper
Cousins	Norma		471	Object	So why do you want to build on agricultural land.		1335		Paper

					<p>Building - By building on agricultural land would make it harder to buy fresh vegetables and fruit locally, also we won't have enough water for Thanet.</p> <p>We don't have enough GPs or medical centers or dentists here also the QEQM Hospital cannot cope now so how would we manage?</p> <p>The Road structor for all the extra for all the extra cars isn't suitable, every where would be grid locked and Birch village is like Oxford Street London. On a Saturday as it is now.</p> <p>What would it be like with all the extra houses and cars?</p> <p>I would be mayhem.</p>				
Crisp	Patricia		369	Object	<p>1. The proposed development of 1,600 new houses is sited on Grade 1 agricultural land - amongst the top fifth in the country (CPRE). If the UK population increases to to 13 million by the 2040s as predicted (NFU) then extra farmland that is more than one and a half times the size of London will be needed to grow the food for Londoners (ONS,2017).</p> <p>Only 60% of food consumed in the UK is home grown and that figure is expected to fall to 53% by 2040 (NFU) which will have serious implications for the economy and unemployment. Measures must be taken to halt this decline in self-sufficiency and that will not be achieved by building over valuable prime quality land.</p> <p>2. The loss of farmland to housing will increase unemployment, and at present Thanet's 4,020 unemployed is the highest in Kent (ONS,2018).</p> <p>3. Thanet is vulnerable to water shortage and low rainfall(CPRE) and aquifers are low in times of drought. Widespread concreting makes more water run into drains, and since 2011 Southern Water has been unable to cope with heavy rainfall and has been fined for illegal discharges into the sea around Thanet.</p> <p>4. The infrastructure in Birchington cannot cope with a population increase of 4,000+.</p> <p>This new influx will need jobs, schools, hospitals, water and other essential services. There is already inadequacies in social services provision, schools and public transport. Local hospitals (QEQM) and Birchington Medical Centre cannot cope with even current demands.</p> <p>5. The extent of the proposed development would radically alter the village's character and much of the housing may be to cater for homeless people from London boroughs. This in turn would increase unemployment figures.</p> <p>6. The proposed new roads will attract more motorists into Birchington and the Square is already the most air polluted spot in Thanet. More roads = more cars.</p> <p>Alternative suggestions</p> <p>1. Restore run-down properties and use the 1,000 long-term empty houses in Thanet.</p> <p>2. Use brownfield sites.</p> <p>3. Cheaper sites in the Midlands and the North (where brownfield former mining sites abound) which are unsuitable for agriculture would be better suited for housing. Poorer quality land is to be used in preference to land of a higher quality (DEFRA,2017).</p> <p>4. Encourage conversions of empty rooms above shops and even change the usage of empty shops into living accommodation.</p>		1067		Paper



Crisp	Andrew		372		Object	<p>1. The proposed development of 1,600 new houses is sited on Grade 1 agricultural land - amongst the top fifth in the country (CPRE). If the UK population increases to to 13 million by the 2040s as predicted (NFU) then extra farmland that is more than one and a half times the size of London will be needed to grow the food for Londoners (ONS,2017). Only 60% of food consumed in the UK is home grown and that figure is expected to fall to 53% by 2040 (NFU) which will have serious implications for the economy and unemployment. Measures must be taken to halt this decline in self-sufficiency and that will not be achieved by building over valuable prime quality land.</p> <p>2. The loss of farmland to housing will increase unemployment, and at present Thanet's 4,020 unemployed is the highest in Kent (ONS,2018).</p> <p>3. Thanet is vulnerable to water shortage and low rainfall(CPRE) and aquifers are low in times of drought. Widespread concreting makes more water run into drains, and since 2011 Southern Water has been unable to cope with heavy rainfall and has been fined for illegal discharges into the sea around Thanet.</p> <p>4. The infrastructure in Birchington cannot cope with a population increase of 4,000+.</p> <p>This new influx will need jobs, schools, hospitals, water and other essential services. There is already inadequacies in social services provision, schools and public transport. Local hospitals (QEQM) and Birchington Medical Centre cannot cope with even current demands.</p> <p>5. The extent of the proposed development would radically alter the village's character and much of the housing may be to cater for homeless people from London boroughs. This in turn would increase unemployment figures.</p> <p>6. The proposed new roads will attract more motorists into Birchington and the Square is already the most air polluted spot in Thanet. More roads = more cars.</p> <p>Alternative suggestions</p> <p>1. Restore run-down properties and use the 1,000 long-term empty houses in Thanet.</p> <p>2. Use brownfield sites.</p> <p>3. Cheaper sites in the Midlands and the North (where brownfield former mining sites abound) which are unsuitable for agriculture would be better suited for housing. Poorer quality land is to be used in preference to land of a higher quality (DEFRA,2017).</p> <p>4. Encourage conversions of empty rooms above shops and even change the usage of empty shops into living accommodation.</p>		1070		Paper
Davies	Julie	CPRE Kent	147		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>Object to the choice and size of strategic sites for housebuilding 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</p>		386		Web

					<p>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>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.</p>				
Davies	Colin		389	Object	<p>Dear Sirs</p> <p>Please accept this letter as my formal objection to the Plan to build 1600 new houses on land around Birchington, and pass on to the Inspector.</p> <p>Employment: I write as one that has experienced the need to leave the area for employment going back some 45 years. In that time engineering factories have closed never to be replaced. Skilled staff have drifted away. The closure of Pfizer has had a major impact on the area, high paid middle classed workers with a variety of skills left Thanet. The closure of the airport has also had the same effect. It says in the plan that 5000 jobs will be created, but not how? Will these jobs be skilled what will attract major high tech employers to an area that has closed its new multi million pound Canterbury University Campus (Westwood), due to lack of students? What does this say about our young people, and schools. Low paid jobs have been taken by EU citizens, displacing our own non skilled workforce. Two and half hours to get to London plus, and return another two and half hours puts off many from moving to Thanet (Birchington), and the fares of £5500 a year are not bearable for most. My train to Victoria (5:58) would have only one or two travellers to London, and I know I was rare in that I paid the fares myself. This is not a commuter friendly area.</p> <p>It is my understanding that many people will be moved to the area that are already on Benefits free up land etc, so that London councils can get better returns from new tenants and profit from the sale of property. These new comers will be detrimental to the low crime and peaceful atmosphere we have here. They will be a drag on council resources, so badly need for the aged population and those with special needs.</p> <p>Traffic: In an area where we experience constant jams due to the amount of cars on our roads and the fact that there are few alternative routes to Margate, Ramsgate and Canterbury, the prospect of more cars filled the residents with horror. Even the new roads would seem to funnel more traffic to Westgate and Westwood, and not ease the congestion.</p> <p>Enviroment:The increasing need to ensure food security has bee overlooked in the plan. Acres of A1 agricultural land producing wheat and vegetables for the home market will be destroyed by this scheme. The pleasant rural landscape so loved by denizens lost for ever. Wildlife habitat so needed in this Country covered in concrete.</p> <p>I consider that many brownfield sites near to London would be better suited to new homes, and that travel would be cheaper for those that needed it. Our exit from the EU brings uncertainty to this plan and doubt in my mind as to the population in the South East in the coming years.</p> <p>Water: It has long been a concern of Birchington that water supply is dependant on an aquifer that cannot deliver the quantity required by the</p>		1138		Email

						<p>current population. To increase demand would deplete it even more, given that it cannot be renewed with the runaway caused by building foundations.</p> <p>Education: What extra places are there to be made for the children of the newcomers?</p> <p>Density of population: Given that we have a high density now, is it correct to crowd more into Thanet which is a triangle with only one way out other than the sea?</p> <p>Regards</p>				
Davis	Gerald		340		Observation	<p>In regard to the proposed housing development for Thanet I feel that not enough thought has gone into the circumstances of the different areas. Thinking of Birchington as a whole, to build 1000 plus houses on the ground adjacent to Essex Gardens because of the extreme increase of traffic will endanger the people living on the 'Garden Estate' ie Essex Gardens, Manor Drive, Lancaster Gardens, Devon Gardens. There will need to be a green wedge or similar to protect the estate.</p> <p>As at the present time it is difficult to cross Essex Gardens because of the traffic racing down the road to avoid the tail back of traffic going through Birchington Square.</p> <p>Would it be more advisable to build on the land adjacent to the Thanet Way thus to avoid increasing population of Birchington as a whole.</p> <p>a) Regarding employment what measures have you put in place for the people to find employment, it is quite evident that those out of work at the present time are far too</p> <p>b) The road that is proposed to leave A28 and be diverted across the fields etc, has consideration be given to the fact that Minnis Road will not be able to accommodate increased traffic and would need to be diverted further down towards Minnis</p> <p>c) Water is a great concern and if the population is to be increased so greatly what measures have been put in place to cater for such numbers.</p> <p>d) There is the question of Hospital and GP surgeries, how are they to cope with increased numbers?</p> <p>These are just a few of the concerns of the residents of Birchington but we hope that more thought should be put in place regarding the proposed increased housing numbers.</p> <p>As a final note while attending a function at the far end of Cliftonville a lady there said, we like to come to Birchington because it is still like a village and so friendly -If the proposed housing goes ahead with such great numbers, this would disappear.</p>		1022		Paper
Davis	Maureen		347		Observation	<p>In regard to the proposed housing development for Thanet I feel that not enough thought has gone into the circumstances of the different areas. Thinking of Birchington as a whole, to build 1000 plus houses on the ground adjacent to Essex Gardens because of the extreme increase of traffic will endanger the people living on the 'Garden Estate' ie Essex Gardens, Manor Drive, Lancaster Gardens, Devon Gardens. There will need to be a green wedge or similar to protect the estate.</p> <p>As at the present time it is difficult to cross Essex Gardens because of the traffic racing down the road to avoid the tail back of traffic going through Birchington Square.</p>		1036		Paper

					<p>Would it be more advisable to build on the land adjacent to the Thanet Way thus to avoid increasing population of Birchington as a whole.</p> <p>a) Regarding employment what measures have you put in place for the people to find employment, it is quite evident that those out of work at the present time are far to</p> <p>b) The road that is proposed to leave A28 and be diverted across the fields etc, has consideration be given to the fact that Minnis Road will not be able to accommodate increased traffic and would need to be diverted further down towards Minnis</p> <p>c) Water is a great concern and if the population is to be increased so greatly what measures have been put in place to cater for such numbers.</p> <p>d) There is the question of Hospital and GP surgeries, how are they to cope with increased numbers?</p> <p>These are just a few of the concerns of the residents of Birchington but we hope that more thought should be put in place regarding the proposed increased housing numbers.</p> <p>As a final note while attending a function at the far end of Cliftonville a lady there said, we like to come to Birchington because It is still like a village and so friendly -If the proposed housing goes ahead with such great numbers, this would disappear.</p>			
Dean	Jean		335	Object	<p>We disagree with the local plan which will it seems turn Birchington, what is now a rural village into a housing estate. If the local people were being considered for the proposed housing it would seem appropriate, apart from the fact that the local short fall in housing does not come anywhere near what is being proposed.</p> <p>There is not now enough water to sustain the population as it stands, how do you propose supply the additional housing?</p> <p>The roads are now very busy and in parts gridlocked again, how is this to be resolved as far as we are concerned no additional roads are part of the plan.</p> <p>The doctors surgeries are now over subscribed and getting an appointment takes weeks. how is this to be resolved.</p> <p>Local schools are overcrowded yet no additional schools are part of the plan. It seems to us that a lot of talking has taken place with not very much being resolved</p>		1017	Email
Denyer	JE		103	Object	<p>1. AGRICULTURAL - F1 premium growing land lost forever in Birchington. Food production is essential, how will this shortfall of crops be managed?</p> <p>2. WATER - currently supplied by one aquifer from Birchington to Ramsgate. Where will additional water supplies be obtained from?</p> <p>3. POLLUTION/RECYCLING - this will only increase in Birchington. What measures will be put in place to deal with this?</p> <p>4. UTILITIES - who will provide and fund additional cabling, gas and sewerage systems in Birchington?</p> <p>5. ROADS - main access into Birchington is at capacity. How will this be restructured and who will fund?</p> <p>6. EDUCATION - currently high pupil numbers in Birchington junior and senior schools which are overflowing. Who will provide and fund new schools?</p> <p>7. MEDICAL - an unacceptable level of GPs and medical services is currently provided in Birchington. What measures will be taken to balance additional patient numbers?</p> <p>8. SOCIAL SERVICES - ongoing shortfall in Birchington care in the community. What will be done to redress increased numbers and where will resources</p>		227	Paper

						<p>come from?</p> <p>9. JOBS - employment opportunities in Birchington and surrounding areas are virtually non-existent. Where will new jobs come from?</p> <p>10. SOCIAL BENEFITS - disabled and vulnerable people in Birchington are relatively high and this can only increase per capita. Where will funding come?</p>				
Dickerso n	Bob	FOCC	164		Object	<p>I moved away from this area some 25 years ago to find work. Having retired, I have now returned - only to find that what had happened to the village of Ashford TW15 is very similar to what TDC are proposing! I chose to return to Thanet for a number of reasons, one of which was a history there of poor planning has resulted in the total destruction of a village atmosphere. The last remaining old and decorative school building has been flattened to make way for multiple housing without regard to essentials such as schools, public transport, hospitals, doctors, dentists, children's play areas etc. This has resulted in an increase in air pollution, population (already struggling to cope) and crime figures. Furthermore a decrease in fire brigade cover for that area made it an unwelcome and increasingly dangerous place to live. I am very much against standing by and watching something similar happen again in Thanet. Birchington has a high percentage of pensioners who, no doubt, wish to live out the rest of their lives in peace and quiet without having to endure what I have encountered and briefly described. There are better areas in this country to build housing. For example, if you drive north, past Manchester, you will find countryside with easy access to the motorway, ideal for new towns to be built which will not upset local residents - because there aren't any! I demand you reconsider these proposals.</p>		481		Web
Dobbs	R A		446		Object	<p>Birchington simply cannot cope with the amount of housing being proposed, our hospital and Dr's are stretched to the limit as it is!! Surely it is better to grow more food than build houses for people who do not even live in the Birchington Area.</p> <p>How on earth will Southern Water cope with another 3-4000 residents? Simple answer is they WILL NOT!!</p> <p>Our countryside is dwindling year after year and the answer is not to keep building on it. Grown more produce and eat more healthily!!</p> <p>I have lived in Thanet all my life and would show you 100's of run-down properties that could be re-developed instead of blighting our landscape.</p> <p>Employment is very very low it will only get worse!!</p> <p>Keep BIRCHINGTON AS A VILLAGE!!</p>		1275		Paper
Donovan	Patricia		251		Support	<p>The proposed new housing would change the character of Birchington beyond recognition. My understanding is that a London Borough has expressed interest in building here. Have you learned nothing from the "Dole on Sea" fiasco? Our GP surgery is already stretched - how will they cope with the influx? Southern Water has said that it cannot provide more water. Birchington Square is, I believe, one of the most polluted places in Thanet with very poor air quality. Do you think that this problem will be helped by further vehicles? It seems to me that the wishes and well-being of local people are low down (if not bottom) on the list of your priorities.</p>		763		Web
Druce	Peter		457		Object	<p>You expect the developer to make appropriate contribution towards the expansion of the Birchington medical centre. This facility does not meet its current demand. Waits of 2-3 weeks to see a doctor are not uncommon. QEQM Hospital does not meet current targets. Where are the staff coming from to meet the new demand.</p> <p>The road infrastructure in the Birchington area particularly Canterbury Road</p>		1309		Web

						<p>and The Square are overloaded at present. True some will be diverted off onto the new road but any freed up road space will only be filled up by generated traffic.</p> <p>The only jobs that this development will create will be to service the new residents - school teachers doctors nurses shop assistants etc will not provide one new industrial wealth creating job. there are around 4000 unemployed people in Thanet more than enough to satisfy the needs of any employer wishing to establish business here.</p> <p>The people have spoken - we don't want these houses.</p>				
Edmonds	T & JM		362		Object	<p>I consider the building of properties on farmland in Birchington a grave mistake for the following reasons:-</p> <p>1) On leaving the EU we will need more farming land to supply our produce</p> <p>2) The building of properties will only benefit the London boroughs and increase unemployment in this area</p> <p>3) Thanets QEQM hospital will need to be enlarged to cater for assumed 3,000+ population in Birchington, let alone other buildings in Thanet.</p> <p>4) Local surgery will need to be enlarged with more parking area and more doctors etc, to relieve what is overstretched at present</p> <p>5) Water companies will need to supply more water and waste removal at what cost?</p> <p>6) More or enlarged schools</p> <p>7) In future years all services will need to be increased and hopefully government has considered this (Probably not!)</p>		1059		Paper
Egan	Fiona		106		Object	<p>The plan to build over 1000 houses in Birchington</p> <p>1 The. road from St Nicholas can hardly cope with level of traffic at the moment</p> <p>2 The water table cannot cope with more houses .</p> <p>3 the infrastructure of the area would need huge investment to cope with bigger local population no evidence of this happening .</p> <p>4. Where will employment for these extra people come from ?</p> <p>5. The quality of life for all residents will be compromised .</p>		231		Email
Egan	F		337		Object	<p>I have concerns re: the building of 1600 houses around Birchington.</p> <p>1. The infrastructure has not had any great improvement to provide for this.</p> <p>2. The road from St Nicholas to Birchington is very congested at times already.</p> <p>3. Can the water and sewerage cope with such an influx of housing. St Nicholas has problems with sewerage that has not been improved but they are building more homes already.</p> <p>4. What new employment will there be for these new residents?</p> <p>5. Hospitals and schools will be greatly effected by such numbers of new residents.</p> <p>6. Will centre of town like Margate or brownfield sites be used or are they even included in this plan?</p>		1019		Paper
Ellman [?]	Collette		444		Object	<p>The land you are proposing to build on is Grade 1 Agricultural land. We will need this when we have to grow our own crops. 1600 dwellings is an insult to local people, we do not have the infrastructure to cope we can't get G.P appointments as it is. This is not the place to build, yes we need more housing but in the right place &amp; on correct land. The use of this land will increase unemployment which is already high in Thanet. Building in Birchington putting people here from S.E London is going to make Birchington a place that people will not want to visit &amp; bring money to the area. The reason we live here is to get away from S.E London not have the population from there brought here.</p>		1273		Paper

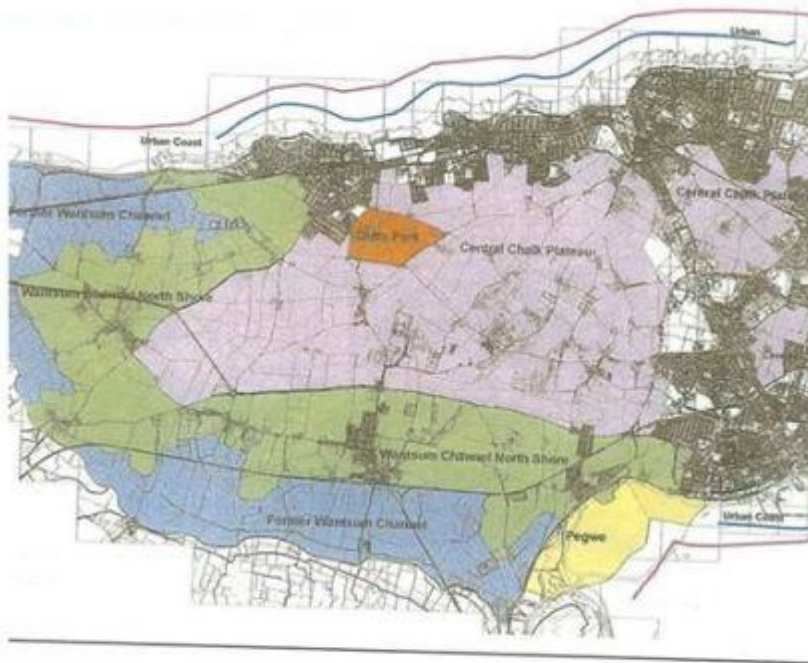
						Yes we need housing but not on Grade 1 land – The local authority needs to upgrade existing stock & use empty property. Birchington will become a slum if this goes ahead. I work in these area's in the community so please do not think that things will be Rosie. There is so much history, wildlife, in this area all of which will be destroyed. Think long & hard if this goes ahead what you are doing to the quality of life for now & the future.				
Faulkner	Maureen		461		Observation	<p>*Has the council taken into account of how much dust this build will create around Brooksend area and how much asthma and people with chest problems will suffer and for how long!!</p> <p>* Will the roads be put in place first? Including side roads.</p> <p>* All the land is Grade 1 agricultural land and needed for food consumption.</p>		1315		Paper
Favell	Dorothy		490		Object	<p>My personal objection is that I have lived in [redacted] since 1977 – I chose this house because it was on the edge of the village; I had no wish to live in the centre of the village, wishing a semi-rural location. [redacted] fitted the bill perfectly and since that time there has been no further outward development of the village of Birchington. In fact, if you look at Google Earth and use the tool to go back in time, the boundaries of Birchington have remained the same since 1940, and probably earlier, with various plots having been infilled with housing within those boundaries. The small area where I live enjoys a wonderful community spirit – most of the neighbours know each other and regularly chat. Dinner parties and get togethers happen often. Generations of children since the houses were built in 1964/65 have enjoyed the safety and freedom of our (once beautiful but now sadly neglected) green, and being a cul-de-sac (with Nottingham Road) we have no through traffic so the road is relatively safe. At the end of both roads we have wonderful views across the open farmland, blighted in recent years by the hideous Thanet Earth development which looks like a factory estate. (One questions how planning permission was ever granted!). Across the Canterbury Road we can again enjoy fantastic views across open fields, with Reculver Towers in the distance. On a good day you can even see Canterbury Cathedral. This view in particular is the one that is iconic of Birchington, especially as the sun is setting. I, and countless other local people, regularly use the numerous public footpaths across the fields for leisure, walking dogs etc. The land is not only used for agriculture but for enjoyment too and quite rightly so.</p> <p>This brings me to my first objection. The draft local plan notes: “The villages retain their separate identity, historic character and have vibrant communities and services” and “the open countryside between the towns and villages remains essentially undeveloped, with a varied landscape, tranquillity and distinctive views”. Strategic priority 4 emphasises the need to “safeguard local distinctiveness and promote awareness, responsible enjoyment, protection and enhancement of Thanet’s environment”. Do TDC actually mean this or just paying lip service? I would refer you to the document attached “Green belt government policy” and to the particular purposes of green belt -</p> <ul style="list-style-type: none"> <li>to check the unrestricted sprawl of large built-up areas</li> <li>to prevent neighbouring towns merging into one another</li> <li>to assist in safeguarding the countryside from encroachment</li> </ul> <p>I would ask TDC how many hectares of precious green belt/agricultural land has already been given up in Thanet over the last 20 years? In my time, the towns have encroached onto what was once farmland – Westwood Cross being a prime example, especially with the most recent contentious development on farmland near Nash Farm (now, not only covered in “rabbit</p>		1371		Email

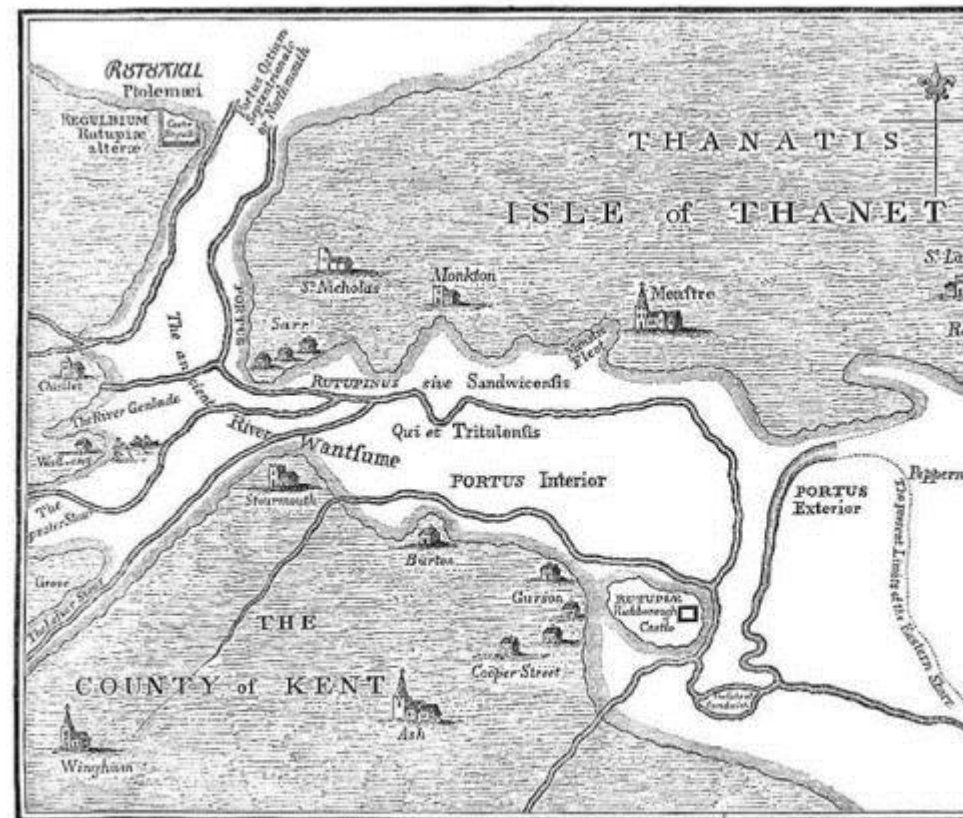
					<p>hutch” houses, but with commercial development also taking place by the likes of Hungry Horse). I would urge you to read this document in full as it contradicts TDC’s plans. Gradually the boundaries of the towns and villages of Thanet have merged. We cannot allow further encroachment onto farmland by extending the outer boundaries of the main settlements. Look on Google Earth and see what the development of Thanet actually looks like and how much land has been lost already.</p> <p>I now refer you to the “Landscape Character Areas” published by TDC in 2012. The opening paragraphs are sufficient proof that the fields of Birchington should not be built upon:</p> <p>The study concludes that the former Wantsum Channel is a landscape of considerable historic importance, providing substantial evidence of centuries of natural physical change, human habitation and management, and that those elements of the landscape are worthy of protection. It also identifies long-held ideas about the Thanet landscape as possessing a gently undulating landscape, with few dominant natural features, shaped largely by arable farming combined with a historical lack of tree cover. Many of the texts comment on the unique openness of Thanet’s landscape.</p> <p>The field study considered an objective and subjective assessment of local landscapes as seen from 67 different viewpoints in and around the district. It concluded that the views of the sea form a particularly important factor in Thanet’s landscape qualities, as the sea forms the backdrop to marshes, agricultural land, urban areas and other landscape areas or features. It also provides a contrasting edge to the open countryside and the built environment. This is enhanced by the flatness of the landscape which enables the sea to be seen from some elevated or particularly flat inland parts of the district.</p> <p>The plots under threat in Birchington all look out over the Wantsum channel with the sea as a backdrop. You cannot allow this landscape to be despoiled. Once built upon, that landscape will be lost forever. Please read the entire document; TDC refresh your memories as there are many relevant points contained therein. The Isle of Thanet Local Plan 1998 included a policy protecting the important visual and environmental quality of major approaches to the Thanet towns and main gateways to the district. The Plan distinguished the landscape and long views, designating Pegwell Bay-Sandwich Bay as a Special Landscape Area, and the Former Wantsum Channel as an Area of High Landscape Value, with protective policies for each designation. It also included a policy protecting designated Local Landscape Areas at the Green Wedge Policy areas, Shottendane Valley (Margate), Gore End (Birchington) and Dent-de-Lion (Westgate). What was important in 1998 is just as important now.</p> <p>Now think about the impact that any development on all the plots relating to Birchington would have on tourism. People arriving by train would have the unedifying sight of a huge housing estate where once there were fields. People travelling by car, coach etc. on the Canterbury Road would see even more of the housing estate spreading across to Quex Park (which, as a main tourist attraction, I’m sure would be affected by this and as a result suffer reduced visitor numbers). Visitors to Minnis Bay in particular, which has always played host to families down for the day, and for longer periods, would be put off by the sight of it and would most likely turn round and go back, or not bother visiting Thanet again. People coming from London, Medway etc. and choosing</p>			
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					<p>to visit Birchington, Westgate and Westbrook beaches don't want to be confronted by urban sprawl. This will have a knock on effect on traders in the village, on holiday rentals, on restaurants and pubs, B&amp;Bs etc. and, ultimately, the whole of Thanet.</p> <p>Next you have to consider the wildlife that lives on or around these fields. The fields are regularly visited during winter months by the Brent geese, especially when wheat has been grown previously (due to the grain left behind). In addition, when out walking, I regularly see (according to the season and the crops) meadow larks, skylarks (they sing and fly upwards till you can hardly see them), corn buntings (very shy) , the increasingly rare brown hares (which my dog when younger tried, unsuccessfully to chase, and I believe should be a protected species)[see <a href="http://www.hare-preservation-trust.co.uk/status.php">http://www.hare-preservation-trust.co.uk/status.php</a> ], dormice, swallows &amp; house martins (see them dipping over the fields catching insects and collecting mud in the rainwater pools), huge murmurations of starlings, spotted flycatchers, greenfinches, goldfinches, collared doves, various species of gulls, a family of jays live at gore end farm, stonechats, linnets, meadow pipits, pied wagtails, kestrels (I can see them hovering over the fields from my garden), rooks, bats, foxes, hedgehogs, and the farm at Suart Lane has beautiful barn owl which may be affected if it's hunting area is reduced; wildlife will be severely affected by any development and this must be taken into account. Just because you don't always see them doesn't mean they aren't there. Agriculture is the friend, and the co-dependant, of much of our native, and migrant wildlife. Bees are increasingly endangered. The crops in these field are co-dependent on bees. If the bees in Thanet disappear so do the crops, and any development of this area, being close to gardens and shrubland where various species of bees live could have far reaching effects. My next objection is that Thanet cannot sustain ANY more development, let alone 17,200 new dwellings, due to the water shortage in this area. We are in a stressed water area...we rely on aquifers for our water supply – build over the aquifers and surrounding farmland, the rain water cannot permeate to the aquifers, and the water supply dries up. Water is a finite resource. We already OVER abstract by +50%. We have no rivers in Thanet for abstraction or reservoirs; we are reliant upon the aquifers. A few years ago during a drought I saw a report where TV cameras went down into a borehole to show the severely reduced water level. It was at a critical level and a hosepipe ban was enforced. This is commonplace and water meters have been forced on us all as a result of the need to preserve water. Please refer to the document “The State of the Water in Kent”. “Our rivers and groundwater provide a finite resource. In Kent we are currently using most of this capacity and in some places, exceeding capacity.” If you refer to “Map 3 Recharge rates per CAMS groundwater unit” you will see that Thanet has one of the lowest recharge rates. More housing and more industry would abstract more water and the density would reduce the amount of rainwater recharging the aquifers. With climate change upsetting the equation still further we must protect the water we have. TDC planning officers said at the recent public meeting that Southern Water say they can cope. I dispute this; as a commercial business with shareholders they are more interested in profits. It is the people of Thanet who will pay the price, with more restrictions on water usage, hosepipe bans during dry spells and high bills. The water must be protected for now and for the future. You also have to consider the knock on effect to the Wantsum channel area, the Minster marshes and the Stour Valley – these areas could dry up. It</p>			
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					<p>would be devastating and irrecoverable, resulting in a loss of habitat for a massive wildlife population.</p> <p>There is an underground stream that runs through plots S498 and S515. The farmer will support this. During winter months or after heavy rainfall there is an area that becomes a pond on the public footpath from Essex Gardens down to Minnis Bay. The fields become quagmires with footpaths too boggy to negotiate. The residents of Canterbury Road, Essex Gardens and Devon Gardens have experienced flooding. There is a pond at Brooks End, and on the Canterbury Road near Court Mount this was once the site of Birchington village pond. Naturally occurring ponds may have been filled in over time, but during heavy rainfall nature takes over. What effect will a housing development have on these areas? Unable to drain through the soil the rainfall run off will cause even more flooding problems. The houses at Brooks End, Canterbury Road, Essex Gardens and Kent Gardens could well find themselves under water. Geological surveys must be undertaken before any plans are passed, but this alone should be reason for agricultural land at Birchington to be discounted. See attachment SFRA volume 1 – it appears proper studies of groundwater flood risk have not been undertaken and one wonders if planners consulted with local people who generally have better local knowledge.</p> <p>And what about sewage? Southern Water appears not to be able to cope now! Every year we have beaches closed due to sewage outfalls after heavy rainfall, and this has a huge effect on tourism, not to mention the health of animals and people. The pumping station at Minnis Bay (Plumpudding) is often blocked – A few years ago, tankers were there for months clearing a blockage and taking away the sludge. This is a regular occurrence. The plots in Birchington have NO infrastructure for water supply, sewage, electricity, gas. The work that would be needed to put these services in place would be immense – how much disruption would that cause, with the heavy plant and equipment involved in such a project? The local people would have to put up with years of this – totally unacceptable. A new housing development on this major road will cause absolute chaos. Again, this will have a terrible effect on tourism. People will just stop coming to Thanet.</p> <p>If you look at the map below you will see the Wantsum flood risk area –that is why Birchington was built on a hill. The Wantsum channel silted up in the time of Elizabeth 1 as she would not pay for the dredging. However, with rising sea levels (look up the floods/tidal surge of 1953) Thanet has the potential to become an island again. When the English Channel was formed by the sea breaking through, an island of chalk was left on the east side of the county. It was separated from the rest of Kent by the Wantsum Channel. The Wantsum Channel was originally up to two miles wide, and as you drive towards the peninsular you can see where it once was. The Channel was protected by Richborough Castle at the western end (built by the Romans) and Reculver Fort guarded the other. The first bridge across to the island was built in 1485 and even as late as the mid 1700's there was a ferry from Sandwich. Over the course of the last millennium, the channel became silted up from the River Stour, and the shingle which was building up along the coast helped join Thanet to the rest of Kent. This is the main reason why the land is so valuable, why it is Grade 1. We must remember that Grade 1 land is rare. See <a href="http://publications.naturalengland.org.uk/publication/35012">http://publications.naturalengland.org.uk/publication/35012</a> The CPRE have produced a response to the draft local plan. I support them fully. The land, where the Wantsum Channel once was, is still only a few feet above sea level,</p>				
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					<p>and in 1953 the island was cut off once more. The sea defences have since been strengthened, but if you walk along the sea walls from Reculver you will see just how low the land lies. Even today there are remains of the small harbours and quays in the villages that bordered Wantsum Channel (and there are remains at Brooks End).</p> <p>Even today it's still called the Isle of Thanet and the people of Thanet consider themselves to be islanders. Will the sea defences hold in the event of a huge surge? Only time will tell, but all those new houses could find themselves under water. Planners have to take geographical and historical facts into account and look at why settlements were built originally where they are.</p> 			
					<p>This ancient map of Thanet clearly shows the ancient Wantsum channel – with rising sea levels are we destined to once again become an island? There are those who would welcome it.</p>			



A MAP of the Rutupian Ports, the ancient course of the Wantsume, and the present course of the River Stour. The space between the Island of Thanet and the County of Kent, formerly covered entirely with water, being now all of it dry land as far as the Eastern Shore at Pepperness.

It would be criminal to destroy this farmland when there are empty properties and land all over Thanet that could be utilised.

My next argument relates to the roads. North Thanet has one road in and out – the Canterbury Road. Birchington is a bottleneck due to the dual carriageway finishing at Brooks End and the mini roundabout at The Square. Every day, and even worse in the summer with day trippers, traffic backs up from The Square all the way down beyond Brooks End, often up to the St Nicholas roundabout. In the other direction it regularly backs before King Ethelbert School to the Westgate traffic lights. Rush hour in Birchington seems never ending but peak times (7am to 10am and 3pm to 7pm) are particularly bad. It is sometimes almost impossible, as a pedestrian, to cross the road, and pulling out of side roads such as King Edward Road can take up to 10 minutes. More housing will only add to the problem and TDC just don't seem to realise the extent of the vehicular traffic on our roads. Accidents happen on a regular basis and only time will tell if the new 50mph speed limit on the dual carriageway from St Nicholas roundabout will reduce their number, the summer months always being particularly bad. Side roads such as King Edward Road, Quex View Road, Park Avenue and Essex Gardens are already used as "rat runs" with people cutting through. These roads were not built for heavy traffic and are breaking up. KCC seem to be failing abysmally in repairing Thanet's roads (filling and patching is not working as the holes just keep opening up again) and eventually whole roads will have to be re-laid. Station Road has just been patched up...there are still potholes as the job has not been done properly. The Square in Birchington is known to be the most heavily polluted area in the whole of Thanet with pollution levels being monitored – what effect must this have on the people who live on this road or nearby? Extra traffic from

					<p>thousands of extra houses will add to the congestion and the pollution. Are TDC and KCC going to compensate the people who suffer health problems such as lung disease?</p> <p>Park Lane, where the local school is situated, is another dangerous and extremely busy road that was never designed for the volume of traffic that it already has to cope with. Pulling out of the junction with Brunswick Road you take your life in your hands and the parents parking outside the school only add to the problem. The junction at the top of Acol Hill has becomes busier and busier over the last few years with cars heading to Westwood...housing on those fields will make the traffic even worse. There seems to be no cohesion between the TDC and KCC who are responsible for highways.</p> <p>Representatives from KCC should have been included in the local consultation meetings...sadly there were no representatives from KCC, Southern Water or any of the utility companies, and TDC appeared, in my eyes, to pass the buck and not take any responsibility for these services. I object strongly to any development being started without a transportation management plan - roads need to be put in place first. In terms of the viability, development costs here and in Westgate will be astronomical to make this achievable. If the local people are to be able to comment on the plan properly then we must have complete answers to these issues.</p> <p>Next. Medical and ancillary services. The Medical Centre at Birchington was put into special measures last year as it was in dire straits. Many doctors and staff left the practise and it still has major problems. Trying to get an appointment is a joke. At least 3 weeks is the best you get. And with 36% over 65, the surgery has to cope with a huge elderly population. This also puts a strain on social services. QEQM Hospital is also in special measures. The Accident &amp; Emergency department has been downgraded – serious trauma has to go (on a long journey) to Ashford. It is said that doctors just don't want to come to Thanet. I have personal experience with a family member of the 2nd rate service at the QEQM (my granddaughter through our insistence was treated at Chelsea &amp; Westminster for a congenital problem that QEQM seemed ill equipped to deal with). An extra 25,200+ (minimum based on 2.1 people per dwelling – a figure given to me by a planning officer) people in Thanet, if 12,000 new dwellings are built, will make the demands on the medical services unsustainable. This will also effect mental health provision, nursing home provision, child protection agencies etc. What provision have TDC made for this as it appears to me to be none.</p> <p>One of the main contentious issues regarding these 12,000 houses is the possible influx of incomers, particularly from London Boroughs. Margate and Cliftonville have been known as “dole on sea”, Kosovan City and numerous other names, due to the area being known as a dumping ground for asylum seekers, people being displaced from London due to high rents etc. TDC have not given us assurances that this will be prevented. Whilst 30% of the housing is designated as “affordable housing” this is misleading – we’ve all realised that this does not mean what we thought it meant. It’s a misleading because it is social housing, not housing that first time buyers can afford to buy, which is the common misconception. Councils think they are fooling us by saying “affordable housing” but we have gotten wise to this</p> <p><a href="http://www.theguardian.com/housing-network/2014/feb/03/affordable-housing-meaning-rent-social-housing">http://www.theguardian.com/housing-network/2014/feb/03/affordable-housing-meaning-rent-social-housing</a></p> <p><a href="https://www.gov.uk/government/collections/affordable-housing-supply">https://www.gov.uk/government/collections/affordable-housing-supply</a></p>				
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					<p><a href="https://www.gov.uk/definitions-of-general-housing-terms">https://www.gov.uk/definitions-of-general-housing-terms</a></p> <p>When questioning the planning officers at Birchington’s drop in, I asked if the remaining 70% of housing would have any restraints as to who could buy the properties. I was told there was no way TDC could put restraints on would be purchasers....so in effect, buy to let landlords, housing associations, London Boroughs etc. could purchase the remaining housing stock and the 30% social housing figure could become 70%, 80% or even 100%.</p> <p>Attached is a document FALP-Inspector-Report – further alterations to the London Plan. From this you will see that London is projected to fall short of its housing needs. This is why the people of Thanet are worried. Why should London allow private landlords to force tenants out so that they can then remarket the properties at high rents and then expect other areas to take those displaced people? Social cleansing is the scourge of London and a disgrace but we should not suffer because of it. In addition, where are those displaced people expected to find work?</p> <p>Thanet is an area of high unemployment and deprivation. An increase in social housing will put immeasurable strain on all services. Lack of paid council tax receipts and an increase in housing benefits will quite possibly bankrupt TDC. Birchington in particular is a village community that would be destroyed by a large influx of incomers, and social housing benefit claimants. We enjoy an enviable community spirit; although a large village, people talk to each other, make friends, help each other out etc.</p> <p>To conclude, I have left out many of the points raised in the local plan, not because I agree with them, but because my main personal concerns are that the proposed use of agricultural land in Birchington should be taken out of the plan, I am questioning the need for 17,200 houses overall, I am disputing the number of jobs forecast, and I advocate Manston Airport remaining as a functioning airport with only aviation related activities.</p> <p>Other documents used in the writing of my objections:</p> <p><a href="https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans">https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans</a></p> <p><a href="http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf">http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf</a></p> <p><a href="http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf">http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf</a> (what a shame TDC did not produce such a worth document!)</p> <p><a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf</a></p> <p><a href="https://excel.office.live.com/x/ExcelView.aspx?FBsrc=https%3A%2F%2Fwww.facebook.com%2Fattachments%2Ffile_preview.php%3Fid%3D647776915348424%26time%3D1425678079%26metadata&amp;access_token=100001906038614%3AAVI7q2PpQZw2J70YinGV7HCb-Dd95VZml8avXRsgEl4h8g&amp;title=Country+of+birth+tables+2008+to+2012.xlsx">https://excel.office.live.com/x/ExcelView.aspx?FBsrc=https%3A%2F%2Fwww.facebook.com%2Fattachments%2Ffile_preview.php%3Fid%3D647776915348424%26time%3D1425678079%26metadata&amp;access_token=100001906038614%3AAVI7q2PpQZw2J70YinGV7HCb-Dd95VZml8avXRsgEl4h8g&amp;title=Country+of+birth+tables+2008+to+2012.xlsx</a></p> <p>This document shows how immigration is affecting the population of the UK – in Thanet we have had an upsurge of immigration in recent years. This is affecting the availability of jobs, and the availability of housing. It is my contention that immigration, which was unfettered during the last Labour administration, and which the coalition government have done little to contain, is having a direct impact on Thanet and the drafting of this local plan. Why should the settled local population have to put up with the consequences of failed government policies? If this link does not open see attached</p>				
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					document. <a href="http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalplanning/815640/">http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalplanning/815640/</a>				
Fearn	terrance		220		Object This development will be built on agricultural land that will in the future be needed for food production, QEQM cannot handle the needs of the local population as it stands and neither can the local Doctors and Dentist surgeries. Local schools also struggle and it is not enough to build new facilities without ensuring there are Doctors, Nurses, Dentists and Teachers willing and able to live and work in the area. Southern Water appear unable to deal with heavy rainfall at the moment and with extra development this can only get worse. Thanet already suffers from a water shortage and again extra development will only make this worse. Where is the employment for the extra people who move into these homes, there may be employment while they are being built but what happens afterwards. However that is assuming that these are not just for the London Boroughs to move their homeless into. Would suggest looking into getting unoccupied and 'run down' properties restored and building on brown field sites before even considering using agricultural land. Thanet could very quickly become another overspill development for London and having lived in Thanet for over 70 years I feel that it would not be a good thing.		667		Web
Fenlon	Fred		386		Object Subject: Spoiling our Village. To Strategic Planning Team. My mother and father chose Birchington in 1977 to live, work and retire because they liked the quiet mood of this village. moved here 8 years ago for the same reason. It sound like what you want is to destroy the tranquillity of Birchington. We enjoy the views over the farm land which we need to provide our food for the future. To have space is what we moved here for. I feel that myself and other people living live here do not want the mess and contamination that the building works will bring. For a lot of these people it is their last years. I think it would be better to build on land not used for farming and to renovate dilapidated and unused housing all over Thanet. I believe there is room for some new homes but not what you propose. I'm told there are over 4000 unemployed in Thanet and you intend to expand that. Are the councils they come from going a pay for them? The landscapes will be destroyed and also the habitat for the wild life that also live here. In summary please rethink your plans to suit village life and not implode on the people who came here for what Birchington is. If you do anything at all it should not to disturb anyone or anything that lives here.		1135		Email
Fenlon	Victoria		424		Object I have been a Thanet resident since moving here in 1984, working at the hospital until retirement.		1206		Paper

					<p>Since 2011 I have been resident at the above address.</p> <p>I am appalled at the proposal to not only build approximately 1600 homes in my village but to use good arable land, producing crops for food each year upon which to put these houses. How is it that such valuable food-producing land, which I believe is protected by law against such builds, is thought to be the area for this? How is it that this law has so conveniently changed to enable the plan; is it the university landowners who profit or someone else receiving a 'back hander' to allow it? Food crops are surely very necessary to feed the already growing population.</p> <p>Will the necessary fresh water source be found to supply the new housing? We are aware that the water in Birchington is precious and in my household we use it carefully.</p> <p>Will the extra schools be provided to educate the extra children through the ages of 5 to 18? Where are the new teachers coming from, that are already in short supply?</p> <p>Our GP surgeries are already oversubscribed and under staffed, as is the Q.E.Q.M. hospital. How will budgets be stretched to build new treatment areas, where can more doctors, nurses and ancillary staff be found when there is already a problem in recruiting?</p> <p>How will our already overstretched accident and emergency unit cope? Where does the money come from to provide more ambulances and crews to man them?</p> <p>What about new roads, sewerage and drainage? What about the infrastructure for all of these houses?</p> <p>Regarding Birchington village itself; life here is pleasant, our excellent parish council work hard to maintain its security and good decorative order. Further, its position with clean, channel-lapped beaches ensures visitors return year-in, year out which boosts local economy. How many will return when our village becomes an over crowded mini-town, losing its character and charm?</p>					
Fenton	Eileen		472		Object	<p>1. We will need all the farm land to feed the people in the future. Shortly there must be alternatives.</p> <p>2. There is no room at the doctors at the moment there is long waiting lists.</p> <p>3. The same goes for the hospitals.</p> <p>4. People enjoy Birchington as a nice quite, safe village at the moment that is why we all moved here. We do not want it big and over populated.</p> <p>5. OLD people feel save as it is.</p>		1337		Paper
Forbes	Jean		361		Object	<p>All below will become so much worse</p> <p>1) It can take 20 mins to get out of my road and traffic queues bumper to bumper to get into the village and parking is already inadequate. When walking the fumes released by cars make me cough.</p> <p>2) It takes 3 weeks to get a doctors appointment and months for a hospital appointment which tend to be cancelled. Ambulances can take over 1hr to get here.</p> <p>3) My grandchildren cannot find work</p> <p>4) When it rains the drains block and I have had Southern Water out to sort this</p> <p>5) We have a shortage of dog pooh bins and I'm sure more homes means more dogs</p> <p>6) The Council haven't emptied green bins for over 10 weeks so how are they going to keep up with the extra bins to empty.</p> <p>7) Thanet people who are employed mostly get basic wage and wouldn't be</p>		1058		Paper



						able to house buy.				
Francis	Vincent		448		Object	<p>As for Birchington, the increase in housing is far above the recommended amount of housing for a village, this will turn Birchington into a town. We also do not have adequate infrastructure in place to handle 1000 new houses, which would be build on Grade 1 agricultural land, which in itself is madness. The local Doctor's can not cope as it is, so how will you allocate all these extra people? The air quality in Birchington will also become an issue, the Square is a main link and is clogged at times &amp; getting worse. Station Road is clogged and getting worse, do you actually think about people having to live in this area at all?</p> <p>Thanet is an area that is considered a potential drought area, you will be making this worse, can our water &amp; drainage cope with these houses? I would like to see proof that Thanet will not be blighted with this increase in housing &amp; that TDC are not gambling with our quality of life</p>		1279		Email
Giddins	Rod		62		Object	<p>Policy SP14 proposes an extra 1,600 houses in Birchington which would increase the population by at least 30%. There is mention of allowing space for an extension of Birchington Medical Centre which is laudable but Thanet already struggles to attract qualified medical staff and general practitioners so the extra population is highly likely to put excessive strain on existing services and facilities. Funding the extension to the medical centre by developer contribution only provides the accommodation, not the required staff. The extra housing would also exacerbate traffic congestion in the village centre, which is already extremely busy and suffers from high levels of pollution.</p>		164		Email
Giddins	Rod		62		Observation	<p>However, if the proposed relief road is constructed from the A28 to Park Lane the impact on the local landscape could be reduced by requiring the road to be in a cutting. In addition, the proposed housing development (if it is allocated for such) should be separated from the existing village settlement by a green wedge which would act as a wildlife corridor and break up the "urban housing mass" when seen on the approach to Birchington. This would also help to retain the long views over pleasant undulating countryside and to Quex Park. The Sustainability Report also makes it clear that there will be an adverse impact on the landscape and ecology of the area (see page E44 of the report).</p>		174		Email
Girdler	Sue		237		Object	<p>I strongly object to the Proposed Local Plan for Birchington. My husband and I purchased a house 25 years ago overlooking green belt, prime agricultural land on the outskirts of Birchington as we wanted to be able to look out over farmland and open countryside. The views from our home have already been spoilt to a degree by Thanet Earth with light pollution being an issue on a nightly basis. The proposed development on prime agricultural land will leave us looking out over urban sprawl.</p> <p>In addition to this, the lack of joined up thinking is likely to impact further on our lives and that of everyone else living and working or looking for work in Thanet.</p> <p>Loss of identity and sense of community for the villages of Birchington, Westgate and Garlinge producing one large town</p> <p>Loss of prime agricultural land for the growing of food crops at a time when the effect of Brexit is yet to be understood – "When considering development proposals ... poorer quality land is to be used in preference to land of a higher quality." (DEFRA, 2017)</p> <p>Air and traffic pollution in the Square in Birchington</p> <p>Increased unemployment - more houses that jobs</p>	<p>Building on Grade 1 Agricultural Land that is some of the best in the Country can not be justified all the time there is poorer quality land and brown field sites available.</p> <p>Future generations have a right to expect Grade 1 Agricultural Land to be protected.</p>	722		Web

					<p>Lack of medical facilities, hospitals are already unable to cope, it can take up to 3 weeks to get an appointment at the local doctors' surgeries. Delays in getting ambulances because they are queuing at the hospital and treating patients in the ambulances until they can be booked in, only to face hours waiting to see a doctor. Even if more surgeries are built and extra hospital capacity provided they need to be staffed, Thanet is no longer an attractive area to move to.</p> <p>Shortage of school places</p> <p>Detrimental effect on the tourist trade of increased traffic congestion, risk of sewage discharges onto our beaches and water shortages during dry periods</p> <p>For people in Birchington it is often quicker to get to restaurants and superstores out of Thanet than it is to reach those in Thanet because of the traffic congestion and total lack of infrastructure</p> <p>Wildlife (including bats) and birds will have their habitat destroyed.</p> <p>The Council would do well to remember that the National Planning Policy Framework – Protecting Green Belt Land states:</p> <p>“The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>Green Belt serves five purposes:</p> <p>To check the unrestricted sprawl of large built- up areas</p> <p>To prevent neighbouring towns merging into one another</p> <p>To assist in safeguarding the countryside from encroachment</p> <p>To preserve the setting and special characteristics of historic towns</p> <p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p>				
Girdler	Mark		239	Object	<p>I object to the number of houses proposed for Thanet and in particular for Birchington.</p> <p>The infrastructure and facilities in Thanet are already stretched and operating over capacity. No new houses should be built in Kent until the facilities and infrastructure are in place to provide for them.</p> <p>It takes 3 to 4 weeks to get an appointment at a doctors surgery and most dentists only carry out private work which is only any good if you can afford it. The A and E department at the QEQM is operating over capacity at most times with waiting times up to 13 hours. These may be a NHS national problem but please explain to me how building 17,140 new houses will help any of the above problems.</p> <p>Thanet has restricted access to the main arterial routes. The queues into Birchington from the A299 are at least a mile at peak times which is bad for the environment and pass right by the proposed new housing site. Birchington square has pollution levels well above recommended levels due to the amount of traffic passing through it. Access through Acol village has just had speed bumps fitted which means more queuing and slow moving traffic causing more and more pollution to the area. The traffic in the Westwood cross area is a complete nightmare and to be avoided at all times let alone peak times. We tend to head west from Birchington to Herne Bay and Canterbury and avoid Westwood as much as possible.</p> <p>The government has allowed far too many people into the country. It does not</p>	Grade 1 Agricultural Land should NOT be built on.	725		Web

						<p>matter what colour, race or religion the numbers are just too great and affecting the quality of life of the local population. Building more and more houses will only make the situation worse and put an unacceptable level of demand on an already stretched water supply and sewage treatment in the area.</p> <p>The council applies strict rules on multiple occupation accommodation to avoid overcrowding and this is regardless of the numbers of people requiring housing. The same should be applied to the whole of Thanet with regard to single dwellings to avoid overcrowding.</p>				
Gooby	AR		270		Object	<p>Building on Grade 1 agricultural land is a crime to this country. Why not use all these empty buildings and brown field sites, most of which are in the towns leaving the fields free to grow our food as we leave the EU. They may make it difficult and more expensive to by food from them. What would happen if we where to fall out compleatly with a country and not have the option to trade or buy food at all.</p> <p>If a lot of the housing is to become social housing from London where are the jobs for them and the people that we already have unemployed (highest unemployment in the country).</p> <p>QEQM can't cope with what it has got now even with the proposed extension to A&amp;E. it is also closing the stroke unit to pay for it.</p> <p>If the housing where to be built in the Midlands there would be more chance of employment. By building over landeven more rainwater will be lost so another water treatment plant will also need to be built.</p>		809		Email
Gooby	Rosemary		350		Object	<p>My greatest concern regarding the proposed plans for up to 1600 new dwellings is that these buildings are planned to be located on Grade 1 agricultural land, the fifth best in the country. We need to be preserving this land for agricultural use, especially as we leave the EU. We need to increase self sufficiency and we also need to have control over how our food is grown.</p> <p>My next concern is the burden that an influx of potentially 4-7 thousand new residents will add to our already overstretched health and education systems as well as essential services - water, drainage, sewage.</p> <p>Other concerns are: traffic congestion and air pollution, particularly around the Village Square; there is no proposal for extra secondary school places; leisure facilities have not been mentioned - an increasing young population will need sports facilities and youth clubs.</p>		1042		Email
Goodwin	Raymond g	none	376		Object	<p>I consider G.B. to be gradually more and more dependant on the supply of foreign food, with world agricultural land diminishing due to climate change. One of the major causes of this is over population, each human being breathing in oxygen and converting it into carbon-dioxide on expiration. Reducing child benefits but supplying free school meals would discourage excess childbirth as the parents would not be able to incorrectly use the child benefit!</p> <p>People like myself could do loft conversions making the property multi-occupancy, providing financial help was available, lessening the need to build on agricultural land. Help given (financial) would allow farmers to multi - crop each year.</p> <p>Water which is in a precious supply in Thanet would be further rationed and not then available to the farmer, due to increased density housing, when all facilities, hospitals, medical/dental services are limited and further stressed by increased population. Even shops will be overloaded and unable to compete fairly with supermarkets.</p>		1080	<a href="#">#169 Goodwins Raymond.pdf (438 KB)</a>	Paper

						Building on airport land would add to the 1600 houses planned, further devastating the current limited facilities of present population! [Two attachments accompany this representation - file attached]				
Hambidge	R		343		Object	<p>I am writing to oppose the Local Plan for housing on sites at Westgate-on-sea, Garlinge and Birchington.</p> <p>The proposal to build thousands of houses on Grade 1 agricultural land adjacent to these three communities is in my view barbaric. Our local farming community is precious and should be awarded protection not only for the preservation of local jobs, wildlife and for our future but once that Grade 1 agricultural land is built on there will be no turning back.</p> <p>I have lived in Thanet all of my life. Over the years my family and I have witnessed the barbaric loss of several delightful and architecturally stunning buildings to the greed of various developers in our lovely little town by the sea. Local bodies were not quick enough to award these historic buildings with listed status and now they are gone forever.</p> <p>I fail to understand why the term 'Local' is used to describe this plan. It neither represents the needs of the local people or any growth in our population. This plan only represents the needs of other areas who have failed to make adequate provision for their growing housing problems.</p> <p>The strain on the local Doctors (oversubscribed by 200 patients already), Dentists, Hospital, Mental Health Unit and Police would be unbearable. The A &amp; E Department at QEQM. is already overstretched and now we have looming over us the loss of the stroke emergency care to Ashford a good hours drive away if the traffic allows.</p> <p>Our local primary schools cannot accommodate the number of applicants each year as the population stands at present and the promise of another infant school for Westgate quite honestly does not quell my fear for the future educational needs of this area.</p> <p>It has been stated by Southern Water that Westgate does not have the capacity to either supply water or dispose of waste water for the number of housing proposed in the earlier Local Plan, even greater numbers of houses on the new Local Plan can only exacerbate this problem.</p> <p>In the new local plan the projected new jobs in Thanet is 5,000 and the planned additional housing is 17,500 meaning probably a 35,000 addition to the population. These projections only spell one thing; many thousands of people either unemployed or having to commute out of area. If Westgate-on-Sea has the additional 2,000 houses as in the new local plan that equates to 4,000 people trying to exit Westgate to get to their place of work because it will not be in Thanet.</p> <p>Westgate-on-Sea has a small Railway station with no parking facility so good luck to any commuters with your walk to the station and back after your long day at the office.</p> <p>Please rethink your plan. If more housing is absolutely needed, which I doubt, especially the numbers, they should be placed in an area that has easier access to out of the area i.e. The Thanet Way.</p>		1028		Paper
Hambidge	L		345		Object	<p>I am writing to oppose the Local Plan for housing sites at Westgate-on-sea, Garlinge and Birchington.</p> <p>I have lived in Thanet all of my life Over the years our family have witnessed the loss of</p> <p>architecturally stunning buildings to the greed of developers in our lovely towns. Local bodies were not quick enough to award these historic buildings</p>		1032		Paper

					<p>with listed status and now they are gone.</p> <p>The proposal to build thousands of houses on Grade 1 agricultural land adjacent to these three communities is in my view barbaric. Our local farming community is precious and should be awarded protection not only for the preservation of local jobs, wildlife and for our future but once that Grade 1 agricultural land is built on there will be no turning back I fail to understand why the term 'Local' is used to describe this plan, it neither represents the needs of the local people or any growth in our population. This plan only represents the needs of other areas who have failed over the years to make adequate provision for their growing housing problems.</p> <p>Southern Water has already stated that water supplies "half of demand" by 2030 and will be looking to encourage customers to use less even though here in Kent we the customers are among the most water efficient in the UK.</p> <p>Southern Water on the other hand is the worst water company for complaints as broadcast recently on local radio from official statistics. It has been stated by Southern Water that Westgate does not have the capacity to either supply water or dispose of waste water for the number of housing proposed in the earlier Local Plan, even greater numbers of houses on the new Local Plan can only exacerbate this problem.</p> <p>If the Government dictates to local Councils, these houses should be built then the infrastructure should be put in place first and funding supplied by the Central Government.</p> <p>Road building should be completed before house building starts. Thanet's roads are greatly congested and many in desperate need of repair. When repairs are made or when one main road is closed for repair, installations or accidents there is mayhem on all other roads with traffic at almost standstill. The strain on the local Doctors (oversubscribed by 200 patients already), Dentists, Hospital, Mental Health Unit and Police would be unbearable. The A &amp; E Department at QEQM. is already overstretched and now we have looming over us the loss of the stroke emergency care to Ashford a good hours drive away if the traffic allows.</p> <p>Our local primary schools cannot accommodate the number of applicants each year as the population stands at present and the promise of another infant school for Westgate quite honestly does not quell my fear for the future educational needs of this area.</p> <p>In the new local plan the projected new jobs in Thanet is 5,000 and the planned additional housing is 17,500 meaning probably a 35,000 addition to the population. These projections only spell one thing; many thousands of people either unemployed or having to commute out of area. If Westgate-on-Sea has the additional 2,000 houses as in the new local plan that equates to 4,000 people trying to exit Westgate to get to their place of work because it will not be in Thanet.</p> <p>Westgate-on-Sea has a small Railway station with no parking facility so good luck to any commuters with your walk to the station and back after your long day at the office.</p> <p>Should any of the proposed housing go ahead the very least that should be demanded is a park. There is not one park in either, Westgate on sea, Garlinge or Birchington . There are two or three recreation grounds (NOT Parks) and in consideration to the fact that you will be removing the local open space which is a requirement to maintain the quality of life, it is vital that part of the plan</p>			
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						for Westgate on sea, Garlinge and Birchington incorporates at least one decent sized park. Not much to ask when you consider that Margate has the luxury of three parks. Please rethink your plan. If more housing is absolutely needed, which I doubt, especially the numbers, they should be placed in an area that has easier access to out of the area i.e. The Thanet Way.				
Hardy	Vivien		123		Object	<p>I am writing to place my objections and concern regarding the local plan. It is concerning that grade 1 land is included in this plan as once built on there is no return.</p> <p>Our roads are already under strain living on the Canterbury Road the traffic is non stop and at peak times often at a standstill. More houses will mean more traffic causing even more problems.</p> <p>Our water table will not be able to cope</p> <p>Our hospital is under threat to lose its stroke unit when it could take at least 50 mins to get to Ashford hospital when we now how important those first 30 mins are</p> <p>We have a doctor shortage</p> <p>Inadequate roads or infrastructure</p> <p>And not enough work</p> <p>I understand that homes need to be built but on this scale it is madness</p>		277		Email
Harrington	Brian & Maureen		475		Object	<p>We agree with all the items on the attached papper as reasons not build houses.</p> <p>Food, Special Soil &amp; Countryside</p> <p>1. This is Grade 1 Agricultural land. (Natural England} The soil quality is amongst the top fifth in the country. (CPRE) ',</p> <p>2. Only 60% of food consumed in the UK is home-grown. (Nat Farmers Union, 2018)</p> <p>3. The figure is expected to fall to 53% by 2040s. (NFU, 2018)</p> <p>4. That 53% will have serious implications for the economy and unemployment (NFU)</p> <p>5. "We think that it is perfectly reasonable to look at halting the decline in self sufficiency and reversing it.11 (NFU) But that won't be done by building over it.</p> <p>6. Food security will be under greater pressure, with a prospective increase in the UK population of 13 million by the.2040s. (NFU)</p> <p>7. Climate change and market volatility plus the possible stance of hostile nations in the future may make farmland of Thanet's calibre even more precious.</p> <p>8. The standard of imported food may be lower than our own.</p> <p>9. Future generations may be deprived of Thanet's remaining countryside. Our legacy to them will be urban sprawl.</p> <p>10. The extent of the proposed 1,600 new homes for Birchington would radically alter the village's character.</p> <p>11. Birchington's population is 10,000. This new influx will add 3,000 - 4,000 (Birchington Residents' Association)</p> <p>12. Much of the proposed development may be to cater for homeless people from London boroughs.</p> <p>13. 85% of people in 2015 wanted to see supermarkets selling more food from British farms. (NFU)</p> <p>14. London's population is about 8.8 million, and is expected to reach 10 million by the early 2030s. Extra farmland that is more than one and a half times the size of London will be needed to grow the food for Londoners by 2031. (Office for Nat Statistics, Sept 2017)</p>		1340	<a href="#">#181 Harrington B &amp; M attachment.pdf (116 KB)</a>	Paper

					<p>Biodiversity This development will destroy wildlife habitats, including hedgerows. Endangered species such as sky-larks wm be at greater risk.</p> <p>Infrastructure 9/29/2018                                      Mail - John Repsch - Outlook</p> <ol style="list-style-type: none"> <li>1. Even 15,000 houses could mean 4 people per house; that's an extra 60,000 people who need jobs, schools, hospitals, water and other essential services, and would swell Thanet's population by a third. (David Steed, Thanet Gazette, 2017)</li> <li>2. This is already inadequate in providing Thanet with enough schools, social services and public transport.</li> <li>3. QEQM hospital can't cope with current demands.</li> <li>4. Birchington Medical Centre can't cope with current demands.</li> </ol> <p>Water</p> <ol style="list-style-type: none"> <li>1. "Thanet is vulnerable to water shortage and low rainfall."(CPRE)</li> <li>2. Aquifers are low at times of drought, increasing probability of hosepipe bans.</li> </ol> <p>Water bills may rise.</p> <ol style="list-style-type: none"> <li>3. Since 2011, there have been numerous reports of Southern Water being unable to cope with heavy rainfall, and fined for illegal discharges into sea around Thanet.</li> <li>4. Widespread concreting makes more water run into drains. This water requires more filtering.</li> <li>5. Heavy rainfall can increase risk of flooding.</li> <li>6. Planting trees reduces risk of flooding.</li> </ol> <p>Unemployment</p> <ol style="list-style-type: none"> <li>1. The loss of farmland to housing will increase unemployment.</li> <li>2. Thanet's 4,020 unemployed is the highest in Kent. (Office for Nat Statistics, Aug, 2018)</li> </ol> <p>Air Pollution</p> <ol style="list-style-type: none"> <li>1. The Square is the most polluted spot in Thanet. (TDC)</li> <li>2. The proposed new roads will attract more motorists into Birchington.</li> <li>3. Building more roads and widening others simply attracts more cars onto the roads and fewer passengers onto public transport. Cars fill the space they are allotted. (Friends of the Earth)</li> </ol> <p>For many, the views of the local countryside, including Reculver, will be replaced by views of roof-tops. Natural landscapes are not enhanced by covering them in tarmac and concrete.</p> <p>Alternatives</p> <ol style="list-style-type: none"> <li>1. Restore run-down properties. There are more than 1,000 long-term empty houses in Thanet. (Kent online, Oct 2oi 7) This is also more sustainable because it uses much less greenhouse gas than new-build.</li> <li>2. Disallow current properties to remain empty for more than six months.</li> <li>3. Use brownfield sites.</li> <li>4. Use financial incentives to encourage sole occupants of large properties to down-size.</li> <li>5. Encourage conversions of empty rooms above shops.</li> <li>6. Encourage the renting out of flats and bed-sitting rooms.</li> <li>7. Housing could instead be built using cheaper sites in the Midlands and</li> </ol>				
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						the North, where brownfield sites in previous mining villages abound, as do rugged sites which are unsuitable for agriculture. (Money Week) 8. "When considering development proposals ... poorer quality land is to be used in preference to land of a higher quality." (DEFRA, 2017)				
Harris	Wayne		352		Object	Losing Grade A farming land increasing unemployment. There are not enough schools in the area. The local hospital are under increasing pressure to cope so more people coming into the area will not help. I don't want to see the local area spoilt and we cannot afford to lose valuable top grade A farming land		1044		Paper
Harwood	E M		351		Object	I am totally against your plans for the building of thousands of houses in Thanet, particularly in Birchington where I live. All these new houses are to be built on top grade farmland, which is the fifth highest grade soil in the country. How is the country supposed to feed it self when the land is covered in concrete? Secondly where is the water to come from that all these extra people will need? Southern Water have no control of our water after it leaves Ashford 30 miles away. Our water quality at present is poor because of us being built on chalk which is very free draining and has large cracks in it. Also we are usually one of the first areas to get a hose pipe ban in the summertime. Another problem will be, effectively treating the extra waste water that will be produced. Thirdly, where are the thousands of people going to find work and be able to support themselves? We already have the title "Dole on Sea" and a lot of the work already in Thanet is on 'zero hours contracts' and people cannot plan their lives on that basis, nor can they live on it. Sea levels are rising and any new houses built in the Minnis Bay area in Birchington could be badly affected by flooding, as are the residents already living there. Fourthly, what plans are in place to provide all the extra medical aid people will require? Our hospital has difficulty coping now and we are already going to lose our stroke unit. Doctors surgeries are already overloaded with patients and several have closed all over Thanet. How will you cope with that situation especially with the thousands of extra residents? Also trying to get a dentist is a very great problem for many people at present. So what for the future? You must not keep concreting over our precious farmland and government needs to be made aware of this.		1043		Paper
Haydon	Trevor		309		Object	While it is vital that Thanet District Council considers the needs of the district for the coming years, and has consulted with residents about the content as presented, I cannot agree that this draft represents the views of Birchington residents, as expressed in response to the earlier draft, and neither does it take into account my own concerns that: "They make use of rural,	Scrap plans to put housing on productive farmland	920		Web



					<p>green field, agricultural land a resource we'll never be able to recover". Further to my comments you also appear to have disregarded the comments of our own MP Roger Gail who states: "These proposals appear to conflict with Policy SP26 and "the Protection of Open Space". Further, we must now consider, in light of recent developments in regard to Europe, whether it is justifiable or right to take farmland out of production (this is, after all, land that is currently being farmed - it is not lying dormant) in order to build more houses and the infrastructure to support them. I, therefore, raise the following, more detailed, concerns:</p> <ol style="list-style-type: none"> <li>1. The numbers of houses to be built in Birchington have increased to 1,600 - There were considerable objections made to the building of a much lower number of houses in the earlier draft, the increase in house numbers brings with it the need to reconsider every other aspect of the plan for Birchington and the village's ability to provide for the needs of increased population.</li> <li>2. Increased water consumption - Although it has not been necessary, at least in recent years, to impose hosepipe in Birchington, the additional houses and more specifically, residents, will make this less likely as population increases.</li> <li>3. Increased congestion and air pollution - The A28, which passes through the village carries a lot of traffic and the draft plan points out very clearly "Birchington Square lies on the main route to Margate for those travelling into the district from the west, and as such at peak times suffer from traffic congestion. This has also resulted in the area suffering from higher levels of air pollution." You have not considered the impact this will have on the current population. The A28 will experience increased traffic congestion, particularly in the summer months when queues currently extend beyond the village boundary and Birchington Square will suffer even greater levels of air pollution.</li> <li>4. Increased waste - Water, Sewage and Refuse collection requirements will increase leading in any event to increased land-fill and water treatment. Does it raise the question of whether the number of sewage outflows would increase during inclement weather?</li> <li>5. Impact on wildlife - This development will destroy existing habitats, diminish opportunities to provide additional hedgerows and impact endangered species such as Sky-larks. The farmers in the local area currently make provision for the bird population by leaving a proportion of the land (at field boundaries) to form wildflower meadows.</li> <li>6. The character of the Village - Birchington is able at present to maintain its "village" feel (just), 1600 additional homes, retail provision, school and enlarged medical centre would threaten this designation.</li> <li>7. Employment - Where will the additional jobs come from and can we guarantee that such jobs as are created go to local residents who will need them?</li> <li>8. Birchington Medical Centre is currently understaffed - I cannot believe that increasing population will help them cope when there is no sign of them doing so now.</li> </ol>				
Hickman	Jane		313	Observation	<ol style="list-style-type: none"> <li>1. Grade 1 Agricultural land</li> <li>2. Employment</li> <li>3. Thanet remaining countryside for future generations will be gone forever</li> <li>4. Infrastructure. Sewerage. We always have flooding in our road, when it rains. No ground for drainage To much cement, tarmac No gardens</li> </ol>		927		Paper

						<p>5. Birchington Medical Centre under pressure now all these families</p> <p>6. 60,000 ? We need jobs school hospital water etc.</p> <p>7. loss of farmland will increase unemployment</p> <p>8. Air pollution</p> <p>9. Views of countryside lost</p> <p>Alternatives</p> <p>Rent out flats Restore run down properties</p>				
Hudson	Camilla		328		Object	<p>1) This is Grade 1 Agricultural Land</p> <p>2) We import 40% of food</p> <p>3) Selficiency will no be possible if we concret over Grade 1 soil</p> <p>4) By 2040 it is projected the population will increase by 13 million</p> <p>5) Proposed development will increase populations in Birchington by 3000-4000</p> <p>6) Road can't cope now, proposed roads to nowhere</p> <p>7) Q.E.Q.M. can't cope now</p> <p>8) Birchington medical centre can't cope, badly operated another subject</p> <p>9) Water &amp; sewage (where is it coming from and where is it going</p> <p>10) Air pollution in Square worst in Thanet</p> <p>11) Destruction of habitats &amp; views</p>		1007		Paper
Hudson	P		333		Observation	<p>My husband + I moved to Birchington many years ago + have never lived in such a friendly place. We know our neighbours well, which in this day + age is a rarity, when we go to the village people smile, say hello. We feel content and safe here. So many of the villagers have grown up together or gone to the same schools.</p> <p>Thanet has the highest unemployment in Kent, so how do you propose to create employment for the families who will move into these houses. Unemployment leads to even more problems.</p> <p>Why build on quality farmland, if you look around Thanet alone there are so many large, unoccupied buildings that could be converted for rental ie how long has the B.Gas building + land* been unoccupied, * Boundary Road, Ramsgate? A time limit should be imposed on these buildings left unoccupied before they have to be sold.</p> <p>Talk to residents who occupy huge houses who want to move/downsize, who cannot afford to, offer some form of incentive! This would free up houses for families.</p> <p>Birchington Medical Centre is under huge strain already + struggles to give patients appointments less than 2 weeks away. How will this will be workable if the population rose dramatically? peoples lives will be at risk! These proposed houses will not be for the sole benefit of local people, will they be houses for the London borough overflow? Birchington struggles with to cope with the incoming traffic now, so how will it cope with the extra traffic + pollution. Birchington should be left alone, remain a village, we want to be able to enjoy fresh air, to enjoy open spaces, to enjoy wildlife, to have medical assistance when needed + all this for the future. DO NOT BUILD ON OUR LAND!! PLEASE!!</p>		1015		Paper
Hudson	Neville	Birchingt on Parish Council	442		Object	<p>Submission from Councillor Neville Hudson Birchington Parish Council</p> <p>In studying the amended local plan, it appears that very few of the objections and submissions made to the previously published draft have been properly considered. No clear evidence is given for this.</p> <p>Example, petition and letters from people in Birchington against the</p>		1269		Email

					<p>substantial number of proposed new houses, is not only ignored but housing numbers are increased to 1600 on grade one agricultural land.</p> <p>Have all brown field sites and other development opportunity sites including empty housing within Thanet been considered, properly researched, with a reasoned view to reduce new development on our open countryside. Not enough evidence to support this.</p> <p>No evidence is offered as to how appropriate medical services and social services will be delivered for the proposed increase in population. The current services are already stretched to breaking point, with unacceptable waiting times to see the Doctor that that patients are registered with. Care in the community is often stretched in ways that make life very difficult, for the particularly large percentage of elderly people in Birchington to receive adequate time from care professionals, to suit their many needs. It has been announced that QEQM Hospital is already losing some vital services. The plan in some way should guarantee the future of a Major properly resourced hospital in Thanet.</p> <p>No evidence is offered to deal with the number of young people who will be needing secondary education within the plan time scale. Already local secondary schools are stretched and have little If any additional capacity for pupils above their existing entry numbers.</p> <p>No evidence is included in how Thanet water resources will be able to provide adequate fresh water for the huge increase in housing across the Island, it is well documented that we have potential shortages of this important resource; this is also true for on- and off-site drainage. To say that the utilities will be consulted and deliver the resources needed is not good enough. Details of Positive costed plans that are guaranteed to be deliverable, should be included in the submission.</p> <p>The Highway proposals around Birchington are welcomed and should reduce the continued environmental problems in Birchington Square. The proposal for one-way traffic in Park Lane will be helpful but is incomplete in not recommending routes for traffic to use in the opposite direction.</p> <p>It is suggested that all the new roads will be resourced from the proposed housing development this is only reasonable if some of development planning gain resources are used to improve the quality of life for Birchington Residents.</p>				
Hudson	Maureen	Birchington Residents' Association	454	Object	<p>Birchington Residents' Association objected most strongly in a petition to the proposed building of new homes on Grade 1Agricultural Land. The original quantity of dwellings put before us has now increased considerably.</p> <p>The demands on Birchington Medical Centre will increase considerably. The Medical Centre at this present time is finding it hard to cope with the population as it stands at this present time, so any increase in patient numbers will cause immense problems for Doctors, Staff and Patients.</p> <p>Patients are already finding it difficult to get appointments with a Doctor, this will only get to an unacceptable level.</p> <p>Traffic will increase dramatically, with possibly two, three or four cars per household. How will the roads in Birchington cope with this increase.? Parking in Birchington at this present time is difficult. This will affect our local shops as Westwood Cross will be very inviting, with free car parking for any length of time.</p> <p>Schools in Birchington are at near capacity, how will they cope with an influx of the many pupils that will require to be educated.</p> <p>Water is a necessary commodity, where will the water come from that will be</p>		1301		Email

					needed to serve the many new homes. Area's for young people to enjoy freedom are needed, with the proposed plan to build 1600 houses will deem this impossible. Members of Birchington Residents' Association object most strongly to the proposed increase in the numbers of houses to be built on our beautiful countryside. Once houses are built and concrete laid it can never be reversed.				
Hurst	Rosemary		505		Object I moved to Birchington three years ago to enjoy a peaceful way of life in retirement - like many other people, I feel that Birchington's character will change completely, for the worse. The farmland is necessary for the people living here to be able to have access to food easily, also there will be great pressure on the NHS services and schools places. it will change the character of Birchington which is not meant to have a much larger community and bring in lots of social problems that occur with a community that will only move to Birchington for housing.		1421		Paper
Iles	Joanne		319		Object I write to express my grave concern regarding the Local Plan for 1,600 homes as proposed to be built in Birchington. The land earmarked for this is Grade 1 agricultural farmland and as such vital to the future sustainability for food production, integral to this is the level to which the water table needs to be maintained. Once this land is built on it cannot be reversed. In addition I am aware of a large number of houses and flats which are unoccupied and I am not convinced that Thanet District Council have exhausted all opportunities to bring these properties back into full use including Compulsory Purchase Orders. The housing market in Birchington is continually fluid and there is a regular quantity of properties for sale, does a demand for extra housing exist? This brings me to the next problem, the local amenities are currently stretched so without substantial investment the doctors surgery, schools and local road network simply will not cope with the additional numbers of people. I oppose this proposal and trust you will support the views of the local community by rejecting it too.		974		Email
Iles	G		394		Object Letter of objection - The Local Plan - Reference Birchington I write to express by grave concern regarding The Local Plan for 1,600 homes as proposed to be built in Birchington. The land earmarked for this is Grade 1 agricultura l farmland and as such vital to the future sustainability for food production, integral to this is the level to which the water table needs to be maintained. Once this land is built on it cannot be reversed. In addition I am aware of a large number of houses and flats which are unoccupied and I am not convinced that Thanet District Council have exhausted all opportunities to bring these properties back into full use including Compulsory Purchase Orders. The housing market in Birchington is continually fluid and there is a regular quantity of properties for sale, does a demand for extra housing exist? This brings me to the next problem, the local amenities are currently stretched so without substantial investment the doctors surgery, schools and local road network simply will not cope with the additional number of people. I oppose this proposal and trust you will support the views of the local community by rejecting it too . Yours sincerely		1156		Email
Isherwood	John		223		Object This housing will increase Birchington's population by up to 40%. Main roads are inadequate at the moment, the increase in road traffic will be a disaster.		674		Web

						<p>The proposed link road from the A28 to the Minnis Road will not have an effect on the traffic going down the A28 to and from The Square, where currently traffic jams happen every single day, this proposed additional housing will only serve to increase the number of such traffic jams. Birchington Medical Centre can't cope with its current level of work. This is an unemployment black spot, where are all the jobs going to be created for these new residents, The land being used is high quality farm land, poorer quality land should be used i.e. TDC seem to have this dream that one day Manston will be a thriving airport, its a dream, it won't ever happen, so why not use what is essentially a very large brown field site to develop a whole new community, the developers to fund new schools, improved road and rail access, medical centres etc. The current views from Birchington looking out towards Reculver are stunning, this plan will turn those views into a concrete jungle. Overall a poorly thought out plan that I do not think reflects the views and wishes of the people of Birchington, who you are meant to be representing.</p>				
JACK	JAMES	Mr.	276		Object	<p>I strongly object to the proposals outlined in the Local Plan as they affect Thanet and Birchington in particular. The proposed housing developments will impact adversely on the overall quality of life in the District and indeed on the wider community. Specifically:-</p> <ol style="list-style-type: none"> <li>1. Unemployment in Thanet is high. A substantial increase in housing stock will inevitably exacerbate the situation.</li> <li>2. In general terms the local infrastructure is currently wholly inadequate for the existing communities in Thanet. There will have to be massive investments to provide additional schools, hospitals, roads, GP surgeries, retail outlets, water, energy supplies, transportation etc.</li> <li>3. If implemented, the proposals will adversely affect the air quality in local areas which are already heavily congested.</li> <li>4. The reallocation of top quality agricultural land for housing is a serious mistake. Surely, given the inexorable increase in the country's population in coming years, the need to retain high yielding agricultural land must be a paramount consideration. The prospect of the UK leaving the EU soon can only add weight to this argument.</li> </ol>		818		Paper
Johnson	Elisabeth	Monkton Residents Association	51		Observation	<p>Providing a new school at Birchington may help provided places but it will not help the traffic situation as many of the children who will have to use it will come from other rural areas where the schools are already full but large amounts of development are intended to take place.</p>		128		Web
Kildaras	Polly		390		Object	<p>Hello, I am writing to voice my opposition to the local plan of building in Birchington on Sea, Kent. For several reasons:</p> <ol style="list-style-type: none"> <li>1. Cannot afford to lose green, open space-it can NEVER be made green again. So important.</li> <li>2. Infrastructure cannot cope with more people, cars, rubbish, etc. Our schools, hospitals &amp; roads are already up and over capacity.</li> <li>3. Water- our supplies are already at breaking point without adding many more thousands of consumers.</li> <li>4. Beauty and character of the village will disappear under the weight of people, losing it forever.</li> </ol> <p>I believe that any building (and especially low cost housing) should be concentrated in inner cities, like Margate. Re-generate the town centre by tearing down dilapidated, empty, filthy buildings and replacing them with underground parking, and multi-storey flats, modern and affordable. This not only provides low cost living places, but it revitalizes the town centres, creating</p>		1141		Email

					<p>jobs, and vibrancy within the town centres, instead of fostering destruction and loathing of even visiting them. The most important reason for doing this is keeping green spaces GREEN and beautiful for all to enjoy. Forever. Really, its quite simple to achieve with a bit of common sense.</p> <p>Please reconsider and count my opposition as a resident of Birchington on Sea, Kent.</p>				
Kingsman	Barry		152	Object	<p>I attended a meeting of residence at Birchington Centre recently. A was appalled to be informed, that far heeding any concerns we had about the sustainability of the previous draft plan, you are proposing increasing the number of houses for Birchington.</p> <ul style="list-style-type: none"> <li>• It would appear Thanet is having to accept a far higher proportion of the houses proposed for surrounding as a whole.</li> <li>• Birchington cannot cope with the 1600 houses planned.</li> <li>• We do not have any spare capacity of water at present to supply the area.</li> <li>• There is insufficient infrastructure at present; some services are stretched to the limit.</li> <li>• There mention of another entry level school, but</li> <li>• The senior schools would not be able to cope. They are full and have a waiting list!</li> <li>• The proposed relief roads do not appear to having any funding at this stage.</li> <li>• The A28 through Birchington is at the moment, gridlock everyday, and as a consequence we have some of poorest air quality in the area, by your own admission, this will only make it worse and endanger the health of it's residence.</li> <li>• Thanet has one the highest unemployment levels in South East. Where are the jobs?</li> <li>• Doctors Surgery close to breaking point at present and its getting worse.</li> <li>• 30% Social housing is far more than the councils own waiting list, so these will be filled by people from out of there area.</li> <li>• Our social services will not be able to cope.</li> <li>• All this at the expense of our Green Belt some of the best agricultural land in the country.</li> <li>• Why not utilize the large number of empty and derelict properties already in certain areas of Thanet as well as Brown Field sites</li> <li>• A very concerned resident.</li> </ul>		423		Paper
Kingsman	Janet		154	Object	<p>I attended the residents meeting on the 14th September and was shocked to hear that TDC are trying to have approved a Draft Local Plan that has now increased Birchington to 1600 homes, where is the logic in that.</p> <p>What notice have they taken from the residence of Birchington from the objections from February 2015. they have simply added more house. where is the justice in that.</p> <p>No Environmental Impact Assessment has been made</p> <p>Inadequate infrastructure: schools, social services, doctors, hospitals, public transport and roads the list goes on.</p> <p>The A28 in Birchington is unable to cope with traffic now</p> <p>Birchington has the poorest quality air by your own admission</p> <p>Thanet has the finest quality farmland in Kent and England.</p> <p>When BREXIT comes next march we are going to need our farmland to produce more crops.</p> <p>30% Social housing is far more than the councils waiting list, so these are going to be filled from people out of our area, another drain on our Council</p>		425		Paper

					<p>taxes.</p> <p>Wildlife habitat will be destroyed</p> <p>Aquifers are low at times of drought.</p> <p>Increase probability of hosepipe bans</p> <p>Widespread concreting makes more water into drains.</p> <p>Increase risk of flooding.</p> <p>Our legacy to future generations: urban sprawl.</p> <p>Thanet has the one of the highest unemployment levels where are all these people going to work!</p> <p>What is wrong with making use of all Thanet's empty properties?</p> <p>A very concerned resident</p>				
Langford	Andrew		170	Object	<p>I object on the following grounds:</p> <p>This is grade 1 Agricultural Land (source: Natural England). The soil quality is amongst the top fifth in the country</p> <p>Only 60% of food consumed in the UK is home-grown, and this is expected to fall to 53% by 2040 and will have serious implications for the economy and unemployment. Halting this decline in self-sufficiency won't be done by building over it (source: NFU)</p> <p>Climate change, market volatility and the possible future stance of hostile nations may make farmland of Thanet's calibre even more precious</p> <p>1,600 new homes in Birchington will equate to an extra 3-4,000 residents. Birchington's population is c.10,000, and this massive increase will radically alter the village's character and (notwithstanding the proposed enhancements to infrastructure) place huge strain on resources. Birchington Medical Centre and QEQM hospital cannot cope with current demands, and CPRE report that "Thanet is vulnerable to water shortage and low rainfall". Southern Water are reportedly unable to cope with heavy rainfall and fined for illegal discharges into sea around Thanet. Planting trees and maintaining agricultural land reduces risk of flooding.</p> <p>Unemployment is likely to increase, Thanet's 4,000 unemployed is the highest in Kent (source: Office for National Statistics, August 2018)</p> <p>Air pollution in The Square is very high currently, and the proposed new roads will attract more motorists into Birchington</p>	<p>I believe that the following alternatives need to be considered:</p> <ol style="list-style-type: none"> <li>1. Restore run-down properties - Kent Online reported in October 2018 that there are more than 1,000 long-term empty houses in Thanet. Restoring these properties is more sustainable because it uses much less greenhouse gas than new-build. Also disallow current properties to remain empty for more than 6 months</li> <li>2. Use financial incentives to encourage sole occupants of large properties to down-size</li> <li>3. Encourage conversions of empty rooms above shops, and renting out of flats and bed-sitting rooms</li> <li>4. Use brownfield sites. For example, housing in the Midlands and the North, where brownfield sites in previous mining villages abound, as do rugged sites which are unsustainable for agriculture (source: Money Week)</li> <li>5. A 2017 DEFRA report sums matters up perfectly "when considering development proposals...poorer quality land is to be used in preference to land of a higher quality"</li> </ol>	490		Web
Lee	A		133	Object	Large scale housing projects are not sustainable		322		Web
May	Raymond		238	Object	<p>I object to this development on the grounds that it causes the loss of Grade 1 agricultural land. We, in Britain, already import more food than we produce locally. If you equate Thanet Council's plans with hundred's of others around the country, similarly planning ahead, you get an idea of the scale of the potential loss of food producing land. Can we continue on a path of steadily increasing the importation of food as the land to produce our own food diminishes.</p> <p>In addition, I object to the affect of adding a potential population increase in Birchington of 5,000 plus. This would represent half of the current population. Is it sustainable? They would be hard pressed to classify it as a village in future!</p>		748		Web
Mayhew	G		48	Object	<p>its not good for the people who live on the edge of fields and are going to lose their views and quality of life. Over the years of building there will be noise and dumper trucks everywhere, what about public services, NHS, water supplies it will be overloaded in the areas. Its not about developers making money its about Birchington's quality of life. I moved here 25 years ago and I think I would have to move away if it goes ahead are you going to pay my fees for moving away.</p>	Not legally compliant, not sound, does not comply with duty to cooperate	115		Paper

Mcandre w	Patrick		487		Support	<p>I STRONGLY DO NOT WANT ANY MORE HOUSES IN BIRCHINGTON</p> <p>I strongly object to the building of new houses in Birchington on the agricultural farmland and building of a new Rd via Minnis Rd, Birchington cannot cater for all these new residents.</p> <p>Already the doctors cant cope at the moment you have to wait 3 weeks for a Apt.</p> <p>The infrastructure would not be able to cope with all these extra people. Namely the road conjection, hospitals already cant cope. The water &amp; sewerage are already finding it hard to supply the service.</p> <p>My Suggestion would be to use Manston Airport to building all these extra houses as Manston has the roads coming of the Thanet Way &amp; there is all that unoccupied land, which is not been used. Trains could have trainlines exstended from Minster Station Etc. All these extra houses could be built there.</p>		1353		Paper
McCarthy	Teresa		332		Object	<p>I am 94 years old so cannot dictate a long letter but I strongly object to the building of houses on our farmland in Birchington. Too many reasons to list. If you wish to visit me to discuss you are more than welcome.</p> <p>But please take this objection seriously.</p>		1011		Email
McDaid	lyn		121		Object	<p>I am against the provision of more houses in Birchington and wish to see Manston developed as an airport.</p>		257		Web
Mileman	Christop her		507		Object	<p>I have serious concerns about the scale of the proposed development- 1600 houses I families - and the impacts that it will have.</p> <p>You should not be building on Grade 1 Agricultural land which is regularly farmed. I would anticipate an increasing need for domestic agriculture following Brexit.</p> <p>I understand that there are concerns about the amount of water available on Thanet for the huge increase in house numbers planned. More detail should be made available on how this is to be addressed.</p> <p>The proposed increase in the number of jobs must be post-construction numbers to explain where the in-coming families will find long term employment.</p> <p>The Birchington Medical Centre is already stretched and any increase in patient numbers will make waiting times totally outrageous. What are the plans to address this and the availability of GPs?</p> <p>QEQM and A&amp;E will be unable to cope with such a vast influx of people to Thanet generally.</p> <p>If 30% of the housing is to be Social Housing this will be an additional drain on over-stretched Social Services and medical services, especially if employment issues are not fully addressed.</p> <p>How will the requirement for infant, junior and secondary education be dealt with? Local secondary schools are already oversubscribed. Any new schools I expansions must be in place before the development commences. The plan must explain how and where the additional capacity will be provided.</p> <p>The bottle-neck at the junction of Park Lane and the A28 at Birchington Square is already excessively busy. Additional traffic from new housing will made this worse.</p>	<p>Fully explain how the following will be addressed:</p> <ul style="list-style-type: none"> <li>• Water availability</li> <li>• Where I how and what sufficient jobs will be created (post-construction)</li> <li>• How Social Services and medical services will be scaled up to meet the demand and who will pay for this</li> <li>• How school capacity will be increased and who will pay for this</li> <li>• Exactly how will the Park Lane I A28 traffic issues be resolved</li> </ul> <p>Re-think the numbers of houses I scale of the development and how Grade 1 Agricultural land can be preserved for farming not housing.</p>	1426		Paper
Milimuk a	Elle	GVA	358		Object	<p>The proposed allocation site comprises land classified as 'Excellent' in the Agricultural Land Classification.</p> <p>The revised allocation proposes an additional 600 homes on this site, however we note that the revised site boundary incorporates Site ST3 which was already allocated in the Preferred Options Local Plan (Policy H02C) and</p>		1052		Web



						<p>therefore double counts 90 homes.</p> <p>With respect to the 510 additional homes proposed, it is unclear how these could be accommodated on the proposed allocation site as the proposed site boundary has changed only marginally (by 9.3ha) and the maximum density control proposed by Policy SP14 remains unchanged. The additional areas now included within the proposed site boundary comprise agricultural land/greenfield which is not in the SHLAA and has not been put forward by a developer; and land identified in the SHLAA as having constraints to development. We therefore question whether these sites are available, viable, sustainable or feasible within the plan period.</p>				
Millar	Bill	NHS Thanet Clinical Commissioning Group	513		Observation	<p>Birchington Medical Centre is currently marginally under-sized in terms of space for its existing patient list size, based on a comparison of its GIA against NHSE guidance on the size of premises according to its list. However, the growth of 1,600 dwellings anticipated in the Draft Local Plan will need to be addressed. 1,600 homes translates into around 3,840+ additional patients over an extended period. This increase in patients would result in a requirement for an additional 307 sqm of GMS space. Opportunities may exist within the existing premises to either convert existing administration space to clinical rooms, or to deliver an extension. S106 contributions would be expected in order to address growth planned growth in the town and limit the recurrent cost liability to the NHS.</p>		1485		Email
millar	malcolm		54		Object	<p>I do not think the plan for 1600 houses is viable. It is very difficult to attract new doctors to the Birchington Medical Centre and it already takes two to three weeks to get an appointment. The A28 road is already congested, particularly at Birchington Square.</p> <p>I am not opposed to New houses in Birchington, but I think the proposed numbers are unrealistic.</p>		145		Email
Mugridge	R W		486		Object	<p>Grade 1 agriculture land surrounds Birchington and should not be use for building houses food provided will be lost and probably have to be replaced by dearer imported food. The village all ready suffers from poor air quality due to traffic and road infrastructure being poor The lack of water supply in summer with hosepipe bans threatened where will the water come from for a further 30000-40000 people medical need are hopeless at being met at Birchington medical centre. Appointments to see a Doctor average 3-4 weeks now another 30-40000!! Death before appoint comes seems inevitable. QEQM hospital cannot cover present population let alone so great an increase.</p> <p>No employment opportunities now for present population let alone increased numbers probable rise in crime could result</p> <p>The open farm land surrounding our house/bungalow with the proposed development would be lost to a concrete jungle a fall in house prices can probably be expected in an area of aged population noise increase of plant operating and building site will be expected plus lorries going to and fro parking problems during the day for local residents along small roads inadequate for purpose from building contractors etc.</p>		1352		Paper
Noake	GE		280		Object	<p>Thanet's Local Plan is "unsound" for many reasons below are the ones I consider most important:-</p> <p>1) The sites listed at the top of this letter are "the best and most versatile agricultural land" - Grade I farmland. The National Planning Policy Framework (NPPF) Policy E18 - states that planning permission will not be granted for development which would result in the irreversible loss of the best &amp; most versatile agricultural land, unless it can be clearly demonstrated that:-</p>		824		Paper

					<p>a) the benefits of the proposed development outweigh the harm resulting from the loss of agricultural land.</p> <p>b) there are no otherwise suitable sites of poorer agricultural quality that can accommodate the development.</p> <p>Thanet District Council (TDC) stated in their strategic Priorities &amp; objectives that they would support &amp; sustain the rural economy &amp; recognise the importance of the best agricultural land.</p> <p>THIS PLAN FAILS TO ADHERE TO THE NPPF Policy AND TO TDC's own policy. To build on this Grade I farmland will squander this irreplaceable asset and have implications for the nations food security.</p> <p>Insufficient effort has been made to identify alternative &amp; brownfield sites for development.</p> <p>2) The NPPF (p68 item 4) states that the planning system protect &amp; enhance valued landscapes. Sites S515 and S498 epitomize the Thanet landscape with wide skylines &amp; views to the coast this landscape will be destroyed by these developments. These areas are feeding &amp; roosting sites for Marsh Harriers &amp; Wild Geese.</p> <p>3) The Office for National Statistics has admitted it's growth projections are wrong &amp; has revised them down from 210,000 to 159,000 a year. Many local authorities based their local plan on the higher estimate &amp; an overoptimistic estimate of economic growth.</p> <p>Because national policy is holding them to the higher numbers they are giving less weight to protecting villages from over-development - this is the case with Birchington. It is referred to as a village but has not been afforded the same protection as adjacent villages such as Acol, Minster or Monkton. The scale of these developments has more than doubled - originally 700 dwellings, then 1,000 now 1,600 plus, nearby Westgate a 1,000 now 2,000.</p> <p>Thanet already has the second highest population density in Kent 13.7 persons per hectare, nearby 5.3, Dover 3.7. It should be noted that Thanet is a severely deprived area with many social problems, high unemployment, lower life expectancy than the national average.</p> <p>Services are already at capacity, the main hospital is being downgraded, Kent Police have said Thanet's Local Plan does not meet requirements of sustainable development for "healthy communities".</p> <p>Southern Water highlighted problems with supplying sufficient water when housing numbers were 1/2 the new levels.</p> <p>Thanet has one of the lowest rainfalls in the country relying on Aquifers that run low at times of drought.</p> <p>Proposed new roads are insufficient &amp; not properly evaluated. The A28 the main road into Thanet, is already frequently at a standstill. Air pollution is very high particularly in Birchington square.</p> <p>Essentially this Local Plan is building vast housing estates on the outskirts of Birchington and Westgate, not "planning" at all but the worst example of urban sprawl.</p> <p>The Local Plan is unsound on numerous levels it needs complete revision &amp; further consultation.</p>				
Orpwood	Patricia		168	Object	<p>Thanet is a former island and is now a peninsula which means, with sea on three sides, it occupies a restricted space. In addition the centre is, at the moment, occupied by Manston airport and agricultural farmland so that housing and roads are concentrated around the coast. Thanet was a rural community whose economy was boosted by the seasonal tourist trade, which</p>		488		Paper

					<p>is now vastly reduced. Instead it has become a favourite retirement area and, according to KCC in 2015, 36% of the residents of Birchington, for example, were over 65. This has put an enormous strain on our doctors, dentists, social workers and the QEQM hospital, which has some of the worst A&amp;E figures in the country and finds it hard to attract doctors to the area. On many counts these plans, put forward by Thanet District Council (TDC) are not sustainable or viable.</p> <p>One of the major problems is the water supply. Thanet has one of the lowest rainfalls in the country and the lowest in Kent. There are no rivers or lakes and our only source of supply is the aquifer which Southern Water (SW) acknowledges is badly depleted. This problem was recognised in 1991 in a joint report by Kent County Council (KCC) and SW, who stated that the water supply was not viable. Various solutions were suggested including flooding the closed Tilmanstone Colliery near Deal, creating a reservoir at Broad Oak near Canterbury or desalination plants. The viability was again questioned in a recent report by SW whose only solution was that people would have to use less water. They have no current plans for supplying the new developments and have confirmed the supply is not viable, suggesting people will just have to use less water. In addition the water filling the aquifer is rainwater filtering down through the land into the aquifer. Much of this comes from farmland. If this farmland is lost and the area concreted over, that means even less water reaching the aquifer.</p> <p>Much of the interior of Thanet is Grade One agricultural land according to the East Kent Land Use Map and Natural England. That means that with a mild climate, plenty of sunshine and good soil, it is some of the best farmland in the country and can sustain up to three crops a year. With current questions about our future food supply, food security has become an important issue. Yet this Plan involves building the new houses on this very valuable land. Once the land is built on, it is lost for ever.</p> <p>Thanet is an employment blackspot with unemployment standing at over 20% according to figures from KCC. This amounts to some 4020 employable people, according to the Office of National Statistics (2018). Should the new developments encourage the London Boroughs to re-home people in Thanet, there would be little work for them and this would increase unemployment in an already deprived area where much of the work currently on offer is minimum wage and zero hours contracts.</p> <p>Birchington up until the 1950s was a rural village with many employed on farms and some transported to the nearby collieries (all now closed). The population, according to the census, in 1951 was 5081. This expanded by roughly a thousand every ten years until 1981 when it increased by 2,000 and had reached 12,200 in 1991. Originally, we were told we needed an additional 1,000 houses, but this has increased during the time. TDC has been working on its Plan to 1,700 new houses, or an increase in population of some 5-6,000. However, Birchington does not have the infrastructure to support a population of this size. We have one doctors' surgery, which is already struggling to cope according to the Care Quality Commission and two private dentists. It is difficult now to find a National Health Dentist in Thanet or neighbouring towns. The Queen Elizabeth the Queen Mother, Birchington's nearest hospital is also facing problems. Two local care homes have been closed down within the last year and there is a shortage of places for our elderly population as well as</p>				
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					<p>provisions for Social Care. With our increasingly elderly population, the situation can only become worse and the extra residents would be disastrous. We have a PCSO (often taken for other duties) and a Kent Warden to cover a population of now well over 12,000. There is one primary school, Birchington Primary School, which, despite the building of extra classrooms in the last few years, is now working to capacity as is King Ethelbert the nearby outstanding (OFSTED) secondary school. The only two main roads to Margate from Birchington are the A28 and the Sea Road, which is in danger of collapsing because of erosion along the cliff edge and a decision has been taken that, when this happens, it will not be restored. Other roads around Thanet are narrow and dangerous rural roads. Any planned new roads would need to be in place before development and existing roads up-graded. These requirements are not definitely specified in the Plan.</p> <p>These are just some of the problems that affect Thanet and Birchington in particular. Many of these queries were raised at the Draft Plan stage, but TDC did not appear to listen and no substantial changes were made or strategies outlined to cope with the problems. As the plan stands, it would cause enormous problems for an already deprived area.</p>				
Perryma n	P J		98	Object	<p>Proposed development – Birchington Objection</p> <p>The scale of the proposal would totally destroy the character of the village</p> <p>The increase of traffic would result in chaos</p> <p>Jobs. There is a shortage of jobs already in the area. Where is the employment coming from?</p> <p>Schools are already over subscribed, no secondary schools have been planned.</p> <p>I OBJECT in the strongest possible terms to this development.</p>		221		Paper
Proctor	C		491	Object	<p>Birchington Medical Centre has been unable to cope with increasing demand and has difficulty in attracting new G.P.s. It appears that professional people do not want to work on the Isle of Thanet. Even if extra facilities are included in the housing development to accommodate the increased population, the Local Plan will not work if they cannot attract the staff.</p> <p>Do we need a thousand new homes in the village of Birchington? The traffic congestion experienced regularly from Brooks End Hill through to the Square</p> <p>and aJong to Epple Corner is unacceptable. Changing the road layout will not solve the congestion problem and it may well put an end to the success of our</p> <p>shops in Station Road. Birchington Square is already the most polluted area in Thanet.</p> <p>Birchington is a village with a population of 10,000 people. I suggest that an increase of the estimated 4000 people will upset the balance and unnecessarily</p> <p>ruin the close community spirit that exists today.</p> <p>In Birchington, the plan is to build the new homes on valuable Grade 1 agricultural land. The soil quality is amongst the top fifth in the country. Once this land is replaced by concrete there is no going back. We need locally grown produce and in the future, when we exit the E.U. it will be important to us all. The farmers want to continue farming, but will they be given the chance? We need these job opportunities.</p> <p>The water supply will not sustain the increased demand required by thousands of new homes. Thanet is vulnerable to water shortage and low</p>		1370		Paper

					<p>rainfall. Southern Water had threatened hosepipe bans recently. Climate change means the probability of even lower rainfall in the future. Rather than building on Grade 1 agricultural land, use the brownfield sites and restore the run-down properties. Mary Portus highlighted the crisis in Margate High Street. suggesting that this area could be used for housing. If we want to keep the chance for resurgence in shops, why not develop the flats above these shops. Decision on the Manston Airport has yet to be made and the Government has consistently refused to back it. Will it prove viable for anyone else? It is probable that houses will eventually be built on this site and then of course the number of new houses required, will need to be reduced. Building now on the Grade 1 agricultural land is unnecessary. Stop it now before it is too late. The Isle of Thanet, surrounded on three sides by the sea, is a special case. The plan, as presented, is flawed. Please consider the people who already live here and let this part of the country develop in a more natural way.</p>				
Ptarmigan Land and Millwood Designer Homes		Ptarmigan Land and Millwood Designer Homes	493	Joshua Mellor - Barton Willmore LLP	<p>Object</p> <p>[Electronic Version Attached - includes appendices]</p> <p>4.1 Policy SP14 proposes the allocation of land, for a strategic housing site, at Birchington, on land south and west of the existing settlement.</p> <p>4.2 We support the identification of the strategic housing site for Birchington but note changes are required to the draft policy wording and area presently identified to be allocated in order for it to be effective and result in the most comprehensive scheme coming forward.</p> <p>4.3 The proposed allocation boundary comprises land controlled by the Promoters (SHLAA sites 004, 005, 006, 008 and 009) plus land to the north-west between the Site and railway line (SHLAA site 007), controlled by the Church Commissioners (CC). A map is included of the proposed allocation, indicating the landownerships, in Appendix 2.</p> <p>4.4 The allocation represents an amended, and increased, site area and housing requirement than the previous version of the Policy SP14 contained within the Preferred Options Consultation (January 2015) for 1,000 dwellings (the Ptarmigan land), plus 90 dwellings on Land fronting Park Lane, Birchington (the Millwood land) through Policy H02C.</p> <p>4.5 The Promoters have subsequently collaborated to ensure the delivery of a comprehensive development across the Site, including promoting additional land through the Council's Proposed Revisions to Draft Local Plan (Preferred Options) consultation (January 2017) and the March 2018 'Call for Sites'. The majority of this land has subsequently been included in the proposed allocation Policy SP14 (which also now includes the land previously identified as Policy H02C), alongside the CC land.</p> <p>4.6 At no time have either of the Promoters been approached by the CC. No work has been undertaken to ensure this additional land can come forward comprehensively with the Site.</p> <p>4.7 A Development Capacity Plan is included in Appendix 3 which</p>	<p>[Please refer to suggested wording for SP14 - located in comments box for formatting]</p>	1384	<a href="#">207 Mellor Joshua Barton Willmore Birchington Reg 19 Local Plan Reps Final with appendix.pdf (64.9 MB)</a>	Email

					<p>demonstrates the allocation land within the Promoters control can sufficiently support 1,600 dwellings alongside all other policy requirements. There is no need for the CC land to be included to achieve this.</p> <p>4.8 The Development Capacity Plan has been informed by technical work, as detailed in Section 5, which demonstrates the suitability of the site to deliver the policy requirements. To our knowledge, no such work has been completed for the CC land.</p> <p>4.9 The current policy requirements necessitate a development brief and masterplan to be produced for the entirety of the allocation, including the CC land. The inclusion of the CC land adds unnecessary complication and delay to the delivery of the allocation. This policy requirement should be amended to allow proposals to come forward for the allocation where they accord with a development brief and masterplan which delivers the policy requirements (i.e. not a development brief and masterplan for “the whole site”).</p> <p>4.10 The inclusion of the CC land is unnecessary and not required. The allocation boundary should be amended to reflect the Promoter’s land interests. This should include the entirety of the Site, thereby reflecting existing field boundaries and the boundaries of land promoted through previous consultation exercises. The removal of the CC land will also ensure the allocation is suitably set-back from the railway line, thereby reducing the necessity for noise mitigation to be in place along this boundary.</p> <p>4.11 A Development Capacity Plan is included in Appendix 4 which demonstrates how the allocation boundary should be amended to include the entirety of the Site, to reflect and effectively utilise field boundaries. The allocation continues to provide for approximately 1,600 dwellings and other policy requirements, whilst responding appropriately to the more sensitive areas, including providing a new interface between the urban edge and countryside.</p> <p>4.12 The increased allocation areas allow for an over-provision in terms of Green Infrastructure and Public Open Space, thereby assisting in reducing the Council’s shortfall of open space as identified in its Open Space Strategy (2017) and ensuring a high quality green edge to the development.</p> <p>4.13 Furthermore, the increased allocation area allows the preservation of archaeological sensitive areas, which will be removed from continued agricultural use which is steadily degrading and destroying archaeological remains in this area.</p> <p>4.14 The allocation boundary should therefore be amended to that shown in Appendix 5 (i.e. the entirety of the Site) and the policy text amended to read (strike through text deleted, underlined text added):</p> <p>Land is allocated for up to around 1,600 new dwellings at an average maximum density of 35 dwellings per hectare net at Birchington. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site including provision within the site of in</p>				
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					<p>accordance with a developmet brief and masterplan which delivers the following requirements:</p> <p>1) a new link road to serve the development and extending from Minnis Road and the A28,  2) a minimum of 14 ha of open space  3) a fully serviced site of 2.05 ha (to be provided at the cost of the developer) for a two-form entry primary school,  4) small scale convenience retail provision required to accessibly serve day to day needs of the development.</p> <p>Phasing of development will be in accordance with Appendix B. The access road and serviced school site shall be programmed for delivery as agreed by the County Council as highway and education authority respectively. Development will be expected to provide an appropriate contribution and land for the expansion of Birchington Medical Centre. Masterplanning will be informed by and address:</p> <p>1) pre-design archaeological evaluation,  2) assessment of the impact of development on the junction of Park Lane and the A28, and the junction of Manston Road/Park Lane and Acol Hill  3) liaison with service providers to investigate the need to upgrade the capacity of any utility services and infrastructure including gas supply,  4) the need to preserve the listed buildings on the site and respect the setting of Quex Park,  5) the need for integration of development and landscaping to enable a soft edge between the site and open countryside.  6) appropriate noise mitigation for any development near the northern edge of the site which is adjacent to the railway line</p> <p>5.0 DELIVERABILITY OF LAND SOUTH AND WEST OF BIRCHINGTON</p> <p>5.1 The Site, at land south and west of Birchington, is located adjoining the existing village boundary, north and south of the A28. In total, the Site comprises 78.2 hectares of agricultural land.</p> <p>5.2 The majority of the Site has previously been included as a proposed allocation within Local Plan consultation documents (Reg 18 Preferred Options January 2015, Reg 18 Focused Revisions January 2017 and draft Reg 19 Pre-submission version January 2018). The updated allocation boundary reflects the sustainable nature of the Site and the necessity for the Council to identify further suitable and available housing land to meet its growth requirements. As detailed in the preceding section, the Site, without the CC land, can support the requirements of policy SP14.</p> <p>5.3 Development on the Site would help achieve the sustainable development principles of the NPPF 2012 which underpin the plan, including delivering much needed housing within the District, meeting the needs of the community and delivering a range of house types and sizes, including the provision of a significant level of affordable housing (i.e. 30% of 1,600 dwellings, equating to 480 affordable dwellings.</p> <p>5.4 Over the course of its delivery, the development would support economic growth of Birchington and surrounding areas, providing new construction jobs</p>				
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					<p>and introducing a new labour force into the area with associated expenditure in the local economy.</p> <p>5.5 Furthermore, the development would provide extensive areas of new Green Infrastructure, including formal and informal areas of public open space, addressing current levels of under- provision across the District, and new areas of landscaping, providing a new ‘soft edge’ to the built up area of Birchington.</p> <p>5.6 The Site is being promoted by a strategic land promoter, with prior experience in delivering sites of this size, and a developer, with a proven track record of housing delivery. Based on our knowledge of the Site and prior experience of the Promoters, an Indicative Delivery Trajectory is included in Appendix 6 demonstrating the delivery of 1,600 dwellings on Site across the plan-period.</p> <p>5.7 Detailed technical work has been carried out for the Site, to demonstrate its suitability to support the policy requirements and inform the Development Capacity Plan (Appendix 4). A summary of the work carried out is set out below.</p> <p>Highways</p> <p>5.8 Initial highways work demonstrates suitable access is achievable into the Site from the existing road network, with proposed site accesses at Minnis Road, the A28 and Park Lane. Work is ongoing, in liaison with Kent County Council (KCC), to agree suitable designs of these junctions.</p> <p>5.9 The Council’s draft Transport Strategy 2015 – 2031 (July 2018) acknowledges the Site provides the opportunity to improve highway access, allowing (through the Inner Circuit link road) traffic to avoid the busiest sections of the A28 within Birchington, particularly ‘The Square’. The allocation boundary ensures necessary land is included to facilitate the delivery of the required portion of the Inner Circuit link road within the Site.</p> <p>Ecology</p> <p>5.10 As detailed in the Ecology Summary Note (September 2018) in Appendix 7, and accompanying reports, a preliminary ecological appraisal (PEA, July 2016) and in-depth ecological survey work has been undertaken in relation to the Site, including in relation to reptiles, breeding birds, wintering birds, bats and botanicals.</p> <p>5.11 The PEA demonstrates the site is intensively managed which limits its potential to support protected or otherwise notable species. It was recommended that further ecological surveys be undertaken to confirm the absence, or otherwise, of protected species.</p> <p>5.12 Subsequent survey work, as described in the summary note and corresponding survey results, demonstrate there are no significant ecological constraints to development coming forward on the Site, subject to the implementation of recommended ecological mitigation measures, including SAMM payment (as below) and relevant considerations for masterplanning.</p>				
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					<p>5.13 As required by the provisions of Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’) a Habitats Regulations Assessment report (HRA Report, July 2018) has been prepared on behalf of the Council to assess the draft Local Plan against the conservation objectives of any European protected sites that may be affected. The assessment concludes, subject to proposed mitigation and management measures, including through the use of a Strategic Access Management and Monitoring Plan and tariff (SAMM), there will be no adverse effects on any European protected sites as a result of the draft Local Plan, alone or in combination.</p> <p>5.14 The HRA report confirms that whilst the SAMM was initially drafted on the basis of a lower housing requirement the measures proposed can be scaled up to address the higher housing requirement. The Council will need to ensure this position is robust and adequately addresses potential adverse impacts on European protected sites and the council is encouraged to ensure this document is reflective of the Local Plan on site specific numbers.</p> <p>5.15 The HRA report provides, at Appendix C, a summary of the review and screening undertaken of the emerging policies at Preferred Options stages (including the 2016 amendments). No similar exercise is undertaken specifically for the draft Local Plan policies, however section 7.1 of the HRA report identifies the previous conclusions remain valid and there are no adverse effects on any European protected sites. Again, the Council will need to demonstrate robustness of this approach to ensure the plan is found “sound”.</p> <p>Landscape and Visual</p> <p>5.16 A Summary Landscape and Visual Appraisal (September 2018, Appendix 8) has been prepared to provide an update on previous landscape and visual work accompanying previous representations for the Site.</p> <p>5.17 As detailed in the appraisal, following site visits and review of the published Landscape Character Assessments, the Site is considered to have capacity to accommodate residential development.</p> <p>5.18 The appraisal identifies a number of landscape sensitivities and opportunities for the Site, including the need to respect the setting of nearby heritage assets, the potential for integration of development and landscaping to enable a soft edge interfacing with the wider landscape, and the provision of a new ‘green necklace’ around the southern edge of Birchington to improve biodiversity and amenity.</p> <p>5.19 The Council acknowledges the acceptability of the Site in landscape capacity terms, proposing it as an allocation in the draft Local Plan.</p> <p>5.20 As concluded by the appraisal, the Site can accommodate the proposed development and provides an opportunity to address the stark urban edge of Birchington through the introduction of a softer transition incorporating new</p>				
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					<p>green infrastructure.</p> <p>Archaeology and Heritage</p> <p>5.21 An initial Heritage Desk-Based Assessment (March 2017, Appendix 9) identified the Site to have potential to contain buried archaeological remains of prehistoric through early medieval date, and recommended further archaeological evaluation be undertaken. Subsequently, through Geophysical Survey investigations (Appendix 10 and 11), it has been demonstrated there are particular areas of higher archaeological potential, together with other areas in which no features have been identified.</p> <p>5.22 In liaison with Kent County Council, targeted trial trenching has been undertaken on Site, the results of which are included in the Archaeological Evaluation report in Appendix 12. This confirms the presence of archaeological features on parts of the Site which will be required to be preserved in situ as part of the Development.</p> <p>5.23 The Development Capacity plans have appropriately responded to the results of the archaeological work completed to date, with no built development shown on the preservation in situ areas. The archaeological sensitive areas will be utilised for open space and landscaping, where practicable, and thereby remove this land from ongoing agricultural use which is steadily degrading remains which will now instead be preserved in perpetuity.</p> <p>Drainage</p> <p>5.24 The Site is located within Flood Zone 1, at low risk of flooding from River or Sea, and therefore acceptable in this regards.</p> <p>5.25 A Local Plan Technical Report – Flood Risk and Surface Water Drainage (September 2018, Appendix 13) supports these representations and provides a summary of the technical work completed to date on the Site, including soakaway testing. The report demonstrates that infiltration is likely to be an appropriate method of surface water disposal for the Site.</p> <p>5.26 To help inform a future masterplan, and demonstrate a ‘high level’ approach to drainage, a preliminary concept drainage strategy is provided (Appendix B of the report) in accordance with required standards. Furthermore, a series of Sustainable Drainage Systems (SuDS) will be proposed throughout the development forming parts of the landscaping and biodiversity strategy for the Site.</p> <p>Air Quality</p> <p>5.27 It is acknowledged the Site is adjacent to the Thanet urban Air Quality Management Area (AQMA) which encompasses the main urban areas of Thanet. The majority of development across the district is likely to come forward adjoining this AQMA and therefore this is not considered to be a factor which would lead to the preclusion of the Site from allocation.</p> <p>5.28 Furthermore, the Site will deliver its part of the proposed Inner Circuit ring road, which will help direct traffic away from the urban areas and the AQMA (including the former AQMA at The Square, Birchington), thereby providing a beneficial impact with regard to Air Quality in the long-term.</p>				
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					<p>Education</p> <p>5.29 Kent County Council’s previous consultation response to the January 2017 Reg 18 Focused Revisions consultation (April Newing; March 2017) confirmed increased education demand would be required for 6no. 2FE primary schools across the District including 1no. at either Birchington or Westgate strategic sites.</p> <p>5.30 Subsequently, both strategic site allocations have increased (from circa. 1,100 to 1,600 at Birchington and from 1,450 to 2,000 at Westgate), therefore there may be an increased education requirement arising. Nevertheless, it is anticipated this will not exceed 2FE primary provision on the Site, and, as demonstrated on the Development Capacity Plan, land is allowed for this to be delivered. Should it be shown to be necessary, further land could be made available.</p>					
Ransom			153		Object	The allocation of this site does not comply with the vision expressed in the Landscape Assessment "to conserve open arable farmland". This land is Grade 1 agricultural land, which should be preserved for future food production.		549		Web
Repsch	John		126		Object	SP14. More roads attract more traffic to fill the space allotted. The proposed link road would encourage traffic from the Thanet Way to ignore the A299 and instead take the A28. This would create more noise and air pollution in a residential area. This development would destroy wildlife habitats, including hedgerows. Endangered species such as skylarks would be at greater risk.		739		Web
Repsch	John		126		Object	SP14, No.2 The congested Park Lane/A28 junction would persuade motorists heading towards Birchington to take a short-cut by peeling off into the residential Quex Estate of Brunswick Road and then Park Avenue and King Edward Road.		740		Web
Repsch	Jill		381		Object	I suffer from asthma, and I'm frightened of what the effects of building site dust would be. Lorries churning up dry dusty soil may make breathing very hard for me. Medication helps, but I can still be left with constricted bronchial tubes which leave me wheezing. I might have to move away, but I have no idea where to, having lived here since 1955. If, God forbid, there were ever another war, I wonder where our food would come from, given that we are getting rid of our highest quality soil at such an alarming rate. If people from South-east London were to be imported into Thanet, they would want the same way of life as they had been used to in London. Instead they would find themselves cast into a very strange-looking environment, missing many of the amenities with which they had grown accustomed and enjoyed. Margate could become a hotspot for the kind of gang violence that has been reported in London. Also, whether rational or not, a great fear for the people of Birchington is that some of the 5,000 or so newly imported neighbours might be tempted to break into the premises of those residents already here.		1112		Paper
Rowe	Judith		216		Object	There is not sufficient employment in Thanet for the number of new houses proposed. Thanet is not likely to attract new employers. There is no incentive for industry to move here. The airport will not re-open, neither will Ramsgate port. Thanet is already a depressed area, with high unemployment. Extra unemployed people moving to the area will put added strain on police and		658		Web

					<p>social services. It is also not suitable for extra retired people, as again social care and health care is already inadequate. Thanet is not suitable for commuter dormitory as travel to London is still too far.</p> <p>The transport links, and road capacity, are inadequate.</p> <p>The schools and hospital, and GP surgery, cannot support current residents.</p> <p>Top grade farmland should not be lost. We are already under threat of food security due to idiocy of Brexit.</p> <p>There are many under developed brown field sites in Thanet, empty and under used buildings. Use these first. Penalise owners of empty/derelict buildings, and offer incentives for single people to downsize. Develop housing above retail premises. Smaller, studio sized apartments, suitable for singles, child free couples or retired or disabled would meet local needs better, especially if there were incentives for overhoused locals to move.</p> <p>Water and sewage services already strained. Pollution of the sea, and water supply and quality, are a concern.</p>				
Satterthwaite	Diana		109	Object	<p>I have been a resident of Birchington for the past 35 years and wish to place on record the following comments regarding the Proposed Local Plan for the area:</p> <p>Proposed housing on Grade 1 Agricultural Land - I object strongly to the proposal to build 1600 houses on grade 1 agricultural land around the Birchington area. Once the land has been used for housing it will be impossible to utilise it for future use. The area is being saturated with additional population but the farmland to grow food is being reduced. This will mean that more food will need to be imported, creating extra transportation, air pollution and following Brexit unknown importation restrictions and costs. The land that is being built on will also reduce the amount of rainwater going into the aquifers, while the population to use water is being increased.</p> <p>Traffic congestion - Birchington is already struggling with traffic congestion and with a possible increase of 3200 more vehicles in the area (allowing 2 cars per household) there will be gridlock. Station Road is already struggling to cope and The Square is already suffering with high levels of air pollution. I am aware of the plan to build new roads and divert traffic away from The Square which would be a good improvement, providing this is in place before any building work starts.</p> <p>Utilities - my main concern is the lack of increased fresh water provision for the area. I have already commented on the reduced rainfall and increased usage following construction of the houses and as far as I am aware no plans are in place to address this problem. The disposal of waste water and sewage in this area already causes problems and the increase of population across Thanet will exacerbate this problem.</p> <p>Medical services - High on my list of concerns is the availability of Medical Services, both G.P. and</p>		234		Paper

					<p>Hospital access. Our local Doctors Surgery has been struggling to recruit Doctors for several years and it is common to wait for 3 weeks for a Doctor's appointment, with the increase in population this will deteriorate further. I understand land has been put aside to enlarge the premises, but this will not assist with the recruitment of medical staff who do not wish to work in this area for various reasons.</p> <p>Our local Hospital (the Queen Elizabeth the Queen Mother Hospital in Margate) is already experiencing problems with recruitment and long waiting times for A &amp; E services, again this can only increase. It is proposed to move all Stroke Services to Ashford which is at least an hour away (and in bad weather could be inaccessible as proved earlier in the year) so with an increased population again this will be exacerbated.</p> <p>General -The above points are the ones I feel most strongly about, but I am also very sad that the green spaces we have around Thanet will be lost forever. If this proposal goes ahead I feel there must be provision for green areas around the whole development, for walkers, cyclists, horse riders and wildlife.</p>				
Sims	John		142	Object	<p>I object to building on top grade agricultural land because this is needed to increase our self-sufficiency in food production. According to the latest reports the water supply, waste water and sewage arrangements are inadequate to support the number of houses suggested and should be fit for purpose before any building takes place. Thanet council has already allowed more building than it should and more will turn the area into one big housing estate. I am not sure that there will be enough jobs in the area to allow people to afford to buy houses unless they are definitely affordable. Can we be guaranteed this as part of the development or will they just be too expensive for young people to afford? The proposed improvements in infrastructure are not sufficient to counteract traffic delays and lessen pollution, or provide enough health care and schools. The council should consider people it represents opinions and consider the problems that would happen by making the area more densely populated.</p>	<p>Look more further at infrastructure changes to ensure issues can be fully resolved before building more houses. Consider using brownfield sites to put houses on and look at housing stock in Thanet that could be re-used if renovated, by forcing landlords to do this.</p>	358		Web
Skelton	Heather		492	Object	<p>This is an absolutely ludicrous plan and will destroy the beautiful village of Birchington, where I am a member of the community. The infrastructure simply cannot cope. Even 15,000 houses could mean 4 people per house, potentially 60,000 people who need jobs, schools, hospitals, gas, water etc. This would swell Thanet's population by a third. Thanet is already at breaking point in providing adequate schools, social services &amp; transport &amp; this will exacerbate the problem. QEQM can't cope with current demands &amp; neither can Birchington medical centre.</p> <p>Our house looks out onto beautiful countryside which I believe is Grade 1 agricultural land &amp; amongst the top quality soil in the country. I do not wish to see the dessimation of a natural landscape in place of concrete &amp; tarmac. Birchington Square is currently the most air-polluted spot in the whole of Thanet &amp; increasing population &amp; roads will add to this problem on a catastrophic scale.</p>		1374		Paper

						Thanet already has the highest unemployment rate in Kent, more households would contribute to this problem, not to mention the jobs that would be lost through the loss of the farmland. There are several alternatives that could be explored to address housing needs, that could help to regenerate Thanet as a whole. I implore you to reconsider the destruction of this site that me & my family enjoy walking the dog, getting some fresh air & seeing nature as it should be. We love our village and Thanet as a whole but this is most definitely a mistake that will cost the residents of Birchington dearly for generations to come.				
Smith	Robert L		314		Observation	The Birchington area is considered above air pollution standards set by environmental standard will not another number of vehicles generated by more housing make the problem worse. The employment that was estimated by Thanet Earth greenhouse site never came to pass as for Business Parks the number of industrial units for sale has grown over the recent years many lie empty, Thanet is not a magnet for business example empty Fizer site after years on market.		939		Paper
Smith	Jenny		356		Object	The Birchington area is considered above air pollution standard set by environmental standards. Another number of vehicles generated by more housing will make the problem worse. Birchington & Westgate medical services, already stretched to capacity not to mention our local hospitals, clinics etc with mo mention of infrastructure schools etc we will all suffer.		1048		Paper
Solly	C		419		Object	[See attachment]	No Consideration arising of Village status with a large expansion of housing and infrastructure. This has not met approval from the people in Birchington or has been led by democratic need or change. Phasing Strategy may not deliver houses in the volume proposed Effects of Brexit and the change of economic activity in the area. Council decisions have increased risk of plan unsoundness. Community right to object has been ignored, which could be contrary to localism act 2012 Realistic Phasing should be made and complete (Manston Green not declared) Wording to ensure adequate water supply is available (Irrespective of IDP). Further investigation and mitigation for effects of Light Pollution especially from Thanet Earth Include wording to include assessment of historical monuments. Impact to Gore End in terms of Landscape as has been historically made in previous local plans and should be maintained, respected and enhanced.  Include policy from 2015 draft that stated:  Masterplanning will be informed by and address:  1) the need to clearly demonstrate how the SPA mitigation strategy as set out in Policy SP25 is being met and how it will ensure that development does not increase recreational	1220	<a href="#">Solly SP14 comments.pdf (8.6 MB)</a>	Email

						<p>pressure on designated sites,</p> <p>2) a wintering and breeding bird survey to assess impact on bird populations within the district and the need to mitigate/compensate,</p> <p>Include in policy “appropriate contribution towards the Thanet Coast Strategic Access Management and Monitoring (SAMM) scheme”</p> <p>Ensure that the highway works is made before development of housing begins, the new roads will act as access roads to the new development sites.</p> <p>Ensure that key road links and changes to junction and road layout are covered in this policy and clearly stated.</p> <p>Ensure that original policies on the draft plan (2015) are represented in the published document.</p> <p>Assessment of the effect of development on Bat Species which is recorded in the area.</p> <p>Assessment of the effect of development on Bird Species which is recorded in the area.</p> <p>That Policy CC05 should also be applied in respect to District heating</p> <p>That Policy HE01 should be included in the policy, as there is archaeological interest.</p> <p>That the bridge to be widened on the single way road at Minnis road.</p> <p>That the junctions of Brunswick road are improved for safety as this is a high risk for accidents for traffic turning right out of the junction.</p> <p>That the 5 way junction at Canterbury Road, Mill Row, Essex gardens and Park Avenue to be improved.</p> <p>Contributions and policy should address the comments arising from the Open Space Strategy, Playing Pitch Strategy and Sports Facility Strategy 2017 (in the evidence base).</p>				
Spanton	Ed	Ed Spanton Farms	125	Howard Courtley - Courtley Plannig Consultants Ltd	Object	See attached submission from SPRU attached	See SPRU submission attached	291	<a href="#">09.25.ER.K5022PS.Housing Land Supply.Final.pdf (885 KB)</a> <a href="#">09.27.18.AB.K5022PS.GeneralRep.Final.pdf (739 KB)</a>	Web
Stedman	Jennifer		111		Object	<p>After an extensive perusal of the local plan I would like to put forward my objections as follows:</p> <p>1. I am concerned about the rise in population for Birchington village. The objection is that no provision medically is made in the plan to accommodate this rise. 1500 houses could mean 4 people per house - an extra 60,000 people and Birchington Medical Centre and the QEQM cannot cope with current demands.</p> <p>2. Thanet suffers at the present time with water shortages and low rainfall (CPRE). and Southern Water is not coping with heavy rainfall and is illegally</p>		236		Paper

						<p>discharging into the sea around Thanet.</p> <p>3. The land proposed to be built upon is Grade 1 Agricultural Land. Once built upon this land will be lost to farming forever. With the expected growth of London's population extra (not less) farmland will be needed to grow the food for Londoners.</p>				
Stedman	Trevor		169		Object	<p>I have spent some time looking over the Local Plan and list below my objections:</p> <p>1.The rise in population. The objection is that no provision has been made to accommodate this rise. 15000 houses could mean 4 people per house - an extra 60,000 people who will need jobs, schools, hospitals, water and other essential services and would swell Thanet's population by a third. How will Thanet cope as it is not coping already?</p> <p>2. Birchington Square is the most polluted spot in Thanet - the proposed new roads will swell the amount of cars and pollution. Birchington is already gridlocked in the summer and even with new roads, the problem can only get worse.</p> <p>3. The loss of Grade 1 farmland will have serious implications to both economy and employment and future generations will not have the benefit of Thanet's remaining countryside. Once built on, it is gone for ever.</p>		489		Paper
Stephen s	Thomas		357		Object	<p>The land to the south of the Garden Estate in Birchington is prime agricultural land - grade 1 listed and should never be built upon.</p> <p>The properties overlooking this land have rural views and this adds significantly to the value of the properties. If the home owners were compensated for loss of value, the compensation bill would run into millions.</p> <p>When the building work commenced much dust and grit would be thrown up into the atmosphere and this would cause a terrible pollution problem and when the prevailing south or south west wind blows this would blow the dust and grit into the village. This would pose a serious health hazard, particularly the elderly or those with chest conditions.</p> <p>Much has no doubt been written and discussed about the impact on the infrastructure, Hospitals, schools, public transport, doctors, dentist and the supply of utility services etc which are struggling to cope now. Birchington is not the place for house building on this scale.</p>		1049		Paper
Stevens	Angela		163		Object	<p>TDC should have submitted valid reasons why Thanet cannot cope with so many houses, not least because of being covered in prime agricultural fields. Also, see previous comments re ruining Thanet villages!</p>	Justify to MHCLG why Thanet should not have an influx of new builds so huge it will ruin Thanet for ever! This should have been done by officers ages ago!	618		Web
Sullivan	J		91		Object	<p>1. The scale of the development is completely unacceptable and would destroy the character of the area</p> <p>2. A by-pass would be essential. The A28 going through the centre of the village already causes chaos and pollution.</p> <p>3. Primary schools are planned, where do the children go form there?</p> <p>4. The new houses would not benefit the local community or provide jobs because once they have been build, the labour force would move on and the new residents would commute elsewhere to work.</p> <p>I object wholeheartedly to the proposed plans.</p>		211		Paper
Swithinb ank	Mark		303		Object	<p>I strongly object to the development of the housing (1600 new dwellings) and the proposed new road between Canterbury Rd. and Minnis Rd. for the following reasons</p> <p>1. The proposed site is prime agricultural land, which if built upon would reduce the capability of growing local produce and increase food imports at a</p>		884		Web



						time when we should be increasing local production. "When considering development proposals... poorer quality land is to be considered in preference to land of a higher quality" (DEFRA, 2107) 2. The number of houses will increase the population by up to 60% (family of 2 adults and 2 children) There doesn't seem to be a plan for increasing the infrastructure to cope with this increase ie. schools, doctors surgeries, jobs, traffic, water and other essential services. 3. There seems to be no assurances that the proposed housing will be for local people and the fear is it will be used to house by London boroughs to reduce their housing needs not ours. 4. There doesn't seem to be a traffic survey of how much traffic the new road would take and the amount of pollution it would generate 5. Unemployment is already high in Thanet. Where are all these new residents going to find local jobs?				
Thacker	Andrew		515		Object	This is Grade 1 farmland which should be used to grow crops instead of building houses. And increasing the village population by potentially another 40%. We do not have the infrastructure or resources to cope with an increase of this size. Why not utilise some of the numerous derelict houses/flats/hotels/shops + factories in Thanet instead of ruining hundreds of acres of Greenbelt land + destroying wildlife habitat.		1535		Paper
tulett	robert		355		Object	1. The use of grade 1 agriculture land. How are we to grow the food for our country when this is lost forever. 2. Brownfield sites must be used for example Manston Airport 3. Fresh clean water is in short supply in East Kent. there is no mention of where additional water is coming from. 4. Employment lack of.		1047		Paper
Twyman	Paul		324		Object	SP 14 should revert to the original	SP 14 should revert to the original	992		Email
Vincent	Scott		22		Object	My Objection is given at a high level. Bolting this many houses to an already overpopulated village in an area already struggling with regard to infrastructure is very short sighted. The road linking the A28 to Shottendane road is key to the transport strategy. However in the wording, more specific transport evaluation is given to the Westgate sites than those in Birchington. Surely significant transport planning at the source is crucial to future sustainability and viability. I note that the allotments have been removed from the plan, was this simply an error? I would also like to see more information regarding the type of development proposed ad where the extra dwellers were expected to come from?		38		Web
Vincent	Caroline	Birchingt on Parish Council	429		Object	The Parish Council were not satisfied with the consultation on the amendments, they requested an officer to attend the public meeting particularly as the amendments had significant effects on the community and this was denied. The only consultation for the people of Birchington was a small box of papers in the library, this is considered unsatisfactory. On the 14th September a public meeting was held at the Village Centre approximately 150 people attended and the public voted unanimously against the amendments regarding additional housing on grade 1 agricultural land in Birchington as presented in the latest Local Plan consultation. At the Birchington Parish Council committee meeting members unanimously objected to the latest Local Plan with the proposed 1600 houses, which is considered overdevelopment.		1240		Email

					<p>Birchington Parish council has considered the latest consultation and are particularly concerned in the following areas:</p> <ol style="list-style-type: none"> <li>1. Insufficient attention given to the water supply. The Thanet area is vulnerable to water shortages.</li> <li>2. Inadequate provision for schools with an increasing population.</li> <li>3. Inadequate provision for medical services with an increasing population, the current medical centre struggles to cope with the current population.</li> <li>4. Building on Grade 1 agricultural land will mean less locally produced products and more food being imported which also takes away local employment.</li> <li>5. Lack of employment already in Thanet which has the highest rate in Kent.</li> <li>6. The numerous objections from Birchington regarding the first consultation appear to have had no attention paid to them.</li> </ol>				
walden			378	Object	<p>I object to the above plan because :-</p> <p>Destroying Grade A farmland Thanet have some of the best farmland in England it is ranked in the top five. To destroy this would be a national outrage . The UK needs to be self sufficient in producing its own food. The farmland also provides open countryside with fantastic views, lovely walks, fresh air (air pollution being a major problem in Birchington) opportunities to see wildlife such as hares, bats, stoats, numerous birds. Building on this would destroy what little countryside we have left in Britain. Future generations will be deprived of all this. Destroying Birchington Village. We moved to a Village we wish to stay in a Village not see it turn into a concrete jungle. Road infrastructure The A28 Canterbury Road is constantly blocked with traffic. People use the side roads as a cut through with more vehicles on the road it will be gridlocked. Hospitals, Medical Centres, Schools, Employment, Water All the above are stretched with our cure population, not enough adequate provisions have been put forward If provision for the above were put in place, build on brownfield sites NOT grade A farmland which is so precious</p>		1093		Email
walden			378	Object	<p>BIRCHINGTON VILLAGE LOCAL PLAN I object to the above plan because:- Destroying Grade A farmland Thanet have some of the best farmland in England it is ranked in the top five. To destroy this would be a national outrage. The UK needs to be self sufficient in producing its own food. The farmland also provides open countryside with fantastic views, lovely walks, fresh air (air pollution being a major problem in Birchington) opportunities to see wildlife such as hares, bats, stoats, numerous birds. Building on this would destroy what little countryside we have left in Britain. Future generations will be deprived of all this. Destroying Birchington Village. We moved to a Village we wish to stay in a Village not see it turn into a concrete jungle. Road infrastructure The A28 Canterbury Road is constantly blocked with traffic. People use the side roads as a cut through with more vehicles on the road it will be gridlocked.</p>		1411		Email

						<p>Hospitals, Medical Centres, Schools, Employment, Water</p> <p>All the above are stretched with our cure population, not enough adequate provisions have been put forward.</p> <p>If provision for the above were put in place, build on brownfield sites NOT grade A farmland which is so precious</p>				
Ward	Linda		157		Object	<p>A development of this size would have a massive impact on the character of the village of Birchington, which already suffers from high levels of pollution from traffic in the square, and a medical centre which is unable to meet demand. Furthermore, the majority of the land to be used for development would be high level agricultural land, which is completely unacceptable.</p>	<p>both educational and medical infrastrucure must not be left to the whim of the developers.</p> <p>Agricultural land must be preserved to feed the nation.</p>	447		Web
Wheeler	Guy		113		Observation	<p>Birchington Specific Issues:</p> <p>On a practical level, the building of 1000+ homes on green field sites in Birchington is alarming for the following reasons:</p> <p>The water supply is dependent on a natural aquifer, and presently is unable to cope with the sewerage requirements for the area. The prospect of another sewerage plant at Minis Bay is incomprehensible.</p> <p>The proposed solution to pipe water in from a future reservoir at Broad Oak in Canterbury is unlikely to happen as land that occupies the pipe route is in private hands and unlikely to be sold for such development.</p> <p>Canterbury is expanding and it is likely any such reservoir would be only capable of supplying the city's needs and not outlying districts such as Thanet.</p> <p>The proposed new "Super Hospital" planned for Canterbury will have an adverse effect on water supplies in the Canterbury area.</p> <p>Kent County Council would be tasked with supporting a new road infrastructure, and have not detailed how they intend to deliver this (from a practical and financial perspective). Smaller access roads would fall to TDC and developer's, so far there is no evidence that any financial budgeting has been planned for the future to raise the funds required for this. The plan shows only minor road changes and has not detailed how the increase in traffic volume will be adequately catered for.</p> <p>The recent fire at Westwood Industrial estate saw a number of arterial roads either closed or heavily congestion at present traffic volume levels. To suggest that there are appropriate plans in place to cope with increased traffic volumes is unfounded.</p> <p>The philosophy of building houses first and then attracting employers and industry is a complete break with the traditional economic plan historically used in the UK, so why have TDC adopted this?</p> <p>History shows that industry is established first and then workers look to set up home nearer to their employer, not the other way round! Surely TDC are missing a trick here? Attract a number of employers/companies and get them to fund the road and utility provision required (just like supermarkets pay for road improvements-now there's a thought!)</p> <p>The use of grade 1 farm land has to be avoided at all costs as we are likely, as a nation, to experience a shortage in supply , heightened if Brexit results in import tariffs being applied to food. Protecting our assets of farm land in Thanet is, I would suggest, a trump card for TDC as it can champion UK agriculture and enjoy the potential benefits of future UK Government subsidies (Just like the current EU subsidies, this will become more relevant as time goes on).</p> <p>From a social integration aspect, the building of 1,600 homes in Birchington</p>		242		Email

					<p>will have a more devastating effect on the community as it has the potential to change the demographic in an unsustainable way.</p> <p>Currently Birchington has a mixed populace of Retired and middle aged people and young families. By far the highest percentage of social and welfare support is tailored for the older generation (housing, medical, social support). If too many young families are brought into the neighbourhood the council will be faced with massive on-costs (schooling for example) and yet no proposal has been included in the plan that realistically caters for the numbers projected.</p> <p>Of a bigger concern is the prospect that the houses on the plan will be purchased and populated by London Borough s for social housing; this goes against the notion that the housing plan is for Thanet natural expansion. It is one or the other, so, TDC which is it?</p> <p>The spectre of increasing air pollution must also be considered, Birchington already has poor air quality. With 1,600 homes in Birchington, will come the prospect of 2000 extra cars on the road, hardly a step towards reducing Thanet's carbon foot print! (note 12000 homes in total on the isle will result in a forecasted 24,000 extra vehicles a day! You can't redevelop all of Thanet to cope with this, just look at the current congestion hot-spots the Isle currently "enjoys".</p> <p>The local plan is reliant on the land owner (Birchington-St John's College) realising a suitable sale price, I can't imagine many local developer's having enough funds. This will then encourage out of Thanet developers , along with their out of town work force to consider taking on the new builds. Hardly bringing a cost benefit realisation to Thanet!</p> <p>The sites proposed for Birchington are the exact same as the areas highlighted by Southern Water as green no flood zones, hardly a surprise! But modern technology now means that even areas that suffer a degree of flooding can be utilised for building (Look at Netherlands, or closer to home, Norfolk and Suffolk). And yet no consideration has been given to this alternative.</p> <p>The Southern Water flood zone map shows fields along the dual carriageway towards St Nicholas that could be built on and a new village/small town developed. The road network would be suitable and there would be a distinction between the new area nad Birchington, thus preserving the areas integrity. Has this been explored and if so, where is the report?</p> <p>The European Commission has launched legal proceedings against the governments of Britain and five other countries for repeatedly breaching legally binding EU air pollution rules. The prospect of an additional 24,000 cars driving through Birchington everyday can only result in substantially increased air pollution and an impact on the health of residences.</p>				
White	Allan		406	Object	<p>I am opposed to this for several reasons. the first is that Grade 1 green belt land is to be used and can never be reclaimed. the land intended is amongst the top five in the country for soil quality.</p> <p>The next reason for opposition is the increase in population of the village. with an estimated 60,000 people this will have a huge impact on jobs, schools, hospital and all the infrastructure. There is already talk of the stroke unit being moved from QEQM to Ashford. I don't think the NHS can take many more patients. The medical centre is already under strain this could break it completely.</p> <p>In my opinion there are plenty of brownfield sites, old unused houses that are unoccupied. It makes no sense to use such high calibre land with amazing farming potential.</p>		1178		Paper

Williams			294		Object	<p>There is already insufficient employment in Thanet to support the existing community let alone increasing the population.</p> <p>Inadequate provision already exists with schools and social services</p> <p>QEQM can not cope now</p> <p>Medical centres are oversubscribed</p> <p>Thanet has a low rainfall and therefore is vulnerable to water shortage.</p> <p>There have been illegal discharges into the sea in Thanet by Southern Water due to bursts of heavy rainfall.</p> <p>Loss of farmland will increase unemployment</p> <p>Already Thanet has high unemployment</p> <p>Many beautiful views will be lost. Natural landscapes and access to open lands for walking aids good mental health</p> <p>This is grade 1 agricultural land. The quality of soil is amongst the top 20% of the country.</p> <p>Only 60% of food consumed in the UK is grown in the UK. This would decrease significantly with building on grade 1 land.</p> <p>Birchington's population is 10,000 This would increase by 3,000-4,000 Totally changing the nature of the village .</p>	<p>Restore run down properties. There are over 1,000 long term empty houses in Thanet.</p> <p>Use brownfield sites.</p> <p>When considering development proposals - poorer quality land used.</p>	854		Web
Williams on George	Janet		407		Object	<p>I am writing to object to the proposals to build so many new homes in the Birchington and Westgate areas.</p> <p>Whilst I recognise the need for new homes I do not agree with the vast numbers of homes planned for this area.</p> <p>I list my reasons:</p> <p>1) Population density:</p> <p>Thanet is an area of 103 square km with a current resident population of 134,000 people which is the 4th most populated district in Kent. Thanet has the 2nd highest density of population in Kent.</p> <p>2) Unemployment:</p> <p>Thanet is already an area with a high percentage of unemployment and considerable social deprivation.</p> <p>The current unemployment rate for Kent is 1.9%.</p> <p>Thanet has the highest unemployment rate of 4.9% and worryingly the highest rate for 18 to 24 year olds in the South East at 7.5%. (source: Strategic Business Development Intelligence KCC.</p> <p>Please refer to photocopies A and B.</p> <p>Where are new residents going to work. The figures speak for themselves!</p> <p>According to the Local Plan there will be inward investment to create jobs, development of Manston Park (already a contentious issue), regeneration of of town centres (how and who will finance this?), Growth of the Port of Ramsgate (which has failed in the past), and new tourism related development.</p> <p>Surely it would be preferable to attract business and commercial development to reduce the existing unemployment problem before embarking on such a vast housing project?</p> <p>Housing:</p> <p>Affordable housing should provided primarily for LOCAL people, such as key workers and people on the Housing list.</p> <p>Housing should not be bought up by London Boroughs as this constitutes social dumping to an area with high unemployment.</p>		1179	<a href="#">111 Williamson George Janet Appendix B.pdf (45 KB)</a> <a href="#">111 Williamson George Janet Appendix A.pdf (53 KB)</a>	Paper

						<p>Infrastructure:</p> <p>Thanet is currently suffering from a lack of services. The existing services such as schools, GP surgeries , QEQM are already overstretched.</p> <p>Consequently a large influx of people would therefore increase the pressure on existing services.</p> <p>Currently Thanet needs more GP surgeries, a walk in centre to help alleviate pressure on A and E at QEQM .Surely these issues should be a priority before increasing the population?</p> <p>The road network in Thanet is already overloaded leading to air pollution issues.</p> <p>Transport links need improvement.</p> <p>These issues must be addressed before any building commences.</p> <p>Environment:</p> <p>The Plan to build on prime farming land is totally unacceptable.</p> <p>The natural environment will be severely compromised due to overpopulation.</p> <p>Water supplies must be protected and light pollution issues addressed .</p> <p>Thank you for considering my comments (I hope!)</p>				
Wraight	Kenneth	1959	141		Support	Plenty of room build in birchington voters want this as shown in recent bye election		362		Web

Strategic Site Policies SP15 - Westgate										
Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
.		Tesco Stores Ltd	408	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>The allocation for Strategic Housing Site SP15 Westgate-on-Sea has increased from 1,000 dwellings in the 2015 version of the Local Plan to 2,000 dwellings in the Pre-Submission version. Again, we consider that there is little justification provided for this 100% increase. The first 50 units are expected to be delivered in 2019/20 but with no planning application submitted we consider this to be overly optimistic, and indeed, unrealistic. The proposal must include a masterplan to incorporate the provision of a District Centre, the provision of community facilities and a new link road. We consider that with all these matters to address the Council has been too optimistic with the delivery of this allocation.</p> <p>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 its 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. We therefore contend from the evidence provided within NLP's Start to Finish Report it is unlikely that the strategic sites at Birchington (SP14), Westgate on Sea (SP15), and Manston Court Road/Haine Road (SP18) will deliver units by 2019/20. Furthermore the NLP report identified the following average delivery rates for greenfield sites:</p>	<p>Provide a robust justification in the draft Local Plan for increasing the housing allocation at Westgate on Sea by 1,000 units or otherwise reduce the allocation to 1,000 units and allocate a wider range of additional housing sites to make up the shortfall.</p> <p>Apply a more realistic housing trajectory in Appendix B in recognition of the planning status of the site.</p>	1188		Email

						<p>On sites of 500 – 999 dwellings, the average annual delivery rate was 86 dwellings per annum;  On sites of 1,000 to 1,499 dwellings, the average annual delivery rate was 122 dwellings per annum;  On sites of 1,500 to 1,999 dwellings, the average annual delivery rate was 142 dwellings per annum; and  On sites of 2,000 or more dwellings, the average annual delivery rate was 171 dwellings per annum.  Appendix B to the Local Plan ‘Housing Allocations and Permissions’ sets a trajectory for Westgate which anticipates 200 dwellings per annum will be delivered from 2024/25 onward for a sustained and consecutive period of 7 years. We contend this is overly ambitious and unrealistic.  We therefore consider that this site (SP15, Westgate-on-Sea) 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.  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.</p>				
Alan Byrne/English Heritage			155		Object	<p>Policy SP13 - Policy SP18 -Strategic Housing Sites - notwithstanding the mentioning of heritage assets within the individual site allocation policies and the requirement to have regard to them in preparing development proposals, we are concerned that insufficient prior assessment of potential impacts on those assets has been undertaken in advance of the site allocations. We are unable, therefore, to fully understand the likelihood or otherwise of impacts occurring that harm (or indeed preserve or enhance) the significance of the assets.  For this reason, Historic England is unable to support these policies as they are currently drafted and suggest HIAs are carried out to inform the policies in advance of the EIP. The policies may have to be redrafted in light of the assessments if potential for harm is identified.  (See also the not below on HIAs).</p>		1002		Email
Andree	Karl		41		Object	<p>As a long-term resident of Westgate I wish to register my strong opposition to any further developing and building of new houses in the area. Not only will this</p>		92		Email



						<p>put further demand on stretched resources and facilities but will also bring more cars on the local roads and damage the environment and encroach on valuable green. This will only bring benefit to the developers and spoil the environment and ambience for the current residents.</p> <p>I implore you to stop and not consider any further developments from being considered in Westgate and its environs.</p>				
Attwood	Christine		97		Object	<p>Unfortunately, I have been unable to attend the meetings held in Westgate-on-Sea regarding the current consultation and would like the following points to be considered:</p> <ul style="list-style-type: none"> <li>• The 2011 Census shows Westgate-on-Sea had 6,996 residents and 3,615 dwellings (3,255 households). The proposed 2,000 dwellings therefore seems excessive and would drastically change this small town with a distinctive village character.</li> <li>• The number of proposed dwellings would cause a significant loss of grade 1 agricultural land. Once built on it cannot be recovered.</li> <li>• The proposed dwellings would significantly affect residents of Wellesley Close, St Benets, Crofton and St Jean's Roads and those living at the Shottendane Road end of Minster Road by encroaching on their homes and denying them the views of greenery and wildlife they currently enjoy.</li> <li>• Primary schools in Westgate-on-Sea are already oversubscribed and the town's doctor's surgery is operating at full capacity</li> <li>• Doctor's surgeries elsewhere in Thanet have been having recruitment and retention issues. Many are not accessible to residents of Westgate-on-Sea by public transport.</li> <li>• Social affordable housing is required for Thanet residents not those of London boroughs</li> <li>• The lack of employment opportunities in Thanet</li> </ul>		220		Paper
Austin	J		465		Object	<p>I would like to say a few words regarding the talk of houses being built around the area of Westgate. It is not acceptable as there are not enough schools. Dr surgurys in the area, also Dentists The area is on Agriculture ground. plus it is flood ground.</p>		1328		Paper
Bartlett	H		370		Object	<p>I am writing to oppose the housing sites proposed in the Draft Local Plan 2031 for Westgate-on-Sea and Garlinge.</p> <p>Firstly traffic impact an additional 2,000 homes could equate to additional 8,000 people (4 to a home average family) 4,000 cars as most people have 2 cars. The housing sites proposed are served by narrow or rural roads which are narrow and congested now and</p>		1068		Paper

					<p>would be unsuitable for particularly heavy plant and machinery needed to access proposed sites. Therefore in particular Shottendane Road would need widening and would mean loss of more farmland but if has to occur should be done prior to any permission to build houses and paid for by the building firms.</p> <p>Impact on the environment and local landscape would mean loss of prime agricultural land and goes against Local Plan of keeping openness of countryside which is a scarce commodity in Thanet. The Green Wedges must be protected as one site west of Allen Avenue has been offered for 130 plus homes which would reduce the Green Wedge and with no thought to access to proposed houses other than out onto Shottendane Road (rural narrow road ) or through The Warren Drive which is narrow and along Lymington and Linksfield Road which would not sustain heavy vehicle use due to size of roads only just suitable for cars. If building on Green wedges is allowed this goes against Local plan of keeping each town or village separate and the Council should adhere to section 4.12 under section of Green wedges which state they should be protected,therefore joining Westgate-on-Sea to Birchington and in the process wildlife habitat public footpaths will be lost. Because farmland will be built over future food production and farm jobs which goes against Local Plan of promoting jobs in the Green Sector will be lost. The field at Garlinge is also an important heritage site so would be surrounded by a housing development!</p> <p>Local services are already under strain the GP surgery in Westgate-on Sea cannot expand at present site. The Queen Elizabeth Queen Mother Hospital already over loaded and is in processes of being downgraded which means patients having to travel further afield for care impacting on surrounding roads as far as Ashford.</p> <p>Needs to be increase in provision of emergency services and increase in police as crime rates will increase.</p> <p>No adequate school provision made local primary St Crispin's already over subscribed without additional housing being built Westwood Cross has been allowed to expand without school provision so additional problems in education already.</p> <p>Where are additional jobs being created ? Thanet already has high unemployment compared with rest of Kent the Business parks are only 30% filled at present time .Tourism is seasonal low paid work and by building over farmland you reduce Green sector jobs that the Council are so keen to</p>				
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						<p>promote.</p> <p>Manston airport is already closed unlikely to be viable as operational airport so houses should be built there as better road access already.</p> <p>Thanet has to have a local plan but this is contradictory and poorly thought out we have plenty of Brownfield sites but of course cheaper for companies to build on Greenfield as zero rated for V.A.T. and blight our countryside for future generations. Will the Council make sure houses are for Thanet residents first or will London boroughs buy them up creating more problems and making a dumping ground in Thanet.</p> <p>Thanet has been allocated to build more houses than anywhere else in Kent based on just taking the highest number of houses built in last ten years and not basing it on an average so because of this we have ended up with such a ridiculously high number of houses required to be built when a lot less needed.</p>				
Barton	Jean		101		Object	<p>I am writing to oppose the Local Plan for housing sites at Westgate-on-sea, Garlinge and Birchington.</p> <p>First I fail to understand why the term ‘Local’ is used to describe this plan, it neither represents the needs of the local people or any growth in our population. This plan only represents the needs of other areas who have failed over the years to make adequate provision for their growing housing problems.</p> <p>I have lived in Thanet all of my life and moved back to Westgate-on-Sea from Margate six years ago, back to the home I was brought up in. Over the years my family and I have witnessed the tragic loss of several delightful, architecturally stunning buildings to the greed of various developers in our lovely little town by the sea. Local bodies were not quick enough to award these historic buildings with listed status and now they are gone forever.</p> <p>The proposal to build thousands of houses on Grade 1 agricultural land adjacent to these three communities is in my view barbaric. Our local farming community is precious and should be awarded protection not only for the preservation of local jobs, wildlife and for our future but once that Grade 1 agricultural land is built on there will be no turning back. In the words of Franklin D. Roosevelt ‘A nation that destroys its soils destroys itself’.</p> <p>Southern Water has already stated that water supplies “half of demand” by 2030 and will be looking to encourage customers to use less even though here in Kent we the customers are among the most water efficient in the UK. Southern Water on the other hand</p>		226		Email

					<p>is the worst water company for complaints as broadcast recently on local radio from official statistics. It has been stated by Southern Water that Westgate does not have the capacity to either supply water or dispose of waste water for the number of housing proposed in the earlier Local Plan, even greater numbers of houses on the new Local Plan can only exacerbate this problem.</p> <p>If the Government dictates to local Councils, these houses should be built then the infrastructure should be put in place first and funding supplied by the Central Government. Road building should be completed before house building starts. Thanet's roads are greatly congested and many in desperate need of repair. When repairs are made or when one main road is closed for repair, installations or accidents there is mayhem on all other roads with traffic at almost standstill.</p> <p>The strain on the local Doctors (oversubscribed by 200 patients already), Dentists, Hospital, Mental Health Unit and Police would be unbearable. The A &amp; E Department at QEQM. is already overstretched and now we have looming over us the loss of the stroke emergency care to Ashford a good hours drive away if the traffic allows.</p> <p>Our local primary schools cannot accommodate the number of applicants each year as the population stands at present and the promise of another infant school for Westgate quite honestly does not quell my fear for the future educational needs of this area.</p> <p>In the new local plan the projected new jobs in Thanet is 5,000 and the planned additional housing is 17,500 meaning probably a 35,000 addition to the population. These projections only spell one thing; many thousands of people either unemployed or having to commute out of area. If Westgate-on-Sea has the additional 2,000 houses as in the new local plan that equates to 4,000 people trying to exit Westgate to get to their place of work because it will not be in Thanet.</p> <p>Westgate-on-Sea has a small Railway station with no parking facility so good luck to any commuters with your walk to the station and back after your long day at the office.</p> <p>Finally, Should any of the proposed housing go ahead the very least that should be demanded is a park. There is not one park in either, Westgate, Garlinge or Birchington . There are two or three recreation grounds (NOT Parks) and in consideration to the fact that you will be removing the local open space which is a requirement to maintain the quality of life, it is vital that part of the plan for Westgate, Garlinge and</p>				
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						<p>Birchington incorporates at least one decent sized park. Not much to ask when you consider that Margate has the luxury of three parks.</p> <p>Please rethink your plan. If more housing is absolutely needed, which I doubt, especially the numbers, they should be placed in an area that has easier access to out of the area i.e. The Thanet Way.</p>				
Blewitt	John		35		Observation	<p>It is quite obvious that a new main relief road will be required. starting at Brooksend. Following roughly the route of Crispe Road, via Acol Margate Hill and Shottendane Road. This would relieve some of the extreme traffic congestion that already exists at the A28 Junction at Birchington Square and Minster Road Westgate. Also this route will be run mainly over exiting farmland.</p>		71		Web
Bottali	Denise	1962	325		Object	<p>I would like to register my objection to the Local Plan, with regards to housing being built on grade 1 agricultural land at Garlinge, Westgate and Birchington on the grounds that no such development should be given permission on land that is used to grow our food, especially with the uncertainty of Brexit looming.</p> <p>You should be using all brown field sites (apart from Manston) and compulsory purchasing empty and derelict homes across the Isle and renovating these for local people awaiting housing instead of lining the pockets of developers and playing into the hands of London's social cleansing, of which the Isle of Thanet cannot sustain such an increase in it's population.</p>		999		Email
Bradley	Susan		171		Object	<p>I have attended meetings regarding the proposed building of 2000 houses on Class 1 agricultural land between Garlinge and Westgate and write to outline my views on same:</p> <p>Firstly it is scandalous that you are proposing to build on class 1 agricultural land which provides food for the people of this country. Once this land is concreted over there will never be another opportunity to retrieve it again. Kent is not called the Garden of England for nothing.</p> <p>Currently the infrastructure in Thanet is not sufficient to service the indigenous population. By that I mean that there are not enough of the following:</p> <p>Hospitals (see 3)</p> <p>Jobs (see 4)</p> <p>School places (see 5)</p> <p>Appointments at Doctor's surgeries (see 6)</p> <p>Roads (see 7)</p> <p>Water (see 8)</p> <p>QEQM, our local hospital, is already in danger of having the stroke unit relocated elsewhere, which will endanger the lives of the residents of Thanet who will have to travel up to an hour to receive treatment. How</p>		491		Email

					<p>can adding thousands more people to the equation help this situation. People will die as a result. Where are all these extra people going to find jobs? Thanet is already one of the most deprived and has one of the worst employment records in the country and many of its residents are in receipt of benefits. Thanet Schools are already overcrowded with class numbers rising higher. Where are the new children going to be educated. Are you going to build new schools?</p> <p>Have you tried to get an appointment at your doctors surgery recently? People have been known to wait up to three weeks to see their doctor. Thousands of extra people in the area are going to put even more pressure on the system ensuring that people will wait even longer to obtain an appointment. Again people will die</p> <p>As a resident of Linden Road, I frequently travel along Minster Road and Shottendane Road in order to reach Westwood Cross. Both these roads are narrow and carry a lot of traffic. With the proposed erection of circa 2000 houses, the traffic is going to increase hugely. This will increase pollution and increase the likelihood of road accidents. Especially as there are several schools (already oversubscribed) in the area. During the summer months, when the rainfall is light (or in the case of 2018, non existent) there is always the threat of a hose pipe ban. How will the addition of 2000 houses assist in reducing the likelihood? It is very plain to see that this resource will be under threat and a hose pipe ban will become the norm.</p> <p>As stated in item 7, pollution is most likely to increase. This in a coastal area where fresh sea air should be the normality. Traffic on the Canterbury Road is already heavy and standing at a traffic crossing, as I frequently do, the fumes coming from the vehicles is toxic. I have thought of wearing a mask when walking.</p> <p>There are hundreds of empty properties in Thanet which can be utilised to accommodate families without the need to build on and concrete over sacred agricultural land. Do you really propose to build a concrete jungle which can then never return to its original purpose?</p> <p>Please consider the environmental damage that will be caused to the locality if all the fields and hedgerows are embedded in concrete</p> <p>To summarise, there appears to be no reasonable explanation as to why Thanet needs to be completely destroyed by building thousands of extra dwellings and which appear not to be destined for local people</p>				
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						The country is overcrowded and this is as a result of various governments' immigration policy over the years. Now WE the indigenous population have got to be punished as a result.				
Brown	Jacqueline		47		Object	<p>Proposed 2,500 Houses to be built in Westgate on Sea, Kent</p> <p>Please accept this letter as formal letter of objection against the proposed 2, 500 houses to be built In Westgate on Sea 21,000 houses across Thanet in total The reasons being:</p> <p>Lack of suitable infrastructure:</p> <p>1 Access - Only suitable roads for access are Minster Road and Victoria Avenue to fields with proposals to be built on In Minster Road; both of which are purely residential, and are already gridlocked in the mornings and evenings. The parking for cars of residents is already abysmal. When Sainsbury wanted to build a store on Canterbury Road, Westgate on Sea, one of the main reasons for not allowing planning permission was that there would be too much traffic going into the Canterbury Road to be safe. This plan would involve at least a further potential 2,500 cars going from Minster Road or Victoria Avenue on to the Canterbury Road every day,. whkh would pose even more of a hazard. (Shottendane Road ~s a B road and is already highly hazardous)</p> <p>2 Employment - There are no jobs, factories or large shops in Westgate &amp; Gariinge. There are no factories in Thanet hence it is an area of high employment there is no industry and further jobs ironically will be lost in the agricultural area when the fields are built on taking more employment opportunities away.</p> <p>3 Margate hospital - The hospital is struggling to cope with Thanet's current population level and there are already long waiting lists. My husband has a heart condition which results in him having to go into A&amp;E at times and the queues of people waiting to be seen are atrocious. This will only worsen if this proposal goes ahead. It was reported in the local media and I think it may even have mad national news last year Queen Elizabeth the Queen Mother Hospital had to call in Red Cross volunteers because the staff who do an excellent job were struggling to cope with the number of patients needing attention. I can't imagine that situation has improved. I have heard accounts from work colleagues and friends· who have had elderly relatives having to go into QEQM of them having to be kept on trolleys due to the lack of beds. The hospital's Stroke Unit is also under threat of closure which would put the people of Thanet's lives including my husband's</p>		114		Paper

						<p>at risk if forced to then travel to William Harvey hospital in Ashford. Thanet has not got the infrastructure to take this level of increase in population.</p> <p>4 - Local GPs Surgery - The surgery in Westgate Bay Avenue is already over subscribed. Westgate is not a suitable area to take such a huge expansion in population.</p> <p>5 Dental Surgery - There Is only one private dental practice in Westgate</p> <p>6 Schools - The local schools are already full and increases in class sizes to cope with the larger number of children in the area would be to the detriment of children's education and well being.</p> <p>7 Water and Sewage - There is already inadequate water on the island, which often leads to water restrictions during in summer. I wonder if the reasons there were no restrictions this summer was because this was just around the corner and would have added further weight to this argument! The sewage plant at Broadstairs is already prone to overflows into the local bays which is not good for tourism the risk of likelihood of this occurring would greatly increase. The treatment plant is working at it's full capacity and would not cope with the proposed level of new housing.</p> <p>8 Westgate is already at capacity of population with around 6,996 people taken from 2011 census. The town has taken as much development in recent years as it can accommodate. This scheme could see this rise again four fold. The roads are filthy as it is. For example the top end of Victoria Avenue. This situation can only deteriorate further with a 2,500 new homes! There is limited vehicular access in the area due to cars having to park on the roads, pavements and verges as the roads in the area have terraced houses, Victoria Avenue, Belmont Road, St Benet's Road for example. There are areas in Thanet which are rundown and derelict putting new houses into these areas would actually enhance Thanet. These opportunities should be used instead of green field sites. This is the easy option for developers and maximises their profits. This is the main reason for this for property developers in London to free up very expensive land and housing in the capital and for developers locally to make massive profits.</p> <p>9 Thanet is an area of high social deprivation already with high unemployment levels. The majority of the isle's children leave school with low aspirations and little hope of finding employment as it is. If the population is increased by the levels these proposals would bring, this will sink Thanet into higher</p>				
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					<p>levels of social deprivation. Indeed Thanet isn't suitable we have enough problems and issues already.</p> <p>Loss of valuable agricultural land and habitat for wildlife</p> <p>1 The fields are important to grow fresh food, produce from companies growing hydroponically just doesn't taste the same as that grown in s-Oil under natural conditions. This factory growing of crops and also looks to use a huge amount of energy if the light pollution from Thanet Earth is anything to go by. If our fields are built on this will mean having to import more food from abroad leading to higher costs and larger carbon footprints.</p> <p>2 The fields provide a habltitat for small mammals and invertebrates. Birds use them to hunt or forage for food. Currently walking along the verges to the fields you can see birds hovering above the fields they will lose a vital hunting area if this plan is given the go ahead. Our green spaces are precious to our indigenious fauna. One of the many species of birds that make their home in the fields on Minster Road are Skylarks which are protected and under threat. The hedgerow supports pollinators such as bees and butterflies vital for a healthy planet and again they are under threat as is widely reported in the media. My family and I great value living dose to the fields and feel privileged to see the flora and fauna it supports on our walks along side them,</p> <p>We are living in an increasingly unstable world if war were to break out in the future and we have concreted over our agricultural land and are unable to grow our own food the people of this country would be in a very precarious position. We can't just plan for now we have to think what could happen in 20, 50, 100 years from now because once we've lost this land there is no getting it back.</p> <p>Increased Risk of Flooding</p> <p>The fields help to soak up water during periods of heavy rain without them the area could be at greater risk of flooding. Has the council consulted the Environment Agency about this·? If so is the report in the public domain I live very close to the fields in Minster Road which are under threat of development so would be directly affected by risk of flooding:</p> <p>Summing Up</p> <p>I think the housing policy in the local plan needs to be rejected and proposed number of houses to be built hugely reduced and vacant buildings both residential and former businesses should be used along with brown field sites. Agricultural land and all green</p>				
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						spaces should be left as they are. The architects need to think smart to use the vacant buildings and brown field sites to maximise the number of dwellings. Car parking should be put under ground to create more space. With communal gardens including a vegetable plot and children's play area as well as an area for residents to enjoy beautiful flowers and get together for picnics and barbecues instead of individual tiny gardens. We need to create communities I sincerely hope you will take the issues and points I have raised in this letter into consideration when making your decision and will opt to reject this proposal. I also feel there should be a government enquiry into this as once the land is gone the decision cannot be reversed and we have lost it forever				
Brown	Stephen		110		Object	<p>Please accept this letter as formal letter of objection against the proposed 2, 500 houses-to be built in Westgate on Sea</p> <p>21,000 houses across Thanet in total</p> <p>The reasons being:</p> <p>Lack of suitable infrastructure:</p> <p>1 Access - Only suitable roads for access are Minster Road and Victoria Avenue, both of which are purely residential, and are already gridlocked in the mornings and evenings. I experience this every day in journeys by car on this road; as it is I consider this to be one of the most dangerous roads to drive along in Thanet.</p> <p>2 Employment - There are no jobs, factories or large shops in Westgate &amp; Garlinge. Thanet is an area of high employment there is no industry. I am not convinced by projections of new jobs being brought to the area and can only see short term employment brought in the construction industry. Long term these proposals will lead to higher unemployment in the area.</p> <p>3 Margate hospital - The hospital is struggling to cope with Thanet's current population level and there are already long waiting lists; I have several severe health conditions including a heart problem which means I have plenty of experiences myself and of observing the queues of the people waiting to be seen at Queen Elizabeth Queen Mother hospital. The staff do an admirable job trying to manage this at the present time. The situation would greatly worsen if more houses are built in Westgate and Garlinge and I worry from a personal level how this would impact on me. The condition I suffer from Atrial Fibrillation puts me at a higher risk of suffering a stroke if the stroke units at Margate and Canterbury are closed down and I had to travel to William Harvey hospital in Ashford I believe this would put me in greater danger as all advice with</p>		235		Paper

					<p>strokes is to be treated as soon as possible time is of the essence in achieving a good outcome so another huge worry I have is that the stoke unit at my nearest hospital will be closed down.</p> <p>4 - Local GPs Surgery- The surgery in Westgate Bay Avenue Is already over subscribed. Currently it has registered over the 10,000 patients it was built to serve and has been extended to it's full capacity . Westgate is not a suitable area to take such a huge expansion in population .</p> <p>5 Dental Surgery - There is only one private dental practice in Westgate so would be unable to support such a rise in population.</p> <p>6 Traffic Congestion across Thanet - Whereever you go in Thanet you get caught in traffic jams which causes stress and frustration to road users. You need to allow at least an extra half hour for any appointments to ensure being there on time. I am also concerned about the pollution all these stationery vehicles are producing.</p> <p>7 Water and Sewage - There is already inadequate water on the island, which often leads to water restrictions during in summer, and the sewage plant at Broadstairs has in the past had over spills into the local bays which is not good for tourism. Margate is just building this up with the Turner and Dreamland effect these proposals threaten to undo all the good work that has gone into regenerating Margate so far. The treatment plant is working at it's full capacity and would not cope with the proposed level of new housing across Thanet.</p> <p>7 Westgate has already more than reached it's population capacity. Thanet has already taken more than it's fair share of development and already has 3 times over the average for Kent 439. The Thanet average is 1368 which goes a long way to explaining the problems already covered in earlier points the traffic chaos, huge strain on the local health service providers at the hospital and in the local practices across Thanet. High levels of unemployment. There are around 2000 empty properties across Thanet which should be utilised to provide for local housing needs.</p> <p>Loss of valuable agricultral land and habitat for wildlife</p> <p>1 The fields at risk of being built on are prime agricultural land which serves a far more valuable purpose in it's currrent use to grow food. This scheme blatantly contradicts the government's plan for agricultural self suffiency post Brexit. If we can't grow our own food in this country we are going to have rely on costly food imports. Kent is the garden of England</p>				
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					<p>we should preserve our fields which are iconic parts of our landscape, it is a huge part of Kent's identity. Once we have lost this land we cannot get it back.</p> <p>2 The fields provide a habitat for animals and insects. Birds use them to hunt or collect seeds and plants for food and small birds nest in the hedgerow. Every day I walk with my dog along the verges to the fields I see birds hovering above the fields they will lose this crucial hunting area if this plan is approved. Our green spaces are precious to our native species. One of the many birds that make their home in the fields on Minster Road are Skylarks which are protected and under threat. The hedgerow running beside the fields provides pollen and nectar for bees and butterflies as we all know they are under threat from loss of habitat as well as pesticides.</p> <p>3 The fields and open space enrich our lives and are good for our well being. I can't imagine not being able to walk by them with my dog. My wife and I treasure being able to pause on our walks and listen to the bees buzzing and the birds singing. They provide precious moments of calm and peace in an increasingly hectic and noisy world. With my health problems they offer a place of tranquility and beauty which is vital to me and I'm sure many other local people.</p> <p>Increased Risk of Flooding</p> <p>The fields help to soak up water from heavy rain without them the area could be at higher risk of flooding.</p> <p>I sincerely hope you will take the issues and points I have made in this letter into consideration when making your decision and will decide to reject this proposal. I also think there should be a government enquiry into this as once the land is gone as I have already said but can't stress this enough the decision cannot be reversed and we will have lost it forever. The Campaign for the Protection of Rural England rightly is opposed to the development of agricultural land. Please also consider this in your decision making.</p>				
Burnett	Gordon		342	Object	<p>The loss of Grade 1 agricultural land - we need to be able to provide food locally rather than rely so heavily on imports. Last year both skylarks and cuckoos have been found in the area between Minster and Shottendane Roads and are on the RSPB's Red List of endangered species. •</p> <p>Access roads. In my opinion, Minster Road, Garlinge High Street and Briary Close are too narrow to cope with more traffic than they already do. Due to parking, cars etc. frequently have to give way to oncoming traffic making it difficult for pedestrians to cross Minster Road and Lymington Road. This problem is</p>		1026		Web

					<p>exacerbated at school run times and the evening rush hour. •</p> <p>The need for so many houses and the lack of jobs. The number of proposed houses will destroy the unique nature of Westgate-on-Sea and Garlinge and cause the loss of green wedges. There are already a high number of unoccupied buildings in Thanet and, with the demise of the High Street, it would seem a better idea to convert the empty shops into living accommodation. There is a general view that the London Boroughs will use the new houses for their tenants. Thanet has always been an unemployment black spot so how will those of working-age find jobs? If elderly people are encouraged to move into the area, I fail to see how our existing medical and social service facilities will cope. •</p> <p>Medical facilities and schools. The overall impact of 12,000 houses in Thanet will inevitably impact upon existing medical facilities and schools. The QEQM Hospital is already fully stretched and it was stated at the meeting held at Westgate Pavilion in January that doctors in both Westgate and Garlinge have a higher caseload than the recommended number per doctor. Similarly, St Crispin's School already has more Westgate children applying for admission than places available. Young children need to go to school close to home not be bussed or taken by car (thus increasing traffic problems) to other places in Thanet. In the past 5 years or so, the buildings of Westgate Surgery and St Crispin's have been extended and further expansion at their present sites seems unavailable. Prior to the building work at Westgate surgery, unsuccessful attempts were made over a number of years to find a suitable alternative site. Garlinge used to have separate buildings for its infant and junior schools but both schools now share the same building so again space in Garlinge is already at a premium. •</p> <p>Water supply and sewerage systems. In the 1973, flooding in Westgate from the site of the proposed development to a large area south of the railway line led to a loss of life. Sewerage systems in the area are frequently unable to cope leading to sewerage being discharged onto Thanet beaches. This is neither good hygienically nor for an area so dependent on tourism. Thanet is an area of low rainfall so again the need for extra domestic water seems to pose unnecessary risks.</p>					
Campbell	Elizabeth		425		Object	<p>I have lived in Westgate for 38 years, its a lovely little place to live. I don't agree that having more people in a small town like Westgate would cope, with doctors and schools. The roads with to many cars parking is bad now. It would be a bad thing to lose all ower farm land. How would people find work in Thanet? We are</p>		1210		Paper

						told to save water, we will use more.				
China Gateway International Ltd.		China Gateway International Ltd.	503	Abraham Laker - RPS	Object	<p>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.</p> <p>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;</p> <p>The allocation for Strategic Housing Site SP15 Westgate-on-Sea has increased from 1,000 dwellings in the 2015 version of the Local Plan to 2,000 dwellings in the Pre-Submission version. Again, we consider that there is little justification provided for this 100% increase. The first 50 units are expected to be delivered in 2019/20 but with no planning application submitted we consider this to be overly optimistic and unrealistic. The proposal must include a masterplan to incorporate the provision of a District Centre, the provision of community facilities and a new link road. We consider that with all these matters to address the Council has been too optimistic with the delivery of this allocation. 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> <p>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.</p>		1418		Email
Cooper	Barbara	Kent County Council (KCC)	514		Object	<p>Provision and Delivery of County Council Community Services: KCC would like to see the policy amended as follows:</p> <p>"3) provision of community facilities as outlined in the Infrastructure Delivery Plan including an area of regularly shaped land within the development of no less than 2.05ha to be transferred at nil value to the County Council for the purposes of providing a Two</p>		1503		Email

					<p>Form Entry Primary School. The site to be adequately serviced by the developer, including utilities and highway access. And 1ha of land for a new medial centre.”</p> <p>PRoW and Access Service: KCC recommends the inclusion of the following text into the policy: Incorporate and provide for connections and improvements to existing PRoW and cycle networks facilitating walking, cycling and public transport to, from and within the site.</p> <p>To incorporate and provide for connections and improvements to existing PRoW network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.</p>				
Cornford	Joanna		367	Observation	<p>Informed and considered planning based on the needs of our area, Westgate on Sea, should in the view of those who live and work in this area concentrate on: Bringing back into use empty properties Development of brown field sites Provision of adequate infrastructure</p> <p>Provision of adequate facilities for our already over stretched services</p> <p>The Draft local Plan as presented is full of fine words with little relevance to our needs.</p> <p>The Draft local Plan is obviously a 'quick fix' for central government initiatives, following the neglect by former governments, to provide adequate housing stock Nationwide.</p> <p>Since 2015 the objectively assessed figures for housing in Westgate on Sea have been proved inaccurate by those who have researched the figures (Neighbourhood Plan Steering Group NPSG and CPRE).</p> <p>This Draft local Plan proposes to build on grade one agricultural land at a time when scientific concerns exist that our three most important issues this century are:</p> <p>Food scarcity</p> <p>Depleting natural resources</p> <p>Climate change</p> <p>The National Union of Farmers are calling for politicians to encourage new investment in farming; at a time of climate change with long growing hours, farm land in the south will have the ability to grow crops that thrive in warmer soils, crops we now expensively import but in the future will be unavailable due to climate change (a reality which central government continue to put their heads in the sand over).</p> <p>Global food demand will rise by at least 60% over the</p>		1064		Paper

					<p>next 35 years but supply will be significantly challenged by the increasing scarcity of natural resources of fresh water and quality growing land, this is fact.</p> <p>To concrete over grade one agricultural land is morally unacceptable, can we honestly believe that future generations will congratulate us on accepting these choices?</p> <p>This Draft Local Plan is wordy, ill devised and unattainable relying on inflated figures and driven by the greed of those who benefit financially with no thought to the consequences for our descendants; our children, our grandchildren and their children- the future.</p> <p>This Draft Local Plan is unacceptable in that it contravenes many planning ideals such as ratio of land per houses, it is inaccurate in its calculation. Thanet is unique but it is at the 'end of the line' people come here to retire and to holiday along our beautiful coast line, the district council has never been able to encourage a better economy the geographic and the demographic hinder this.</p> <p>We are already overloaded our infrastructure cannot cope, facilities are being cut back despite being already oversubscribed; QEQM (Queen Elizabeth the Queen Mother) hospital, once acclaimed, is now being downgraded so that our older population have to find their way to Ashford, their families, their loved ones have to travel at their own expense to support their sick family members this is an unacceptable state of being in the 21st century it is unaware and punitive for those who need the support the most. Schools are overloaded the Ursuline College with its new buildings will be at maximum capacity before any new homes are created.</p> <p>This plan needs to be bespoke to our area, with the right thinking this is achievable for the future of our residents and our area.</p> <p>The Draft Local Plan needs to be viable and provide for positive improvements for the community we are already in, not a community that cannot be sustained. Not a Local Plan which provides in the here and now to satisfy the needs of those who only seek to profit from the area.</p> <p>Proper consideration should be our right, especially when the effects are so far reaching.</p>					
Corsby	Dave		331		Object	<p>The local plan allocates land for 17,000 new dwellings with 5,300 of them in Birchington, Westgate and Westwood on top grade agricultural land. The national Planning Policy Framework does not specifically identify self sufficiency in food production as a requirement for planning authorities to consider but</p>		1013		Paper



					<p>advises that where significant use of agricultural land is necessary to meet allocation targets local authorities should seek to use poorer quality areas.</p> <p>The guidance does not meet the unusual situation in Thanet where almost all the land allocated for housing development is precious top grade agricultural land. None of the farmland in Thanet should be built on. Any shortfall in housing requirements should be met by using brownfield sites and rugged sites in the north which are unsuitable for agriculture.</p> <p>The present plan is based on a blinkered approach that we must have extra houses even if that means permanently destroying top grade agricultural land which is needed to provide self sufficiency in food supply.</p> <p>The comprehensive considered Local Plan for Thanet is flawed by a misconception that the additional houses have to be tacked onto existing conurbations. The proposals are unfairly onerous to Birchington with 1600 houses and Westgate with 2000 houses allocated while Minster, Monkton, St Nicholas, Cliffsend have escaped with relatively few additional houses.</p> <p>Instead of further pressure on existing Thanet communities no consideration or provision has been given to the alternative of building new and largely separate communities with access which would not put pressure on existing transport and services in Thanet. It would be better for new house building to be undertaken in the areas:</p> <ul style="list-style-type: none"><li>• North from Potten Street towards Plum Pudding Island with independent direct access to the Thanet Way (A299);</li><li>• West of St Nicholas towards Wagtail and Marshside with independent direct access to the Thanet Way (A299);</li><li>• Between Minster/Monkton and Richborough with independent direct access to the A253 between Gore Street and Monkton and or access to the A256;</li><li>• South of St Nicholas in the areas surrounding Down Barton Road and Summer Road extending towards independent access to the A299 and A28.</li></ul> <p>It is difficult to understand why the Plan seems set on spoiling the existing Thanet towns and villages when the alternative of creating new independent hamlets would largely avoid this. Is it that tagging onto existing infrastructure is easier simpler quicker and more lucrative for developers? A look at the map shows that new hamlets at say Potten Street, Wagtail, Down Barton and Ebbsfleet would pose a less undesirable outcome than the present proposals. The suggested house building programme appears to be a</p>				
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						short term fix which will create a permanent deterioration.				
Dadd	JC		95		Object	<p>I wish to register my strong objection to the proposed housing development at S 1 - S2 Westgate, Garlinge and other agriculture areas of Thanet.</p> <p>I do not believe Thanet can sustain such a high proportion of housing and also the high proportion of traffic.</p> <p>These proposals will alter the character of Westgate and Garlinge and the rest of Thanet to such an extent that they will not be recognisable.</p> <p>I would like to make the following points:-</p> <p>1) The loss of valuable Grade 1 and Grade 2 agricultural land. Due to the imminence of Brexit we will need good agricultural land for future use, and Thanet has some of the best growing soil in the UK. To put houses on this land is just not acceptable.</p> <p>2) The hospital, doctors and dentists cannot meet the demands required at the moment, with the present level of population, and certainly could not cope with the addition of 17,000 houses, i.e. average of 2 adults and 2 children per family which amounts to an increase in population of 34,000 adults and 34,000 children which would equate to 68,000 more people on our small, already overcrowded Island.</p> <p>3) Water and waste disposal would have to be dramatically increased.</p> <p>4) I strongly believe housing should be for local people, and I do not think there will be anywhere near the demand for this number of houses.</p> <p>5) There are not enough schools to cope with this increase.</p> <p>6) There is not enough work for the present population, so how would a further 34,000 adults be employed?</p> <p>7) The huge increase in traffic would be bad for health and the environment. Because there are already two schools in the close vicinity of Minster Road the areas of Minster Road and Lymington Road are already gridlocked between 8.30 and 9.15, and again from 3pm to 3.30pm. Any emergency vehicles needing to use these roads at these times are met with a huge problem at present, which will become much worse if the proposed houses are built. Crossing the road at any time is a problem especially for families taking children to school, Add thousands more vehicles to this it would make it horrendous.</p> <p>8) The refurbishment ,of derelict housing stock should be brought back into use, for example the old home for the blind on Westgate sea front.</p> <p>9) The use of brown sites should be encouraged.</p>		218		Paper

						<p>10) We are only a small island and if these house builds continue every 13 years, Thanet will disappear under concrete and tarmac.</p> <p>11) The character of our lovely villages and small towns, along with agricultural land, needs to be protected at all costs</p>				
Davies	Julie	CPRE Kent	147		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>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.</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>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.</p>		387		Web
Dennis	BL & LA		354		Object	<p>We are writing to oppose the housing sites proposed at Garlinge and Westgate-on-Sea for the following reasons:-</p> <p>1) Impact on traffic and congestion along Minster Road Westgate on-Sea ,Garlinge High Street and Shottendane Road all of which are narrow and would be unable to cope with a higher volume of traffic , heavy plant and machinery along them.Prior to any building taking place the Council should ensure road widening occurs first paid for by the construction companies to reduce congestion and pollution levels in the area.The amount of houses being built is based on the highest amount of houses built over the last 10 years in the area and not an average therefore the amount this area is being asked to provide is far too many we have the highest allocation in Kent!</p>		1046		Paper

					<p>2} We disagree with potential site of west of Allen Avenue Westgate-on-Sea which is sited in the Green wedge separating Westgate-on Sea from Birchington being offered as a possible site for 130 plus houses as this is the Green wedge and goes against council policy on Green wedges (section 4.12 Green wedges). There would be no access to these proposed houses other than through The Warren Drive which cannot cope with traffic now let alone increased traffic and heavy plant the only other access would be onto the Shottendane Road which is narrow and rural which would be extremely dangerous unless road widening occurred which means loss of more farmland.</p> <p>3) Local services would suffer there is only one GP surgery in Westgate-on-Sea and one for Birchington. Westgate surgery has no room for expansion in its present location and could not cope with additional patients (already informed by Dr Meakin at previous meetings). The Queen Elizabeth Queen Mother hospital is already under strain without impact from the additional strain these additional families would. It is under review of being downgraded meaning local people having to travel further to Ashford for treatment bringing additional strains to roads around Thanet.</p> <p>4) No adequate school St Crispins at Westgate-on-Sea already over subscribed. Westwood Cross has already been expanded with no school provision Thanet doesn't have enough places now without increase from additional families.</p> <p>5) Impact on local landscape would mean loss of prime agricultural land which goes against local plan of keeping openness of countryside. There would be loss of wildlife and public footpaths that run through the It goes against the plan of promoting green sector jobs as farmland is being built over and loss of food production capacity would be a consequence.</p> <p>6) There is a potential risk of flooding particularly in Westgate-on-Sea as in the 1970's the field flooded resulting in loss of life, building over this land you are reducing surface water There is also a risk of contamination to the underground water table. Also water pressure in the area particularly around The Warren Drive, Allen Avenue and Ursuline Drive is very low now, this would impact on residents in this area with even lower water pressure than we receive now.</p> <p>7) Employment where are the additional jobs likely to be created we already have business parks only filled to 30% capacity. Tourism is mainly seasonal and low paid work. Building over farmland you are reducing Green Sector jobs and this goes against the promotion</p>				
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						<p>of such jobs in the Local Plan. Manston airport is already closed and unlikely to operate as an airport again and should be used to build houses on instead not wait and decide later to use for housing when prime agricultural land has already been destroyed.</p> <p>8) The number of houses recommended is far too many. We have numerous properties in Thanet that are empty and decaying and brownfield sites which should be used first but of course are not zero rated for V.A.T so cheaper to build on Greenfield sites as new property zero rated. Will there be a guarantee that the affordable houses will be for Thanet residents first as it is cheaper to live here than London and property allocated on need. Thanet has the potential to become a dumping ground for the London Boroughs. Whilst we appreciate Thanet has to have a Local Plan this is ill thought out and full of contradictions. Perhaps Council should revisit actual need based on fact as in last ten years highest building of houses was 830 lowest year 30!! The council have just opted for highest amount instead of taking an average therefore imposing on Thanet far too many houses.</p>				
Dettmer	P R W		436		Object	<p>I do not agree with the proposed building of houses on prime agricultural land in Westgate / Garlinge. Westgate has already a higher density of population than the rest of Thanet including Canterbury.</p> <p>How are our doctors surgeries and schools going to cope with the amount of extra people. Do you intend to build new surgeries and schools and extra sewerage.</p> <p>I know that there are a considerable number of householders who are really concerned of the current local plan and we hope that this is thought through.</p>		1260		Paper
Everest	Penny		179		Observation	<p>Background</p> <p>Thanet should have had a new Plan 5 or 6 years ago but were late in starting this process. TDC proceeded to ask local landowners if they were prepared to sell any land for development. One of the main offers was from Quex which led to proposals for extensive development on Quex-owned land adjoining Westgate -on-Sea and Garlinge. This led to a public outcry. In 2015 TDC, under new leadership, started to review the draft left by their predecessors . Time went by and it was claimed that the uncertainty over the future of Manston Airport made It difficult to finalise the draft. In 2017 the Government asked those Councils which had still to adopted an LOP (of which Thanet was one) to explain why this had not been done. In early 2018 just two Councils in the UK were told that urgent measures were being taken to speed things up. Even</p>		508		Paper

						<p>now we still don't know the fate of Manston Airport. One proposal is to build 2,500 houses there. TDC say that if Manston is retained as an airport, those houses would have to be built elsewhere and most of them have been allocated to Westgate-on-Sea. In addition to the 2015 proposal to build 1,000 new homes we are now faced with having over twice as many.</p> <p>In my view I feel the figures given by Central Government as the Objectively Assessed Housing Need (OHAN) (17,140 additional homes for period to 20 1) are obviously unrealistic if the purpose is to provide housing just for the local population because:-</p> <p>(i) The population figures sent by Central Government are largely based on reports by a consultant called G L Hearn. The findings in their latest report (2016), which increase the estimates for population growth in Thanet, are distorted by the figures for 2013-14 which are completely untypical, and for 2014-15 which are very high. This can be seen easily in figure 2 of the summary. More up-to-date Office for National Statistics (ONS) figures for 2016-17 (July June), show a return to the lower trends in earlier years , with natural growth showing a decline of 200, internal net migration at 419 and international net migration at 314, giving total net annual growth of 533, far below the 1,365 estimate in the Hearn Report. The figures have clearly been inflated to legitimise massive migration into Thanet from London.</p> <p>(ii) There are nearly 2,000 empty, derelict and unoccupied dwellings in Thanet and the first priority should be to focus on these.</p> <p>The proportion of elderly people in Westgate-on-Sea (nearly30%) is well above the Thanet average and almost double the national average of 16%.</p> <p>Overcrowding</p> <p>Looking at the allocations of housing to Westgtate-on-Sea the proposals look preposterous:-</p> <p>Thanet, at 27%, is already far more 'built -on' than the neighbouring Districts (eg Dover at 8% and Canterbury at 9%).</p> <p>The average population density of Kent is 439. The Thanet average is 1,368 (so Thanet is already over 3 times the average for Kent), compared with Dover at 368 and Canterbury at allocations of new homes would double the population and therefore the population density of Westagate-on-Sea, thus increasing overcrowding and pressure on schools and clinics.</p> <p>531. However, the population of Westgate-on-Sea right now is over 2,800!!!! The proposed Westgate surgery is now over-subscribed with 10,200</p>				
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					<p>registered patients (maximum 10,000 registrations). It is too cramped in its premises, and adding residents will result in a deterioration in health care for all. Even within Thanet, Westgate is already a deprived area, with health indicators for life expectancy and disability considerably worse than average.</p> <p>The two primary schools in the area proposed for housing (St Crispins and Chartfield) are overcrowded and under-resourced.</p> <p>Another important factor is that the land proposed for development is prime agricultural land and its use for housing is opposed by the Campaign to Protect Rural England (CPRE). This is contrary to the Government plans for agricultural self-sufficiency post-Brexit. The fact that Quex have offered the land for sale does not take community interests into account.</p> <p>Further Important Factors to be considered</p> <p>Thanet has beautiful sandy Blue Flag beaches with distinctive and individual towns for tourism (one of its main sources of employment). Margate, Broadstairs, Ramsgate, Westgate-on-Sea and Birchington need to keep their individuality to continue to attract tourists. However, the proposed increase in housing will not allowag for them to keep their individuality. Thanet will become one urban ugly sprawl. Not attractive to tourists. The green wedges between the towns will disappear. It is important to have green open spaces for health and well being and planting trees will help reduce pollution.</p> <p>The existing roads will become congested and create more pollution as more cars will be using them.</p> <p>Birchington Square and the St Lawrence Roundabout in Ramsgate are already known 'black spots'. Yes, a new road has been planned (Transport Plan) to take some of the congestion from the A28 across to Westwood Cross but there is no guarantee that the funding will be forthcoming from KCC and developers to build this road and it all takes time. I can foresee that the houses will be built first and the proposed road not being ready.</p> <p>Manston Airport could be opened as a Cargo Airport (infrastructure is in place River Oak still keen) this could provide local jobs and relieve Gatwick and Heathrow of cargo space which surely could be used for the increased demand for more passenger flights.</p> <p>I do not feel that the LOP is effective or sustainable on many levels and should be considered very seriously as this concerns the future of Thanet.</p>					
Francis	M E		434		Object	I appreciate that the Government want you to build more houses in Westgate but 150 would be ample. Having given the matter a great deal of		1256		Paper

					<p>thought, many things need to be considered before making any decision. A wrong decision can never be rectified.</p> <p>a) You are proposing to build on the most fertile land in the country and when we leave the EU, such land will be most vital for growing our own food.</p> <p>b) Global warming means a shortage of water which both household and farmers need and how do you propose to supply enough water plus disposal of sewage etc.</p> <p>c) Employment - where are all the extra population going to work. Unemployment is already very high in this area.</p> <p>d) The Queen Elizabeth hospital is already overstretched</p> <p>e) Where will you find the extra doctors and nurses when there is already a shortage throughout the country?</p> <p>f) Local Council services will be overstretched</p> <p>g) Infrastructure - roads schools surgeries etc would have to be built before any houses.</p> <p>Conclusion - do not build all these unwanted houses in Westgate. Concentrate on renovating existing empty houses.</p> <p>Please read and reconsider</p>				
Georgiou	Constantia		96		<p>Object</p> <p>I am a resident of Westgate on Sea of which I am proud to be a member, I think it's one of the best place to live.</p> <p>Westgate does not need all this extra housing, a large number of the population are of an older generation 30% above Thanet average.</p> <p>Why don't council improve all the empty houses nearly 2,000 in Thanet so they become habitable? That would house a lot of people and it is a waste to see them empty.</p> <p>Our surgery's, schools and our roads are overstretched as it is.</p> <p>We would be overcrowded, busier roads, longer waiting times at our surgery's who are already finding it difficult to cope with the number of patients they have. adding too many more residents will create a deterioration in all our health.</p> <p>I am not against some housing but the number you talk about 2,000 is over the top by too much! Thank you for taking the time to read what I think.</p>		219		Email
Glendinning	Gail		264		<p>Object</p> <p>I am disgusted that you are considering building thousands of houses on top grade farmland, which will double the population of Westgate.</p> <p>Our town is not set up for so many more people. We don't have enough spaces at the doctors or schools, the roads are not fit for more cars, the water company</p>		800		Paper



						has said they would have an issue with supplies too. I feel you haven't allowed a petition to be signed because you would get many more people letting you know they don't want this, but less people tend to write letters these days. I feel you are trying to scew the figures of complainants to your advantage.				
Glendinning	Carole		312		Observation	I feel it is wrong to build houses on grade A farmland, doubling the population of the town, while the roads are not suitable for more traffic and we do not have enough facilities such as doctors and schools. This will put the present population at risk with this ill conceived plan.		926		Paper
godden	christopher		391		Object	My objections to the proposed houses earmarked to be built on land in Westgate/Garlinge are as follows 1. The use of A1 agricultural land for housing does not make sense in the current climate with Brexit looming foor production is going to be ever more important with the possible import & export problems from our EU removal. 2. Who are these houses for. Local people can't afford them. It would seem they are going to be for London migrants. 3. The QEQM Hospital is already at breaking point. The local Doctors Surgery in W/Gate is full. The local Dentist is full. 4. The local Schools are full (St Crispins and Chartfield) 5. There are 2000(approx) empty derelict & unoccupied dwellings in Thanet. 6. There is a lot of brownfield sites all over Thanet that should be used long before A1 agricultural land is used. 7. The traffic problems in and around Westgate at various times of the day would only get worse if more houses are built in Westgate. 8. That said houses do need to be built for local people. Affordable housing that the young of Thanet have a chance to buy. But not to the detriment of the local environment robbing the next generatiom of residents a greenfield outlook.		1147		Paper
Hambidge	R		343		Object	I am writing to oppose the Local Plan for housing on sites at Westgate-on-sea, Garlinge and Birchington. The proposal to build thousands of houses on Grade 1 agricultural land adjacent to these three communities is in my view barbaric. Our local farming community is precious and should be awarded protection not only for the preservation of local jobs, wildlife and for our future but once that Grade 1 agricultural land is built on there will be no turning back. I have lived in Thanet all of my life. Over the years my family and I have witnessed the barbaric loss of several delightful and architecturally stunning buildings to the greed of various developers in our lovely little town by		1027		Paper

					<p>the sea. Local bodies were not quick enough to award these historic buildings with listed status and now they are gone forever.</p> <p>I fail to understand why the term 'Local' is used to describe this plan. It neither represents the needs of the local people or any growth in our population. This plan only represents the needs of other areas who have failed to make adequate provision for their growing housing problems.</p> <p>The strain on the local Doctors (oversubscribed by 200 patients already), Dentists, Hospital, Mental Health Unit and Police would be unbearable. The A &amp; E Department at QEQM. is already overstretched and now we have looming over us the loss of the stroke emergency care to Ashford a good hours drive away if the traffic allows.</p> <p>Our local primary schools cannot accommodate the number of applicants each year as the population stands at present and the promise of another infant school for Westgate quite honestly does not quell my fear for the future educational needs of this area.</p> <p>It has been stated by Southern Water that Westgate does not have the capacity to either supply water or dispose of waste water for the number of housing proposed in the earlier Local Plan, even greater numbers of houses on the new Local Plan can only exacerbate this problem.</p> <p>In the new local plan the projected new jobs in Thanet is 5,000 and the planned additional housing is 17,500 meaning probably a 35,000 addition to the population. These projections only spell one thing; many thousands of people either unemployed or having to commute out of area. If Westgate-on-Sea has the additional 2,000 houses as in the new local plan that equates to 4,000 people trying to exit Westgate to get to their place of work because it will not be in Thanet.</p> <p>Westgate-on-Sea has a small Railway station with no parking facility so good luck to any commuters with your walk to the station and back after your long day at the office.</p> <p>Please rethink your plan. If more housing is absolutely needed, which I doubt, especially the numbers, they should be placed in an area that has easier access to out of the area i.e. The Thanet Way.</p>					
Hambidge	L		345		Object	<p>I am writing to oppose the Local Plan for housing sites at Westgate-on-sea, Garlinge and Birchington.</p> <p>I have lived in Thanet all of my life Over the years our family have witnessed the loss of architecturally stunning buildings to the greed of developers in our lovely towns. Local bodies were not</p>		1031		Paper

					<p>quick enough to award these historic buildings with listed status and now they are gone.</p> <p>The proposal to build thousands of houses on Grade 1 agricultural land adjacent to these three communities is in my view barbaric. Our local farming community is precious and should be awarded protection not only for the preservation of local jobs, wildlife and for our future but once that Grade 1 agricultural land is built on there will be no turning back I fail to understand why the term 'Local' is used to describe this plan, it neither represents the needs of the local people or any growth in our population. This plan only represents the needs of other areas who have failed over the years to make adequate provision for their growing housing problems.</p> <p>Southern Water has already stated that water supplies "half of demand" by 2030 and will be looking to encourage customers to use less even though here in Kent we the customers are among the most water efficient in the UK. Southern Water on the other hand is the worst water company for complaints as broadcast recently on local radio from official statistics. It has been stated by Southern Water that Westgate does not have the capacity to either supply water or dispose of waste water for the number of housing proposed in the earlier Local Plan, even greater numbers of houses on the new Local Plan can only exacerbate this problem.</p> <p>If the Government dictates to local Councils, these houses should be built then the infrastructure should be put in place first and funding supplied by the Central Government.</p> <p>Road building should be completed before house building starts. Thanet's roads are greatly congested and many in desperate need of repair. When repairs are made or when one main road is closed for repair, installations or accidents there is mayhem on all other roads with traffic at almost standstill.</p> <p>The strain on the local Doctors (oversubscribed by 200 patients already), Dentists, Hospital, Mental Health Unit and Police would be unbearable. The A &amp; E Department at QEQM. is already overstretched and now we have looming over us the loss of the stroke emergency care to Ashford a good hours drive away if the traffic allows.</p> <p>Our local primary schools cannot accommodate the number of applicants each year as the population stands at present and the promise of another infant school for Westgate quite honestly does not quell my fear for the future educational needs of this area.</p> <p>In the new local plan the projected new jobs in Thanet</p>				
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					<p>is 5,000 and the planned additional housing is 17,500 meaning probably a 35,000 addition to the population. These projections only spell one thing; many thousands of people either unemployed or having to commute out of area. If Westgate-on-Sea has the additional 2,000 houses as in the new local plan that equates to 4,000 people trying to exit Westgate to get to their place of work because it will not be in Thanet. Westgate-on-Sea has a small Railway station with no parking facility so good luck to any commuters with your walk to the station and back after your long day at the office.</p> <p>Should any of the proposed housing go ahead the very least that should be demanded is a park. There is not one park in either, Westgate on sea, Garlinge or Birchington . There are two or three recreation grounds (NOT Parks) and in consideration to the fact that you will be removing the local open space which is a requirement to maintain the quality of life, it is vital that part of the plan for Westgate on sea, Garlinge and Birchington incorporates at least one decent sized park. Not much to ask when you consider that Margate has the luxury of three parks. Please rethink your plan. If more housing is absolutely needed, which I doubt, especially the numbers, they should be placed in an area that has easier access to out of the area i.e. The Thanet Way.</p>				
Hardley	Lorna		431	Object	<p>To whom it may concern,</p> <p>I write today in response to your local plan for the Thanet area.</p> <p>Having lived here for most of my life I have enjoyed growing up, and now raise a family of my own. I have noticed over the last decade or so, that local jobs, NHS services and school places have been harder to obtain. By building more houses in the local area, which mean more people living in the local area, these services are going to be stretched even further.</p> <p>As for the roads, they cannot cope with the current traffic, let alone adding a potential 2000 more, as well as construction traffic.</p> <p>The farmland, which I have come to love and admire, will be destroyed, which will leave local farmers out of pocket , and also our houses at more risk of flooding , due to be fact that drainage can be a problem {and has been in the past in the Westgate area}.</p> <p>Driving round Thanet I have seen plenty of empty properties, which if he council purchased and renovated would reduce the need for so many extra houses needing to be build. Surely this would be a more cost effective way of providing more housing without ruining decent agricultural land!</p>		1247		Email

Hart	M		438		Object	The area suggested is farmland which is necessary to our local community. We do not have the Drs or schools to accept 2,000 plus people in this area.		1263		Paper
Hollaway	Patricia		480		Object	<p>Please Take note</p> <p>I object to the Building of 2,500 Houses on Farm Land in Westgate &amp; surrounding areas, We have not got the facilities for these, We cannot cope now with not enough of the, where are the jobs coming from Doctors, Dentist, Hospitals, nursing Homes, ambulance, Fire Services, Water Sewers, Parking, Schools, Shops, Street Lights</p> <p>We have pollution everywhere, The Drains are never cleaned they are mostly blocked up. Beaches dirty &amp; polluted, To much Traffic on Roads. Pot holes everywhere, to much Waste Rubish &amp; litter, no one to clean Streets that are filthy, Speeding on Roads especially Minster Road its a wonder no body had been killed here. The stroke unit at QEQM Hospital closing, Water Pressure, Excess dirt &amp; waste from Building site: Everything in Westgate &amp; Thanet is a Eye Sore, Dirty, Overgrown the Parks etc are never landscaped the Trees are never seen to &amp; overgrown the footpaths are dangerous, no Police as such.</p> <p>Shall I go on All TDC does is put Council Tax Up.</p> <p>I have lived in Thanet all my life 79 yrs its never been this bad</p> <p>Disgusted</p> <p>P.S My Father-in-law gave his life for this dirty country what for his family were from Ramsgate since 1804.</p>		1346		Paper
Hollister	Clare		329		Object	<p>In common with the vast majority of my community, I am writing to express my extreme concern regarding the excessive number of new homes being proposed - and thereafter forcibly imposed on - Thanet in the new Local Plan, regardless of the views of the people who actually live there, or the woeful inability of the current local infrastructure to serve their needs. Most particularly of all - again, in common with my whole community - I am objecting to any building on the ST1 and ST2 sites around Westgate and Garlinge, which comprise prime agricultural land.</p> <p>When seeking to build all these new homes, key issues Thanet residents want addressed and answered are: Who is going to live in them? Where are the jobs for them? And where is the infrastructure to cater for such a massive new influx in population when the existing infrastructure is already unable to cope? Are the new homeowners going to bring wealth, jobs, vital skills or other positive benefits to our community, or are they going to place yet further strain on already over-stretched council funds and public services? And if you cannot answer them then surely the homes should not</p>		1008		Email

					<p>be built. It is nothing short of insane to do otherwise; to sacrifice land for a future that may never happen, or put the rights and needs of people yet to live here above those who already do.</p> <p>Some sympathy does go to TDC, in being forced by central government to come up with these higher home numbers. But one also likes to think that, when it comes to allotting more specific areas for new homes, council members have the sense and integrity to appreciate the type of land that their community always wants preserved as more off limits and sacred. And most sacred of all should be prime agricultural land.</p> <p>TDC should be commended for turning down building permission on the ST1 and ST2 sites, last time they came up for consideration. In so doing, they also earned much respect and gratitude from the local population. So once again I would like to highlight the fuller reasons why these sites should not be built on, in the hope that TDC will make the same sensible decision to reject this land for building on again:</p> <p>Food production. You may be aware that the ST1/2 sites feature the highest possible grading for farmland/food production in the UK - i.e. Grade 1. We only have 21% of this type of extra-fertile land in the entire UK for growing food on and thus cannot afford to lose it as a resource. We do not know how much more of our own food we may need to produce in a post Brexit world, and thus sacrificing any more of it for housing - on top of that already sacrificed at Westwood - would be foolhardy to say the least. Especially when there are plenty of other option sites still on the table. It also makes little sense to be building more and more homes for an expanding population, only to find we then can't feed them because we have sold off all the farmland.</p> <p>Flooding/sinkholes risk. The council have previously been alerted to past flooding from the ST1 site into Victoria Avenue and Belmont road below, in the 1970s, resulting in fatalities, after heavier rain. Currently it is only heavy (and deeply ploughed) agricultural soil, and the roots of crops/more mature surrounding trees and shrubs that retain excess water from heavier rainfall in the ST1 site. Once this land is concreted over the flooding risk during heavier rain would become more severe again, due to the specific geography of the ST1 site. Residents who have lived many decades around this site also say that both it, and the ST2 site, have developed sinkholes in the past which of course, in a residential area, could endanger life. Moreover, as the</p>				
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					<p>above facts are already well documented, this would severely affect any insurance payout should any of the properties built on this land be flooded or lost to sinkholes.</p> <p>Environment/loss of wildlife habitat. The ST1 and ST2 sites host a significant population of wildlife - i.e. voles, shrews, foxes, badgers, umpteen different species of birds, insects and moths, plus the rarer slow worm. Building on this land would wipe them out. The CPRE (Council for the Protection of Rural England) have also made their views known re how devastating an environmental impact the destruction of this land for building would have.</p> <p>4. Impact on residents' physical, mental and psychological health. It is not always appreciated how much mental and physical benefit residents gain from the nearby presence of open space, fields and countryside. Or that a vast majority of residents surrounding the ST1 and ST2 sites only moved there, or bought their houses there, in order to experience, or benefit from, views of open countryside. And escape the kind of more oppressive, urban, built up landscape they previously lived in. The ST1/2 sites are, in fact, not just 'bits of land' but vital space that oxygenates our whole community and keeps it in better mental health. It is where people walk, take exercise and appreciate their surroundings. Countless studies have also shown that the more built up an environment people live in, the more their mental health declines. The same is true of higher levels of traffic pollution. Both of these higher risks to mental health would ensue if this land was built on.</p> <p>Education and learning. For many local children, the ST1/2 sites present their only real experience of countryside. They walk across it to school each morning and back in the afternoon. It is where they play in summer, pick blackberries in the autumn, learn about local plants and wildlife, the rotation of different crops and more fully understand the changing of seasons. All of this would be lost to them forever if the land were built on.</p> <p>Destruction of more individual village identities. Currently Westgate and Garlinge represent two very individual town or village communities, with their own hearts and identities which are important to them, separated by the current ST1/2 site farmland. Building on this would morph them both into one big urban sprawl, and their more individual hearts and souls as communities would be lost forever.</p> <p>Dangerous and previously failed precedents. Residents are concerned that the allotment of any more prime</p>				
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					<p>agricultural land for housing sets a dangerous precedent - i.e. that Thanet council, unlike its residents, places no value whatsoever on its precious farmland/countryside as a resource and sees it all as 'fair game' instead to stick houses on. Not only that but the allotment of prime agricultural farmland for housing has previously occurred at Westwood, with the big new housing development currently sited along Haine Road, which is widely viewed locally as a total eyesore, if not utter disaster. For has an uglier, more barren or soulless complex ever been devised? No heart, no space, no community. Nothing. No one I know would ever want to live there and homes are proving trickier to sell. Thus vital, precious farmland was pointlessly sacrificed for this abject failure and blight on the landscape.</p> <p>Other options. If more new housing is really needed, in the kind of numbers previously cited, then surely the most sensible thing to do is site them at Manston, and create a whole new community there, with its own more self-sufficient infrastructure - i.e. schools, shops, medical centre - which in turn would take pressure off local resources elsewhere? There is certainly the space and it would mean no further farmland would need to be sacrificed. I think the majority of Thanet residents would view that as the least worst option.</p> <p>In all honesty, most Thanet residents view the Local Plan as the most catastrophic event to ever hit their community, and something which promises them ever more misery, and destruction of their everyday quality of life, as the future unfolds. In terms of more traffic, noise, crowding, air pollution, crime, stress and struggles to access most basic services like health and education.</p> <p>But decisions still have to be made as to where new homes should be cited, in a way that does not alienate this council ever further from its residents. Which the destruction of any further agricultural land for housing will surely do. For reasons now fully highlighted in this letter. Never, ever underestimate what our fields and countryside really mean to us all in Thanet, or how hard we are prepared to fight to preserve them.</p>					
Hollister	Ernest	EC MEDIA SERVICES	330		Object	<p>In common with the vast majority of my community, I am writing to express my extreme concern regarding the excessive number of new homes being proposed - and thereafter forcibly imposed on - Thanet in the new Local Plan, regardless of the views of the people who actually live there, or the woeful inability of the current local infrastructure to serve their needs. Most particularly of all - again, in common with my whole community - I am objecting to any building on the ST1</p>		1009		Email



					<p>and ST2 sites around Westgate and Garlinge, which comprise prime agricultural land.</p> <p>When seeking to build all these new homes, key issues Thanet residents want addressed and answered are: Who is going to live in them? Where are the jobs for them? And where is the infrastructure to cater for such a massive new influx in population when the existing infrastructure is already unable to cope? Are the new homeowners going to bring wealth, jobs, vital skills or other positive benefits to our community, or are they going to place yet further strain on already over-stretched council funds and public services? And if you cannot answer them then surely the homes should not be built. It is nothing short of insane to do otherwise; to sacrifice land for a future that may never happen, or put the rights and needs of people yet to live here above those who already do.</p> <p>Some sympathy does go to TDC, in being forced by central government to come up with these higher home numbers. But one also likes to think that, when it comes to allotting more specific areas for new homes, council members have the sense and integrity to appreciate the type of land that their community always wants preserved as more off limits and sacred. And most sacred of all should be prime agricultural land.</p> <p>TDC should be commended for turning down building permission on the ST1 and ST2 sites, last time they came up for consideration. In so doing, they also earned much respect and gratitude from the local population. So once again I would like to highlight the fuller reasons why these sites should not be built on, in the hope that TDC will make the same sensible decision to reject this land for building on again:</p> <p>Food production. You may be aware that the ST1/2 sites feature the highest possible grading for farmland/food production in the UK - i.e. Grade 1. We only have 21% of this type of extra-fertile land in the entire UK for growing food on and thus cannot afford to lose it as a resource. We do not know how much more of our own food we may need to produce in a post Brexit world, and thus sacrificing any more of it for housing - on top of that already sacrificed at Westwood - would be foolhardy to say the least. Especially when there are plenty of other option sites still on the table. It also makes little sense to be building more and more homes for an expanding population, only to find we then can't feed them because we have sold off all the farmland.</p> <p>Flooding/sinkholes risk. The council have previously</p>				
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						will surely do. For reasons now fully highlighted in this letter. Never, ever underestimate what our fields and countryside really mean to us all in Thanet, or how hard we are prepared to fight to preserve them.				
Ingram	Dawn		468		Object	<p>I am opposed to the proposal of the amount of housing suggested on the farmland in Westgate.</p> <p>The farmland is even more important to the local community more than ever before due to Brexit. We need to get back to a more sustainable way of life.</p> <p>I am also against the amount of houses suggested as we cannot cope as it is at doctors surgeries. So much so, you can only complain or speak to a doctor concerning one issue or problem. The length of waiting for an appointment is ridiculous as it the wait already on an already over stretched QEQM.</p> <p>This is just the tip of the iceberg - we do not have the facilities - water waste to cope as it is. We have no jobs for the existing people of Thanet.</p> <p>Pollution will increase! I moved here for health! Our beaches will become even more at risk of pollution.</p> <p>Thanet is not big enough not broad enough for this ridiculous increase. So I totally oppose the entire local plan. I feel you think small term + of your pockets rather than long with the isle in mind.</p>		1332		Paper
Jefcoate	John		271		Object	<p>I wish to object to the proposal to build 2000 new homes in the Westgate area, ST1 and ST2.</p> <p>This is agricultural land and too valuable to build on.</p> <p>Westgate is not big enough to home so many residents. We do not have adequate roads and the widening of eg Shottendane road will not ease the burden in the town and beaches of Westgate, Birchington nor Garlinge. Access roads are too narrow and there is no space for widening or building car parks. It will spoil my quality of life in my retirement years.</p>		810		Paper
Jefcoate	Nicola		274		Object	<p>I am writing to express my concern regarding the proposal to build an excessive number of new homes on prime agricultural land ST1 and ST2, which will for ever impact our local community and change the nature of the area in which we have chosen to live.</p> <p>Westgate does not have the infrastructure, and alarmingly does not have adequate road access from the rest of Kent due to our geographical sea side location on the Island of Thanet. Moreover there is no obvious means to increase parking in the town unless buildings are demolished or green squares concreted over.</p> <p>I understand central government demands provision for more housing but it appears that locations have not been well enough thought through, maybe with an attitude of this site is easy to choose being available</p>		815		Paper

					<p>from the current landowner and it looks like good infilling on a map.</p> <p>I think the following points need serious further consideration:</p> <ul style="list-style-type: none"><li>• I believe it is foolish to use prime Grade 1 agricultural land for building. A nation needs to be able to produce significant amounts of food to feed its population. Non agricultural land or land of poorer agricultural quality should be designated for building.</li><li>• It appears that the proposed housing is intended primarily for people from out of the area. I suspect the promise of provision of adequate jobs to attract working and self supporting families to be a 'pie in the sky'. Thanet people have heard similar projections all too often.</li><li>• Do we genuinely have sufficient infrastructure and facilities ie space, to provide for such an extreme population growth in Westgate? I believe it may well detrimentally impact our quality of life eg more traffic, pollution, noise, overcrowding, crime and stress and time to access basic and vital local services. I am concerned that phasing of building will result in developers avoiding provision for eg services and an insidious increasing pressure on existing local services. Westgate and Garlinge do not have the appropriate planned space to serve 2000 or so new homes. A new service centre would be needed for a new population that could potentially double our current population.</li><li>• I am concerned that the only people able to park cars in Westgate town will be those with blue badges, thus pushing local retailers out of business as we transfer shopping to the internet, and yet more white vans.</li><li>• The needs and rights of local residents to live in a community of their choosing is being ignored. The current local plan calls for the local seaside resorts to maintain their character. This proposal violates this right. In the 2011 census Westgate on sea had a population of 6996. Building on ST1 and ST2 as proposed is an extreme increase that will impact us all.</li><li>• I recall the flooding of properties in Westgate (Victoria Rd) in the 1970's with a fatality. Clearly this agricultural land is essential for surface rainwater drainage. This raises legal considerations should properties be flooded due to the new buildings and consequent loss of natural drainage as it is already well documented.</li><li>• I understand there are sink holes in this ST1 and ST2 area. Clearly this should be a major concern for the safety of any residents.</li><li>• These sites are important wildlife sites and should be</li></ul>				
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						<p>protected for the sake of our environment and conservation.</p> <ul style="list-style-type: none"> <li>• As my home of about 25 years backs onto the site in question I believe I will be directly and negatively impacted by this scheme</li> </ul> <p>It is my opinion that sites nearer Manston / Pegwell area should be favoured as a site for a new community. Since the 1960's to my knowledge, various attempts to re ignite Manston as an airport have failed beyond the short term. To the south of Thanet the road infrastructure from the south and west exists with dual carriageways for fast and easy access into the rest of Kent. With new homes in one main location it would be far easier to provide local services such as GP surgeries, much needed dentist, schools, community and recreational hubs for the 21st century. There is considerable chalkland in this area with a very thin soil making it ideal for building but not for agriculture. I hope this proposal to build on prime agricultural land in ST1 and ST2 is rejected and further investigation made into building on brown field sites and areas where access to our local towns and villages and out beyond Thanet is more suitable and sustainable.</p>				
Johnson	Elisabeth	Monkton Residents Association	51		Observation	Protecting Thanet's open countryside which is disappearing under bricks and mortar at an alarming rate together with our water supply which is also under more and more pressure needs to be a major part of these plans, and liaison with service providers needs to result in actions that are of benefit to the community not just words.		130		Web
Jones	HW & Pat Sawyer		479		Object	<p>I write to inform you that I and my husband are very disappointed &amp; the decision for this housing Project is being allowed through.</p> <p>Consider please the impact on our community and I quote a few</p> <p>Traffic (busy &amp; restricted parking Increase in vehicle parking which is terrible already</p> <p>Road In and out of Westgate which is difficult as it is now</p> <p>Local Council Services Rubbish collection street lighting sewerage</p> <p>Health and Wellbeing Causing long waiting list for hospitals who are having trouble coping already.</p> <p>Dentist few and far between &amp; long waiting list.</p> <p>Doctors overloaded already with patients some indeed have not got a place on a doctors lists now. Emergency Services having a job coping.</p> <p>All the above and much more are really worrying. The loss of farmland which we need.</p> <p>I feel we wrote enough (could go on &amp; on) think of the infrastructure needed which mostly is never dealt with</p>		1345		Paper

						ie Westwood Cross. Schools which are full up already & children have to be ferried to school miles from where they live We are against this plan & want to protest vehemently that common sense will prevail.				
Lane	Angela		326		Object	I am writing to object to the draft local plan ammendments which I viewed recently at the Westgate library. This letter concerns SP15 - Strategic Housing Site - Westgate, particularly the extended amount of dwellings that are proposed towards the High Street Garlinge, which would leave our cottage in the middle of a built up area. If these properties are built it would have a negative impact on our whole family and change our way of life. We live in a beautiful Victorian Farm Managers cottage on the edge of a lovely village, with wonderful neighbours. My husband works in the countryside and my daughter has been brought up as a country girl and is very proud of our way of life. I personally cannot imagine living in the middle of a new housing estate, with all its cars and people, bustle and noise. We bought our cottage as a forever home, as many country people do, always loving its character rural views and peace and quiet. These extra properties would leave us over-looked and boxed in, immediately reducing the value of our beautiful home. This leaves us unable to sell to escape the development and leaves me heartbroken at having to consider such a drastic move. I object strongly to having mine and my family's life being dictated in this way.		1000		Paper
Lane	Simon		463		Object	concerning policy SP15 - strategic housing site - Westgate, particularly focusing upon Garlinge High Street. After much reading and map referencing, I strongly object to the proposed development of housing added to the draft local plan. this would have an extremely detrimental effect on the quality of life for both myself and my family. The proposed housing would surround our cottage, leaving use living in the middle of a large new town. As we are country people, (my work is countryside based) this is a most distressing situation. I do not wish to be overlooked and hemmed in by a modern housing estate, (London overspill social housing?) with its noise and light pollution and its many cars and inhabitants. we particularly purchased our cottage for its age, character, history and rural aspect and have been blissfully happy here since 1991. Our property's value is reflected in these attributes, yet no mention has been made of any compensation for the drop in value as we are destined to become part of a new town, rather than a character cottage with field views, on the		1318		Paper

						<p>edge of a village. i feel that this leaves us in the unenviable position of being unable to sell up and move to escape the encroachment, as other character cottages om rural or semi-rural settings are at a premium, as ours has been until this point. They are also extremely hard to find in such a favoured position. Although a 'functional green corridor' (AD13 chapter 3 item 1) is mentioned in the plan. no reference is given to the proximity of the proposed housing, to our boundary, and as a countryside skills tutor having seen extremely slim slices of headland being considered a 'green corridor', this does not give me confidence in the plan. An exact measurement would be more useful to all concerned. I have many other concerns about the size of this proposed development which can be referenced in my initial letter of objection to the initial draft plan. I would be happy to meet and discuss the proposed plan, with an inspector, to clarify any points or if it would be deemed helpful in any way. Thank you for your time and consideration in this matter.</p>				
Lane	Megan		466		Object	<p>I am writing to object strongly to the proposed ammendments to the draft local plan, specifically policy SP15 - Strategic housing site - Westgate. The extra properties that have been added to the plan now completely close in around our cottage, leaving us in the middle of a large housing estate. I am now 21 years old and have always been extremely happy living in our cottage in Garlinge, with open fields around us, our lovely neighbours and safe small village to live in. this would obviously change completely if this proposal is accepted and would change our way of life. the value of our cottage would drop as a consequence of living in the middle of a housing estate without views, making it impossible for my parents and I to be able to afford to move away from the new town back into the countryside. Add to that thousands of new residents (2000 houses) with their cars, noise and lack of village attitude and it is plain to see that this is an extremely upsetting and difficult situation for us to be in. there should be some form of compensation for the de-valuing of our cottage, allowing us an escape route from inprisonment in a town.</p>		1330		Paper
Lee	A		133		Object	Large scale housing projects are not sustainable		323		Web
Martin	T C & C		441		Object	<p>I am completely against the building of extra houses in the Westgate/Garlinge area. It is completely a big mistake. The extra houses will not bring anything to enhance the area, completely the opposite, putting more strain on the services it already has. There is not enough employment in the area now for the</p>		1268		Paper



						<p>current residents. The area is struggling with all the demands on it i.e. school places, doctors, dentists and the QEQM hospital, to name a few - all already under considerable pressure - people now complain about all these services and how underfunded they are - more houses will only add to these problems and the services we do have will be even more thinly spread. The infrastructure of the roads will be even more chaotic than they already are with more traffic - a recent 'fire' in Westwood showed this as a good example. Complete shambles! Thanet comes to a stand-still when one or two of it's major roads has to close for anything- including roadworks/accidents/bad weather.</p> <p>Considering all the empty properties around the area that are talked about - why are they not being renovated to accommodate some of the people the houses are being built for? Is it because new builds attract NO VAT but revamps DO? The builders that will be used will be 'out of area' workers therefore the local tradesmen will not benefit from any of this. You really do not need to be clever to see how the building of these new properties will impact on the local area and surrounding community - common sense needs to be brought into play - PLEASE - DO NOT BUILD MORE HOUSES</p>				
May	Raymond		238		Support	<p>I object to this development on the grounds that it causes the loss of Grade 1 agricultural land. We, in Britain, already import more food than we produce locally. If you equate Thanet Council's plans with hundred's of others around the country, similarly planning ahead, you get an idea of the scale of the potential loss of food producing land. Can we continue on a path of steadily increasing the importation of food as the land to produce our own food diminishes.</p> <p>In addition, The population of Westgate is in the low 7,000's. This proposed development of up to 2,000 houses equating to a least 6,000 residents. So the plan is to nearly double the population by 2031. Quite a frightening prospect for their residents.</p>		751		Web
Mayall	C	Southern Water	473		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 2,000 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</p> <p>Since OFWAT's new approach to water and wastewater</p>		1355		Web

					<p>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 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. Easements would be required, which may affect the site layout or require diversion. These easements should be clear of all proposed buildings and substantial tree planting.</p> <p>Southern Water is unable to support Policy SP15 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 SP15 (new text underlined):</p>				
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						<p>Masterplanning will be informed by and address: [...]</p> <p>the need to ensure occupation of development is phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider [...]</p>				
Messenger	Carol		383		Object	<p>I am one of the ward councillors and when I was elected in 2015 there were two main issues for residents the additional houses (then it was 1000 homes) and keeping Manston as an airport. The community are not disputing that homes are not needed but not on Grade I agricultural land, with issues of severe flooding in the area and a broken infrastructure to place 2000 homes, as stated in the plan is just ludicrous.</p> <p>The Ove Arup report (Sustainability Assessment), reference policy SP15 – expressed concern about the Strategic Housing Sites in Westgate; that it does not support the Sustainability Objective and expresses concern about the environmental impact of the housing on greenfield sites.</p> <p>There are currently just over 80 households on the housing register in Westgate and with a population of just over 7000, 2000 extra homes will destroy this community that still has a small high street vibe, with independent shops that are distinct with their Victorian canopies over hanging the walk way. This area is already suffering from the creation of the Westwood Cross Shopping Centre (WWX) and will not improve with 2000 homes, as the location of these homes will encourage more people to jump in their cars and head to WWX as there is ample free parking. There are no car parks in the town of Westgate.</p>		1127		Web
Milimuka	Elle	GVA	358		Object	<p>The majority of the proposed allocation site is classified as ‘Excellent’ in the Agricultural Land Classification, with a small portion identified as ‘Very Good’.</p> <p>It is unclear how an additional 1,000 homes can be achieved on this site while maintaining the maximum housing density. Indeed, during the most recent call for sites, the land owner suggested 2,500 homes could be delivered on a significantly larger (172ha) site bound by Park Road and Shottendane Road to the south and stretching considerably further west than the proposed allocation. We therefore question whether this site is available, viable, sustainable or feasible within the plan period.</p>		1053		Web
Millar	Bill	NHS Thanet Clinical	513		Observation	<p>In relation to Westgate on Sea, the amount of new development has increased to 2,000 dwellings.</p>		1486		Email

		Commissioning Group				<p>Although it is recognised that additional capacity will be needed for an additional 4,800 patients, the impact on numbers would make it difficult to justify a whole new development for Westgate Surgery at an early stage. Nevertheless, limited spare capacity exists and the premises are already too small for the list they serve.</p> <p>Options are currently being explored to relocate/redevelop the Westgate Surgery but any proposals need to be affordable as well as financially viable. There may be an opportunity to incorporate a new scheme within a mixed-use development and this would be worth further investigation with landowners and Thanet District Council planning officers. It is unlikely that any s106 contribution would be sufficient to make a meaningful financial contribution towards the capital cost of any new development, however if land were to be gifted to the NHS as a condition of any planning consent, the development cost could be more affordable.</p>				
Millwood Designer Homes Limited		Millwood designer Homes Limited	508	Anna Gillings - Gillings Planning Ltd	Object	<p>These representations should be read in conjunction with the accompanying document dated October 2018. As above, the principle of the allocation for up to 2000 homes is entirely supported. However, there are a series of amendments to the policy which are required to ensure the policy represents the most appropriate approach to delivery. The key issues can be considered as follows:</p> <p>Additional uses It is noted that the Plan supports accommodation for the elderly (within Policy HO20), and it is considered appropriate for SP15 to specifically define that the overall housing provision may include such accommodation. This is relevant in the case of sheltered housing for example, which falls within Class C3 would therefore be considered to contribute towards the objectively assessed need.</p> <p>Density and Site Area Millwood proposes an amendment to the allocation boundary in order for it to better accommodate the proposed number of homes in a comprehensively planned neighbourhood, one that integrates with existing development, routes, features and landscape. Rather than following arbitrary lines across open fields the proposed boundary would align with established routes such as Shottendane Road to the south and with the significant designation of the Scheduled Monument to the south west.</p> <p>There are multiple benefits to this proposed amendment, significant among them being:</p>	<p>- Thus the policy should be reworded to read:</p> <p>Policy SP15 - Strategic Housing Site - Westgate-on-Sea Land to the east and west of Minster Road, Westgate is allocated for up to 2,000 new dwellings (which may include an appropriate proportion of accommodation for the elderly) at a [delete - maximum] average density of 35 dwellings per hectare net across the site. Phasing of development will be generally consistent with the indicative phasing in accordance with Appendix B. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site including provision within the site of:</p> <p>1) a minimum of [delete - 17.5] 25 ha of open space [delete - to include a functional green corridor between existing urban edge and new development to preserve the more rural characteristics of existing urban edge dwellings]</p>	1431	<a href="#">Gillings Millwood.pdf (74.4 MB)</a>	Web

					<p>the ability to take a more comprehensive approach to masterplanning for up to 2000 homes that can relate and connect to established routes;</p> <p>the creation of a neighbourhood with a lower average housing density; and</p> <p>the significantly more generous provision of green infrastructure (see 'Landscaping' text below).</p> <p>It is noted that the Plan sets out 'a maximum density of 35 dwellings per hectare net'. Millwood supports an average density of 35 dwellings per hectare but suggest the wording of the policy is amended to reflect that this is an average rather than overall maximum. This wording amendment would allow for a greater variety in character and density across the site, including low density areas of housing, while still ensuring an average of 35 dwellings per hectare overall.</p> <p>Phasing</p> <p>Millwood Designer Homes are entirely committed to bringing forward the proposed new homes in general accordance with the timescale in Appendix B. However, the policy as currently worded seeks accordance with this phasing, without any flexibility. However, at 11.3 the Plan clearly confirms the phasing set out in this appendix is indicative. Thus the policy wording should reflect this, to allow for flexibility over the plan period, particularly in light of the infrastructure requirements of the site and wider area.</p> <p>Landscaping</p> <p>The proposed policy stipulates a minimum of 17.5 hectares of open space. This document illustrates that, within the current allocation boundary, this minimum area is not achievable in combination with an average residential density of 35 dwellings per hectare. Millwood's vision for Westgate is a masterplan designed through a landscape-led approach with meaningful, multifunctional areas of public open space for the new and existing residents to enjoy. A new neighbourhood of up to 2000 homes requires a variety of types and sizes of public open spaces, but the area quoted within the current SP15 policy does not enable this variety or quantum of open space. Thus the policy wording should reflect this and increase the minimum area of public open space required to 25Ha (which for the avoidance of doubt includes play pitches but not 'all other sports' as defined by the Fields in Trust). The proposed policy stipulates a 'green corridor between the existing urban edge and new development' as part of the minimum 17.5 hectares of open space also stipulated by the policy. Millwood do</p>	<p>2) provision of a [delete - District Centre] retail provision to meet the retail need of the development, fit with the retail hierarchy and serve the appropriate catchment</p> <p>3) provision of community facilities as outlined in the Infrastructure Delivery Plan (IDP) including a [delete - fully serviced] area of 2.05 ha serviced to the boundary (to be provided at the cost of the developer) to accommodate a new two-form entry primary school, and 1 ha of land for a new medical centre, if advised to do so by the CCG.</p> <p>Development will be expected to provide an appropriate and proportionate contribution to off-site highway improvements.</p> <p>Masterplanning will be informed by and address:</p> <p>1) a transport assessment (including modelling of junctions of the A28 with Minster Road, Briary Close and Garlinge High Street, the junction of Minster Road with Shottendane Rd the junction of Brooke Avenue with Maynard Avenue), and incorporate:</p> <ul style="list-style-type: none"> <li>• measures to promote multi-modal access, including footway and cycleway connections, and an extended bus service accessible to the new dwellings</li> <li>• Link road through the site to link Shottendane Road to Dent de Lion Road/High Street Garlinge/A28</li> <li>• Upgrade of Shottendane Road to Local Distributor standard</li> <li>• appropriate road and junction improvements and signalling,</li> </ul> <p>2) an archaeological evaluation,</p> <p>3) the need to safeguard the setting of scheduled ancient</p>			
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					<p>not believe this is an appropriate response to existing properties along the northern boundary of the allocation. A narrow corridor of green space along this edge would be largely bordered by back gardens, reducing the opportunity for natural surveillance and overlooking of the corridor, potentially resulting in an unappealing and underused route. The wording in the policy relating to this ‘green corridor’ should be removed.</p> <p>District Centre</p> <p>It is acknowledged and supported that a range of other complementary uses should be provided as part of the allocation, in order to provide for a balanced community. However, it would be overly prescriptive to define the need for a District Centre within the Plan, particularly as Westgate on Sea already benefits from a defined District Centre. The allocation should therefore allow for the needs of the development to be defined at the time of any application. Thus an amendment to this element of the policy is proposed to state that provision should be made to meet the retail needs of the development, but allowing for those needs to be defined in due course.</p> <p>Community Facilities</p> <p>As noted above, the inclusion of a range of uses is supported.</p> <p>In particular, Millwood Designer Homes support the inclusion of land for a 2FE Primary School (as it is understood this need has been evidenced by KCC). For clarity however, it is important the policy confirms that the requirement is for a serviced area of land, up to the boundary of that land, as it will be for KCC, or any alternative education provider, to define requirements for servicing within the plot. An amendment is therefore proposed.</p> <p>In respect of the medical centre, although again, this is supported in general terms, the need for a new medical centre has not been specified at this stage by the CCG. This is in comparison to the requirement in the Plan for medical centre at Westwood (SP38) where the CCG intension is defined. The policy must allow for the requirement for a medical centre to be undertaken in conjunction with, and in response to, the requirements of the CCG, at the time of any application. To define otherwise within the policy is not based on sound and robust evidence.</p>	<p>monuments and the listed Dent de Lion Gateway,</p> <p>4) liaison with service providers to investigate the need to upgrade the capacity of any utility services and infrastructure including gas supply,</p> <p>5) appropriate arrangements for surface water management/sustainable drainage schemes in line with Margate Surface Water Management Plan,</p> <p>6) a Landscape and Visual Impact Assessment to address any visual impact on views to and from the adjacent Green Wedge and protecting wide open landscapes and strategic views</p> <p>7) the need for integration of development and landscaping to take account of public rights of way and enable a soft edge between the site and open countryside.</p>				
Nichols	Patricia		482		Object	On perusal of the information gathering re this proposal it appears that the plan for building this amount of houses is based on figures that are questionable; possibly entirely incorrect.!		1348		Paper

					<p>Also there are nearly 2000 deretict and unoccupied houses in Thanet; surely the first priority should be to focus on these!</p> <p>Thanet is currently already more built on than neighbouring districts; with a population density far above the average for Kent.!!</p> <p>Our one local hospital already struggles to provide a reasonable service with the A+E department at times almost crumbling under the pressure of the present population; at times almost to dangerous levels.</p> <p>In Westgate the population density is extremely high, and there isn't the infrastructure to cope with the amount of houses proposed!!</p> <p>When planning to build new houses surely it is essential to ensure that the present population and services can cope with all the extra people; otherwise life is unpleasant for all!</p> <p>The local doctors surgery is already over-subscribed and is too cramped in the present premises. They are I believe looking for new premises, but then they face the problem of finding doctors and nurses to work in the surgery. Not an easy task I fear.</p> <p>I am also very concerned for the young families that live in Westgate; both schools in the area proposed for housing are already overcrowded and under-resourced.</p> <p>There are many area of concern:-</p> <p>Rubbish Collection</p> <p>Increase in Traffic Noise</p> <p>Sewerage:- already problems dealing with our waste.</p> <p>Water</p> <p>Water Conservation.</p> <p>Light Pollution.</p> <p>However in my opinion one of the biggest objections must be the use of such a large swathe of prime agricultural land. I am personally appalled that this should be considered especially if you consider the need for self sufficiency post Brexit. Also we should be striving to preserve our green spaces for our children and grandchildren. Once concreted over these spaces cannot be retrieved. Apart from the issue of food production which is of course paramount importance; I can see the fields from my bedroom window and the therepentic benefit I receive from looking at the changing seasons is beyond price.</p> <p>Finally of course people need homes and houses must be built, but it is should be a reasonable 'fit' for the reasonable benefit of all; and not to the definite deterioration of the quality of life for all!!</p> <p>TOO MANY HOUSES PROPOSED IN WESTGATE</p>				
nightingale	kaye	Mrs	66	Object	I am writing regarding the draft local development plan		177		Email

						<p>and specifically about the 2,500 houses to be built in Westgate. I discovered Thanet in 2006 and fell in love with the coastline, when we moved here I loved the fact that not only did we have beautiful beaches but within 10/15 minutes’ walk of our flat we could reach fields and farmland and this is something to be treasured. I understand that this is the best farming soil in the country being grade 1, so why would it even be considered for building? The government is trying to make the country self -sufficient post Brexit. This open space is not only necessary for providing food but areas where wildlife can prosper, it also ensures that those living around are able to enjoy nature, peace and tranquillity so important to our wellbeing. One local farm prides itself on being in the same family for over 100 years which is so important to our heritage. Already in my short experience of residing here I have seen farmland disappear around Westwood Cross to provide homes. London is known for its green spaces and lovely parks but here these are few and in Westgate there is only one small playground so we need to keep these fields for our sanity and quality of life.</p> <p>I understand that the population of Thanet has not grown at the rate first predicted in fact it has actually declined. So that in fact the 2,000 empty and derelict properties around the area would be more than enough to house our population. So I am wondering are these homes to be built for London boroughs to buy? I understand that only 30% will be affordable homes so again I question who these homes are for. Unemployment in Thanet at 4.9% is much higher than in the country as a whole, therefore I wonder where these people will be able to find jobs? Already many people travel out of Thanet for work either by choice or necessity so an increase of population will put a strain on already crowded trains, buses and roads. Not to mention the schools at full capacity and the oversubscribed doctors surgery. This proposal would double the population of Westgate and in my opinion destroy the “village” feel we have now where people can greet one another in the shops, pubs and teashops. Thanet is a densely populated area (27% built up compared with Dover 8% and Canterbury 9%). Average population density in Thanet is 1368 much higher than Kent as a whole but in Westgate it is a staggeringly 2,800 now. This plan would double that. So how can this be the right place to build more homes? Please reconsider.</p>				
Nightingale	Roy		334		Object	Although I understand the need for more houses built, I wish to oppose the number of houses planned to be		1016		Email



					<p>built in Westgate-on-sea. In 2015 it was proposed that 1,000 homes be built, recently I believe this has been increased to in excess of 2,000.</p> <p>My reasons for opposing this decision are as follows:  The planned development is on grade 1 agricultural land rather than brown field site. I first heard of this plan on the day that it was stated that our country we only produce 60% of our own food surely this development decrease that statistic even more. Also it would effect the environment by increased transport needs , lorries and planes.</p> <p>In a recent television interview the leader of KCC said that in the event of a lorry build up getting to Dover these lorries would be held on Manston airport site so again another environmental act of madness built opposite these potential new homes</p> <p>Westgate has an aged population and there is very little in the way of public transport. Indeed recently the last bus from Margate to Westgate leaves at 10.15pm and at the present time no bus serves the area where the houses will be built.</p> <p>Margate has the highest rate of unemployment in Thanet where are these people going to get employment?</p>				
Nunn	Julie		368	Object	<p>1. Population Figures</p> <p>The population figures used to support this draft plan are largely based on reports by consultant G L Hearn. The figures presented in this report do not reflect the true net growth of Thanet in the recent past (that being the last decade and including the most recent consensus figures). The report includes atypical numbers from 2014/15 and 2016/17 and inflates the estimated growth from a realistic number or circa 500 increase to an estimated 1365. There is no evidence to support a natural increase of more than 800 individuals on an annual basis above the average experienced in the recent years.</p> <p>Thanet has an overcrowded population already with 27% of Thanet already built on compared to other neighbouring districts, for example Dover 8% and Canterbury%. The average population density of Kent is 439, Thanet's average is 1368.</p> <p>It is impossible to understand how the inflated estimate of increased demand can be justified.</p> <p>The Local plan is supposed to support the local demand. The local area cannot sustain the increased volume of people which would come from outside of the area.</p> <p>2. Medical Care</p> <p>As a local resident it is already impossible to register with a local doctor. There is no transparency about</p>		1065	<a href="#">Nunn rep.JPG (37 KB)</a>	Paper

					<p>when a proposed new doctors facility would be constructed, fitted out and staffed. It is already very difficult to secure a place at a local doctors practice and it is frequently challenging if not impossible to obtain an appointment the day one is needed.</p> <p>Dentist- it is extremely challenging to register for a local NHS dentist place</p> <p>Hospital- QEQM in Margate is closing critical units, with no other easily accessible suitable hospital in the region being available how would the additional 30,000 householders be supported. The most recent CQC report (5 Sept 2018) details 10 out of 14 measurement areas with require improvement.</p> <p>Additional demand on this key service in both the near and longer term would put the existing local population at risk.</p> <p>The additional 30,000 houses are proposed to be a mixture of social and private housing. Social housing alone will put extreme pressure on these services and those not in this primary entitlement bracket (myself included) would be forced to have to pay for private medical and dental care.</p> <p>3. Water and Waste</p> <p>The demand on the local water supply is already resulting in variable water pressure, at peak times the pressure to my house is already significantly reduced. What does this local plan provide to address the additional demand on the water supply resultant from 30,000 additional houses.</p> <p>Waste: The Victorian sewage system which runs under and services Thanet is already under considerable strain with several occurrences where raw sewage has been discharged to the sea in recent years. How does the council plan to address the increased demand and prevent damage to the environment and ecosystem.</p> <p>4. Education</p> <p>All local schools (both primary and secondary) and significantly overcrowded, insufficiently staffed and challenged to appropriately support children at all levels of educational needs and abilities.</p> <p>Building small scale localised primary school buildings will not provide revenue and staff to support the additional demand arising from 30,000 additional houses and will not address the additional demand on secondary schools.</p> <p>5. Road network and local parking</p> <p>Aside from the transport plan featuring widening and improvements to some link roads (eg Thanet Way to Westwood Cross) the local road network is already overwhelmed by road users. Roads through the coastal towns and villages are often at a stand still and in the</p>				
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					<p>evenings full of cars parked on both sides of the road. With regards to Garlinge proposals. Draft plans proposes new road(s) running through from Shottenden Road through to Dent-de-Lion Road with the exit being directly in front of my house. Dent-de-Lion Road is restricted where my house is located by the pavement and a protected footpath on the boarder of the field opposite my house. The road cannot be widened and is not possible on many occasions for cars to pass in either direction due to parked cars or if the vehicles are large/wide. The new road would be seen as a cut through by car users wishing to find the quickest route from the Thanet Way to the west side of Margate. The noise and air pollution resultant from this would be significant and damaging. This route would encourage drivers to use routes through existing residential areas and cause risk to health to pedestrians, elderly and local children. This road would significantly disrupt my health, well being and the value of my property. How would the council propose to mitigate these risks and impact?</p> <p>6. Employment</p> <p>Thanet Policy on Jobs and Economic Growth. Policy SP02. This document refers to a minimum of 5,000 additional jobs planned for Thanet to 2031. Thanet already has an unemployment level of 4.9% which is twice the national average (2.4%). As stated in the opening paragraph the proposed 30,000 houses across Thanet is not warranted to support the local demand for housing. Additional residents would have to be brought into the area to fill these houses and there is not enough employment. The 5000 additional jobs would not reduce the local unemployment to the national average. The area would be over run with unemployed people, seeking benefits and calling upon the local services which are already significantly challenged. The additional demand on resources would not provide wealth to the area and would not therefore generate future employment opportunities.</p> <p>The 2000 additional houses for the Garlinge area have no employment opportunities. The local area has 2 small pubs and few high street shops and no employment opportunities. In order to take employment opportunities (if they were to exist) individuals would be forced to take public or private transport further increasing the pressures on the road network and further contributing to noise and pollution.</p> <p>7. Current population of Garlinge</p>				
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						<p>The residential area surrounding the Quex estate proposed for development is a quiet no through estate largely populated by elderly residents. A large proportion of the area is made up of bungalows which are by design are most suitable for the older generation. An influx of 2000 new houses would bring with it a completely different mix of ages and would change the balance of this well established area. The quality of life of the existing residents would be significantly and negatively affected.</p> <p>8. Waste Management The council's ability to maintain services to meet existing waste output from the existing population is already significantly challenged with funding being challenged on an annual basis. The increased demand on these services will result in more waste, fly tipping and contamination to the local environment.</p> <p>9. Emergency Services The local services are already stretched beyond supply ability. None violent/low level crimes are not responded to due to resource constraints. How does the plan address the increased demand and prevent an impact on the local community.</p> <p>10. Disruption from the building site My house faces onto the Quex estate land which is proposed for 2000 development from 2018 to 2031. There will be constant disruption to my house. There will be constant noise from the site machinery and vehicles, there will be land disruption, the site will have concrete silos, the site will require erection of electricity and lighting creating light pollution both during construction and when populated. Construction vehicles will create road blocks, local road will be closed during construction causing more vehicles to use the already over loaded area. The construction site and residential site thereafter will significantly affect my house. My view (which adds to the value of my house will be destroyed). My house, quality of life and value of my assets will be damaged permanently, how does the council justify this and how do they propose to compensate me for this.</p> <p>11. Impact to the character, quality and function of Thanet's rural settlements and natural environments. My house has trees with tree preservation orders on the property. I recently enquired about carrying out some works to reduce the size/manage the trees and was told that I could not do so without planning approval and they were protected because of the value they have to the local landscape. This landscape will be destroyed by the development plans, how does the</p>				
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					<p>council justify destroying the landscape which has previously been documented as being important to the local community.</p> <p>12. Utilisation of Prime Agricultural land for housing The Quex estate land proposed for development is grade A agricultural land. The proposal to build on this land is contrary to the Government's plans for agricultural self-sufficiency post Brexit. The offer by Quex to sell this land for development has not taken community interests into account. The first choice for agricultural land should be to protect it for that purpose.</p> <p>The DRAFT plan does not include options to build on all available brown field sites. Brown field sites should be first consideration and there is no compelling arguments to support the exclusion of brown field sites from the DRAFT plan.</p> <p>These are my objections to the DRAFT plan and I require a full review to all points raised, a detailed reply to each point raised and an opportunity to discuss my objections at the public examination of the Plan.</p>				
Pannell	janet		498	Object	<p>WHY I MOVED TO WESTGATE ON SEA- My husband and I are both in our mid-sixties and moved to Westgate-on-Sea in February 2017. We were downsizing from our four bed roomed house in Herne Bay and moved to a bungalow in a quiet close here. I used to holiday in Westgate as a child/teenager, when I was living in the Medway Towns. My husband and I still feel the same sort of feeling now that I used to get whilst in Westgate, although we are not on holiday, but retired. The other reason for moving from Herne Bay is that, over the last 30 years we have seen so much new development and the roads have become increasingly busier there. We also suffered from noise pollution from the new A299/Thanet Way, which could be heard most days, night and day. We chose our bungalow mainly because its location suited us; 5 minutes to town, 10 minutes to Doctors and 15 minutes to the seafront. We like to walk and we can walk into Birchington or Margate (but have only walked once that way as we find the area quite run down, although it is meant to be improved). We also like to walk across the farmer's fields off the top of Minster Road - one way takes us to Somali Farm (Mr Linington who leases the farm from Quex Park Estates I understand and is meant to have a lifetime tenancy) and onward to Birchington (avoiding the busy A28) or we go left to Garlinge (Dent De Lion Gateway) and across the A28 to Westbrook Seafront. There is a hard path through each field and it is lovely</p>		1396		Paper

					<p>scenery any time of year, ideal for cycling and dog walking also.</p> <p>There is quite a bit in the Plan about improved cycle ways, walks and about managing to maintain the scenery/vistas in the area -your health has to be improved if you feel happy about your surroundings and are able to get out in the country or by the sea either walking or cycling. You can imagine our upset then on learning about plans to build 2000 new homes off the Minster Road on the very same farmer's land that we enjoy to walk through.</p> <p>SP 15 - WESTGATE KEY STRATEGIC DEVELOPMENT SITE NO 3 ON FIGURE 18- PAGE 34 OF THANET DISTRICT STRATEGY 2015-2031 (DRAFT)</p> <p>We have been to two local meetings about the Thanet Local Plan and been to look at documents at the local library. There is a lot to read and we have not had the time or understanding to take all the recommendations in - we can only comment therefore on our local area issues.</p> <p>The development proposed is to the East and West of Minster Road, approaching Shottendane Road - a narrow, very busy route which leads to Garlinge High Street and then onwards to Margate (hospital area) or if you turn right you can get to Manston or Birchington or Acol/access the A299 to Ramsgate. We are worried about the impact 2000 homes will have on that road and on Minster Road, which becomes very busy particularly between 4 pm and 6 pm. There is a small private school on Minster Road, nearly opposite the park and parents need to pick their children up from here/drop off so would be increasingly dangerous. Minster Road is also used to access Lymington Road (we live in a close off Lymington Road) and in turn the road where the primary school is (St Crispins Road) so the junction between Lymington Road and Minster Road also is very busy at certain times of the day. Any work to up-date Shottendane Lane to a local distribution standard would cause inevitable delays/inconvenience.</p> <p>Although we are saddened to think of the farmland being built on because of the extra traffic in the area and losing the wonderful walks/ vistas, we are also concerned that the land is Grade 1 and its use for housing is opposed by the Campaign to Protect Rural England. As I mentioned before I think we need to grow more food in the area and if this land (and potentially the developer will want more land and wish to build right up to Shottendane Lane, not just the area shown on the plan) is built on we won't be able to re-instate it's use for food produce. We don't know</p>				
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					<p>what will happen to the farmer himself, who tells us he has been told he can have the lease until he dies - he runs a successful fruit and veg shop/cafe from Somali Farm, which is where we often walk to.</p> <p>Thanet already has a deficiency of natural and semi-natural green space of 153 hectares and a deficiency of public parks and gardens of 38 hectares (P.34 Thanet Draft Local Plan - presubmission publications - Regulation 19 - Policy SP11- Housing Provision - item 3.12; so why would you think to build on this valuable land (lovely views, lovely safe walking/cycling away from main roads).</p> <p>BUS ROUTE - Any development on the farmland would need to see that a bus route was available nearer to it. At the moment there is an infrequent service from Lymington Road to Margate/Westwood Cross and a good bus service along the A28 - to Canterbury and Margate/Ramsgate/Broadstairs. I understand the Plan does mention Stagecoach to review Service 32 (Dane Valley to Garlinge) so that it would penetrate any proposed development. If housing were to be included for elderly persons, it would definitely be very important.</p> <p>MEDICAL SERVICES/SCHOOLS - We have only one surgery in Westgate and I understand that is oversubscribed with 10,200 patients. It is already cramped and in Garlinge there is only a Portakabin surgery. 2000 new homes would probably hold at least 3500 adults and probably over 3000 children so a new Surgery would need to be built on that development and be in place before any housing. Likewise a new school would be needed before housing. Children of up to Junior School age in Westgate would likely choose to go to St Crispin's but that is overcrowded and I don't think they can expand - plus any expansion would have a knock on for the road in which it is situated, where there is already a problem plus the surrounding roads, particularly at drop off/pick up times</p> <p>TOURISM - _in Birchington off Shottendane Lane/Park Lane there are two caravan parks - Birchington Vale (Park Resort site) and a smaller one - Quex Park; that one's entrance overlooks the fields, where the proposed development would be and I feel sure that would affect their business. People come to that site who like the quieter life - with no clubhouse, etc.</p> <p>SUPERMARKETS/SHOPS - We have quite a number of small shops/businesses in Westgate but only one Supermarket, which is a small Co-op, very heavily used. Extra development would make queues in there even longer and I think another supermarket - like a</p>				
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						<p>Sainsbury or Tesco Local would be needed in the area to cope.</p> <p>PATHWAYS -Would need to be extended on Minster Road as they peter out at the end of the current housing along it and you have to walk on the farmland.</p> <p>AIR POLLUTION - Assuming the majority of the houses would have at least one car there would be about 2000 more cars on the roads in our vicinity (bearing in mind a lot will have two and a few will have none). This will bring a lot more air pollution.</p> <p>NEW ROADS -We understand that there is likely to be a new road to Minnis Bay from Brooksend on the A28 if the Birchington development goes ahead and a new road from Brooksend to Acol and a road from Shottendane Lane across to Garlinge (Dent-de-Lion), forming a new roundabout and somehow to adjoin the A28 at Westbrook. We are worried about the congestion on the A28 whilst these roads are built. There is already a long tailback at Brooksend at the end of the working day. If a new road is built across the farmland/development to Garlinge, that will impact on the noise levels in the area and there will be a lot of hold-ups in the area for people travelling to and from work. We are worried about being sandwiched between two heavily trafficked roads, i.e. A28 and the new road from Brooksend to Acol, which may head towards this way (we haven't been able to see a definite plan of the route it would take yet) but possibly it will head up to the A299.</p> <p>The last thing I would like to add that if any development has to go ahead at Westgate I hope it will just be for no more than 50 homes and that a large proportion of those would be for older residents who may like to downsize from their larger houses; that in turn would allow for their homes to be purchased by prospective families. There is a lack of suitable housing for older persons (other than flats) and I hope also that no housing development will take place on the proposed site (Westgate/Garlinge).</p>				
Pannell	Richard		500		Object	<p>THE DRAFT DEVELOPMENT PLAN OF THE THANET DISTRICT COUNCIL (AUGUST 2018)</p> <p>Having reviewed the plan at Westgate Library I feel compelled to write and express my deep concerns regarding the plan.</p> <p>I consider the number of new homes proposed and their location on mainly prime agricultural land will have a severe detrimental impact, changing Westgate and the surrounding areas into crowded and busy environments.</p>	<p>The Plan should be a tool to inform the Local Community.</p> <p>Unfortunately, because of amendments, conflicting information and confusing content, this suggests to me that the Plan has not been positively prepared.</p>	1406		Paper



					<p>The Plan should be a tool to inform the Local Community. Unfortunately, because of amendments, conflicting information and confusing content, this suggests to me that the Plan has not been positively prepared.</p> <p>One important area where conflicting information seems to have been provided is the prime agricultural land, owned by the Quex Park Estates, running adjacent to the northern side of Shottendane Road at Westgate which is not included in the Plan for development. However, at a meeting I was told by a local Councillor that the land in fact in the plan and designated for housing development.</p> <p>The Hearn report suggesting the Thanet area population growth of 1365 persons each year until 2031 and used as the basis for the conclusion that 17000 new homes are going to be required is obviously incorrect when considered against the actual growth in the local population noted in the ONS 16/17 survey which stated a 533 persons population growth.</p> <p>In the local community there is a sense that the number of 17000 new homes, suggested in the Plan, is connected to the on-going practice by London Boroughs moving families, on their housing waiting lists, to cheaper homes in the Thanet area. This practice can be clearly identified in the new housing estate adjacent to the Westwood Shopping Centre at Ramsgate.</p> <p>Affordable housing for local people - 'Yes', but not affordable housing for the LondonBoroughs.</p> <p>This approach to provide high volume housing surely is very short sighted, when Thanet has the second highest density of population in Kent (Dartford being the highest). It would seem that other areas in Kent, such as Canterbury or Dover, with less density of population and better employment opportunities for new migrants, would be a preferred option for new migrants.</p> <p>In Westgate, if the proposed housing were to be built, then its' population could potentially double its size and overwhelm the local schools and other public services.</p> <p>Westgate doctors' surgery is currently over-subscribed with 10,200 registered patients (maximum 10,000 patient registrations).</p> <p>As the plan allows for building on some of the best agricultural land in the County, which is strongly opposed by the Campaign to Protect Rural England, and contrary to Government proposals for land use after Brexit, I am, therefore, somewhat confused as to the thinking behind such drastic proposals.</p>				
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						<p>Another serious issue with the plan is that currently open corridors between the building developments of Birchington, Westgate and Garlinge are proposed to be built upon which will merge the identities of the three towns.</p> <p>I trust the feedback to the Plan that I have submitted herein, and feedback from other concerned local people, will be given serious consideration and used to further develop the plan by reducing the proposed new builds to suit the current stretched utility services and the local infrastructure.</p>				
Parnell	Margaret		392		Object	<p>My objections to the houses being built in Westgate</p> <ol style="list-style-type: none"> <li>1. Population density of Westgate is already 28,000 building houses would increase overcrowding putting more pressure on schools, clinics and doctors.</li> <li>2. Roads around Westgate are full to capacity and roads are heaving, the roads around Westgate were not built for all the extra traffic plus parking is a nightmare.</li> <li>3. QEQM Hospital is finding it more difficult to cope with the present population, for eg the first time in my life had to go to A&amp;E and had a five hour wait.</li> <li>4. Primary schools in the area are overcrowded and under resourced.</li> <li>5. Sewerage is also a problem, the tip at Margate is always extremely busy and is often closed due to the sheer capacity of waste.</li> <li>6. I have lived in Westgate for many years and the thought of all the beautiful fields being built on is beyond belief. Please think carefully before making any final decisions.</li> </ol>		1152		Paper
Peeling	Dorothy		420		Object	<p>I have lived in Westgate for over sixty years. I like the peace and quiet of the fields and countryside outlook. I also think it is important to keep the farmland for food especially when we leave the EU.</p> <p>The doctors at present is coping with the pressure of the people who live here, extra will cause problems.</p> <p>I am in my eighties and I love living in St Benets, and I am worried about the noise increase, and increase in traffic, which is already bad.</p>		1196		Paper
Pennington	M	Westgate Town Council	502		Object	<p>I am writing to express our opposition to the proposal to allocate a total of 2,500 new houses to Westgate on Sea, in the framework of the latest draft local development plan. Our position is based on the following facts:</p> <ol style="list-style-type: none"> <li>1) The OAHN {Objectively assessed housing need} is grossly overstated, because it is based on completely out-of-trend figures for a single year (2013-14).</li> </ol> <p>Moreover, it underestimates the additional accommodation which can be provided from currently unoccupied dwellings and does not take into account</p>		1410		Email

					<p>the proportion of elderly people In the existing population.</p> <p>2) The population density in Thanet in general, and in Westgate in particular, is-already very high compared with the rest of Kent.</p> <p>3) Our schools and clinics are already overstretched.</p> <p>4} Additional housing would have to be built on prime agricultural land, which is contrary to the Government's food security and environmental plans post-Brexit.</p> <p>5) There are serious questions about the effects of increases in housing developments on the water table here.</p> <p>In addition, the process of consultation has been inadequate and unacceptable. Thanet District Council will not release the feedback from the Open Spaces consultation which was completed over a year ago. Moreover, Thanet District Council "lost" the representation from Westgate on Sea in 2015. In the latest consultation, it seems the draft plan supplied to Westgate on Sea Library was not the correct version. In our view Thanet District Council should reject the 'one-size-fits-all" OAHN figures from Whitehall and insist on a more serious approach to local planning. Thanet is an exceptional case because of its level of deprivation - it is not part of the "rich south-east" as it is commonly perceived.</p> <p>1. OAHN</p> <p>i) The findings in the latest report (2016) by G L Hearn, which increase the estimates for population growth in Thanet, are distorted by the figures for 2013-14 which are completely untypical and for 2014-15 which are very high; this can be seen easily in figure 2 of the summary. More up-to-date ONS figures for 2016-17 (July-June) show a return to the lower trends in earlier years, with natural growth showing a decline of 200, internal net migration at 419 and international net migration at 314, giving total net annual growth of 533, far below the 1,365-annual growth in the Hearn report, which in our view is completely discredited. The latest figures for EU net migration show much sharper falls than those predicted In the report - indeed, the figures in the report would be counter to Government policy. The figures have clearly been 'pumped up' to legitimise massive migration into Thanet from London.</p> <p>ii) There are nearly 2,000 empty, derelict and unoccupied dwellings in Thanet and the first priority should be to focus on those.</p> <p>iii) The proportion of elderly people in Westgate (nearly 30%) is well above the Thanet average, and almost double the national average of 16%.</p>				
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					<p>2. Population density</p> <p>i) Thanet, at 27%, is already far more 'built-on' than the neighbouring districts (eg. Dover at 8% and Canterbury at 9%).</p> <p>ii) The population density tables of ONS for 2017 show a Kent average of 439 and a Thanet average of 1368 (so Thanet is already over 3 times the average for Kent), compared with Dover at only 368 and Canterbury at 531. The current population density in Westgate is already over 2,8001 I The proposed allocations of new homes would double the population and therefore the population density of Westgate, thus increasing overcrowding and the pressure on schools and clinics.</p> <p>3. Schools and clinics</p> <p>i) Westgate surgery is now over-subscribed with 10,200 registered patients (maximum 10,000 registrations). It is too cramped in its premises and adding residents will result in a deterioration in health care for all. Even within Thanet, Westgate is already a deprived area, with health indicators for life expectancy and disability considerably worse than average.</p> <p>ii) The two primary schools in the area proposed for housing (St Crisplns and Chartfield) are overcrowded and under-resourced.</p> <p>4. Agricultural land</p> <p>i) The land proposed for development Is prime agricultural land and its use for housing is opposed by CPRE. This is contrary to the Government's plans for agricultural selfsufficiency post-Brexit.</p> <p>ii) The fact that Quex have offered the land for sale does not take community. or national food security interests into account.</p> <p>5. Water supply</p> <p>i) We understand the water table in Thanet Is at risk and further housing development could create serious water supply problems.</p> <p>It is for Thanet District Council to represent the people of Westgate to the authorities in Whitehall, but in the past, we feel we have been let down. We need someone to stand up for us and demonstrate that we can manage our own development.</p>					
Phelan	Jennifer		67		Object	<p>I am writing concerning the proposed destruction of our beautiful Westgate.</p> <p>Firstly, I cannot believe that anyone would think building on the arable fields, some of the best arable in the country. Considering the erosion of green in Thanet, we need al the green space we can keep.</p> <p>Secondly, where are all the jobs for these people going to come from. We are already one of the worst palaces in the South East for work, also one of the most</p>		178		Email

						<p>crowded.</p> <p>Thirdly, where is the water going to come from? All of these houses will be using a massive amount of water. The proposed reservoir we were supposed to be getting near Canterbury never materialised. Surely it doesn't take much to realise that the water situation will be desperate.</p> <p>Fourthly, I know we will be promised new schools, Doctors surgeries, but will they come before the houses? Westgate schools and Doctors fit the current requirements, a shopping area is also enough to suit requirements. This is an extremely badly thought-out business by someone looking for a quick fix and no doubt the income from rates is flashing the pound signs, that is if anyone can get a job to pay them. I sincerely hope this plan will be rethought and common sense prevail</p>				
Preston	Duncan		462		Object	<p>I feel I must write to ask you not to allow this development to proceed. The building of 2000 houses in such a small town will absolutely ruin the community. The Schools, Doctors, Dentists are all massively over subscribed already so to add another 25%+ to the existing population is just not acceptable. The road infrastructure can not possibly sustain this amount of new traffic I would urge you to visit Westgate, by the library, at 8.45ish in the morning and see the queues at the traffic lights. On a Sunny day in summer the queues to Margate on the Canterbury road is horrendous so these houses will also have a detrimental effect on Margate, just as it is becoming a vibrant town again.</p> <p>The logic of building 2000 houses on good agricultural land is absurd when there is perfect infrastructure and space at the former Manston Airport site. I would hope that, as the Strategic Planning Officer, you will agree that the site of these houses has been a political decision to "save the Airport" and not done with the interests of the people in Westgate &amp; Birchington.</p>		1317		Paper
Price	Carol		112		Object	<p>Re: Local Plan: ST1 and ST2 sites</p> <p>In common with the vast majority of my community, I am writing to express my extreme concern regarding the excessive number of new homes being proposed - and thereafter forcibly imposed on - Thanet in the new local Plan, regardless of the views of the people who actually live there, or the woeful inability of the current local infrastructure to serve their needs.</p> <p>Most particularly of all - again, in common with my whole community - I am objecting to any building on the ST1 and ST2 sites around Westgate and Garlinge, which comprise prime agricultural land.</p>		238		Paper

					<p>When seeking to build all these new homes, key issues Thanet residents want addressed and answered are: Who is going to live in them? Where are the jobs for them? And where is the infrastructure to cater for such a massive new influx in population when the existing infrastructure is already unable to cope? Are the new home owners going to bring wealth, jobs, vital skills or other positive benefits to our community, or are they going to place yet further strain on already over-stretched council funds and public services? And if you cannot answer them then surely the homes should not be built. It is nothing short of insane to do otherwise; to sacrifice land for a future that may never happen, or put the rights and needs of people yet to live here above those who already do.</p> <p>Some sympathy does go to TDC, in being forced by central government to come up with these higher home numbers. But one also likes to think that, when it comes to allotting more specific areas for new homes, council members have the sense and integrity to appreciate the type of land that their community always wants preserved as more off limits and sacred. And most sacred of all should be prime agricultural land.</p> <p>TDC should be commended for turning down building permission on the ST1 and ST2 sites, last time they came up for consideration. In so doing, they also earned much respect and gratitude from the local population. So once again I would like to highlight the fuller reasons why these sites should not be built on, in the hope that TDC will make the same sensible decision to reject this land for building on again:</p> <p>1. Food production. You may be aware that the ST1/2 sites feature the highest possible grading for farmland/food production in the UK- i.e. Grade 1. We only have 21% of this type of extra-fertile land in the entire UK for growing food on and thus cannot afford to lose it as a resource. We do not know how much more of our own food we may need to produce in a post Brexit world, and thus sacrificing any more of it for housing - on top of that already sacrificed at Westwood - would be foolhardy to say the least. Especially when there are plenty of other option sites still on the table. It also makes little sense to be building more and more homes for an expanding population, only to find we then can't feed them because we have sold off all the farmland.</p> <p>2. Flooding/sinkholes risk. The council have previously been alerted to past flooding from the ST1 site into Victoria Avenue and Belmont road below, in the 1970s, resulting in fatalities, after heavier rain. Currently it is</p>				
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					<p>only heavy (and deeply ploughed) agricultural soil, and the roots of crops/more mature surrounding trees and shrubs that retain excess water from heavier rainfall in the ST1 site. Once this land is concreted over the flooding risk during heavier rain would become more severe again, due to the specific geography of the ST1 site. Residents who have lived many decades around this site also say that both it, and the ST2 site, have developed sinkholes in the past which of course, in a residential area, could endanger life. Moreover, as the above facts are already well documented, this would severely affect any insurance payout should any of the properties built on this land be flooded or lost to sinkholes.</p> <p>3. Environment/loss of wildlife habitat. The ST1 and ST2 sites host a significant population of wildlife - i.e. voles, shrews, foxes, badgers, umpteen different species of birds, insects and moths, plus the rarer slow worm. Building on this land would wipe them out. The CPRE (Council for the Protection of Rural England) have also made their views known re how devastating an environmental impact the destruction of this land for building would have.</p> <p>4. Impact on residents' physical, mental and psychological health. It is not always appreciated how much mental and physical benefit residents gain from the nearby presence of open space, fields and countryside. Or that a vast majority of residents surrounding the ST1 and ST2 sites only moved there, or bought their houses there, in order to experience, or benefit from, views of open countryside. And escape the kind of more oppressive, urban, built up landscape they previously lived in. The ST1/2 sites are, in fact, not just 'bits of land' but vital space that oxygenates our whole community and keeps it in better mental health. It is where people walk, take exercise and appreciate their surroundings. Countless studies have also shown that the more built up an environment people live in, the more their mental health declines. The same is true of higher levels of traffic pollution. Both of these higher risks to mental health would ensue if this land was built on.</p> <p>5. Education and learning. For many local children, the ST1/2 sites present their only real experience of countryside. They walk across it to school each morning and back in the afternoon. It is where they play in summer, pick blackberries in the autumn, learn about local plants and wildlife, the rotation of different crops and more fully understand the changing of seasons. All of this would be lost to them forever if the land were built on.</p>				
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					<p>6. Destruction of more individual village identities. Currently Westgate and Garlinge represent two very individual town or village communities, with their own hearts and identities which are important to them, separated by the current STI/2 site farmland. Building on this would morph them both into one big urban sprawl, and their more individual hearts and souls as communities would be lost forever.</p> <p>7. Dangerous and previously failed precedents. Residents are concerned that the allotment of any more prime agricultural land for housing sets a dangerous precedent - i.e. that Thanet council, unlike its residents, places no value whatsoever on its precious farmland/countryside as a resource and sees it all as 'fair game' instead to stick houses on. Not only that but the allotment of prime agricultural farmland for housing has previously occurred at Westwood, with the big new housing development currently sited along Haine Road, which is widely viewed locally as a total eyesore, if not utter disaster. For has an uglier, more barren or soulless complex ever been devised? No heart, no space, no community. Nothing. No one I know would ever want to live there and homes are proving trickier to sell. Thus vital, precious farmland was pointlessly sacrificed for this abject failure and blight on the landscape.</p> <p>8. Other options. If more new housing is really needed, in the kind of numbers previously cited, then surely the most sensible thing to do is site them at Manston, and create a whole new community there, with its own more self-sufficient infrastructure - i.e. schools, shops, medical centre - which in turn would take pressure off local resources elsewhere? There is certainly the space and it would mean no further farmland would need to be sacrificed. I think the majority of Thanet residents would view that as the least worst option.</p> <p>In all honesty, most Thanet residents view the Local Plan as the most catastrophic event to ever hit their community, and something which promises them ever more misery, and destruction of their everyday quality of life, as the future unfolds. In terms of more traffic, noise, crowding, air pollution, crime, stress and struggles to access most basic services like health and education.</p> <p>But decisions still have to be made as to where new homes should be cited, in a way that does not alienate this council ever further from its residents. Which the destruction of any further agricultural land for housing will surely do. For reasons now fully highlighted in this letter. Never, ever underestimate what our fields and countryside really mean to us all in Thanet, or how</p>				
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						hard we are prepared to fight to preserve them.				
Ralph	S A		474		Object	<p>I object to the Building of 2,500 houses on Farm Land in Westgate &amp; surrounding, we do not have the facilities for this. We cannot cope now &amp; TDC does nothing it is Disgracefull. Where are the jobs coming from &amp; these houses wont be for LOCAL people they will go to the overflow of London etc.</p> <p>Where are the Hospital, Doctors, Dentists, nursing Homes, ambulance, Fire Service, Water, Sewers, Schools, Parking, Shops, Street Lights, Rubbish Bins, Dog Bins</p> <p>TDC cannot clean Drains, Repair Roads, Footpaths, Beaches. No Street Cleaning, Trees &amp; Parks are not seen to, Speeding on Roads, STROKE UNIT closing at QEQM Hospital No Police on the streets. I can go on but I got witters cramp.</p> <p>Please use your heads &amp; STOP THIS NOW</p> <p>Let us locals have a hand in this we pay enough Council TAX.</p>		1339		Paper
Scott	D		56		Object	<p>I have examined the plans and I know the site well. I wish to object strongly to the development of this amount of houses on this site of green belt. The land is top grade agricultural land and a natural wildlife area and is used by all walks of life - dog walkers, ramblers, cyclists, photographers, bird watchers and people who just want to enjoy our beautiful countryside. All this would vanish if tons of concrete were to be dumped on it. This amount of houses, people and cars would put an enourmous strain on a already overloaded Westgate.</p> <p>As you already know, water is a problem already. Sewers need updating, Schools are overloaded as are doctors, Dentists &amp; Hospitals &amp; the roads are congested. The Council have no staff due to lack of money as it is so who's going to clean the streets and empty the bins and who's going to police all these extra people what with a shortage of policemen/women.</p> <p>My son is dreaming of working on the land when he leaves school in a years time but he's had to change his mind and look for something else because houses dont spout food, agricultural land does, so along with thousands of local Thanet people dont destroy our green and pleasant land.</p>		149		Paper
Scott			511		Object	<p>The Proposed allocations ST1 and ST2</p> <p>The proposed allocations ST1 and ST2 in the Draft Local Plan are not proportionate to the existing built form and local services and should be withdrawn. Moreover it is now clear that the designation of the proposals may have been to provide contributions towards a new highway Route. The “Inner Circuit” requires</p>		1441		Email

						development contributions which will not and, at the current time, cannot be financed by KCC - the strategic highway Authority. Also, the money made from the housing allocation will be taken as section 106 monies for this new road. TDC have stated that they will not consider the CIL monies and this once again is against Localism.				
Sewell	D		377		Object	<p>We hereby write to protest at the above draft local plan for 2000 new properties to be built in Westgate-on-Sea to house overspill from London on prime agricultural land. We need this land to grow food supplies so please take this into consideration, bearing in mind the cost of imported food post-Brexit is likely to rise steeply. (We don't even have a decent road now for our area and further services like buses, taxis are polluting our air so we desperately need a TRAM system - do you have a 5, 10, 15 year plan for our area? The litter in our area is also depressing - we despair! Our surgery is turning people away daily because they are full up. Poor tourists and residents have to queue in traffic for ages to get anywhere. Southern Water denied us for six months a supply of water for showers, heating etc. Couldn't be bothered - too busy - we don't count.</p> <p>The situation is deteriorating very rapidly so the prospect of disruption of 2,000 properties being build will further exacerbate our growing problems. Water leaks are reported but go for months with no result.</p>		1088		Paper
Sexton	Peter		489		Object	<p>I am writing to formally object to proposals to develop areas adjacent to Minster Road, Westgate on Sea. I understand that there is already a significant number of identified sites that have planning permission for housing in the local Thanet area, as well as a significant acreage of brownfield land which would accommodate sufficient housing to meet the needs of future local needs. Thanet also has a significantly higher than average number of unoccupied houses which could make a further significant contribution to meeting future demands.</p> <p>The areas identified for development offer Grade 1 agricultural land and therefore would score highly in any decision for them not to be included. Recent agreements by all political parties on the need for policies to fight climate change, TDC see it fit to build on land currently used to produce food and therefore reduce the amount of locally produced crops and directly impact our food mile footprint. The uncertainty of our current political situation adds to the necessity to protect our agricultural capacity. The visual landscape and wildlife and biodiversity also add unmeasurable value to the communities adjacent to</p>		1359		Email

					<p>the sites.</p> <p>Building on these identified sites will have an irreversible impact on both this and Grade 1 agricultural land.</p> <p>Minster Road and the adjacent roads are already very busy. Any further developments in the Westgate and Garlinge areas will inevitably lead to a significant increase in traffic on what are already very dangerous roads. There are sections of Minster Road which are already particularly hazardous and an increase in the number of vehicles using this road as an inevitable consequence of building this large number of new roads will only increase the dangers and levels of congestion. Minster Road is only one of several local roads where there will be a significant increase in traffic noise, congestion and pollution.</p> <p>I also voice significant concerns around how the proposed developments will impact on an already stretched QEQM hospital, local surgeries and schools. The projected figures for secondary school places suggest that even without a significant increase in housing, the pressures on the existing secondary and primary schools will impact on their capacity to deliver quality education and support in an area that contains some of the most deprived wards not just in Kent, but Nationally. Flat capping government spending and increased costs for schools has often meant restrictions on curriculum provision and support required, particularly in areas like Thanet and any further pressures on these local services will further impact on provision. I strongly ask the planning inspectors to take into account the uniqueness of the locality in relation to the existing levels of deprivation and lack of employment opportunities and the impact further developments will have.</p> <p>Westgate and Garlinge are two separate villages and the proposals in the plan would simply mean the creation of a 'mini conurbation', therefore destroying the uniqueness of what the settlements currently offer local residents. I note that good planning practice considers population growth trends and the avoidance of adding overly large developments onto existing small communities. The local plan therefore fails on both counts. The population of Westgate sand Garlinge has not significantly increased over the past three censuses and would not likely do so in the future. The addition of the proposed number of houses adds a disproportionate increase in population to two small villages and also a disproportionate amount of the proposed total of over 20000 houses across Thanet. I also have a number of real concerns around what is</p>				
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						<p>being said regarding the number of Houses required. Thanet Council have the responsibility to meet the housing needs of its local population. I also question the decision to base the proposed developments in the local plan being made on the very highest population and employment growth. Thanet is an area of significantly higher unemployment than most of Kent and the UK as a whole. To suggest need for a further 20000 homes is wildly optimistic at the very least.</p> <p>Local Planners have a huge responsibility to ensure sustainable development to meet the needs of its local population. They also have a responsibility to ensure planning procedures and practice allows prioritisation of all potential sites after appropriate and detailed consideration of the potential impacts. The National Planning Policy Framework argues for sustainable development. This means that after any development any area should be no worse off than before the development. So if important agricultural land is lost, quality landscape is lost, if there will be more congestion, overcrowded schools, hospitals and surgeries then a site should not be included.</p> <p>The sites suggested for development in Westgate are not appropriate for development and should not be part of any future Local Plan.</p>				
Sherriff	Patricia		180		Observation	<p>As a resident of Westgate .I am deeply concerned with the proposal for an additional 2500,new houses for Westgate. On sea. And would like to point out a few issues and give some positive alternatives.</p> <p>2,500 houses will double the population requiring the present services to be grossly extended. I.e..new schools, businesses, hospital, doctors! Surgeries ,transport, Police and all services ,otherwise health and education and well being of everyone wilf suffer.</p> <p>The already large density of population will greatly increase.</p> <p>A need to in crease employment for these extra people or will these Londoners and others commute daily.. ?</p> <p>Kent is known as The Garden of England yet agricultural land is going to disappear in large areas We will need our agricultural land for the future.</p> <p>The crime rate will also increase with additional new housing estates .</p> <p>There will no doubt be a number of foreign speaking families with children who will pose Language problems in schools The elderly often have hearing problems and find foreign accents difficult to understand</p> <p>Resources including water electricity and gas need to</p>		522		Paper

					<p>be adequate .</p> <p>Present roads will not accommodate the extra transport necessary and new roads need to be built before thoughts of building extra housing .</p> <p>On a more positive note some alternatives that might be possible .</p> <p>If so much housing is required in the country .Why not build a new town.with low raise flat blocks to save land ,These could be built farther afield</p> <p>After World War 2 several new towns were built very successfully so perhaps that is what is needed.</p> <p>2 . The unoccupied and derelict buildings could be refurbished for housing again saving prime land.</p> <p>3. Developers could be given an . Incentive to provide housing on sites they have already acquired.</p> <p>4. School extensions could be considered to cope with children of foreigners who tend to reduce the teaching capacity available to our children. It is very important to maintain a high standard of education.</p> <p>5 . Building of small blocks of flats would minimise the use of agricultural land.</p> <p>Westgate on sea is a beautiful little town with lovely buildings and friendly</p> <p>,helpful people and nice buildings .</p> <p>We have something very special and beautiful?</p> <p>WHY SPOIL IT..?</p>				
Smith and Christopher Porteous	Janet		366		<p>Observation</p> <p>As residents of Westgate-on-Sea, Kent, we feel compelled to write regarding the proposed Housing Plan for Westgate-on-Sea and adjoining villages In Kent.</p> <p>Whilst there is always a need for housing for the ever increasing population -to suggest building thousands of houses on mainly prime agricultural land seems absurd. The land has been farmed by local people for centuries giving families a living in a very deprived area. There are very few job prospects here, with high unemployment and many on benefits. Who will live in these houses? Will they be for local families or is the idea to ship out families from the much overpriced london Boroughs?</p> <p>To build homes in this quantity will create an ever increasing pressure on our already overstretched facilities such as schools, doctors and hospitals. As well as domestic services like gas, electricity, water and especially sewage II There would need to be an infrastructure in place to cater for the extra volume of usage. Not like the situation at Westwood Cross when large quantities of houses were built but there is still no sign of schools, doctors or open spaces for children to play.</p> <p>Also, our roads would be gridlocked -they were not</p>		1063		Paper

						<p>built to cope with large volumes of traffic. The Canterbury Road is already bursting at the seams and if you live in this area you would know that on many occasions this summer it has taken hours to do a short journey. Where would all this traffic go?</p> <p>These plans have not been thought through. Surely there are other options instead of building on this prime agricultural land. THE FIELDS ARE FOR FOOD NOT HOUSES.</p> <p>We beg you to think again before giving any sign of approval for this gross overbuild which will change our landscape and villages forever.</p>				
Solly	C		419		Object	<p>[See attachment]</p>	<p>Phasing Strategy may not deliver houses in the volume proposed</p> <p>Effects of Brexit and the change of economic activity in the area.</p> <p>Council decisions have increased risk of plan unsoundness.</p> <p>Community right to object has been ignored, which could be contrary to localism act 2012</p> <p>Realistic Phasing should be made.</p> <p>Wording to ensure adequate water supply is available (Irrespective of IDP).</p> <p>Include wording to include assessment of historical monuments.</p> <p>Impact to Dent De Lion Gateway in terms of Landscape and setting as has been historically made in previous local plans and should be maintained, respected and enhanced.</p> <p>Include policy from 2015 draft that stated:</p> <p>Masterplanning will be informed by and address:</p> <p>1) the need to clearly demonstrate how the SPA mitigation strategy as set out in Policy SP25 is being met and how it will ensure that development does not increase recreational pressure on designated sites,</p> <p>2) a wintering and breeding bird survey to assess impact on bird populations within the district and the need to mitigate/compensate,</p>	1221	<a href="#">Solly SP15 comments.pdf (2.5 MB)</a>	Email

							<p>Include in policy “appropriate contribution towards the Thanet Coast Strategic Access Management and Monitoring (SAMM) scheme”</p> <p>Ensure that the highway works is made before development of housing begins, the new roads will act as access roads to the new development sites.</p> <p>Ensure that key road links and changes to junction and road layout are covered in this policy and clearly stated.</p> <p>Ensure that original policies on the draft plan (2015) are represented in the published document.</p> <p>That the border between Garlinge and Westgate should be known and site design to promote the 2 areas.</p> <p>Field Studies on allocated site to investigate historic settlements. (Markings on the fields are evident on ariel maps) Policy HE01 should be referenced in this policy.</p>			
Stevens	Angela		163		Object	See previous comments re Birchington. Same comments for ALL village proposed building. OBJECT!	See Birchington comments. Same here.	619		Web
Swindells	John		203		Object	<p>Initially I enclose a copy of my letter dated 1st March 2015 outlining my reasons for objecting to just 1000 houses on the prime agricultural land in Westgate on Sea and Garlinge and stressing the importance of MANSTON AIRPORT as an airport.</p> <p>My views have not changed at all but I now find that some 2,500 properties are being suggested which will of course mean approximately 5000 adults, 5000 children and at least 3500 motor vehicles. The proposal does not bear thinking about. This part of Thanet would be permanently gridlocked. We do not have, the schools, medical services, policing or any other facilities to cope with such an incredible expansion of population.</p> <p>The population growth figures put forward are of course totally misleading and out of date. Thanet also have around 2000 empty/derelict properties which could be brought back into use and thus solve a huge part of the housing problem.</p> <p>As we head into the unknown of a disastrous "Brexit" and the vast increase in food costs being suggested, how can anyone even consider using our prime</p>		629	<a href="#">052 Swindells John letter 2015.pdf (140 KB)</a>	Paper

						agricultural land for housing. Thanet has many far more suitable areas to use for development and that is only if we really do need thousands of new houses. We are already an overcrowded "Isle" compared to many other parts of Kent and since it is very unlikely that Thanet residents will actually require the suggested developments, it seems possible that the vast numbers of houses will actually be to relieve housing problems in south London rather than for local families. We do not have the facilities or infrastructure to become a dumping ground for other council areas.				
Sykes	Anthony		31		Object	Westgate will be ruined by this development. It is far too many for the community to absorb. When the government is saying we need to produce more of our own food as a result of BREXIT it is counter productive to build on masses of grade 1 agricultural land. The current trends in population growth do not support this volume and number of dwellings. I wonder if anyone takes any notice of consultations as against many objections these were totally ignored and the numbers doubled.	All economic trends do not support these numbers. Those who have drafted this plan have taken the target number and tried to justify it with false and engineered data.	57		Web
Taylor	Ray		380		Object	I am happy to accept that we, the United Kingdom, need more houses and I agree that each town and village with the UK should shoulder part of the in builds. Having said that I believe the number of houses should be proportionate to the size of the town/village. It is my belief that 500 new houses in Westgate on Sea & Garlinge would be enough for both communities to absorb the influx of this development. For the District Council to propose the building of 2000 houses on prime agricultural land is nothing but a short-sighted approach to a knee-jerk response to a housing issue brought about by successive Administrations within the Isle of Thanet passing the buck. My individual thoughts are; Fresh water -I live in the area where the houses will be built. If we have a fire around this area Southern Water (SW) need to reduce pressure to several streets to maintain pressure for the Emergency Service. Once the fire is extinguished SW re-instate the water pressure. This results in brown water coming from the taps with many black bits floating in it. We have complained to SW but their view is that we were left with no option than to reduce pressure and this causes the dirt within the pipe to fall to the bottom of the pipe which, when the pressure is re-instated, comes out of your tap. The remedy- run your tap for up to 30 mins until clear. This area is on a water meter! How can SW cope with an additional 2000 houses? Sewerage- At the height of the summer season when we have many visitors staying in and around Westgate		1103		Paper



					<p>on Sea SW at a public meeting that they were working at maximum capacity. This Public Meeting was held in Westgate Pavilion 2015 with Chris Wells (then leader of TDC) and Sir Roger Gale (local MP) present. If, during the summer, we have heavy rain then SW have no other option than to discharge untreated sewage directly into the sea. Thanet is well known for having beaches closed because of excrement and soiled items on the beach. The addition of these houses will;</p> <ol style="list-style-type: none"> <li>1. Increased instances of pollution on the beaches resulting in them being closed to the public.</li> <li>2. Thanet will only need 2 or 3 of these occasions in one year of beach closures due to effluent being present on the beaches before visitors and tourists will find other places to go. Tourism is our main employment here in the lise of Thanet.</li> <li>3. Increase in health problems with possible legal action against SW and TDC</li> </ol> <p>Rain Water run off -In 1953 the farmer thought he would change the direction of ploughing the fields that are now allocated to these 2000 houses being built. Because the field was ploughed North to South rather than the traditional East to West there was nothing to prevent the rain water run off to flow down the surrounding roads and to pool around Canterbury Road. In the summer of 1953 we had a severe storm. The run off soon found its level opposite Grove Road and Canterbury Road. The water level went above the first-floor windows of many houses and resulted in one death and many homes left uninhabitable.</p> <p>If we concrete and tarmac over these fields then we will be faced with the same situation at some time in the future. Couple this with both Thanet District Council and Kent County Council withdrawing services like clearing litter and clearing the street drains then even a blind man can see what is waiting to happen.</p> <p>Traffic- In these days where it is not unusual for households to have 2 cars per house this could mean an extra 2500-3500 extra cars on the streets of Westgate on Sea. This would have a crippling effect on Westgate and Garlinge. The centre of both communities is already full to bursting with cars and this will just bring gridlock to our town centres. There is also the increased pollution that these extra vehicles will bring to our streets. This, tied in with the average person in Westgate is elderly, has a high risk of casualties on the roads.</p> <p>Another consideration are the roads around this area. The roads are narrow with cars parked on both sides. Currently there is a voluntary give-way policy between locals. These roads are not suitable for larger vehicles</p>					
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					<p>and an increase in traffic flow would be totally manic. Even the Emergency vehicles have difficulty using these roads with certain side roads being unpassable after 1800hrs when everyone returns home from work/school.</p> <p>The Contractor has suggested that they would be willing to widen and extend Shottendane Rd as part of the Section 106. This is great but the contractor went on to say that they would only do these road works if the contractor in Birchington did their end of the road building and that Kent County Council honoured their promise to build at the other end taking vehicles away from the area onto a main dual carriage way.</p> <p>Employment- The lise of Thanet has the highest Unemployment in the whole of Kent and is in the top 5 within the UK. Currently the unemployment is 4.9 whereas the National average is 2.4 (ONS Mat 2018} I We have little or no employment on this lise. I note, with some astonishment, that TDC are proposing these 2000 houses with no new business' being created in the area. One of the main reasons why this area of Thanet is interesting to those choosing to live here is that it is a great place to retire to! This will have a side effect of discouraging people from buying these houses. If this turns out to be the case then the developer would be left with no alternative than to sell the empty houses to the highest bidder which is a very real worrying for us in Westgate on Sea after the debacle at Westwood Cross!</p> <p>Where are all these jobs coming from'? The Local Plan states that 5000 jobs will be created by the building of these houses. The Consultant who did this report stated that 3000 jobs would be created on a 'temporary basis'. TDC did not like this figure so upped it to 5000 with no evidence to back up their figures. Also, what happens to those jobs once the houses are finished?</p> <p>Emergency Services- There is no provision to increase the cover of emergency services in our part of Eats Kent. Currently, Kent Police spend most of the day responding to triple 9 emergencies only. The Fire Brigade has lost one of their engines/tenders and our local hospital, QEQM, is having some of their flag ship units being removed from them to William Harvey Hospital in Ashford. We are becoming more and more isolated which will be exacerbated by these extra 2000 houses. It is also a concern that, as we are currently waiting up to 3 weeks for a Doctor's Appointment, that these extra people will be forced to attend A&amp;E at QEQM Hospital for treatment.</p> <p>Building on Grade A Farmland -without a doubt this</p>				
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					<p>must be the worst part of this proposed plan! Our fields in Thanet produced a large percentage of potatoes, grain, rape seed and cabbage/cauliflowers in the UK. As we approach the uncertainty of Brexit and the fact that we import more and more food into the UK this must be a concern for all involved. Once this land is built on it will not be coming back into use. Not only is it the loss of Grade A land but there are many animals and insects that will have their habitat destroyed for the sake of building houses on virgin land.</p> <p>The carbon footprint of the extra shipment of food stuff from abroad will heighten the green house effect at a time when the Govt. are actively pushing us to take steps to reduce it.</p> <p>There are many other options available to TDC with regards to building new houses. Sir Roger Gale, in a recent meeting, stated that he alone had I.D'ed the possibility of building 2000 houses on brownfield sites within Thanet. There are a further 1000 empty homes in Thanet that have been left empty for years without TDC enforcing the owners to 'use it lose it'.</p> <p>I am no short sighted enough not to realise that it is more expensive to build on brownfield sites or pursuing owners through the Courts to utilise empty houses but surely the Govt. could look at ways to assist developers i.e. reduce, or even lifting VAT, for these developments and relaxing Planning Laws.</p> <p>Moreover, on top of all this, there is the BIG elephant in the room of reinstating Manston Airport. Never in a month of Sundays will Manston Airport ever come back into use as a place of aviation. For the last 20 years of its working life Manston Airport did not return a profit despite many different Companies and Airlines trying their hardest. The Airport has been stripped and will cost 100's of Thousands of £'s to bring back into use, there is not the infrastructure to enable it to be used for freight and not one company/airline have expressed an interest in this project.</p> <p>I would be grateful if you could note my comments and, after careful deliberation, you decide to go ahead with this proposal then I will accept your judgement. I do not envy your job. Good luck.</p>					
Taylor	Christina		439		Object	Back in 2015 UKIP proposed building 1,000 houses in Westgate on Sea which was opposed profusely by the residents and now three years later with Conservatives in charge of TDC that number has been increased to 2,000+ house. We were told recently by a TDC Councillor that Westgate on Sea have now been allocated 3% more houses than anywhere else in		1266		Paper

					<p>Thanet, and that Thanet have been allocated 3% more houses than anywhere else in Kent. Does that mean that Kent has been allocated 3% more houses than any other county in the country?</p> <p>I strongly object to these proposals for the following reasons:-</p> <p>a. Houses being built on Grade A agricultural land? WHY? This land is vital for the provision of fresh food for the residents of Westgate on Sea and surrounding areas. There are lots of Brown field areas in Thanet that you should use to build houses on. Roger Gale told us at a meeting in The Swan in Westgate last week that he personally had identified Brown Field sites in Thane large enough for these 2000 houses to be built on.</p> <p>b. Statistics show that there are 1k empty properties in Thanet left to rot, I suggest you take on all these properties, refurbish them and use them to house the needy in Thanet. That will help to solve a housing problem and clean up the area.</p> <p>c. 2k extra houses with an average of 3 persons per household = a total of 6k people, almost doubling the population of Westgate on Sea. I notice you have used the census of 2001 rather than that of 2011 which will give a more accurate reading of the actual population, WHY?</p> <p>d. The infrastructure in this part of Thanet is diabolical now, what will it be like with another 2K + vehicles using it daily? Will the infrastructure be dealt with before the houses are built? Since the houses were built at Westwood Cross just a few miles away, Shottendane Road has become a constant nightmare with traffic. The roads in Thanet are filthy, drains blocked due to lack of cleansing, litter everywhere. We pay Council Tax to TDC to provide a service that we are not getting.</p> <p>e. All you are talking about is building houses. Who is providing schools, doctor's surgeries, dentists, hospital, employment for all these residents? A few labouring jobs will probably be created whilst the building is taking place but after that they will be unemployed and living on the resources of TDC.</p> <p>f. What percentage of these houses will be Social Housing? Will the Social Housing be used for residents of Thanet?</p> <p>g. Affordable Housing? What is your definition of Affordable Housing?</p> <p>h. Do you have plans to sell any of these houses to London Boroughs or Housing Associations? These people will be promised a better life living by the sea</p>				
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						<p>only to find when they arrive here that they cannot get work, no schools for their children, no medical services and the cost of living is unaffordable because of the farm land has been built on and food then will have to be imported from other countries, hence pushing up the cost of living. Do you think this is a proper way to treat human beings?</p> <p>i. Southern Water have been telling you for years that the Fresh Water available is at it's absolute limit now. Doubling the population and no fresh water is very scary. Houses, people and NO WATER? This does not make sense.</p> <p>J. Sewage is also a very big problem in this area now with untreated sewage being discharged directly into the sea, the result being that several beaches around Thanet have been closed for some time during the swnmer season. Thanet needs tourists, with beaches closed they will not return b1:It go elsewhere and the tourist industry will just die.</p> <p>k. I agree that we need some houses but it should be proportionate to the size of each village and the facilities available.</p> <p>Please acknowledge receipt of this letter with an answer to my questions.</p>				
Twyman	Paul		324		Object	SP 15 should revert to the original	SP 15 should revert to the original	993		Email
Walker	Roger		371		Object	<p>I am opposed to the above proposal for the following reasons:</p> <p>Looking at the proposed site there is, and if history tells us anything, there will be no infrastructure put in place prior to construction commencing leading to the inevitable problems viz:</p> <ol style="list-style-type: none"> <li>1. The roads are already badly congested and in places in poor condition and with all the construction traffic - Gridlock.</li> <li>2. Even worse when construction is completed and a further 2000 plus cars are let loose on our country lanes.</li> <li>3. There is already overload at the Westgate Surgery. The addition of a minimum 4000 patients cannot be accepted. The possible proposal for a bigger surgery somewhere close will only add to the congestion. The ageing population of the area will further exacerbate the problems.</li> <li>4. Where are the children going to be educated, the current schools could not handle that level of influx. The traffic on school days in the area is already causing huge problems.</li> <li>5. Most critical is WATER. Where is that to come from. Southern Water are already experiencing major difficulties. We have no reservoir. A salt water</li> </ol>		1069		Paper

						<p>treatment plant, maybe, but will that be in place prior to construction commencing. I am sceptical.</p> <p>6. Jobs. There is no industry in an area that has already a high unemployment rate. Where are this huge influx of people going to find employment.</p> <p>7. FINALLY and my biggest objection is the proposal to build on precious agricultural land. We are going to need that land to feed an ever burgeoning population in the future.</p> <p>I look forward to your future proposal regarding the above.</p>				
Wallis	D B		428		Object	<p>I am writing to object to the Draft Thanet Local Plan 2018 with special reference to the Garlinge and Westgate development. I am the owner of Dent de Lion</p> <p>Medieval Gatehouse (National Monument 31404) and object to the encroachment of the development to this site. Dent de Lion Gatehouse represents the only standing remains of an otherwise demolished fortified house. It survives well, retaining most of its original fabric, including interesting decorative details, and provides evidence for the high architectural quality and importance of the house during the medieval period. An extract from a letter to me, from A. R. Middleton on behalf of the Secretary of State for Culture, Media and Sport identifies this building as "A rare monument type with fewer than 200 identified examples, its remains are considered of national importance".</p> <p>This Grade II* monument, painted by J. M. W. Turner in 1792, sits within a barn complex with stables, oast house, farmhouse and yard, farm cottages, a small copse, 'protected' trees and orchard - it links through these to the open countryside beyond. It has been surrounded on three sides by uninterrupted extensive grade 1 agricultural land for over 600 years. These open views make a strong contribution to its significance. Development in the surrounding countryside will intrude on important views from the monument (which is over thirteen metres tall) and will also disrupt valued views of this historic building from approach roads and other viewpoints.</p> <p>The setting is an important factor of this national asset. The new building line proposed includes the farmhouse and yard, the farm cottages, the orchard and the copse, plus 200 metres of hedging planted by the Dent de Lion residents. If developed it would effectively destroy the character of the site.</p> <p>"As heritage assets are irreplaceable any harm or loss should require clear and</p>		1235	<a href="#">121 Wallis D B.pdf (109 KB)</a>	Paper

						convincing justification" 'National planning policy framework', Paragraph 132				
Ward	Linda		157		Object	Again the majority of land allocated for development is prime agricultural land which is not acceptable nor is it in line with National requirements.	Do not allow building on Agricultural land.	448		Web
White	Matthew	Dent De Lion Residents Association	336		Object	<p>We are writing to object to the Draft Thanet Local Plan 2018, specifically the Garlinge and Westgate development.</p> <p>I am the current chairperson for the Dent De Lion Residents Association, which consists of 12 households. I am also on the steering committee for the Westgate Neighbourhood Plan and therefore have been involved in various meetings, especially with the proposed developer Millwood Homes.</p> <p>We object to the development and we are concerned about the detrimental impact such a large development will have on the setting of Dent de The Medieval Gatehouse is a Grade 2* Listed Scheduled Ancient Monument.</p> <p>"Monument No 31404 is of national importance, and as such is affordable protection under the provisions of the Ancient Monuments and Archaeological Areas Act 1979" Letter from the Secretary of State to Dennis Wallis, owner of the gatehouse.</p> <p>Scheduled Monument Consent is needed for works within the protected area of a monument in terms of impact on its setting. We believe this applies to the whole setting of Dent De Lion, which has incorporated the barn buildings, farmer's cottages, farmhouse, and orchard for hundreds of years .</p> <p>Millwood Homes have shown an initial respectful knowledge of Dent De Lion and are proposing a green exclusion zone to surround and protect this area. Dent De Lion has been surrounded by open fields in a rural setting for over 600 years and deserves to remain so. Developing the fields into a 2000 dwelling development that engulfs Dent De Lion is not 'safeguarding' this ancient monument. It is worrying enough that 1000 houses were initially designated to this area, but our increasing concern is to do with the rise in housing numbers from 1000 to 2000, and with TDC indicating on the land allocation sitemap a smaller area of available land than Millwood Homes are proposing to develop on. This will result in a loss of additional green space, which will be used to protect Dent De Lion. Millwood have indicated that 2000 dwellings on this mapped area will give a housing density of 40 dwellings per hectare, which is well above the draft plans maximum density of 35 dwellings per hectare.</p>		1018		Paper

					<p>Millwood Homes have said that the orchard will not be used for development but we have concerns that the limits placed by TDC on available land will put pressure on this orchard being developed. It is a natural wildlife habitat that needs to be protected. It is a good natural environment that supports varied wildlife, including protected species such as bats and lesser spotted woodpeckers. There are TPO's on some of the trees, which we hope will be respected.</p> <p>We strongly want to object to the proposed road linking Shottendane Road and Dent De Lion Road. This suggested road has not yet been modelled or properly considered. I have been asked as a member of the Westgate Neighbourhood Plan to attend an onsite meeting with Colin Mckay from WSP to walk the various proposed roads before the meeting on the 2<sup>nd</sup> October with Garlinge having the majority of the proposed 2000 dwellings, many of which will want to use this new road to get access to the junction of Garlinge High Street and the A28 Canterbury Road. It only takes one car trying to turn right that is not willing to go into the middle section of this junction to cause a build up of cars behind. I have sat in a queue for 15 minutes or more on many occasions and adding possibly hundreds of additional cars to this junction is impractical. This will also cause major delays at the junction of Dent De Lion Road and Garlinge High Street. Why develop Shottendane Road as a major arterial road and not use it as the main point of access in and out of the new development? Secondly we have major concerns about the proximity of this new road to the setting of Dent De Lion and the harm it will cause. Will it eat into the exclusion zone proposed by Millwood Homes?</p> <p>with Millwood Homes presenting to TDC. This road cannot be allowed to go ahead for 2 reasons. Firstly, this road will potentially be used as a main access to and from the new development,</p> <p>We object to the development on the surrounding grade 1 agricultural land that has been farmed for well over 600 years. Generations of local residents and families have enjoyed the views across the fields to this unique setting, which will be permanently spoilt and lost forever.</p>				
white	matthew		440		Object <p>We are writing to object to the Draft Thanet Local Plan 2018, specifically the Garlinge and Westgate development.</p> <p>I am on the steering committee for the Westgate Neighbourhood Plan and therefore have been involved in various meetings, especially with the proposed</p>		1267		Paper



					<p>developer Millwood Homes. Our objections are based on both a personal impact level as well as a more general effect on the local area, local residents, and infrastructure.</p> <ul style="list-style-type: none"><li>• We are concerned about the impact such a large development will have on the setting of Dent de Lion. The Gatehouse is a Grade 2* Listed Scheduled Ancient Monument of national importance and as such there is planning law to protect the view to and from this monument. This also applies to the setting of Dent De Lion, which has incorporated the barn buildings, farmer's cottages, farmhouse, and orchard for hundreds of years. Millwood Homes have shown an initial respectful knowledge of Dent De Lion and are proposing a green exclusion zone to surround and protect the area. Our concern is to do with the increase in housing numbers from 1000 to 2000, and with TDC indicating on the land allocation sitemap a smaller area of available land than Millwood Homes are proposing to develop on. This will result in a loss of additional green space, which will be used to protect Dent De Lion. Millwood have Indicated that 2000 dwellings on this mapped area will give a housing density of 40 dwellings per hectare, which is well above the draft plans maximum density of 35 dwellings per hectare.</li><li>• We want to object to the loss of the semi-rural setting. We moved here in 2002 from the centre of Ramsgate with the specific intention of creating a home in a semi-rural location partly surrounded by fields. Our main reason was so that we could raise a family in a quiet and safe environment but we are now faced with raising our young daughters surrounded by a housing estate with the possibility of it being partly populated by social housing and the problems that potentially brings.</li><li>• Millwood Homes have said that the orchard will not be used for development but we have concerns that the limits placed by TDC on available land will put pressure on this orchard being developed. It is a natural wildlife habitat that needs to be protected. It is a good natural environment that supports varied wildlife, including protected species such as bats and lesser spotted woodpeckers. There are TPO's on some of the trees, which we hope will be respected. We strongly object to the proposed road linking Shottendane Road and Dent De Lion Road. This suggested road has not yet been modelled or properly considered. I have been asked as a member of the Westgate Neighbourhood Plan to attend and onsite</li></ul>				
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					<p>meeting with Colin Mckay from WSP to walk the various proposed roads before the meeting on 2nd October with Millwood Homes presenting to TDC. This road cannot be allowed to go ahead for 2 reasons. Firstly, this road will potentially be used as a main access to and from the new development, with Garlinge having the majority of the proposed 2000 dwellings, many of which will want to use this new road to get access to the junction of Garlinge High Street and the A28 Canterbury Road. It only takes one car trying to turn right that is not willing to go into the middle section of this junction to cause a build up of cars behind. I have sat in a queue for 15 minutes or more on many occasions and adding possibly hundreds of additional cars to this junction is impractical. This will also cause major delays at the junction of Dent De Lion Road and Garlinge High Street. Why develop Shottendane Road as a major arterial road and not use it as the main point of access in and out of the new development? Secondly we have major concerns about the proximity of this new road to the setting of Dent De Lion and the harm it will cause. Will it eat into the exclusion zone proposed by Millwood Homes?</p> <ul style="list-style-type: none"><li>• We object to the development on grade 1agricultural land that has been farmed for over 600 years. Once this has been built on it can never be returned to its original condition and farmed. If you take the farmland away you are also taking away the lifetime tenant farmers jobs, homes and income. With Brexit looming, now more than ever we need to prove our self-sufficiency when it comes to food.</li><li>• We object to the density of the housing, with Garlinge and Westgate getting 30% more than the rest of Thanet. Thanet is already one of the most densely populated areas in Kent. This should be more evenly distributed across Thanet so the effects and impact are less severe on the rural villages. 2000 houses is going to destroy the village feel and appearance of Garlinge and Westgate and put more pressure on amenities than anywhere else in Thanet.</li></ul> <p>We are concerned that although there is the mention of a new medical facility in the local plan, this might not go ahead if proper funding cannot be allocated. The current doctors surgery in Garllnge has already been marked for closure once this year but is still open</p>				
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						<p>at the moment. It is more than double over subscribed. How can the current NHS infrastructure (surgery's and A&amp;E) cope with another proposed 2000 homes in Westgate and Garlinge, and on a wider scale 17000 homes in Thanet?</p> <p>We object to the current housing assessment of 17000 houses for Thanet. The ONS has recently revised down its previous estimate for households being formed to 159,000 per year. This puts a big question mark over the government's current plans for 300,000 new homes to be built per year. The current figures being used estimate a Thanet population growth of approximately 1200 people per year and yet the population growth for Thanet last year was just over 500, less than half of the estimate. Over development based on over estimated figures will just create a pool of empty houses and half finished developments due to lack of house buyers. There aren't enough jobs for locals so why would anyone want to move to Thanet.</p>				
Wing	Susan		397		Object	<p>Firstly, I have had difficulty in accessing your site after my first visit as it was branded as a danger. Comments are in respect of Westgate in particular though would apply to much of the planning. My concerns are:</p> <p>This is prime farm land. With Brexit approaching we will need to produce more food not less! This has been a site where sky larks have bred – this is a protected bird.</p> <p>Infrastructure is not in place.</p> <p>Lack of school places, our infant/junior schools are full with no expansion room.</p> <p>lack of medical and dental cover in Westgate for the extra population. No NHS availability with our dentist is a usual state. The increase in size of our medical centre will not guarantee more GP's they are a rare breed.</p> <p>Vehicular access is difficult now and likely to be chaotic by 2031.</p> <p>Water both for house use and for run off may cause Southern Water a problem they cannot resolve.</p> <p>Sewage may be a similar problem.</p> <p>Local hospital, despite its best efforts cannot cope with the current flow of patients. Is this to be expanded?</p> <p>Are we using brown field sites first?</p> <p>I am sorry that these are last minute points but I am sure tally with much that has been submitted.</p>		1159		Email
Woodbridge	M		94		Object	<p>I totally object to houses being built on Grade 1 Agricultural land. who are the houses for?</p> <p>I totally object to the 2,500 houses being built in Westgate and Garlinge. The proposed houses being</p>		215		Paper

						<p>built was said in 2015 to be 1,000 why has it gone up another 1,500 is the total going to stop at that I don't think so. Who are the houses for?</p> <p>We still have a lot of unused land and empty buildings in Thanet to consider. I object because Westgate cannot cope with the amount of traffic we already have.</p> <p>Our schools are already overstretched with unruly children from the London area we don't need anymore. Our doctors surgeries are overstretched not enough GPs. Doctors have retired no GPs to replace them. I cannot get a GP appointment on the day or weeks ahead. Our QEQM Hospital can not cope with the volume of patients when you are seen after 5-6 hours sent home not treated correctly (overstretched) not enough doctors or nurses.</p> <p>How can you possible think we can cope in Thanet with more people coming to this area with no jobs. Thanet cannot afford to keep more people on benefit because that is what will happen. this is a deprived area. We don't have the proper infrastructure Thanet is classed as a desert area. Come on you people start supporting the residents of Westgate Garlinge &amp; Thanet in general. No to houses on Grade 1 agricultural land. We need fields for food not red bricks.</p>				
Wraight	Kenneth	1959	141		Support	Westgates clrs are happy for extra houses from the manston site to go to westgate that's why they stopped the local plan in January		363		Web
Young	Denise		339		Object	<p>I am writing as I have serious concerns and wish to raise objections regarding the draft local plan itself and also with the inclusion of the sites ST1 &amp; ST2 relating to Garlinge and Westgate.</p> <p>I would like it noted that I wish to be able to add further objections to this proposal as and when facts come to light as I have submitted a number of Freedom of Information questions to Thanet District Council that currently remain either completely unanswered or only answered in part, despite now being well over the statutory 20 working days and also despite several follow-up e-mails from myself regarding this.</p> <p>The need for 12,000 houses</p> <p>My first concern is that the council appear to be trying to fit the plan details around the chosen number of 12,000 houses, rather than coming to a figure based on a deliverable, achievable number of houses required by an objective, evidenced based need for local people which is at the heart of the localism act.</p> <p>There still appears to be misunderstanding on the issue of where the 12,000 requirement originates. In a conversation with Planning Officer Steve Moores it was confirmed that whilst the government had not said</p>		1021		Web

					<p>Thanet must include 12,000 houses, he said that if they were to submit a plan with less than this, it would not be passed. I would like to dispute this.</p> <p>If the country's need as a whole is divided, as I understand it, it would come out as each districts share being approximately 12,000 properties, however Thanet is unique amongst the districts.</p> <p>Thanet is surrounded by sea on 3 sides, thereby limiting its growth and importantly its transport infrastructure .Thanet is small, in fact 1/3 of the size of neighbouring districts.</p> <p>Thanet is densely populated,over 3 time's more than neighbouring districts.</p> <table><tr><td></td><td>Area (sq km)</td><td>Population (2011)</td><td>Density (people per km sq)</td></tr><tr><td>Shepway</td><td>356.7km</td><td>108,200</td><td>300</td></tr><tr><td>Dover</td><td>314.8km</td><td>111,700</td><td>350</td></tr><tr><td>Swale</td><td>373.4km</td><td>136,300</td><td>370</td></tr><tr><td>Canterbury</td><td>308.8km</td><td>150,600</td><td>490</td></tr><tr><td>Thanet</td><td>103.3km</td><td>134,400</td><td>1,300</td></tr></table> <p>Employment</p> <p>Thanet has always been an area of high unemployment and high social deprivation . We already have the highest number of 'looked after' children in the country (many from the London boroughs) which in turn leads to extra demands on services already under pressure. The hope to create 5,000 extra jobs on which this plan is based, is in reality extremely unlikely to be achievable, as has been proved by our comparative unemployment figures both historically and currently. Again, Thanet's location has a big part to play in this and even.if expensive improvements to transport links are possible, Thanet will remain tucked away in the bottom corner of England and surrounded by the sea! As a resident pointed out recently, Thanet is the only place in the country that has a port with no boats, an amusement park with no rides and an airport with no planes!</p> <p>I am particularly concerned that of the 5 scenarios considered, the plan has gone with the option of the highest employment prospects and subsequent</p>		Area (sq km)	Population (2011)	Density (people per km sq)	Shepway	356.7km	108,200	300	Dover	314.8km	111,700	350	Swale	373.4km	136,300	370	Canterbury	308.8km	150,600	490	Thanet	103.3km	134,400	1,300				
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					<p>housing requirements despite Experian themselves being unconvinced that these figures are actually achievable.</p> <p>In the local plan produced by Swale, they have acknowledged that we are in a time of huge economic uncertainty. They have plans to create 7,000 jobs saying that to achieve this they only need to deliver a more realistic 10,800 houses and that (3.0.6) "a higher target committed to prematurely would result in goals which are not obtainable, and ultimately expose communities to uncertainties and demands for infrastructure that have little prospect of being obtainable".</p> <p>I would say that Thanet's hope for 5,000 jobs and 12,000 houses will ultimately prove to be unobtainable. Swale also state they are planning to effectively use brown field sites and minimise the loss of high quality agricultural land. Thanet only plan to use 40% brown field sites. This would then mean that 60% of the allocations are on green field sites. In the case of Garlinge and Westgate (ST1 &amp; ST2) 100% of the allocation will be on green field Grade 1agricultural land.</p> <p>The Green Wedges</p> <p>In the draft local plan it states that the green wedges that separate Thanet's towns will be protected. I ask that ST1 is re-designated as a green wedge as this land is all that actually separates Garlinge and Westgate and provides the protection that enables them to retain their character as individual villages in their own right. Having lived in Thanet all my life and in Garlinge High Street for 16 years and for the last 4 years in Briary Close, I can confirm that community pride and individuality is at the heart of the village of Garlinge. I also have many friends in Westgate who feel the same about their village and community.</p> <p>It is inevitable that Garlinge and Westgate will lose their separate identities if the line that has been drawn straight across the map from the built up area of Garlinge to the built up area of Westgate is filled in with the proposed housing allocation. This will create an unacceptable, continuous sprawl of houses.</p> <p>Protecting our agricultural land should be a priority as it is some of the best and most versatile growing land in the country and it should therefore be treated as an asset. Liz Truss who is the Secretary for the environment recognises this. It is particularly important that we maintain a cautious approach regarding the use of green field sites at this time as currently the fate of Manston, which is potentially a vast brown field site remains unknown.</p>				
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					<p>Potential Residents</p> <p>Westgate's population is approximately 6,996 as of the 2011 Census and Garlinge 4,849. This has changed very little in the last 10 years when it was 6,594 for Westgate and 4,858 for Garlinge in the 2001 Census. This is a total increase of only 393 people in 10 years. This is the natural amount of growth and the amount upon which growth for the next 10 to 20 years should be based.</p> <p>The decline in the Cliftonville wards in terms of crime and anti-social behaviour and the subsequent need for a selective licensing scheme illustrates what happens when the demographics of an area are changed by an influx of new people rather than allowing only the natural local growth that is the idea of localism to occur.</p> <p>I was very concerned to see an advert produced by Westminster Council offering up to £25,000 (dependant on current property size) for tenants over 60 wishing to downsize and relocate to mainly new built homes along the coast and in the countryside. Thanet's ambitious local plan sounds almost purpose built for this and I am sure other London boroughs and their tenants will also be very keen to take advantage, as, indeed, appears to already be the case in parts of Thanet.</p> <p>Crime</p> <p>I have mentioned above my concerns regarding the impact of demographic change on crime. Westgate and Garlinge are currently very safe and friendly villages in which to live and to visit. I would ask that ST1 &amp; ST2 are removed from the plan in order that our low levels of crime are able to remain as such.</p> <p>Thanet as a whole has very high levels of crime, in fact it has the highest levels in Kent, which is another reason to adopt a more reserved approach when considering our total housing allocation. This is especially relevant at a time when policing budgets and policing numbers are being cut. There is talk of merger between Kent and Essex police and rumours that Margate police station may close, this would severely impact on response times for Westgate and Garlinge.</p> <p>QEQM Hospital</p> <p>The CQC report dated 13/8/14 rated emergency care at QEQM as inadequate, mainly due to not enough appropriately trained staff which put patients at risk of receiving unsafe care. Also a 40% vacancy rate for medical registrars led to delays in assessment, treatment and discharge of patients requiring medical care. Medical emergency patients were not always able to be transferred to the appropriate specialist.</p>				
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					<p>Working for the NHS myself, I know how difficult it is for EKHUFT (East Kent NHS Foundation Trust) to recruit the appropriate staff. I can also confirm that currently many clinics in Outpatients are extremely over booked, leading to long waits for patients in the department and that extra clinics regularly have to be put on in order to prevent patients breaching government targets, in a service which is already stretched to capacity and beyond with existing patients.</p> <p>I was extremely concerned that via a Freedom of Information request to EKHUFT dated 12/1/15 asking what measures were in place to cope with an additional 12,000 houses, I received the reply "we can confirm EKHUFT has not been formally asked to comment as part of the planning process as yet, therefore we are unable to make a comment regarding the new houses being built in Thanet".</p> <p>Doctors, Dentists and Schools</p> <p>The surgeries at Garlinge and Westgate are near to capacity and are unable to expand much further. Recently I stood outside the surgery in the rain, 10 minutes, before opening time to get an urgent appointment for my son, to be told all appointments with my doctor had been taken and it would have to be a telephone consultation- not ideal for a poorly child with a chest infection!</p> <p>It is already extremely difficult to find an NHS dentist accepting new patients locally, this will only get worse with higher demand for services.</p> <p>I am also concerned at the lack of consideration given to education, especially at secondary school level.</p> <p>Transport Infrastructure</p> <p>Westgate and Garlinge are poorly serviced by buses in comparison to the rest of Thanet, and are not serviced at all by the Thanet Loop. This will be a major disadvantage for any new development in these villages.</p> <p>The Canterbury Road is already an accident black spot. In 2013 along a very small stretch of the A28 (from just between Westgate Golf Club and the junction of Hartsdown Road) there were 5 serious crashes, 13 minor crashes, with a further 12 crashes on the roads South of the A28 within that area. There was a fatality in 2007 outside St Augustines and a fatality further along the A28 at Margate sea front in 2010. Obviously increased traffic from a new development will lead to increased risk of collision.</p> <p>At present, Thanet is often gridlocked, with the air quality around Birchington Square often having dangerous pollution levels. The Canterbury Road is already under tremendous pressure, particularly at</p>				
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					<p>certain times of the day and the surrounding roads such as Garlinge High Street and Minster Road are narrow and congested. If Shottendane Road is widened, traffic to Westwood Cross will create even more of a bottle neck at Coffin Corner/ Victoria traffic lights. Traffic leading towards Birchington/ Canterbury will have terrible trouble when it gets to Acol. Again, I was extremely concerned to discover via a Freedom of Information question to KCC sent on 2/2/15 that no assessments have been done to check on the transport infrastructure viability of ST1 &amp; ST2. The reply was "we can confirm that at this stage there are no plans for the area. KCC have been presented with pre development papers and before this can be considered we will require a full transport assessment and the highway authority will require full mitigation to accommodate any additional impacts on the highway network generated by increased trips from the development areas. This may involve upgrades and improvements to existing roads and junctions in and around the area and further afield such as key hotspots of Coffin House Corner/Victoria traffic lights and Birchington square".</p> <p>Why were these assessments not obtained prior to ST1 &amp; ST2 being included in the draft plan? How can these sites be deemed to be deliverable when this vital transport needs remains unknown? Where is the assurance that any such transport improvements can be funded or delivered?</p> <p>ST1 &amp; ST2</p> <p>It appears that the original version of the local plan only included sites S485 &amp; 5486. At some point these were included under the umbrella of ST1, in Quex's own words "as ST1 &amp; ST2 are all under one ownership and therefore easier". I believe ST1 &amp; ST2 were hastily added without due thought and process and should be removed as unsuitable from the local plan along with the previously named S485 &amp; S486.</p> <p>Archaeology</p> <p>The fields around Dent De Lion and around the original 5485 &amp; 5486 sites are archaeologically highly sensitive and will require evaluation as crop mark sites, before any development can take place.</p> <p>Birds and Wildlife</p> <p>There are many farm land and migratory birds seen on the fields that comprise ST1 &amp; ST2 and as such a wintering and breeding bird survey is essential.</p> <p>Preservation of the hedge that runs along the length of Briary Close is also essential as this has many birds (such as Black Birds) nesting within in. I understand from Mr Verrall that a wildlife assessment will need to</p>				
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					<p>be performed at the appropriate time of year and as there are also Slow Worms (protected under the Wildlife and Countryside act 1981) living in the Briary Close hedge, I believe this should also include a full reptile survey prior to any works starting.</p> <p><b>Briary Close</b></p> <p>Briary Close is a quiet, peaceful cul-de-sac. We brought our house for the quality and enjoyment of life it offers. We overlook the Briary Close hedge and the fertile fields that separate Garlinge and Westgate. The residents comprise of a mixture of elderly people, many of whom have lived here since the houses were built in the 1970s and families with young children who are able to play outside in safety. There is extremely little traffic movements during the day and at night there is complete silence, only broken at dawn by the songs of the resident birds.</p> <p>Public authorities, such as the council, have a duty to take positive steps so that we can peacefully enjoy our home, as is set down under Article 8 of the Human Rights Act. The extra noise and pollution created both during the construction phase and afterwards when the houses are occupied, particularly if Briary Close is to become a through road, will be in direct breach of the human rights of myself, my family and my neighbours.</p> <p>The questionable needs of any proposed new development will not mitigate our human right to peacefully enjoy our existing home and current amenities.</p> <p><b>Briary Close Junction</b></p> <p>On a recent visit to my home Mr Verrall was able to see for himself the unsuitability of Briary Close as a through road. The road junction is extremely difficult to exit, particularly when turning right. The natural curve of the A28 and the parking in the lay-by at the entrance makes the lack of visibility both difficult and dangerous.</p> <p>Briary Close is very narrow and cannot be widened at the point the road bends, cars have to reverse into the road from their driveways here and the dustbin lorry can only access Briary Close by reversing down the road with great difficulty.</p> <p><b>Drainage</b></p> <p>The fields at ST1 &amp; ST2 have serious drainage problems and Southern Water have confirmed the current sewer system will be unable to cope with any extra demand. Agricultural land plays an important part in soaking up excess rainfall. In 1973 a woman died when a flash flood occurred. According to the Borough Engineer at the time, this occurred as in the worst hit area of</p>				
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					<p>Westgate, there had been a gathering ground of about 640 acres for the rainwater. About 6 inches of rain had fallen on bone dry and hard agricultural land. It had been unable to permeate through the earth and there had been an estimated build up of 360,000 tonnes of water. Since this date the land has been ploughed in such a way as to avoid this happening again, however if this land is concreted over no amount of drains will be sufficient to prevent another flooding disaster.</p> <p>Southern Water does not have a good track record regarding waste. In June 2012 more than 20 beaches were closed after raw sewage entered the sea when Foreness Point sewage pumping station failed. A subsequent report criticised communication and a lack of contingency planning. In 2014 OFWAT imposed a short fall levy of £150million for 'non compliant' discharges from sewage systems and flooding to properties caused by blockages since 2010. In May and July 2014 swimmers at 9 beaches were advised not to enter the sea due to raw sewage discharges from Southern Water pumping stations. Given the complexity of problems with drainage at the ST1 &amp; ST2 sites and the ongoing problems experienced by Southern Water, I am very concerned with the prospect of large sewage containment tanks being proposed as a possible solution, especially with such a large scale development.</p> <p>The potential would be for these to block, overflow, flood and release noxious gases into our environment. Allowing the housing allocation to go ahead on this basis will put Thanet District Council in direct breach of Article 8 of our Human Rights in regards to protecting us from pollution.</p> <p>Water Supply</p> <p>Thanet is already water stressed. Hosepipe bans have been imposed during many hot summers as our reserves run critically low. Thanet Earth is a recent addition to Thanet and consumes large volumes of water. The building of an additional 12,000 houses will not be compatible with the amount of water that is available, especially during any extended dry period.</p> <p>Consultation</p> <p>The way in which the public have been consulted on the local plan is flawed. Stage one of the local plan process was consulted on in summer 2013, however, very few people knew about this. A show of hands at the packed Garlinge residents association meeting, revealed not one person there had been aware of this. The bias towards the internet by TDC as a means of</p>				
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					<p>informing people and as a means of gathering people's views is prejudiced against the majority of Garlinge and Westgate residents, as many are elderly and as such do not have the knowledge, confidence or access to be able to be consulted in this way .</p> <p>Garlinge and Westgate have also been discriminated against by having no council run drop in sessions in the area. The meetings in Westgate and Garlinge were organised by the residents associations and the council could not have foreseen this being the case. The meetings were attended by so many Garlinge and Westgate residents that many had to be turned away without finding out the information they required. The level of attendance at these meetings shows the huge concern of the residents in these villages. The length of the consultation for this phase of the plan is inadequate.</p> <p>The wording of the draft local plan is lengthy and not easy to understand and the implications of it will be far reaching and irreversibly damaging if it proceeds in its current form. Not enough time has been given for people to research and raise their objections.</p> <p>Conclusion</p> <p>Thanet's draft local plan is not sustainable and has serious flaws throughout. It is overly ambitious with no certainties over funding of infrastructure and ultimately it will not be deliverable.</p> <p>The geographical location of Thanet means that it faces challenges which other areas do not have to contend with and therefore due consideration should be given to this. Thanet already supports approximately 1,000 more people per square kilometre than other surrounding districts and in 2014 the level of crime was higher than all other areas in Kent. The Grade A agricultural land included in the draft local plan allocations is classed as the best and most versatile land. A summary of the Interim Sustainability appraisal report states that the protection of the best and most versatile agricultural land has the potential to contribute towards the economy, avoiding increases in flood risk and has significant benefits for the protection of green field land from development.</p> <p>It was concluded that not protecting best and most versatile agricultural land is not predicted as being likely to have any positive effects.</p> <p>The land allocations for Westgate and Garlinge (ST1 &amp; ST2) have been included in the draft local plan for expediency and ease under one ownership and not because they meet any sustainability criteria as these</p>				
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						assessments clearly have not been under taken. These sites are wholly unsuitable. The level of improvement required with regard to vital supporting infrastructure means that these sites will ultimately be undeliverable.				
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## Strategic Site Policies SP16 - Westwood

Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
.		St Johns College	311	Mark Hodgson - Savills	Object	<p>On behalf of our client, St John's College, Cambridge we have supported the overall allocation for 1450 dwellings on this site throughout the Local Plan process. This site has been consistently identified in the previous iterations of the Thanet Local Plan and we have carried out a number of technical studies covering the following subjects:</p> <p>Ecology; Landscape; Utilities; and, Archaeology</p> <p>Ecology Our preliminary ecological appraisal was carried out in May 2016. The conclusions of this appraisal stated that the arable fields that cover much of the site are considered to be of low intrinsic ecological importance and the intensively managed nature of arable farm land within the site limits its potential to support protected or otherwise notable species. It also highlighted that the site is located within close proximity to a number of statutory designated sites but it is considered likely that subject to the adoption of sufficient protection and enhancement of habitats the impacts on ecological resources can be avoided or suitable mitigated.</p> <p>Landscape The landscape work that has been carried out has concluded that the site is extremely open with very few features and there has been a loss of hedges, woodlands and orchards as a result of arable farming with a resultant loss of landscape and ecological features. Given the current open character of the landscape it is important that any development that is undertaken has a positive relationship with the countryside with a newly created urban/rural interface. No key views have been identified that across the landscape that need to be protected at this</p>	<p>In light of the above representations we consider that the proposals map should be amended in order to increase the allocation as shown on Appendix 1 to this representation. This is to allow flexibility on the approach to the cemetery extension through the masterplan process. The allocation boundary should also be amended to exclude the recently permitted 40 dwellings in the south-eastern most corner of the site.</p> <p>Acting for a strategic site landowner we would welcome the opportunity to put our view in person to the Inspector.</p>	1294	<a href="#">101 Hodgson Mark Savills Appendix 1.pdf (8.2 MB)</a>	Email

					<p>stage.</p> <p>Given the open nature of the site there is significant opportunity to create a multifunctional landscape that can accommodate both landscape and ecological mitigation and enhancement as well as new paths, cycle ways which can improve the visual impact of the area.</p> <p>Utilities</p> <p>This report was essentially a baseline survey to establish what utilities were present on the site and therefore may form constraints when seeking to develop the site.</p> <p>The key constraint is the 132 kV electric overhead line and the accompanying masterplan has been developed to accommodate this asset within the site.</p> <p>There is also a 400mm water main crossing the site which can also be accommodated within the proposed masterplan.</p> <p>Consequently it is not considered that there are any utility restrictions that will prevent the development of this site.</p> <p>Historic Environment Desk-based Assessment</p> <p>This assessment has identified that there is no overriding heritage constraints that would preclude development of the site. It goes on to state that any buried archaeological remains within the site are unlikely to represent an absolute constraint on development.</p> <p>The key historic constraints on the site are the buildings at Nash Court focused on the grade II listed farmhouse. This forms an interrelated farmstead complex, retention and refurbishment of which could be accommodated within a masterplan of the site. This could result in a significant heritage benefit to the site. Our masterplan has envisaged that there will be public open space around Nash Court so the setting will remain unaffected.</p> <p>Transport</p> <p>The policy states that development will be expected to provide an appropriate contribution to off-site highway improvements including in respect of the Thanet Transport Strategy.</p> <p>Ultimately this will need to be determined at the time of the planning application as the detail of the contributions required are unclear at this time.</p> <p>Margate Cemetery</p>				
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					<p>Part of our objection to the Westwood allocation relates to the adjoining Cemetery extension proposed under policy CM03. This land is owned by our client and we believe it should be included within the strategic Westwood policy boundary shown on the Proposals Map as opposed to a separate allocation. Our reasoning is set out below and also in our objection to Policy CM03.</p> <p>A draft cemetery proposal was consulted on in the Preferred Options consultation in January 2015 under Policy CM03. This policy stated that Margate Cemetery is nearing capacity and a need has been identified for its expansion and a site of 4.2 hectares has been identified to the east of the existing cemetery to accommodate the additional land requirement. This policy has been carried forward into the Submission Plan. However, there is no evidence provided in relation to the amount of land required or how this particular area of land was identified. This extension is proposed on land owned by St John's College and at present there is no funding in place to deliver this cemetery extension. In this context the College wishes to work with the Council in order to assist in the delivery of this cemetery proposal. Subject to agreement on the site area actually needed for the cemetery expansion we have included an alternative site for this proposal within our illustrative masterplan. This site covers the same area of 4.2 ha as shown in the previous consultation document under Policy CM03. It should be stressed that this is an indicative masterplan and further discussions are required on the justification and size of the cemetery proposal.</p> <p>However, it should be noted that this is not a requirement that arises as a result of the proposed residential allocation under Policy SP16. Rather it is an existing need and it is reiterated that any identified need for the cemetery extension results from broader need in the locality and not as a result of the proposed housing allocation. As such, it is necessary to emphasise that any land offer over and above direct mitigation for the scheme will be offered to the Council to purchase in order to comply with relevant legislation and national</p>				
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					<p>policy. Reference is made to the following extract of the Planning Practice Guidance, which sets out the fundamental tests: Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the Community Infrastructure Levy Regulations 2010 and as policy tests in the National Planning Policy Framework.</p> <p>23b-001-20161116</p> <p>Subject to agreement on the site area actually needed for the cemetery expansion we have included an alternative site for this proposal within our illustrative masterplan. This site covers the same area of 4.2 ha as shown in the previous consultation document under Policy CM03. It should be stressed that this is an indicative masterplan and further discussions are required on the justification and size and location of the cemetery proposal.</p> <p>It is suggested that the policy approach to the provision of the cemetery extension should be changed to one of support but without the need to specify a size and location. This approach provides flexibility on the location subject to detailed site investigations. This could be a sensible way forward for the provision of the Margate cemetery extension given the uncertainties around the justification, timescales and area required. Consequently the strategic allocation area at Westwood under Policy SP16 should be increased to include the land proposed for a cemetery extension as shown on our indicative masterplan.</p> <p>Masterplan</p> <p>Accompanying this set of representations at Appendix 1 is a Strategic Masterplan Vision document which shows an indicative layout as to how the proposed 1,450 dwellings could be accommodated on the site. As explained above an additional area of 4.2 ha has been included to allow for the accommodation of the cemetery expansion. This masterplan document also includes a</p>				
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					<p>revised allocation boundary on the south east corner of the allocation. This is because planning permission has been granted under reference OL/TH/15/1256 and reserved matters approved under reference R/TH/16/1522 for 40 dwellings in this location. We therefore consider that this area does not need to be included within the allocation.</p> <p>This Masterplan document explains the opportunities and constraints across the site together with appropriate access points and shows an illustrative layout as to how the site could be developed.</p> <p>This is clearly an important strategic site within the District and the College continues to support the allocation of this site at Westwood as part of the overall Local Plan strategy.</p> <p>We have also had an opportunity to review the various documents prepared by Dixon Searle Partnership, and in particular the “Local Plan and CIL Viability Assessment” dated December 2017 and the further update “Strategic Sites High-Level Further Review” dated July – August 2018. We understand that the one of the primary reasons for updating the viability appraisals is due to Thanet District Council (TDC) adopting an updating sites list with a combination of increased dwelling numbers in some circumstances.</p> <p>We agree with Dixon Searle Partnership (“DSP”) that the appraisals – which test the “strategic sites” – are high level in nature. DSP state; “To test the potential viability of sites of a strategic scale and characteristics, appraisals were carried out and, as agreed with the Council, the specific inputs for each scenario appraisal based primarily on high-level assumptions reflecting published information and our experience of viability work on similar sites in a range of other locations – both for strategic level assessment and site-specific viability review / s.106 negotiation purposes”. Furthermore, we agree with DSP’s statement; “This is a high-level picture that could and most likely will alter as more information becomes known about the sites and market conditions vary, etc”</p> <p>We therefore support the allocation and look forward to working with TDC in the future with refining the viability once further site specific</p>				
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						detail has been crystallised.				
Alan Byrne/English Heritage			155		Object	<p>Policy SP13 - Policy SP18 -Strategic Housing Sites - notwithstanding the mentioning of heritage assets within the individual site allocation policies and the requirement to have regard to them in preparing development proposals, we are concerned that insufficient prior assessment of potential impacts on those assets has been undertaken in advance of the site allocations. We are unable, therefore, to fully understand the likelihood or otherwise of impacts occurring that harm (or indeed preserve or enhance) the significance of the assets.</p> <p>For this reason, Historic England is unable to support these policies as they are currently drafted and suggest HIAs are carried out to inform the policies in advance of the EIP. The policies may have to be redrafted in light of the assessments if potential for harm is identified.</p> <p>(See also the not below on HIAs).</p>		1003		Email
Cooper	Barbara	Kent County Council (KCC)	514		Object	<p>Provision and Delivery of County Council Community Services: The proposed allocation of 5000 homes in the Westwood area will produce up to 6FE of additional primary demand (1260 pupils); in order to ensure adequate school places for this increase in demand new primary schools will be required. The current consultation plan incorporates just one 2FE primary school, proposed within SP17; this site already benefits from a planning permission and the associated s106 secured the 2FE primary school site.</p> <p>Two additional primary schools are required; an application for 900 units is currently being considered on part of the allocation at SP18, the County Council is seeking a 2FE primary school site in response to that application. It is requested that the associated policy for SP18 reflects the need for the site to include the necessary primary school as well as the required secondary school site.</p> <p>To ensure an adequate supply of places to meet the additional demand directly generated by the proposed growth, a further primary school is required in the Westwood area; given the proposed spatial distribution of dwellings it would be most appropriate for this school to be located within one of the residential allocations at the Northern end of the Westwood area. The large allocation of 1450 dwellings at SP16 would</p>		1504		Email

					<p>be an appropriate location to allow the greatest number of pupils to live as close to the new schools as possible.</p> <p>Minerals and Waste: Policy CSW 16: Safeguarding of Existing Waste Management Facilities of the adopted KMWLP outlines the need for existing and permitted waste management facilities to be safeguarded. It is also required that the Minerals and Waste Planning Authority for Kent is consulted for any proposed new development located within 250m of safeguarded waste management facilities. This is to ensure that the proposed new developments do not compromise the ongoing and lawful operation of the safeguarded waste management facilities.</p> <p>This strategic housing site allocation appears to be within 250m of the safeguarded Margate Refuse and Recycling Centre, and therefore requires an Infrastructure Assessment to determine whether the proposal is accordance with Policy CSW 16 of the KMWLP.</p> <p>Similarly, the CEMEX concrete production facility at the Manston Road Depot is safeguarded under Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure of the adopted KMWLP. This site allocation also appears to be within 250m of this safeguarded mineral infrastructure, and therefore requires a Mineral Infrastructure Assessment to investigate whether the allocation is acceptable in not compromising the future lawful operation of this mineral plant infrastructure.</p> <p>PRoW and Access Service: KCC recommends the inclusion of the following text into the policy: Incorporate and provide for connections and improvements to existing PRoW and cycle networks facilitating walking, cycling and public transport to, from and within the site.</p> <p>To incorporate and provide for connections and improvements to existing PRoW network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.</p>					
Corsby	Dave		331		Object	The local plan allocates land for 17,000 new dwellings with 5,300 of them in Birchington, Westgate and Westwood on top grade agricultural land. The national Planning Policy Framework does not specifically identify self		1014		Paper

						<p>sufficiency in food production as a requirement for planning authorities to consider but advises that where significant use of agricultural land is necessary to meet allocation targets local authorities should seek to use poorer quality areas.</p> <p>The guidance does not meet the unusual situation in Thanet where almost all the land allocated for housing development is precious top grade agricultural land. None of the farmland in Thanet should be built on. Any shortfall in housing requirements should be met by using brownfield sites and rugged sites in the north which are unsuitable for agriculture.</p> <p>The present plan is based on a blinkered approach that we must have extra houses even if that means permanently destroying top grade agricultural land which is needed to provide self sufficiency in food supply.</p>				
Davies	Julie	CPRE Kent	147		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>Object to the choice and size of strategic sites for housebuilding 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.</p> <p>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>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.</p>		388		Web
Johnson	Elisabeth	Monkton Residents	51		Support	Probably too much development for the present infrastructure.		131		Web

		Association								
May	Raymond		238		Observation	I object to this development on the grounds that it causes the loss of Grade 1 agricultural land. We, in Britain, already import more food than we produce locally. If you equate Thanet Council's plans with hundred's of others around the country, similarly planning ahead, you get an idea of the scale of the potential loss of food producing land. Can we continue on a path of steadily increasing the importation of food as the land to produce our own food diminishes.		789		Web
Mayall	C	Southern Water	473		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 1,450 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 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.		1356		Web

						<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>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. Easements would be required, which may affect the site layout or require diversion. These easements should be clear of all proposed buildings and substantial tree planting. Southern Water is unable to support Policy SP16 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 SP16 (new text underlined):</p> <p>Masterplanning will be informed by and address: [...]</p> <p>the need to ensure occupation of development is phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider [...]</p>				
Millar	Bill	NHS Thanet Clinical Commissioning Group	513		Observation	<p>An additional 1,450 dwellings in the Westwood area, in conjunction with the growth already being experienced in the area will increase pressure on local GP practices as there is currently no dedicated provision of healthcare services in this area of intense growth. Many of the closest practices are already at capacity and would be unable to absorb the growth from more new housing. Many of the existing premises are ageing and not fit for purpose, Recruitment and retention of clinical</p>		1487		Email

						<p>staff remains a problem which leads to an unstable workforce; increasing patient list sizes is likely to have a negative impact on these practices very quickly.</p> <p>Although SP38 indicates the need for a new medical centre at Westwood Cross, there is also a need to invest in the practices which will remain serving the smaller communities in and around the main Westwood development site. It is envisaged that S106 contributions will be sought in order to future-proof the provision of health services in terms of estate.</p>				
Samme	Linda	Manston Parish Council	16		Object	Westwood is already overdeveloped and this is impacting on Manston itself. Some more out of town areas would be more acceptable.		268		Web
Spanton & Paterson			148	Nicholas Rooke - Finn's	Support	We reiterate our client's support for this policy and confirm that the land owned by them (originally Site S553) is still available for development. We are happy to co-operate with the adjoining landowners in the delivery of this site and there are no constraints preventing them from allowing the land to be developed		396		Web
Stevens	Angela		163		Object	Total chaos will ensue on our roads if these houses are built. The roads around WX are already gridlocked due to new builds!	See Birchington comments.	620		Web
Ward	Linda		157		Observation	As above		449		Web



Strategic Site Policies SP17 - Land fronting Nash-Haine Roads										
Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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 SP13 - Policy SP18 -Strategic Housing Sites - notwithstanding the mentioning of heritage assets within the individual site allocation policies and the requirement to have regard to them in preparing development proposals, we are concerned that insufficient prior assessment of potential impacts on those assets has been undertaken in advance of the site allocations. We are unable, therefore, to fully understand the likelihood or otherwise of impacts occurring that harm (or indeed preserve or enhance) the significance of the assets. For this reason, Historic England is unable to support these policies as they are currently drafted and suggest HIAs are carried out to inform the policies in advance of the EIP. The policies may have to be redrafted in light of the assessments if potential for harm is identified. (See also the not below on HIAs).		1004		Email
Cooper	Barbara	Kent County Council (KCC)	514		Object	<p>Provision and Delivery of County Council Community Services: KCC would like to see the following text removed, and replaced with:</p> <p>“2) as required provide a fully serviced site of 2.05ha (to be provided at the cost of the developer) for a new two form entry school as an integral part of the development. ”</p> <p>An area of regularly shaped land within the development of no less than 2.05ha to be transferred at nil value to the County Council for the purposes of providing a Two Form Entry Primary School. The site to be adequately serviced by the developer, including utilities and highway access.</p> <p>Minerals and Waste: Policy CSW 16: Safeguarding of Existing Waste Management Facilities of the adopted KMWLP outlines the need for existing and permitted waste management facilities to be safeguarded. It is also required that the Minerals and Waste Planning Authority for Kent is consulted for any proposed new development located within 250m of safeguarded waste management facilities. This is to ensure that the proposed new developments do not compromise the ongoing and lawful operation of the safeguarded waste management facilities.</p> <p>This strategic housing site allocation appears to be within 250m of the safeguarded MPL Waste Management and therefore requires an Infrastructure Assessment to determine whether the proposal is accordance with Policy CSW 16 of the KMWLP.</p> <p>PRoW and Access Service: KCC recommends the inclusion of the following text into the policy:</p>		1505		Email

						<p>Incorporate and provide for connections and improvements to existing PROW and cycle networks facilitating walking, cycling and public transport to, from and within the site.</p> <p>To incorporate and provide for connections and improvements to existing PROW network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.</p>				
Davies	Julie	CPRE Kent	147		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>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.</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>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.</p>		389		Web
May	Raymond		238		Object	<p>I object to this development on the grounds that it causes the loss of Grade 1 agricultural land. We, in Britain, already import more food than we produce locally. If you equate Thanet Council's plans with hundred's of others around the country, similarly planning ahead, you get an idea of the scale of the potential loss of food producing land. Can we continue on a path of steadily increasing the importation of food as the land to produce our own food diminishes.</p>		792		Web
Solly	C		419		Observation	<p>The Policy should consider a link road through Westwood industrial Estate as a road improvement between Nash and Margate Road. This offers relief of traffic from Westwood and the Victoria traffic lights Junctions.</p>	<p>The Policy should consider a link road through Westwood industrial Estate as a road improvement between Nash and Margate Road. This offers relief of traffic from Westwood and the Victoria traffic lights Junctions.</p>	1222		Email

Strategic Site Policies SP18 - Land at Manston Court Road-Haine Road

Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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
.		Tesco Stores Ltd	408	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>Strategic Housing Site SP18 Land at Manston Court Road/Haine Road is proposed to comprise up to 1,200 new dwellings and leisure uses. This is an increase in the number of dwellings proposed for this site compared to the Preferred Options Revisions, increasing by 500 dwellings. The Council consider that the first 50 units could be completed on site by 2019/20. However as the outline application was only submitted in March 2018 and the applicants have had to address a number of outstanding matters including highways, flood risk and conservation issues we consider that it is extremely unlikely that the necessary permissions will be agreed in time for the first units to be completed by 2019/20. The Outline Planning Application has yet to be determined, Reserved Matters and Discharge of Pre-Commencement Conditions will need to follow, the site may then need to be sold to a housebuilder to commence site preparation works. All this takes time before development is commenced. Completions of the first dwellings ready for occupation typically takes several months more.</p> <p>In addition, the proposed allocation adjoins a number other proposed strategic allocations and residential sites. Therefore any highway improvements would need to accommodate the additional traffic generated by these cumulative developments and contributions agreed across the sites. We consider that is it</p>	<p>Provide a robust justification in the draft Local Plan for increasing the housing allocation at Land at Manston Court/Haine Road by 500 units or otherwise reduce the allocation to 700 units and allocate a wider range of additional housing sites to make up the shortfall.</p> <p>Apply a more realistic housing trajectory in Appendix B in recognition of the planning status of the site.</p>	1189		Email

					<p>very optimistic for the necessary highway improvements and contributions to be agreed between the various landowners and then implemented prior to the units being completed on site within the Council’s notional delivery period.</p> <p>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 its 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. 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. We therefore contend from the evidence provided within NLP’s Start to Finish Report it is unlikely that the strategic sites at Birchington (SP14), Westgate on Sea (SP15), and Manston Court Road/Haine Road (SP18) will deliver units by 2019/20.</p> <p>We therefore consider that this site (SP18, Manston Court Road/Haine 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> <p>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.</p>					
Alan			155		Object	Policy SP13 - Policy SP18 -Strategic Housing		1005		Email

Byrne/English Heritage						<p>Sites - notwithstanding the mentioning of heritage assets within the individual site allocation policies and the requirement to have regard to them in preparing development proposals, we are concerned that insufficient prior assessment of potential impacts on those assets has been undertaken in advance of the site allocations. We are unable, therefore, to fully understand the likelihood or otherwise of impacts occurring that harm (or indeed preserve or enhance) the significance of the assets.</p> <p>For this reason, Historic England is unable to support these policies as they are currently drafted and suggest HIAs are carried out to inform the policies in advance of the EIP. The policies may have to be redrafted in light of the assessments if potential for harm is identified.</p> <p>(See also the not below on HIAs).</p>				
China Gateway International Ltd.		China Gateway International Ltd.	503	Abraham Laker - RPS	Object	<p>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.</p> <p>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;</p> <p>Strategic Housing Site SP18 Land at Manston Court Road/Haine Road is proposed to comprise up to 1,200 new dwellings and leisure uses. This again is an increase in the number of dwellings proposed compared to the Preferred Options Revisions, increasing by 500 dwellings. The Council consider that the first 50 units could be completed on site by 2019-20. However, as the outline application was only submitted in March 2018 and the applicants have had to address several outstanding matters including highways, flood risk and conservation issues we consider that it is extremely unlikely that the necessary permissions will be agreed in time for the first units to be completed by 2019-20. The Outline Planning Application has yet to be determined, Reserved Matters and Discharge of Pre-</p>		1419		Email

					<p>Commencement Conditions will need to follow, the site may then need to be sold to a housebuilder to commence site preparation works. All this takes time before development is commenced. Completions of the first dwellings ready for occupation typically takes several months more.</p> <p>In addition, the proposed allocation adjoins a number of other proposed strategic allocations and residential sites. Therefore, any highway improvements would need to accommodate the additional traffic generated by these developments and contributions agreed across the sites. We consider that it is very optimistic for the necessary highway improvements and contributions to be agreed between the various landowners and then implemented prior to the units being completed on site within the Council's notional delivery period.</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> <p>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.</p> <p>Accordingly, we strongly urge the Council to consider the inclusion of these sites as allocations within the emerging Local Plan.</p>				
Cooper	Barbara	Kent County Council (KCC)	514		Object <p>Provision and Delivery of County Council Community Services: KCC recommends the following text is included within the policy:</p> <p>"An area of regularly shaped land within the development of no less than 2.05ha to be transferred at nil value to the County Council for the purposes of providing a Two Form Entry Primary School. The site to be adequately serviced by the developer, including utilities and highway access."</p> <p>KCC also recommends that point 3 be amended to read:</p> <p>"An area of regularly shaped land within the</p>		1506		Email

					development of no less than 8.0 ha to be transferred at nil value to the County Council for the purposes of providing a Six Form Entry Secondary School. The site to be adequately serviced by the developer, including utilities and highway access.” PRoW and Access Service: KCC recommends the inclusion of the following text into the policy: Incorporate and provide for connections and improvements to existing PRoW and cycle networks facilitating walking, cycling and public transport to, from and within the site. To incorporate and provide for connections and improvements to existing PRoW network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.				
Davies	Julie	CPRE Kent	147		Object 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.		390		Web
Greenacre		Greenacre	501	Simon Marks	Object Please find enclosed on behalf of our clients	Within these representations we	1407		Email

(Thanet) Ltd		(Thanet) Ltd		- Montagu Evans LLP on behalf of Greenacre (Thanet) Ltd		<p>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. 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). 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"> <li>• Available - Green acre (Thanet) Ltd have a controlling interest in the la rid subject of the policy allocations;</li> <li>• Suitable - the Site is in a sustainable location, in close proximity to Westwood Cross centre and well served by a variety of modes of</li> </ul>	<p>have considered the soundness of the Regulation 19 Local Plan as required by the NPPF. Despite our overall support for the direction of travel proposed by The Plan, as currently drafted, it is not sound as it is not positively prepared, effective or consistent with national policy. The plan as currently drafted is unsound having regard to the reasons set out below.</p> <p>We consider that the inconsistent densities in the Local Plan are not based upon site specific characteristics and are not justified or effective. On this basis the Plan is unsound. Increasing the housing density at Site SP18, as part of the strategic allocation, would introduce a consistent approach throughout the plan, as required by national planning policy, will be appropriate for the site and location and will provide greater certainty both in respect of housing delivery and supporting infrastructure.</p>			
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					<p>transport; and</p> <ul style="list-style-type: none"><li>• 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.</li></ul> <p>Policy SP18 - Strateg ic Housin g site - Land at Manston Court Road/Haine Road</p> <p>The Strategic Policy in respect of the Land at Manston Court Road I Haine Road allocation states that this part of The Site could comprise up to 1,200 dwellings at a maximum density of 30 dwellings per hectare. Greenacre (Thanet) Ltd support the enlargement of this allocation from 700 dwellings to 1,200 dwellings. The Site will deliver sustainable development in accordance with the NPPF.</p> <p>The draft Policy wording recommends a density of up to 30 dwellings per hectare. The majority of site allocations within the draft Plan comprise a density of up to 35 dwellings per hectare. This includes the adjacent site allocation H03. There are no specific characteristics of the Site which require a Policy to constrain the density of development. In addition, the Strategic Site (SP18) is in a sustainable location adjacent to Westwood Cross, with good access to a variety of transport modes.</p> <p>Paragraph 123 of the NPPF sets out that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. The Council have a historic record of poor delivery and on this basis, the plan is not effective or consistent with national planning policy. To ensure that the Site is efficiently redeveloped, subject to more detailed analysis at the planning application stage, we consider the density of development should be consistent with other strategic sites and should increase to up to 35 dwellings per hectare. This has already been demonstrated in</p>				
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						<p>part through the outline planning application comprising part of the SP18 and H03 allocations. Through appropriate masterplanning, an increase in housing numbers can be accommodated at site SP18, as demonstrated by the outline planning application which consists of a mix of densities thereby creating an appropriate and sensitive development of the Site.</p> <p>We consider that the inconsistent densities in the Local Plan are not based upon site specific characteristics and are not justified or effective. On this basis the Plan is unsound. Increasing the housing density at Site SP18, as part of the strategic allocation, would introduce a consistent approach throughout the plan, as required by national planning policy, will be appropriate for the site and location and will provide greater certainty both in respect of housing delivery and supporting infrastructure.</p>				
Johnson	Elisabeth	Monkton Residents Association	51		Observation	Again probably too much development for the current infrastructure.		132		Web
May	Raymond		238		Object	<p>I object to this development on the grounds that it causes the loss of Grade 1 agricultural land. We, in Britain, already import more food than we produce locally. If you equate Thanet Council's plans with hundred's of others around the country, similarly planning ahead, you get an idea of the scale of the potential loss of food producing land. Can we continue on a path of steadily increasing the importation of food as the land to produce our own food diminishes. The south western edge of this proposed development is only 1,650 metres from Manston runway. If it ran, as envisaged by RSP as a 24/7 cargo hub, this would seriously impact the residents living there and the pupils in the proposed secondary school.</p>		793		Web
Mayall	C	Southern Water	473		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 1,200 new dwellings at this site. 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</p>		1357		Web

					<p>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. 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 Fleete Manston Water Service Reservoir is adjacent to the site. In connection with this, water supply (as well as wastewater) infrastructure crosses the site, which needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. These easements should be clear of all proposed buildings and substantial tree planting.</p> <p>Southern Water is unable to support Policy SP18 as sound because it does not adequately</p>				
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						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 SP18 (new text underlined): {...} The Masterplan shall incorporate: 1) [...] 5) The need to ensure occupation of development is phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider [...]				
Milimuka	Elle	GVA	358		Object	An additional 500 homes is proposed on agricultural land to the west of the Manston Court Road/Haine Road allocation. The majority is classified as 'Excellent' in the Agricultural Land Classification, with a small portion identified as 'Very Good'. This site was promoted by the landowner in the most recent Call for Sites for "Between 751 - 667 dwellings (35 dph /30 dph). Site area: 31.33ha" however no evidence has been provided to confirm it is deliverable or achievable and the site was not assessed in the SHLAA.		1055		Web
Millar	Bill	NHS Thanet Clinical Commissioning Group	513		Observation	An additional 1,200 dwellings in the Westwood area, in conjunction with the growth already being experienced in the area will increase pressure on local GP practices as there is currently no dedicated provision of healthcare services in this area of intense growth. Many of the closest practices are already at capacity and would be unable to absorb the growth from more new housing. Many of the existing premises are ageing and not fit for purpose, with limited development potential on their current sites. Recruitment and retention of clinical staff remains a problem which leads to an unstable workforce; increasing patient list sizes is likely to have a negative impact on these practices very quickly. Although SP38 indicates the need for a new medical centre at Westwood Cross, and this will likely result in the relocation of some existing practices, there is also a need to invest in the		1489		Email

						practices which will remain serving the smaller communities in and around the main Westwood development site. It is envisaged that S106 contributions will be sought in order to future-proof the provision of health services in terms of estate.				
Samme	Linda	Manston Parish Council	16		Object	The site itself falls inside Manston Parish Council. We have Manston Green development, further building at Haine Road and are getting entrapped Manston Parish will be too big		269		Web
Solly	C		419		Object	This site has at late notice been included as a strategic site and the highway requirements have confused the whole road strategy for the plan. The new road appears (by councils own options) to have 2 designs based on the outcome of the airport. This policy should be suspended due to the uncertainty of the airport has been resolved. This is largely at the moment down to RSP's plans for highways if a DCO is granted if not granted the funding and design of the road network will be different (as it is proposed to have a road across the airport site from a different option taken by the council). Therefore the viability, transport modelling, highway commitments, funding model and from whom is very much in doubt. This policy may not be appropriate to provide housing delivery in the short term and will affect the housing phasing plan. This may not be the best option for housing and lacks any form of positive preparation especially for roads. This site is on High Quality Agricultural Land and for which lower grades should be sought first.	This policy should understand the aspects of the DCO decision of Manston Airport and/or Stone Hill's parks plans. The site has been chosen to provide road infrastructure in this plan but this has a number of uncertainties. The policy should be suspended until the outcome of the DCO is known, and future planning policy, possibly in the next local plan review.	1223		Email
Stevens	Angela		163		Object	Far too ambitious a plan and unreal! The present secondary school by Manston/Haine (apart from grammar schools) aren't full. The roads already are! Doctors and dentists around Thanet are closing. How is this ever going to be viable? More residents, more cars, even more gridlock without proper services.	Dismiss this plan completely!	621		Web
Twizell	Heather	Natural England	512		Object	Policy SP18 -Strategic Housing Site - Land at Manston Court Road/Haine Road Natural England would query why this is the only Strategic Housing Site policy (SP13-SP18) to include a specific clause (4) requiring an assessment of the site's potential to support breeding or wintering birds. Is there particular evidence held around this site that requires policy protection over and above that given in clause 5, part 2 of SP12? Even if evidence is		1452		Email

						provided that clause 4 is justified we believe it will still require some rewording. Should survey work demonstrate that the site is of value for breeding or wintering birds what is required is more likely to be mitigation than enhancement.				
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Document Section Path			> <a href="#">Type and size of dwellings</a> > <a href="#">Table 6 - Mix of affordable housing by dwelling type (built form)</a> > <a href="#">Table 6 and SP19</a>							
Document Part Name			<a href="#">Table 6 and SP19</a>							
Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
Bates	John		226		Observation	Too many residential properties in Thanet do not have off-street parking of any sort. Many vehicle owners are increasingly finding it difficult to park their vehicles near their homes and those that do are causing accessibility problems to service and emergency vehicles in many parts of Thanet. Yellow lines are not the answer. I would suggest that all new individual residential properties built in Thanet each have off-road parking for at least two vehicles to alleviate any future issues - to not do so is only going to cause greater problems in future.	Ensure two off-road parking spaces for each individual new residential property built within Thanet	872		Web
Behrendt	Mark	Home Builders Federation	423		Object	<p>Policy SP19 - Type and Size of dwellings</p> <p>Policy is unsound as it is not effective</p> <p>This policy requires housing developments to address the SHMA recommendations regarding the size and type of both market and affordable housing. However, on many sites, and in particular smaller sites, it will not be possible to have a mix of dwelling types to reflect those set out in the SHMA and set out in the supporting text to this policy. We would suggest that the wording be amended to provide greater flexibility and require applicants to take account of the recommendations of the SHMA. Such flexibility within the policy will be important given that the revised NPPF reduces the scope to reduce requirements with regard to affordable housing and infrastructure. Whilst these expectations should be reasonable greater flexibility on the mix of dwelling type and tenure will provide scope for developers to try and ensure the Council's requirements elsewhere in the plan can be delivered.</p> <p>Recommendation</p> <p>That the first paragraph of policy SP19 be amended to read: "Proposals for major housing development will be expected to address take account of the SHMA recommendations regarding the make-up of market and affordable housing types and sizes needed to meet requirements."</p>	<p>Recommendation</p> <p>That the first paragraph of policy SP19 be amended to read: "Proposals for major housing development will be expected to address take account of the SHMA recommendations regarding the make-up of market and affordable housing types and sizes needed to meet requirements."</p>	1208		Email
Coombs	Joshua		292		Object	The use more executive homes rather than mixed development and affordable housing in SP14 - Birchington.		865		Web
Millwood Designer Homes Limited		Millwood designer Homes Limited	508	Anna Gillings - Gillings Planning Ltd	Object	This Policy as drafted is overly restrictive and does not allow for site specific circumstances to be taken into account. Although the principle of reflecting the SHMA in respect of type and size of dwellings is supported, it should allow for exception or flexibility where individual site circumstances suggest a different approach should be taken. Site SP15 for example may be well placed to deliver a higher proportion of	<p>The policy should therefore be amended to read:</p> <p>"Proposals for housing development will be expected to address the SHMA recommendations</p>	1432	<a href="#">Gillings Millwood.pdf (74.4 MB)</a>	Web

						smaller, or indeed family housing than the SHMA suggests. Each site should be assessed at the time of application/delivery. This approach is already included within the policy in respect of the proportion of flats and should therefore be reflected within the first paragraph.	regarding the make-up of market and affordable housing types and sizes needed to meet requirements, so far as is appropriate for each site"			
Ptarmigan Land and Millwood Designer Homes		Ptarmigan Land and Millwood Designer Homes	493	Joshua Mellor - Barton Willmore LLP	Object	6.3 Policy SP19 (Type and Size of Dwellings) identifies that proposals for housing development will be expected to address the SHMA recommendations regarding the make-up of housing types and sizes, to meet requirements, however proposals are "encouraged" to provide a higher proportion of houses as opposed to flats than recommended by the SHMA. We support this approach, but recommend the policy be updated to reflect housing types and sizes should reflect the SHMA or any other up-to-date evidence available (e.g. future Council or Neighbourhood Plan assessments).		1386		Email
Samme	Linda	Manston Parish Council	16		Object	more land could be saved if small height flats were built instead of houses in some area		270		Web
Taylor	Jeanne	Lee Evans Planning	304	Jeanne Taylor - Lee Evans Planning	Object	See attached Statement	See attached Statement	892	<a href="#">Objection to Policy SP19 Type and Size of Dwellings and the supporting tables.docx (22 KB)</a>	Web
Walker	John	The Ramsgate Society	231		Observation	<p>Comments on Chapter 3: Housing Strategy; SP19 and SP20 Type and Size of Dwellings</p> <p>4.1 We have no major comments on this section of the Draft Plan, which is based on the Strategic Housing Market Assessment 2016 (SHHA). The recommendation of a planned balance within the affordable housing sector of 45-50% flats and 50-55% houses seems appropriate, and we agree with the Plan's stipulation that "schemes proposing a higher proportion of flats will need to be accompanied by a supporting justification" (para 3.33).</p> <p>4.2 However, it is not clear from the body of the Plan what the planned figure for affordable housing is within the overall provision for 17,140 homes up to 2031. TDC's document "Guidance for Residential Developers-Affordable Housing" stated that there was a "substantial shortfall of affordable homes in the District" (para 12). In March 2018 there were nearly 2500 households on the housing waiting list, most of which require one or two bedroom accommodation. This acknowledged shortfall of social housing to rent needs to be addressed urgently, and relates primarily to the needs of the existing population, whereas many of the calculations of future housing need in the Plan are focused on expectations of inward migration.</p> <p>4.3 In this context it is essential that the Council has in place</p>		707		Web



					<p>a firmly enforced policy requiring developers to make provision for a proportion of affordable homes on new sites. Policy SP20 within the Draft Plan states that “residential development schemes for more than 10 dwelling units, including mixed use developments incorporating residential shall be required to provide at least 30% of the dwellings as affordable”. This is a very good start, and represents an improvement on the policy in the Guidance referred to above which had a higher threshold of 15 dwellings, but everything depends on how the Council acts in relation to the further statement that “the above requirements will only be reduced if it would make the proposed development unviable to meet them”.</p> <p>4.4 TDC’s “Planning Obligations and Developer Contribution Supplementary Planning Document” provides valuable advice on the full range of situations and services where such contributions are relevant. In the case of affordable housing, it includes a reminder that national policy “sets out that the presumption is that affordable housing will be provided on the application site...so that it contributes towards creating a mix of housing”.</p> <p>4.5 This last point is often forgotten: the purpose of the planning obligation policy is not simply to get the developer to make a contribution towards the provision of affordable housing, whether in houses or in “commuted payments”, but to help create a more socially mixed community. Developers have a habit of seeking to avoid the requirement of making provision for affordable housing by claiming “non-viability”, or by seeking to offer a commuted payment of money in lieu of the affordable housing quota. Sometimes when developers argue the case for non-viability what they really mean is that they believe that the proximity of the affordable housing will affect the value or saleability of the private housing being developed: that is not a relevant factor in the criteria for assessing non-viability. We urge TDC to strictly enforce SP20 for the benefit of those people seeking affordable housing.</p>				
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Providing affordable homes SP20

Respondent Surname	Respondent First Name	Respondent Organisation Name	Respondent number in this document	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	<a href="#">Attached documents</a>	Submission Method
Agnew	Richard	Gladman	516		Object	<p>Policy SP20 – Affordable Housing</p> <p>Gladman are concerned with this policy seeking for at least 30% of dwellings to be affordable and submit that this is inconsistent with the Viability Assessment supporting the Local Plan.</p> <p>The Viability Assessment states at Paragraph 29 that ‘an affordable policy headline target applicable at 11+ dwellings, and seeking not more than 30%, is likely to be workable in striving to secure an optimal level of affordable homes provision’ (emphasis added). Figure 9 on Page 115 takes this further to state a suggested range of 20-30% not exceeding 30% in any To be sound this policy should be amended to reflect the evidence base.</p>		1539		Email
Barnett	David		146		Observation	<p>I am in total agreement to this policy and in respect of this would submit that I own an area of land that I would be prepared to offer for development of 100% social/affordable housing development. The land is situated adjacent to an existing residential area of a like nature and is currently redundant. The site has clearly defined and mature boundaries and although situated on the perimeter of a defined "Green wedge" a previous landscape appraisal has concluded that the site is more in keeping with the very closely situated built environment than the farmland that surrounds it. I would therefore submit that this site should be seriously considered as a potential site to increase the provision of affordable/social housing as outlined in this policy.</p>		377		Web
Behrendt	Mark	Home Builders Federation	423		Object	<p>SP20 - Affordable housing</p> <p>The policy is not sound as it is unjustified</p> <p>This policy seeks to require all developments off over 10 units to provide at least 30% affordable units. The first issue that we have with this policy is that it is established as a minimum requirement. This does not provide the necessary certainty for either the decision maker or applicant as to the required level of provision. The policy should set out clearly what is expected of the developer and if they meet that expectation then an application should not be refused on that basis.</p> <p>Secondly, we are concerned that the Council has ignored its own viability evidence in setting its 30% requirement. The position adopted by the Council in its affordable housing policy is the third recommendation set out in paragraph 3.12.3 of the viability assessment. This paragraph outlines that this is an aspirational target and that this will require the Council to negotiate on this position on a more frequent basis than should the policy be established at a lower level. In particular the viability assessment raises concerns that the development of PDL sites could be compromised by a 30% requirement where costs are higher. To this end the viability assessment also recommends that either a lower requirement for all development is set within the local plan or a</p>	<p>Recommendation</p> <p>The Council reduces its affordable housing requirement to 20%.</p>	1211		Email

					<p>variable rate between PDL and green field sites.</p> <p>To address this concern arising from the viability assessment the Council have included a clear statement that viability considerations will be taken into account when assessing applications. This is welcomed. However, we are concerned that whilst this policy is being examined against the original NPPF, it will be applied under the revised NPPF, which in paragraph 57 gives more weight to the viability testing of the local plan. It will therefore be important that the Council does not seek to establish aspirational targets within its local plan that push the margins of viability, but establishes a requirement for affordable housing that will minimise the need for negotiation. This is made even more important given that the Council are yet to establish the rate which it intends to set CIL. Under the revised NPPF paragraph 35 would require this to be considered as part of the examination into the Local Plan and allow for a through consideration of their impact on deliverability. Without this rate it is therefore important that sufficient scope is provided for within the plan to ensure that the Council can support infrastructure provision alongside the delivery of affordable housing.</p> <p>We would suggest that further consideration needs to be given to the evidence supporting this policy and the national policy framework under which it will be delivered. This evidence indicates that a target of 20% would achieve the Government's expectations in the revised NPPF and would allow scope to ensure that the necessary infrastructure requirements can be delivered without compromising the delivery of affordable housing. Without a reduction in the affordable housing requirement the policy will be out of date on adoption and require an immediate review to ensure its conformity with national policy.</p> <p>Recommendation</p> <p>The Council reduces its affordable housing requirement to 20%.</p>				
Bransfield	Sheila		456		<p>Observation</p> <p>POLICY SP20 – AFFORDABLE HOUSING</p> <p>Demands within the Local Plan for developers to provide 17% starter homes, 18% affordable rent and 65% social rent dwellings can only be included if TDC's Planning Department enforce Planning Conditions, which they incessantly fail to do. Developers submit plans including such properties, but appear to have no intention of building any. Most new builds are detached, many with four or five bedrooms, which render them out of reach of those in greatest need.</p>		1307		Email
Carter	Viv		176		<p>Observation</p> <p>Inevitably, builders aim to comply with the number of affordable homes within their development, then having gained planning permission, decide the cost of building the affordable element is not viable. This was quoted to me by the developers of the "Stone Hill Park" site, when I asked how many homes would be affordable. Until this get out clause is removed- we will not have affordable housing.</p>		498		Web
Coombs	Joshua		292		<p>Object</p> <p>Executive Homes to increase the living standards and those who aspire to move up the ladder to such village locations such as Birchington.</p>		866		Web
Elbourn	Bernard		131		<p>Object</p> <p>Water Supply</p>	Provide evidence that new dwellings will not compromise existing water supplies.	317		Web
Giddins	Rod		62		<p>Observation</p> <p>Policy SP20 relating to affordable housing provides a caveat that if a development was to be unviable then the required 30% affordable housing provision could be reduced. This caveat should be removed so that developers always have to provide</p>		165		Email

						affordable housing in any development of 10 or more units as this is fundamental to helping local people to get on the housing ladder. This policy needs to be much more robust.				
Johnson	Elisabeth	Monkton Residents Association	51		Observation	As previously commented this has not so far happened,		133		Web
Millwood Designer Homes Limited		Millwood designer Homes Limited	508	Anna Gillings - Gillings Planning Ltd	Object	As with Policy SP19, this policy as drafted is overly restrictive and does not allow for site specific circumstances to be taken into account. Although the principle of 30% provision and the preferred mix of tenure is accepted, the policy should allow for exception or flexibility in respect of the tenure where it is agreed individual site circumstances suggest a different approach should be taken.	The policy should therefore be amended to read:  "Residential development schemes for more than 10 dwelling units, including mixed use developments incorporating residential shall be required to provide at least 30% of the dwellings as affordable housing, provided in the following proportions, where appropriate."	1433	<a href="#">Gillings Millwood.pdf (74.4 MB)</a>	Web
Solly	C		419		Object	Point 1: Thanet has a issue with its local population in employment opportunities and the rapid rise in house prices for which will not be affordable by increasing supply alone. There is also an additional issue that the in-migration of people are increasing the price of housing further. Thanets local plan needs to consider "Local Need". Requirements in planning applications should not be reduced because of viability (see point 2), it simply should be rejected. Affordable homes should be protected and even enhanced to a higher level. For every 1000 homes it is suggested that 51 houses will be starter homes, 54 as affordable rent and 195 for social rent. A breakdown of these figures is shown below. Shelter wrote a report in 2014 and the data suggest that on the 3 scenarios the highest percentage in Thanet for affordability was 25%. This suggests many people are priced out of the housing market. Information is shown below. Shelters report highlighted many problems with affordable homes. The local plan should reflect "local need" as its top priority and should increase the requirement appropriately. Point 2: 2 sites which have been approved under this local plan have already been challenged for viability. The 2 planning applications were: OL/TH/16/0376 – LAND REAR OF 2-28 KINGSTON AVENUE, MARGATE Where ""Members confirm that planning permission be deferred to officers for approval subject to securing a legal agreement for the provision of financial contributions as set out in the report and conditions outlined at Annex 1, including the provision of an affordable housing financial contribution in lieu of on-site	Remove the ability to reduce or eliminate affordable housing commitments as was seen Introduce a affordable housing viability test. So that planning committees would know if development is viable before approval of a application Increase Percentage to 40%	1224	<a href="#">Solly affordable housing.pdf (510 KB)</a>	Email

						affordable housing provision, as outlined in this report.” and OL/TH/16/1416 – LAND ADJOINING 1 CHILTON LANE AND CANTERBURY ROAD EAST, RAMSGATE. Where ““Members approve the planning application subject to submission and approval of a legal agreement securing the financial contributions as stated, along with the reduced level of affordable housing provision.” These sites are under SP15 Policy Planning meeting minutes: <a href="https://democracy.thanet.gov.uk/documents/g4697/Printed%20minutes%2016th-May-2018%2019.00%20Planning%20Committee.htm?T=1&amp;CT=2">https://democracy.thanet.gov.uk/documents/g4697/Printed%20minutes%2016th-May-2018%2019.00%20Planning%20Committee.htm?T=1&amp;CT=2</a> This similarly caused a reaction in the press. News story: <a href="https://theisleofthanetnews.com/cutting-of-affordable-homes-on-thanet-developments-branded-as-profits-over-people/">https://theisleofthanetnews.com/cutting-of-affordable-homes-on-thanet-developments-branded-as-profits-over-people/</a> Affordable housing is very much needed in Thanet, and so a test of viability should be made foraffordable housing in this policy. Planning commitess are then better informed of the requirementsand viability of affordable housing.				
Taylor	Jeanne	Lee Evans Planning	304	Jeanne Taylor - Lee Evans Planning	Object	See attached Statement	See attached Statement	889	<a href="#">Objection to Policy SP20.docx (19 KB)</a>	Web
Ward	Linda		157		Observation	Affordable homes should be to satisfy local needs only. No provision should be made for rehousing those from outside the area. Developers should not be able to change the numbers of affordable houses agreed to.	Uphold the rights of local people to live in decent accomodation.	450		Web