

Chapter 4 - Environment Strategy

Document Section Path	Protecting the Countryside SP21
Document Part Name	SP21

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Agnew	Richard	516	Gladman		Object	<p>Policy SP21 – Development in the Countryside</p> <p>Gladman are concerned with the approach to development outside of the urban and village confines. The approach does not accord with the Framework and is therefore Instead of restricting development in these areas until a time that the need for development ‘overrides the need to protect the countryside’, such as a lack of 5 year housing land supply, we would suggest an alternative more flexible approach should be used.</p> <p>We would suggest the policy approach should be amended to be flexible enough to be able to accommodate new development outside of existing development boundaries, to allow the Council to quickly address any issues in shortfall in housing supply against the plan Gladman recommend that the Council could incorporate a criteria-based policy to achieve this, as such an approach would allow the plan to protect itself against unsustainable development, whilst at the same time being open and flexible to additional development opportunities to come forward to meet identified needs. Gladman refer to the submission version of the Harborough Local Plan, Policy GD2, which states: -</p> <p>“In addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where...”</p> <p>A series of criteria then follows.</p>		1540		Email
Barar		375			Observation	<p>4 - Environment Strategy - Protecting the Countryside. This section of the local plan from 4.1 to 4.4 is insightful and I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout. It concludes “The following policy seeks to achieve the objective of safeguarding the geological and scenic value of the coast and countryside”. This also is a welcome stance by the Council Planning Authority and should be encouraged, throughout, especially within an area designated as a strategic housing site.</p> <p>Policy SP21 - Development in the Countryside states</p>		1081		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>“Development in the countryside outside of the urban and village confines, as identified on the Policies Map and not otherwise allocated for development, will not be permitted unless there is a need for the development that overrides the need to protect the countryside and any adverse environmental effects can be avoided or fully mitigated subject to the provisions of other policies”. This policy appears to tender that further development is permissible should further development override the need to protect the countryside. I would suggest that the retention of green corridors / wildlife corridors is a justifiable reason to allow SP14 some ‘breathing space’ to encroach further slightly beyond the boundaries already depicted and include a soft edge towards open countryside. This would allow SP14 to achieve its target of 1,600 houses irrespective of the soundness of other policies, whilst retaining for existing and new residents of Birchington, the character of the countryside we currently enjoy. Failing this option, shortfalls in housing can be made up on brownfield sites within Thanet.</p>				
Barnett	David	146			Observation	<p>I support the need to protect the countryside but with the proviso that common sense should be applied to any planning decisions applicable to sites situated immediately adjacent to defined countryside zones. Sensible planning considerations should be made on the basis of the particular site concerned and not immediately dismissed purely because a line on a map has been drawn during the local plan preparations. It is often the case that a particular site has suffered a total change in character due to adjacent development and therefore should be considered for future change of use if this would not adversely impact upon the character of the immediate area. By adopting this approach, valuable potential development land would, I submit, be made available in order to address the requirements of the local plan.</p>		378		Web
Davies	Julie	147	CPRE Kent		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>The District measures some 10 miles by 5. Thus, the rural part of Thanet is generally in close proximity to the urban area and the plan allocation sites. We are concerned that the policy will unnecessarily allow the loss of greenfield sites, including best and most versatile agricultural land.</p>		391		Web
Fitzpatrick	Mary	281	Faithful Companions of Jesus	Iwan Jones - JIG Planning & Developm	Object	<p>These representations are solely made in respect of Policy SP 21- Development in the Countryside which reads as follows.</p> <p>Development in the Countryside outside of the urban and village</p>	To reflect our stance and evidence provided in the previous section (3), it is proposed in the first instance	822		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
				ent		<p>confines, as identified on the Policies Map and not otherwise allocated for development, will not be permitted unless there is a need for the development that overrides the need to protect the countryside and any adverse environmental effects can be avoided or fully mitigated subject to the provisions of other policies.</p> <p>These representations are made in respect of the property, Stella Maris Convent and on behalf of the FCJ. The property is located on the west side of North Foreland Road, Broadstairs which is considered to be within the built confines of the town of Broadstairs. A location plan is provided at Figure 1 where Stella Maris Convent is outlined in red. It is worth noting at this juncture that Stella Maris Convent was not put forward as part of the Council's 'Call for Sites' process. Notwithstanding this, it is confirmed that the property will become available for development during the Plan period up to 2031. It can also be said that the property is suitable and deliverable for residential development. The FCJ would also wish to confirm that it is only the existing built-up area of the site, circa 50% of the entire site, that would be sought for redevelopment in the future. There is no desire to propose any development on the remaining 50% of the site which is greenfield.</p> <p>The principle of Policy SP21 seeks to protect Thanet's open countryside. However, the Stella Maris Convent site is not open countryside. It is a site that is 50% brownfield with substantial footprint and built form situated towards the northern end of North Foreland Road, Broadstairs. The amount of footprint is shown by the outline of the buildings on the plan at Figure 1. Open countryside is beyond and adjacent to the western boundary of the property. Hence, we consider that the urban boundary in this location should partly follow the western boundary of the site as opposed to the eastern boundary. This is shown further at Figure 3 [please see pdf attachment]. Any potential redevelopment of the built part of the site only in the future would not encroach or have a detrimental impact on the countryside. It is not proposed that any development will occur on undeveloped field that forms the other 50% of the site.</p> <p>We concur that Thanet's countryside provides important landscapes that contribute to its sense of place, as well as making Thanet an attractive place that people want to come to. The countryside also supports a variety of habitats and species. Consequently, there is a presumption against development in the countryside. We endorse the fact that Policies are drawn to</p>	<p>that the delineation of the urban boundary is re-drawn as per the plan shown at Figure 3. This re-introduces the brownfield part of the Stella Maris Convent with its vast footprint back to being within the urban boundary and out of the countryside which is logical and perfectly sensible.</p> <p>Secondly, It is proposed that the wording of Policy SP21 is amended as shown underlined [capital letters] below.</p> <p>Development in the Countryside outside of the urban and village confines, as identified on the Policies Map and not otherwise allocated for development, will not be permitted unless IT PROPOSES THE REDEVELOPMENT OF AN EXISTING BROWNFIELD SITE SUBJECT TO THE PROVISIONS OF OTHER POLICIES, there is a need for the development that overrides the need to protect the countryside and any adverse environmental effects can be avoided or fully mitigated subject to the provisions of other policies.</p> <p>We consider that the representations made in respect of Policy SP21 and the property Stella Maris Convent, to be sufficiently robust to warrant an amendment to the urban boundary in this particular location so that the brownfield element of the site only is excluded from the countryside and becomes part</p>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>protect the countryside but at the same time they must not compromise the ability of existing brownfield sites within existing built confines to come forward for redevelopment in the future. This conflicts with one of the over-arching principles of the National Planning Policy Framework (NPPF) which is to 'give substantial weight to the value of using suitable brownfield land within settlements' - paragraph 118 c). In turn, using brownfield land within settlements contributes towards achieving sustainable development which is the thread that runs through the NPPF and which is the ultimate planning objective. It is for this reason that we question the soundness of these aspects of Policy SP21. Within the Plan period up to 2031, Stella Maris Convent will become available for redevelopment or change of use. It is in part a brownfield site with substantial built form and it is only that part of the site that the FCJ would propose for redevelopment. It is not the intention to develop on any part of the field that represents the remaining circa 50% of the site which is proposed to be retained as green, undeveloped and open space. It is therefore important that brownfield sites such as this benefit from a flexible and positive policy position so that an effective use of the land can be made in the future, contributing towards the achievement of sustainable development. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development- para 11. For Local Plan making this means that:</p> <p>a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.</p> <p>It is our view that Policy SP21 should be expanded to include wording to the effect that brownfield sites within the countryside will be permitted for redevelopment subject to good design and that any proposed development will not result in an increase in height or built footprint when compared against existing buildings on site. The policy is considered ambiguous as currently drafted as it does not express how the Council would determine any future development proposals of brownfield sites within the countryside. The NPPF at paragraph 16 d) advises that plans should;</p> <p>contain policies that are clearly written and unambiguous.</p> <p>Para 35 of the Framework advises that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p>	of the settlement of Broadstairs. However, we wish to retain our right to make personal representations at the Examination should it be deemed necessary.			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>a) Positively prepared- providing a strategy which, as a minimum is consistent with achieving sustainable development.</p> <p>c) an appropriate strategy.</p> <p>d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>As previously mentioned, 'making effective use of land' contributes to the overarching principle of achieving sustainable development. Policies contained within the new Thanet Local Plan must be consistent with that aim.It is considered that the current delineation of the urban boundary as defined by the proposals map of the Local Plan is too tightly drawn and includes Stella Maris Convent which should be excluded from the countryside as it is an existing brownfield site. It is important to emphasise again that it is only the brownfield part of the site that is proposed to be excluded from the countryside which represents 50% of the site -the remaining 50% which is greenfield is proposed to be retained as countryside.</p> <p>Stella Maris Convent will, in the period up to 2031 become available for redevelopment, conversion or change of use. It is in part a brownfield site with substantial built form. The objective must be to create a positive policy framework that would enable the redevelopment or change of use of such buildings in order to achieve an 'effective use of the land'. Moreover, the redevelopment of existing brownfield sites would not be detrimental to the countryside as built form already exists. The countryside would therefore remain protected in the event that new development is contained to those parts of the site already built. That is what is proposed here by focusing any future new build or redevelopment on the existing built up area whilst leaving untouched the greenfield portion of the northern half of the site.</p> <p>The NPPF elaborates further on the objective of 'making effective use of land' in section 11. Here, at para 117 it advises that;</p> <p>'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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.</p> <p>This encourages the re-use of sites such as Stella Maris Convent. The policies within the emerging plan should therefore follow suit and should exclude brownfield land within the built envelope of settlements from policy designations that seek to prohibit</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>development.</p> <p>As previously mentioned, the site is situated within the built envelope of the settlement of Broadstairs. The site is not isolated but represents a continuation of built form when heading north out of Broadstairs. On the opposite side of North Foreland Road, built form protrudes significantly further northwards to that of Stella Maris Convent. It is our opinion that it is the Lighthouse and the North Foreland Estate that denote the commencement of the settlement of Broadstairs in this direction - these are denoted on the aerial plan at Figure 2 [please see pdf attachment].</p> <p>Moreover, the speed limit on North Foreland Road is 30mph and stays at this limit until Joss Bay and Elmwood Avenue on the 82052 are reached. See figure 2 [please see pdf attachment]. A speed limit of 30 mph is typical within built-up areas where there is a concentration of population and is predominant within residential areas. The fact therefore that the speed limit is set at 30mph is a reflection that the site is within the urban boundary of Broadstairs. Within the countryside, it is expected that speed limits increase to 40mph and the national limit of 60mph respectively. The fact that the speed limit on North Foreland Road is not set at this level tells that North Foreland Road is not within the countryside but forms part of the built settlement of Broadstairs.</p> <p>The aerial image at Figure 2 also demonstrates that Stella Maris Convent forms a natural part of the settlement of Broadstairs. It has defined boundaries to the east that cut in towards the Lighthouse and North Foreland Road to create a defined edge to the town of Broadstairs at this location. The extent of the countryside is beyond the western boundary of Stella Maris Convent and Broadstairs Lighthouse. It is the western boundary of Stella Maris that clearly defines the separation of built form from the countryside.</p> <p>A number of photographs are attached at Appendix 4 [please see pdf attachment] that demonstrate the scale and amount of built form on site. These photographs also evidence that the site is well contained by a solid 6ft high timber fence with an established and dense tree line that close any views of the countryside beyond the western boundary of Stella Maris Convent. The fence and tree line extend towards the Lighthouse and it is that precise point that denotes the commencement of the urban boundary of Broadstairs and not the current delineation as shown on the Proposals Map of the Draft Local Plan. Notwithstanding this, it is only proposed to exclude the existing footprint of Stella Maris Convent from the</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>countryside whilst the greenfield which characterises 50% of the site area is proposed to remain as such - please see Figure 3 [please see pdf attachment].</p> <p>Figure 3 illustrates our proposed revision to the urban boundary and the extent of deletion of the countryside thus re-introducing the brownfield only part of the site back to being within the settlement of Broadstairs. The northern half of the site which is a greenfield is proposed to remain within the countryside. Figure 3 also shows that part of the proposed revision to the urban boundary includes land that is not within the ownership of the FCJ- this is the land to the south.</p> <p>To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed (para 59 of the Framework).</p> <p>Para 68 advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.</p> <p>Thanet's housing provision up to 2031 is 17,140 homes. This represents a tall order given that only 1,555 homes were built in the period 2011-16. To give the Council the best chance of meeting this target, it must encourage the re-use of brownfield sites. Indeed, the Council would be putting itself at a disadvantage by not encouraging brownfield sites to come forward to help in achieving its housing target.</p> <p>Stella Maris Convent would represent a small housing site which would be attractive to the SME housebuilder which the Government is seeking to encourage and support. This further emphasises the need to encourage the re-use of brownfield sites for redevelopment and would represent a further positive knock-on effect of the site coming forward for development in the future.</p> <p>To conclude, underpinning the National Planning Policy Framework is the objective of 'making effective use of land'. Policies within the emerging Thanet local Plan should be reflective of that overarching principle. As currently drafted, Policy SP21 and the inflexible and inaccurate (in our view) delineation of the urban boundary includes a site within the countryside which in part shouldn't be within the countryside. The built-up area of Stella Maris Convent should be excluded from the countryside and included within the urban boundary of</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>Broadstairs as it forms part of the settlement. Amending the urban boundary slightly, so that It wraps around the western boundary, to include the built form part only of Stella Maris Convent would introduce a brownfield site that would not be constrained for future development when it becomes available in the time up to 2031.</p> <p>The countryside designation and the draft Policy SP21 would frustrate the future redevelopment of brownfield sites which conflicts with the Framework as it advises that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements for homes' - para 118.The advice by Central Government through the Framework is therefore clear and conclusive.</p> <p>When brownfield sites, such as Stella Maris Convent become available for redevelopment, the new local Plan should contain policies that encourage their re-use and redevelopment. Indeed, should policies hinder and frustrate the re-use of suitable brownfield land which then becomes vacant, vulnerable and dilapidated then the site would cause more harm to the appearance of the countryside than if it was to be redeveloped, subject to good design obviously. By utilising the footprint only of current brownfield sites, the countryside would remain protected.</p> <p>Paragraph 4.4 of the sub-text to Policy SP21 states that the 'Council considers that it is essential to protect the countryside through planning policy in view of its vulnerability to sporadic forms of development'. The objective of this is understood, however, the redevelopment of Stella Maris Convent would not represent 'sporadic development' as the site is already developed in part and it is only that part which would be proposed for redevelopment in the future whilst protecting the greenfield which forms 50% of the site are from development. This objective would not be compromised by taking only part of the site out of the countryside through slight adjustment of the urban boundary.</p> <p>The urban boundary of Broadstairs in this location should therefore be re-drawn so that a brownfield site is excluded from the countryside and becomes un-hindered by potential planning policy constraint which could prevent 'effective use of land' from occurring. This would be contrary to National Planning Policy. To improve the soundness of the Plan, the delineation of the urban boundary is proposed to be amended as per the plan shown at Figure 3.</p> <p>By referring back to para 35 of the Framework and the test of</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>soundness, it is not considered that the Strategy of the Local Plan is consistent with the Framework or with achieving sustainable development. It is our view that the Strategy should do more to encourage the redevelopment of brownfield sites. However, it is considered that this can easily be resolved through a slight adjustment to the urban boundary which will enable an easier passage to secure the 'effective use of land'.</p> <p>It is therefore respectfully requested that having regard to all of the above, the brownfield element of Stella Maris Convent is taken out of the countryside through a re-alignment of the urban boundary {Figure 3) thus becoming unaffected by the constraints of Policy SP21.</p>				
Friend	William	266	Friend Growers - P03798	Jeanne Taylor - Lee Evans Planning	Object	See attached Statement	See attached Statement	804	p03798.reps on behalf of friend growers.pre-submission thanet local plan july 2018.04-10-2018.pdf (10 5 KB)	Web
Gregory	Amelia	316	Thanet Trees https://www.facebook.com/groups/2138824569723508/		Observation	<p>Environment Strategy:</p> <p>https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9430772</p> <p>Thanet Trees proposes that there is more to be done to provide safe habitats for wildlife in Thanet. Huge open fields are virtually devoid of wildlife, so hedgerows and boundaries need to be carefully managed and protected to provide important places for wildlife to thrive. Where possible wildflower strips and hedgerows (with trees) should be reinstated, which will help to prevent soil erosion, which Thanet is surely at high risk of</p> <p>https://www.independent.co.uk/news/uk/home-news/britain-facing-agricultural-crisis-as-scientists-warn-there-are-only-100-harvests-left-in-our-farm-9806353.html</p>		965		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	We have so little countryside left in Thanet that a need for development which overrides the need to protect the countryside cannot at this time be envisaged.		134		Web
Jones-Hall	Samara	295			Observation	Draft Local Plan has pushed housing on to greenfield sites rather than use an used brownfield site.	The Local Plan must support the mixed-use development of the former Manston airport site	890		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
							<p>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 Policy SP09-Ramsgate.</p> <p>Commercial aviation is not viable at this location.</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>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
							<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+ 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. Why revert to proven failure of Manston when we can continue to back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Lee	A	133			Object	No large scale building on farmland. We need our fields and open spaces! Fields and green space have already been built on too much in recent years in Thanet eg Business parks at Manson/Haine Road that are underused and empty. T	Demolition of Business park buildings that are not used and change use of land for housing.	325		Web
MEADEN	IAN	2			Object	The draft proposals to double the size of St Nicholas At Wade by building on agricultural land is not in keeping with your pledge to protect the countryside and unique character of the few remaining villages. The houses currently under construction are certainly NOT AFFORDABLE by local people and are on agricultural land	Try following your own stated policies.	3		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Messenger	Carol	383			Object	<p>Our current policy CC1 will be replaced in the emerging plan with SP21, which is a very watered-down policy and does not go far enough to protect our countryside and allows land previously protected to be developed, which I believe to be short sighted and it is not following the guidelines set out in the NPPF:</p> <p>15. Conserving and enhancing the natural environment</p> <p>170. Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland</p>		1128		Web
N		257			Object	<p>How does proposing to build on greenbelt land around Cliffsend, Westgate and Birchington tally with the above? These more village settings, with the nature around them are crucial to keep as limited areas, so that the whole of Thanet does not become one huge amalgam. New houses should go on brownfield sites first.</p>		896		Web
Ransom		153			Support	<p>Large areas of open farmland have been allocated for housing within the local plan. This contradicts this policy.</p>		561		Web
Sitch	Sue	38	Mr		Support	<p>REDUCE THE CURRENT PLAN BY 50% . Create green corridors (a presentation has been created in Birchingtoni to support this piece of necessary work)</p>		86		Web
Solly	C	419			Object	<p>As stated in SP11, SP14, SP15, the requirements for housing is overvalued and 91% of farmland (when compared with brownfield register) is in the countryside and on Grade 1 and 2 (ALC) Best and Most Versatile agricultural land. Windfall applications will undoubtedly be applied for and the issues of housing delivery mean that Thanet does generally fail 5 year land supply. Past planning applications have been approved in the countryside and very little weight to this policy. The inner link road strategy does also affect development in the countryside. Due to the size and shape of the island the urban area is moving from a thickening horseshoe to eventually bridge the edges of coastline together. Thanet is already 27% developed which is over bordering districts and development might be able be transferred over by duty to cooperate. More work with other districts should be down to balance this out. Thanet will become unsustainable for land</p>	<p>Improve efforts for duty to cooperate due to the land use for development is higher than other districts.</p> <p>Strengthen weight on this policy to protect Greenfield sites and habitats.</p>	1225		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						availability before many other districts and other areas in the country will.				
Stevens	Angela	163			Object	If officers had taken more notice of NPPF notes as stated in 4.1, 4.2 and 4.3, they might have written to the DCLG (as it was then), told them about Thanet and fought for our corner, instead of letting it drift and doing nothing for it's residents!	Despite numerous objections from various elected councillors, the officers have seen fit to ignore them at every stage and said the government will impose even more houses if we don't put forward all these thousands of new builds in Thanet! NO TDC. You are wrong. You had the opportunity to put Thanet's case forward, but didn't!	622		Web
Twizell	Heather	512	Natural England		Support	<i>Policy SP21 - Development in the Countryside</i> The final point around the need for adverse effects on the environment being avoided or fully mitigated is welcomed.		1454		Email
Ward	Linda	157			Observation	Nothing should be allowed to override the need to protect our countryside and high quality agricultural land.		451		Web

Document Section Path	Green Wedges SP22
Document Part Name	SP22

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
.		433	The Mockett Trust Ltd	Mike Goddard - Goddard Planning Ltd	Object	<p>Paragraph 4.11 identifies the potential cumulative impact of several small scale developments which could be a “detriment to the green wedges” and cause new development pressures where there are currently none. It goes on to say that it could also set a precedent of releasing green wedge sites and result in further development within the green wedges which would diminish their functions. In our view, it is inappropriate to take this position as each case is to be dealt with on its own individual merit. Taking such a position is unjustified, particularly as the council states that it has assessed sites put forward in the green wedges and found that the allocation of some sites can cause less harm than others. The recent appeal decision at Westwood Lodge demonstrates that in certain circumstances, the release of green wedge land for development is appropriate. It also undermines this approach of the council in treating all green wedge sites as sacrosanct.</p> <p>The draft policy also requires it to be demonstrated that proposed development is essential to be located within the green wedges. It appears to include only as permissible open sports and recreational uses. In our view, the council is treating the green wedge policy as a national designation which it is not. The green wedge boundaries are capable of review and they can change in the same way as a settlement boundary might change. Consequently, the treatment of it as sacrosanct, or permanent, in the way that a Green Belt policy might be, does not apply. The policy wording of SP22 in our opinion sets an unreasonably high bar – that it is “essential for the proposed development to be located within the green wedge.” We are concerned that the test about what is essential introduces a much higher policy test than the NPPF would. The green wedge is not the Green Belt. National policy in the NPPF does not apply the test of essentiality about development within the countryside.</p>	<p>Consequently, we consider that point 2 and the text which follows it, should be deleted from the policy.</p> <p>The wording of the text in 4.11 should be modified to recognise that the release of land for development in the green wedge may be acceptable subject to meeting the criteria in Policy SP22.</p>	1252		Email
Agnew	Richard	516	Gladman		Object	Policy SP22 – Safeguarding the Identity of Thanet’s		1541		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>Settlements</p> <p>Gladman submit that new development can often be located in 'Green Wedges' without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances we would question the purpose of a 'Green Wedge' designation, particularly if this would prevent the development of otherwise sustainable and deliverable housing sites to meet the district's needs. Gladman note that there appears to be no robust evidence supporting the extent of the current countryside gap designations.</p>				
Alan Byrne/English Heritage		155			Support	Policy SP22 - we support this policy which will help to underpin the distinctiveness and unique character of each of Thanet's historic settlements.		929		Email
Barar		375			Support	Green Wedges policy. I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout.		1082		Email
Barnett	David	146			Object	<p>Overall, I agree with the policy as outlined but have specific observations in relation to how the boundaries of the Green Wedges are defined. There appears to be no real thought or consideration as to the real character of the sites situated within the defined Green Wedge areas, instead the local authority just drawing a line on a map to define this.</p> <p>I own an area of land known as "Pendell", Broadley Road, Margate CT93UP which, until the 1970's was an isolated rural settlement containing two residencies. In the 1970's the local authority built a large social housing estate to within 3 metres of the frontage of the site. Naturally, the character of "Pendell" changed overnight and as a result, my parents who lived there suffered constant problems with vandalism, burglaries and other crime, culminating in a serious arson attack as a result of which the house had to be demolished for safety reasons.</p> <p>Since that time, I have liaised with the local authority in order to seek guidance as to how the site may be utilised only to be told that due to the boundary of the Green Wedge running along the frontage of the site that no development would be allowed in accordance with the</p>		411		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>current Green Wedge policies.</p> <p>It is my view that any Green Wedge policy should be determined on the basis of the individual landscape and topography of a particular site and not just determined by a line drawn upon a map without any common sense or thought being applied to this process</p> <p>.In relation to "Pendell" it is my belief and that of independent experts that the site is more in keeping with the nearby built environment which is only approximately 3 metres from the site frontage than the Green Wedge in which it currently is located.Indeed this was highlighted during the previous Local Plan consultation in 2004 but was not accepted by the Planninig Inspector. A landscape appraisal has been conducted which includes the following observations:</p> <p>1.From an analysis of the site,it is clear that Pendell site does not share the same landscape characteristics as the remainder of the Green Wedge</p> <p>2, There are strong reasons why the site could be considered as not contributing in large part to the landscape characteristics of the Green Wedge and that the llandscape character of the site is more in keeping with that of adjacent residential areas than the open farmland of the Green Wedge.</p> <p>3.The curtilage of the site is domestic in character.</p> <p>4.Pendell site is an enclosed space.</p> <p>5.The site is non agricultural and previously developed land.</p> <p>6.The site does not come into any of the criteria describing Green Wedge landscape as it is not high quality farmland.</p> <p>7.It is concluded that the inclusion of Pendell within the Green Wedge is inappropriate.</p> <p>The site has been presented as a potential site for development as part of the Thanet Local Plan call for sites 2018 process. It is my view that this site should be removed from the applicable Green Wedge for the reasons as oulined above.I note that the local</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						authority acknowledges that in certain situations, development within the Green Wedges may not be detrimental to the aims of this policy and I would submit that this most certainly applies to Pendell as it has become redundant and somewhat "marooned" as a result of the current Green Wedge policy.I submit that this site could be a useful asset for potential development as affordable/social housing which would be in keeping with the adjacent built environment and thereby alleviate the need to utilise greenfield building land without having any adverse impact upon the Green Wedge in which it is currently located.The site is unique in that there are no other similar properties located in such close proximity to an existing heavily developed housing estate so development of the site would not lead to other potential sites located within the green wedge as suggested by the current Green Wedge policy. As a footnote I would add that I have canvassed the views of both local developers and councilors all of whom have stated that the site would be an excellent addition to the Millmead estate and provide valuable extra social/affordable housing potential.				
Coombs	Joshua	292			Support	Soft edging and Green Wedges should be adopted to soften any development and create a natural environment so that the new developments are phased in with existing homes and buildings whilst creating the essential space and wildlife corridors needed after the destruction of more green environment.		857		Web
Dale	Joanne	234			Observation	Where is the woodland in these green wedges? The plan mentions isolated belts of woodland and an opportunity to enhance wildlife habitats. This plan needs more detail, particularly since these green wedges appear to be at risk of encroachment from both urban and business development. There's not a lot of wild space in Thanet and that that is needs more protection and to be more easily available to residents for recreational use. Hedgerows and wildflower strips need reinstating by farmers to provide habitats and food for our struggling wildlife.		860		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						https://www.guardian.com/environment/2018/jan/03/wildflower-planting-on-farms-boosts-birds-from-skylarks-to-starlings https://businesswales.gov.wales/farmingconnect/posts/benefits-hedgerows-and-trees-agriculture https://www.guardian.com/commentisfree/2018/mar/26/wildlife-modern-farming-insects-birds?CMP=share_btn_fb				
Dove	Clare	298			Observation	<p>As a member of Thanet Trees where is the woodland in these green wedges? The plan mentions isolated belts of woodland and an opportunity to enhance wildlife habitats - this plan needs a lot more detail, particularly since these green wedges appear to be at risk from encroaching urban and business development. There is a dearth of wild spaces in Thanet and these pockets of woodland need more protection and need to be made available for easier recreational use by locals. Where are the birds? We have lost half of our wildlife in the UK in the last 50 years and probably more in Thanet. Farms need to reinstate hedgerows (including trees) and wildflower strips, which will provide homes for the wildlife we are losing at an alarming rate.</p> https://www.theguardian.com/.../wildflower-planting-on-farms-... https://businesswales.gov.wales/.../benefits-hedgerows-and-tr... https://www.theguardian.com/.../wildlife-modern-farming-insec...		909		Web
Fitzpatrick	Mary	281	Faithful Companions of Jesus	Iwan Jones - JIG Planning & Development	Object	<p>These representations are solely made in respect of Policy SP 22 - Safeguarding the Identity of Thanet's Settlements which reads as follows.</p> <p>Within the Green Wedges new development (including changes of use) will only be permitted if it can be demonstrated that the development is</p> <p>1. not detrimental or contrary to the following aims to:</p> <ul style="list-style-type: none"> • Protect areas of open countryside between the towns from the extension of isolated groups of houses or other development. • Ensure physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness. • Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape 	<p>To reflect our stance and evidence provided in the previous section (3), it is proposed in the first instance that the expanse of the Green Wedge is reduced as per the plan shown at Figure 2. This reintroduces the brownfield element only of Stella Maris Convent with its vast footprint back to within the urban boundary which is logical and perfectly sensible. The greenfield which denotes the northern 50% of the site is proposed to remain Green Wedge within the countryside. The urban boundary delineation has also been re-directed for consistency and as per our</p>	853		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet.</p> <ul style="list-style-type: none"> • Increase access and usability without compromising the integrity of the Green Wedges. <p>Or</p> <p>2. essential to be located within the Green Wedges. Open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies, the wider objectives of this plan and the stated aims of this policy. If granted, any associated built development must be kept to a minimum, essential, small in scale and be necessary to support the open use. It should also be well related to adjacent urban edge and sensitively located to retain openness of the area.</p> <p>Proposals for policy compliant development that includes measures that will create or enhance wildlife habitats and biodiversity within the Green Wedges, or will improve the quality of the Green Wedges by providing high quality public amenity space will be supported.</p> <p>These representations are made in respect of the property, Stella Maris Convent and on behalf of the FCJ. The property is located on the west side of North Foreland Road, Broadstairs which is considered to be within the built confines of the town of Broadstairs. A location plan is provided at Figure 1 [please see pdf attachment] where the full extent of Stella Maris Convent is outlined in red. It is worth noting at this juncture that Stella Maris Convent was not put forward as part of the Council's 'Call for Sites' process. Notwithstanding this, it is confirmed that the property will become available for development during the Plan period up to 2031. It can also be said that the property is suitable and deliverable for residential development. The FCJ would also wish to confirm that it is only the existing built-up area of the site, circa 50% of the entire site, that would be sought for redevelopment in the future. There is no desire to propose any development on the remaining 50% of the site which is greenfield.</p> <p>The principles and objective of Policy SP22 are understood and acknowledged. We concur that Green Wedges perform a highly significant function by way of perception of space, greenness and their openness. This is important as it adds to the quality of life and well-</p>	<p>representation submitted In respect of Policy SP21.</p> <p>Secondly, it is proposed that the wording of Policy SP22 is amended by the deletion of the wording (including changes of use) as shown underlined [in capital letters] below. This is considered to be unnecessary and particularly onerous</p> <p>Within the Green Wedges new development (INCLUDING CHANGES OF USE) will only be permitted if it can be demonstrated that the development is</p> <p>1. not detrimental or contrary to the following aims to:</p> <ul style="list-style-type: none"> • Protect areas of open countryside between the towns from the extension of isolated groups of houses or other development. • Ensure physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness. • Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet. • Increase access and usability without compromising the integrity of the Green Wedges. <p>Or</p> <p>2. essential to be located within the Green Wedges.</p> <p>Open sports and recreational uses will be permitted subject to there being no overriding conflict</p>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>being perceived by people in the community. Retaining separation between Thanet's towns and villages is also supported and accepted.</p> <p>However, we consider that the extent of the Green Wedge designation is too expansive, particularly as it washes over Stella Maris Convent which comprises substantial built form and which is clearly within the built confines of the urban fabric of Broadstairs. It is our view that Policy SP22 as currently drafted could potentially hinder and frustrate, in the future, any proposed redevelopment, conversion or change of use of an existing brownfield site that could contribute towards the Council's housing land supply. We consider that this conflicts with the National Planning Policy Framework (NPPF) and thus it represents our objection to the Policy as currently drafted.</p> <p>The purpose of the planning system as advised by the NPPF (para 7) is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives- economic, social and environmental. Part of the environmental objective includes 'making effective use of land'- para 8 c).</p> <p>Within the Plan period up to 2031, Stella Maris Convent will become available for redevelopment or change of use. It is therefore important that brownfield sites such as this benefit from a flexible and positive policy position so that an effective use of the land can be made in the future, contributing towards the achievement of sustainable development.</p> <p>So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development- para 11. For Local Plan making this means that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. It is our view that Policy SP22 is insufficiently flexible to adapt in the event that brownfield sites such as Stella Maris Convent become available for redevelopment or change of use in the future.</p> <p>Para 35 of the Framework advises that local plans are</p>	<p>We consider that the representations made in respect of Policy SP22 and the property Stella Maris Convent, to be sufficiently robust to warrant an amendment to the urban boundary in this particular location so that the brownfield element of the site only is excluded from the countryside and its current Green Wedge designation. However, we wish to retain our right to make personal representations at the Examination should it be deemed necessary.</p>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p> <p>a) Positively prepared- providing a strategy which, as a minimum is consistent with achieving sustainable development. c) an appropriate strategy. d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>As previously mentioned, 'making effective use of land' contributes to the overarching principle of</p> <p>achieving sustainable development.Policies contained with the new Thanet Local Plan must be consistent with that aim. It is not considered that the current expanse of the Green Wedge or the draft</p> <p>wording of Policy SP22 would be consistent with the policies of the Framework and could actually</p> <p>discourage and prevent 'the effective use of land' from occurring in respect of certain sites. This goes</p> <p>against the grain of what the planning system seeks to achieve and would not contribute towards the</p> <p>aim of sustainable development.</p> <p>Stella Maris Convent will, in the period up to 2031 become available for redevelopment, conversion</p> <p>or change of use. It is in part a brownfield site with substantial built form and it is only that part of the</p> <p>site that the FCJ would propose for redevelopment. It is not the intention to develop on any part of</p> <p>the field that represents the remaining circa 50% of the site which is proposed to be retained as green,</p> <p>undeveloped and open space. However, it cannot be the intention of the emerging Local Plan and</p> <p>Policy SP22 to stifle and discourage the future use of a brownfield site and for it to become vacant,</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>dilapidated and unused. The objective must be to create a positive policy framework that would</p> <p>enable the redevelopment or change of use of such buildings in order to achieve an 'effective use of the land'.</p> <p>The NPPF elaborates further on the objective of 'making effective use of land' in section 11. Here, at para 117 it advises that;</p> <p>'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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.</p> <p>This encourages the re-use of sites such as Stella Maris Convent focusing on its built-up area only. The policies within the emerging plan should therefore follow suit to enable the use of previously developed land without the imposition of restrictive and onerous wording that would frustrate the delivery of housing on such sites.</p> <p>Para 118 adds that planning policies and decisions should: 'give substantial weight to the value of using suitable brownfield land within settlements for homes'.</p> <p>As previously mentioned, the site is situated within the built envelope of the settlement of Broadstairs. The site is not isolated but represents a continuation of built form when heading north out of Broadstairs. On the opposite side of North Foreland Road, built form protrudes significantly further northwards to that of Stella Maris Convent. It is our opinion that it is the Lighthouse and the North Foreland Estate that denotes the commencement of the settlement of Broadstairs in this direction - these are denoted on the site location plan at Figure 1. The site should therefore be taken out of the Green Wedge designation as it is within the urban boundary of Broadstairs.</p> <p>Figure 2 illustrates our proposed revision to the urban boundary and the extent of deletion of the Green Wedge thus re-introducing the brownfield only part of the site back to being within the settlement of Broadstairs. The</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>northern half of the site which is a greenfield is proposed to remain as Green Wedge and within the countryside. Figure 2 also shows that part of the proposed revision to the urban boundary includes land that is not within the ownership of the FCJ- this is the land to the south.</p> <p>To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed (para 59 of the Framework).</p> <p>Para 68 advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.</p> <p>Thanet's housing provision up to 2031 is 17,140 homes. This represents a tall order given that only 1,555 homes were built in the period 2011-16. To give the Council the best chance of meeting this target, it must encourage the re-use of brownfield sites. Indeed, the Council would be putting itself at a disadvantage by not encouraging brownfield sites to come forward to help in achieving its housing target.</p> <p>Stella Maris Convent would represent a small housing site which would be attractive to the SME housebuilder which the Government is seeking to encourage and support. This further emphasises the need to encourage the re-use of brownfield sites for redevelopment and would represent a further positive knock-on effect of the site coming forward for development in the future.</p> <p>To conclude, underpinning the National Planning Policy Framework is the objective of 'making effective use of land'. Policies within the emerging Thanet Local Plan should be reflective of that overarching principle. As currently drafted, Policy SP22 and the expanse of the Green Wedge is a 'catch all' mechanism which is not truly in the spirt of 'making effective use of land' or delivering sustainable development.</p> <p>The Green Wedge designation and the draft Policy SP2.2 would frustrate the future redevelopment of brownfield sites which conflicts with the Framework as it advises that planning policies should 'give substantial weight to the value of using suitable brownfield land within settlements for homes' - para 118. The advice by Central</p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>Government through the Framework is therefore clear and conclusive.</p> <p>When brownfield sites, such as Stella Maris Convent become available for redevelopment, the new Local Plan should contain policies that encourages their re-use and redevelopment.Indeed, should policies hinder and frustrate the re-use of suitable brownfield land which then becomes vacant, vulnerable and dilapidated then the site would cause more harm to the appearance of the Green Wedge than if it was to be redeveloped, subject to good design obviously. By utilising the footprint only of current brownfield sites, the extent of the Green Wedge also would not be diminished which is the primary purpose of Green Wedge designation.</p> <p>The expanse of the Green Wedge designation should therefore be reduced so as not to propose a 'catch all' approach which would prevent 'effective use of land' from occurring and being realised and would hinder the use of brownfield land. This would be contrary to National Planning Policy. To improve the soundness of the Plan, the expanse of the Green Wedge is proposed to be reduced as per the plan shown at Figure 2.</p> <p>It is therefore respectfully requested that having regard to all of the above, the brownfield element of Stella Maris Convent is taken out of the countryside through a re-alignment of the urban boundary and that the same area of the site is not designated as Green Wedge thus becoming unaffected by the constraints of Policy SP22.</p>				
Friend	William	266	Friend Growers - P03798	Jeanne Taylor - Lee Evans Planning	Object	See attached Statement	See attached Statement	802	p03798.reps on behalf of friend growers.pre-submission thanet local plan july 2018.04-10-2018.pdf (105 KB)	Web
Giddins	Rod	62			Support	I welcome the importance given to protecting the “green wedges” and other open spaces in Thanet. These are vital to retain the character of the district for the benefit of residents and visitors to this densely populated area.		171		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Gregory	Amelia	316	Thanet Trees https://www.facebook.com/groups/2138824569723508/		Observation	<p>Green Wedges:</p> <p>https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9430900</p> <p>Thanet Trees asks where is the woodland in these green wedges? The plan mentions isolated belts of woodland and an opportunity to enhance wildlife habitats - this plan needs a lot more detail, particularly since these green wedges appear to be at risk from encroaching urban and business development. There is a dearth of wild spaces in Thanet and these pockets of woodland need more protection, and need to be made available for easier recreational use by locals. Where are the birds? We have lost half of our wildlife in the UK in the last 50 years and probably more in Thanet. Farms need to reinstate hedgerows (including trees) and wildflower strips, which will provide homes for the wildlife we are losing at an alarming rate.</p> <p>https://www.theguardian.com/environment/2018/jan/03/wildflower-planting-on-farms-boosts-birds-from-skylarks-to-starlings</p> <p>https://businesswales.gov.wales/farmingconnect/posts/benefits-hedgerows-and-trees-agriculture</p> <p>https://www.theguardian.com/commentisfree/2018/mar/26/wildlife-modern-farming-insects-birds?CMP=share_btn_fb</p>		964		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	<p>it is felt essential that the essentially rural and unspoilt character and distinctive landscape qualities of the countryside be conserved and protected and it is hoped therefore that this part of Policy SP22 will be taken into account and not overruled.</p>		135		Web
Jones-Hall	Samara	295			Object	<p>The Draft Local plan has pushed housing on to greenfield sites where there is little or no additional infrastructure. Turns villages into towns. Rather than use an unused brownfield site.</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</p>	893		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
							<p>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+ 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</p>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
							<p>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>			
Lee	A	133			Object	Do not build on green wedges!		326		Web
Lorenzo	Peter	37	The Broadstairs Society		Support	The Society supports this policy		79		Web
Ransom		153			Observation	<p>The viability of the Green Wedges as farmland is questionable as the areas are comparatively small and inaccessible. This is also true of their value in keeping the towns separate. There are no signs to distinguish where one town begins and another starts. There is no distinction between Ramsgate and Broadstairs or Ramsgate and Margate. The area around Westwood Cross is particularly confusing. Having lived in the area for over 30 years, I have no idea where one town ends and another starts. Surely it would be better to allow some building within the urban area of Thanet, whilst retaining some of the green areas for recreation, rather than creating a semicircle of housing on the rural areas, which will create a large urban sprawl discouraging to visitors, who will have to plough their way through a lot of traffic to reach the coast.</p>		564		Web
Repsch	John	126			Object	<p>4.7</p> <p>Unfortunately many farmers' fields look more like cabbage deserts, because the farmers have rooted out the hedgerows. In order to recover the patchwork quilt look, we must also recover the hedgerows. Then we would also offer scope for creating wildlife habitats.</p>		741		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Solly	C	419			Observation	<p>Support the use of green wedges, however this should be increased in light of development in this plan. Policy at Westwood appears to show green wedge will be included in that proposal but unclear where that is. Looking at the land in this policy it is much smaller in scale and should be in keeping to the green wedge.</p> <p>Separation and therefore green wedges, should also be added to Birchington/Westgate, Westgate/Garlinge and Shottendane Road (or valley) and Westwood.</p> <p>The council needs to decide what will be protected in perpetuity. Windfall applications could lose opportunities to do so with ever increasing development.</p> <p>The policy should also be protected against land swap or viability concerns. 2 case of where this has happened was on 2 planning applications</p> <p>OL/TH/15/1303 St Lawrence College College Road RAMSGATE Kent CT11 7AF, where the sports field was moved into the green wedge, promoting the loss of open space (possibly green space)</p> <p>17/00031/REF Former British Gas Site Northdown Road BROADSTAIRS Kent CT10 2UW, where development on the green wedge was required and viability issues raised for affordable housing and infrastructure.</p>	<p>Increase Green wedges especially in the areas of strategic housing. Promote future green wedge needs in advance. Protect green wedge policy against land swap and viability issues.</p>	1226		Email
Stevens	Angela	163			Support	Green wedges should be protected at ALL times.	I think the comments about “providing there is no overriding conflict with other policies” should be taken out. Thanet’s Green Wedges need to be preserved 100% of the time, for ever!	623		Web
Twizell	Heather	512	Natural England		Object	<p>Green Wedges</p> <p>Ideally there should be a clear link in this section of the Plan with the subsequent section on developing Thanet’s Green Infrastructure Network. At present there is not a single reference to the term Green Infrastructure in either the supporting text or the policy covering Thanet’s Green Wedges, yet it is clear from the supporting text that these form a core element of Thanet’s current and future GI Network. Paragraph 4.6 has particular resonance, stating as it does that ‘<i>The Green Wedges are</i></p>		1455		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<i>distinct from other types of open space as they provide a link between the open countryside and land which penetrates into the urban areas.'</i> Policy SP22 - Safeguarding the Identity of Thanet's Settlements We support the final paragraph of this policy around development improving biodiversity or delivering new publicly accessible open space within the Green Wedges.				
Ward	Linda	157			Observation	The green wedges especially between Westgate and Birchington will be eroded to a degree where the villages will lose their intrinsic identities.		452		Web

Document Section Path	Views and Landscapes Map 2 - Landscape Character Areas SP23
Document Part Name	SP23

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/English Heritage		155			Support	Policy SP23 - we support the character area based approach set out in this policy and the intention to reinforce existing character and protect views and the skyline.		930		Email
Alltoft	Wendy	196			Support	Common sense needs to be applied and stop the building on our lovely Isle and leave some green areas and farming areas for future generations. The current council can be very short sighted rather than think about the long term future of our already struggling area.		577		Web
Bacon	Joseph	255			Observation	FOCC proposes that the entirety of the Cliftonville coastline must be considered as a singular and unique landscape in the Local Draft Plan. Concrete proposals must be detailed to protect and enhance this landscape, to make the most of tourism and recreation possibilities, and to urgently protect our crumbling heritage. The Newgate Gap Project will demonstrate how this could be done, by making the most of this special landscape with so much potential. There needs to be a consultation with the community on how best to protect and enhance this landscape. FOCC would like to be involved.		777		Web
Bacon	Joseph	255			Observation	Your development plans for beaches in Cliftonville are unclear. What sort of development would you allow at Walpole Bay for instance? Palm Bay is designated undeveloped		779		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>which makes no sense since it currently supports a cafe, a Jet Ski business, and a huge car park. What does this mean for the rest of the beaches on the stretch between the Main Sands and Walpole Bay?</p> <p>If we want to revitalise the heritage and local amenities of the Cliftonville Coastline these beaches need to be given more detailed consideration. We believe there is scope for sympathetic development within the car park area of Palm Bay, at Walpole Bay (in order to support swimmers) and at the Newgate Gap, in order to bring visitors down to the beach through this historic landscape at a half way point along the Cliftonville Coastline.</p>				
Barar		375			Support	<p>Views and Landscapes. 4.13 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. I fully concur with this stance and would encourage the Council Planning Authority to do likewise having identified SP14 as a strategic site. Within ‘Table 7 – Landscape Character Areas’, Birchington (SP14), is identified as “C: Undulating Chalk Farmland”. This is further defined as “Some of these character areas are important for their long distant views to the marshes and sea while in others the agricultural land performs a settlement separation function. These areas of high-quality agricultural land are of value for farmland and roosting coastal birds. The openness and undeveloped character of the farmland contributes to the essentially rural character and relatively dark skies”. Furthermore “Development proposals</p>		1083		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) and summarised below.</p> <p>All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should demonstrate how the development will take advantage of and engage with these views". I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout within Birchington (SP14) and an achievable way to accomplish this is with the retention of green corridors / wildlife corridors to soften and fragment, new developments. This has been evidenced in the Birchington Parish Council Appraisal 2018 (see attached).</p>				
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Heritage: KCC notes that (unlike earlier drafts of the Local Plan) a separate policy on the 'Protection and Enhancement of Thanet's Historic Landscapes' has not been provided. KCC assumes that the intention is that the goals formerly addressed by this policy will now be addressed by policy SP23 on Landscape Character Areas. However, KCC considers that the text in policy SP23 does not focus on the historic aspects of the landscape in the same way as the former policy.</p> <p>When considering the impact of development proposals in the countryside, it is important to understand the historic development of the landscape so that its essential character can be conserved. The landscape contains many surviving historic features, such as the patterns of tracks, lanes and hedgerows that give character to the district. KCC</p>		1507		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>considers that the policy should ensure that the heritage significance of the landscape is underlined more strongly and recommends that policy includes the following amended bullet point:</p> <p><i>“A sense of openness and 'big skies', particularly in the central part of the District deriving from the unique historic landscape pattern of tracks, lanes and field boundaries”</i></p> <p>Resilience and Emergency Planning: KCC recommends that the reference to tree planting is expanded to include street tree and urban tree cover, as well as the creation of habitats and landscapes.</p>				
Davies	Julie	147	CPRE Kent		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>In respect of the sense of openness and ‘big skies’ (2) note that significant housing development is proposed at Minster and Manston Business Park (on the Manston Chalk Plateau).</p> <p>Please see comments submitted on behalf of CPRE Kent Thanet District Committee on the Landscape Character Assessment consultation.</p> <p>The area of the central plateau provides habitat for a range of rarer farmland birds and wildlife adapted to open grassland. The wildlife value of unmanaged chalk grassland should be acknowledged. The area has local amenity value due to containing large sections of Thanet’s Public Rights of Way network which provide panoramic views across the district and out to sea. The flat nature of the landscape and proximity to local urban areas makes these routes accessible to a variety of users including dog walkers, ramblers and horse riders – being the predominant area for equestrian land use in Thanet including</p>		392		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						two riding schools and some of the larger livery yards, which are located to utilise the PROW network.				
Dawes	Jenny	59			Observation	Greater protection should be afforded to B1 and F1 to protect and preserve the slope down to Pegwell Bay. <u>N</u> onew (residential) development should be permitted in this area. This landscape and the views it affords are of historic importance. This has been confirmed by Historic England's recent surveys for Ramsgate HAZ.		156		Web
Giddins	Rod	62			Observation	Policy SP23 (Landscape Character Areas) is especially important as these are unique to Thanet. However, the Plan should explain how these are not going to be compromised by the proposed growth in housing development, especially at Manston and along the edges of existing urban areas.		172		Email
Gregory	Amelia	119	Friends of Cliftonville Coastline		Observation	FOCC proposes that the entirety of the Cliftonville coastline must be considered as a singular and unique landscape in the Local Draft Plan. Concrete proposals must be detailed to protect and enhance this landscape, to make the most of tourism and recreation possibilities, and to urgently protect our crumbling heritage. The Newgate Gap Project will demonstrate how this could be done, by making the most of this special landscape with so much potential.	There needs to be a consultation with the community on how best to protect and enhance this landscape. FOCC would like to be involved.	281		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	It is to be hoped that all of Policy SP23 will be an integral part of any planning application consideration within the rural areas, except for the last part as it is very unlikely that any development would be for the economic or social well-being of such an area.		136		Web
Jones-Hall	Samara	295			Observation		The Local Plan must support the mixed-use development of	886		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>I strongly object to the Council's decision to continue to prolong this issue and delay any progress or viable development of the Manston site by "proposing not to allocate the Airport site for any specific purpose in the draft Local Plan".</p> <p>Specifically, I believe the council has been negligent in its duties with regards to the DCO Applicant (RSP) proposal 24/7/365 cargo hub and its impact on destroying and diminishing Thanet's landscape character and local distinctiveness.</p> <p>For example Landscape and Tranquility: Ramsgate's historic landscapes would be directly affected by the start of over-flight (day and night) and more indirectly by increased road traffic.</p> <p>Noise from aircraft and air pollution would be intrusive and have a detrimental impact on the appreciation, understanding and enjoyment on the extensive designated and undesignated historic and heritage sites.</p> <p>Historic landscapes – The Royal Harbour, Ramsgate Conservation areas and all areas mentioned above – are a key part of the historic character and heritage of Ramsgate and the tranquility of the historic areas (the Royal Harbour and Conservation Areas) are valued by residents and visitors.</p> <p>There will be a detrimental visual impact on the views from and towards the historic Royal Harbor, which since the closure of the previously failed airport has a steadily growing café culture and independent shops around the Royal Harbour and inside the refurbished Military Road Arches.</p>	<p>the former Manston airport site. 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 Policy SP09-Ramsgate.</p> <p>Commercial aviation is not viable at this location.</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</p>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>RSP's Proposal not only threatens the character of these historical places but the literary, artistic and architectural settings of our heritage which will diminish enjoyment and understanding as well as slow or reverse visitor numbers and tourism spend in the coastal economy in Ramsgate and Thanet.</p> <p>Preserving the tranquility of all these areas including the Ramsgate main sands is not only important for the people that live in these coastal communities but it is also important for the tourism economy and is part of our national heritage and integral to our history.</p>	<p>instead 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>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. Why revert to proven failure of Manston when we can continue to back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Lee	A	133			Object	Preserve landscape and character to be set in stone. There can be no essential economic or social well-being that could justify development of these areas.		327		Web
Lorenzo	Peter	37	The Broadstairs Society		Support	The Society supports the policy although it needs to be policed thoroughly and effectively		80		Web
Repsch	John	126			Object	<p>4.13</p> <p>The view across the fields from Birchington's King Edward Road, Mill Row, Essex Gardens, Surrey Gardens, Minnis Road is almost overwhelming. Some</p>		743		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>residents have claimed that the view was what decided them to move there. The fields are in harmony with the sunsets and the focal point is Reculver. The sight of it brings joy to one's heart. This rich portrait would be masked by rooftops if the housing development were to take place. Contrary to what 4.13 promises with protecting and enhancing the natural and local environment, the opposite would be the case.</p> <p>4.22</p> <p>Quex Park may well be unique, but conservation is not one of the owner's priorities. Many mature trees have been sawn down to make space for commercial enterprises, and events such as weddings and concerts are often accompanied by thundering firework displays. These are most detrimental to wildlife.</p>				
Solly	C	419			Observation	<p>Paragraph 4.21 doesn't appear to be up to date, there should be references to the light pollution from the thanet earth site, especially in the winter months. Please refer to the map in the landscape character assessment document.</p> <p>Minster and Manston business park fall under this policy this area in Thanet is not particularly controlled for sprawl and should include additional mitigation against the landscape and other issues like light pollution.</p> <p>Light Pollution is covered in another policy, but it should be noted that landscapes do cover 24 hours in a day and 365 days in a year. There seems to be a bias towards daylight hours and non seasonable protections.</p>	Consider the development in other policies and how they interact with landscapes. It is not clear what weight is given. Consider that landscapes cover days, night and seasons.	1227		Email
Spanton	Ed	125	Ed Spanton	Howard	Object	see Briefing Note from CSA on views	See attached Briefing Note	312	2914_12_Briefing	Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
			Farms	Courtley - Courtley Planning Consultants Ltd		and landscape.	from CSA		Note.pdf (41 KB)	
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached Briefing Note submission from CSA	see attached Briefing Note from CSA	313	2914_12_Briefing Note.pdf (41 KB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached submission from CSA " Landscape Overview and Concept Master Plan	See attached submission from CSA	695	2914_04_A Landscape Overview for land to west of Cliffs End, Kent_.pdf (7.9 MB)	Web
Tuffs	Jo	79			Support	Thanet District Council should include in this local plan the committment to protecting the unique character of Pegwell Bay; to keep this part of the coast undeveloped and to protect the coastal views which give the district the character it has which is of equal significance as the character of the Lake District or the Fens but far more difficult to define.		198		Web
Twizell	Heather	512	Natural England		Support	<i>Views and Landscapes</i> We have not provided detailed comments on this section as Thanet District does not contain any nationally protected landscapes i.e. AONBs or National Parks. However, it is good to see the Local Plan recognising Thanet's locally valued landscapes and providing policy protection for these.		1456		Email
Ward	Linda	157			Observation	I do not believe the proposed develoment of Birchington would be in keeping with the suggested approach.		454		Web
Wraight	Kenneth	141	1959		Observation	All at risk from a cargo hub		364		Web

Document Section Path	Green Infrastructure Network SP24
Document Part Name	SP24

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/ English Heritage		155			Object	Policy SP24 - we agree with this policy but think there should be an additional bullet point relating to the conservation and enhancement of the character of historic green spaces.		931		Email
Barar		375			Support	<p>The Green Infrastructure Network. I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites. The policy details that “All large development sites will be expected to contribute to Thanet's Green Infrastructure by providing any of the following:</p> <ul style="list-style-type: none"> • Integration of Sustainable Drainage Systems (SuDs) • Planting of hedgerows • Provision of green roofs • Creation of ponds • Creation of urban green corridors • Creation of roadside verges • Tree planting • Provision of off-site enhancements • Provision of space for walking/informal recreation/dog walking in new developments <p>Other suitable planting schemes to provide biodiversity opportunities”</p> <p>All of these options are proactive in retaining and enhancing our natural countryside in whatever format however I must mention the importance of retaining the natural, unmanicured, spontaneity of areas around SP14 which already serve as green corridors / wildlife corridors, albeit, they adjoin farmland (please see the attached photographs of ‘SP499 looking towards Quex Park’ and ‘SP498 looking towards Acol’. Both areas now form part of SP14. These areas serve as corridors for walkers/dog walkers, bird watchers, landscape photographers and cyclists and have done for quite some time. I once again to evidence the importance of these areas, would like to highlight that 69.78% of the people who participated in the Birchington Village Appraisal 2018, consider ‘preserving green space’ and 67.17% consider ‘respecting the landscape’ are issues, they strongly agree, should be retained, strategic site or not. I would urge planners to consider this as all they would have to do is redraught plans to build a little further away from existing housing up to 100 metres. This policy concludes with “Provision of new infrastructure</p>		1084		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>in new developments, particularly for informal recreation and dog walking can help to reduce the impact of visitor pressure on the nature conservation interest at the coast. It can also aid restoration of the landscape, improve biodiversity and improve connectivity between habitats or habitat features such as hedgerows”. I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites.</p> <p>Policy SP24 - Green Infrastructure “All development proposals should respect and where possible, enhance Thanet's Green Infrastructure network by integrating Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between them, should be included early in the design process for major developments. Development should make a positive contribution to Thanet's Green Infrastructure network by:</p> <ul style="list-style-type: none">• Creating new wildlife and biodiversity habitats• Providing and managing new accessible open space for informal recreation/walking and dog walking• Mitigating against the loss of any farmland bird habitats• Providing private gardens and play space;• Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows• Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment guidelines <p>Investment and developer contributions should be directed to improve and expand Green Infrastructure and provide connecting links where opportunities exist”. I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites.</p>				
Cocks	G C	104			Support	The incorporation of "Green Lanes "is a very good idea. Seperation of large blocks of housing will benefit greatly to the "Living Enviroment". These green lanes will suit people and nature alike		229		Email
Cooper	Barbara	514	Kent County Council (KCC)		Object	SUDS: KCC notes that the supporting text on green infrastructure network references the integration of SuDS. It would be beneficial if Policy SP24 made specific reference to		1508		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>such integration for example: “<i>Creating new wildlife and biodiversity habitats, including integration with surface water management.</i>” This would reflect the multi-functional objectives of SuDS within the revised NPPF.</p> <p>PRoW and Access Service: The Kent Design Guidance incorporates consideration of existing and new PRoW routes within traffic free, wide green corridors of open space. Such green corridors provide areas of accessible space and contribute towards the enhancement of local biodiversity and green wedges, potentially incorporating linear features such as native hedgerows, for example. KCC recommends that TDC has consdieration of the Kent Design Guidance, including in the consideration of the ProW network.</p> <p>Resilience and Emergency Planning: It is recommended that TDC considers reference to tree cover within Thanet and how it may be improved in line with the 25 Year Environment Plan.</p>				
Dove	Clare	298			Observation	<p>As a member of Thanet Trees I would like to know how the council can work with us to ensure that trees are planted, protected and promoted to ensure a meaningfully Green Infrastructure. We have already liaised with Dane Valley Woods, Mockett’s Wood and more, and are aware of the challenges and lack of funding these much-needed initiatives face. It is proposed that an overall policy to unite ecological groups is needed, particularly with regards re-wilding places such as Manston where there is the potential to provide really large havens for wildlife. There is also a very real need for more green spaces and tree planting in urban areas - where there are barely any trees and when trees are cut down they are not replaced. The general culture and attitude towards trees needs to be changed, as they are a necessity in the urban environment. For more details on why trees are so important in urban spaces see below.</p> <p>http://www.fao.org/zhc/detail-events/en/c/454543/ https://www.woodlandtrust.org.uk/get-involved/street-trees/</p>		907		Web
Environment Agency		449			Object	<p>Green Infrastructure Network We consider this section “Unsound” as it stands. This section of the Local Plan overlooks an important component of the environment contrary to statements in the National Planning Policy Framework (NPPF). Natural England’s Green Infrastructure Guidance</p> <p>http://publications.naturalengland.org.uk/file/94026 states that “Green Infrastructure also encompasses river systems and coastal environments. Although ponds are mentioned,</p>		1280		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>rivers and coastal environments appear to have been completely overlooked in this section. Policy SP24 - Green Infrastructure should be re-written to clearly include rivers and flowing water. Policy SP24 - Green Infrastructure is deficient by virtue of this omission and needs to be reviewed in light of the NPPF's recognition of the importance of rivers as wildlife corridors in Section 174 on Habitats and biodiversity. It would be appropriate to add rivers (all flowing water) into the policy where there is reference to linear features: "Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows and rivers"</p> <p>Biodiversity: International and European Sites As the Environment Agency might identify sites in the District that are required for compensatory habitat for implementation of Shoreline Management Plans, the protection accorded to such sites, even if not designated, should be mentioned in accordance with Section 176 of the NPPF which states that "sites identified, or required, as compensatory measures for adverse effects on habitats sites" "should be given the same protection as habitats sites." Strategic Access Management and Monitoring Plan (SAMM) and the Thanet Coast Project We support the principles here for a levy and for amendments to the charging scheme. Is effective monitoring of outcomes included in the proposal?</p>				
Gregory	Amelia	316	Thanet Trees https://www.facebook.com/groups/2138824569723508/		Observation	<p>Green Infrastructure Network:</p> <p>https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9431156</p> <p>Thanet Trees would like to know how the council can work with us to ensure that trees are planted, protected and promoted to ensure a meaningfully Green Infrastructure. We have already liased with Dane Valley Woods, Mockett's Wood and more, and are aware of the challenges and lack of funding these much needed initiatives face. It is proposed that an overall policy to unite ecological groups is needed, particularly with regards re-wliding places such as Manston where there is the potential to provide really large havens for wildlife. There is also a very real need for more green spaces and tree planting in urban areas - where there are barely any trees and when trees are cut down they are not replaced. The general culture and attitude towards trees needs to be</p>		966		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>changed, as they are a necessity in the urban environment. For more details on why trees are so important in urban spaces see below.</p> <p>http://www.fao.org/zhc/detail-events/en/c/454543/ https://www.woodlandtrust.org.uk/get-involved/street-trees/</p>				
Johnson	Elisabeth	51	Monkton Residents Association		Observation	How this is going to take place in amongst all the planned development i am not sure but it certainly should.		137		Web
Kirkaldie	Malcolm	382			Object	<p>The state of Thanet’s sport and open space is a joke and this plan fails to address how it expects to maintain any Sport and Open space let alone increase the above for the amount of over expansion of houses in Ramsgate. I see no evidence that TDC has even looked at or respond to the MENE by Natural England which significantly impacts on the viability of this current plan.</p> <p>The fact is that putting church yards and verges/walkways in to pad out public open space/Green wedges does not cut it. The failure to deal with the need for more open space and Sports Pitches in Ramsgate for the proposed increase of houses is against policy. On the question of allotments this plan fails to plan for the increase? The plan should indicate that it supports a bid to have the Seafront promenade from East to West on the register of Parks/Gardens and include it and the Conservation areas as THI’s.</p>		1124		Web
Lorenzo	Peter	37	The Broadstairs Society		Support	The Society supports this policy		81		Web
Millwood Designer Homes Limited		508	Millwood designer Homes Limited	Anna Gillings - Gillings Planning Ltd	Object	As with policy SP20, this policy as drafted is overly restrictive and does not allow for site specific circumstances to be taken into account. The fifth bullet point requires the introduction of linear features , such a native hedgerows. Although there is no objection to the principle of native hedgerows, the policy requires <i>all</i> development to provide such features. There will be circumstances, such at Westgate, where the use of overly linear features may not be appropriate (particularly if this is interpreted to be applied to the design of green corridors for example).	<p>The policy should therefore be amended to read:</p> <p>“Development should make a positive contribution to Thanet's Green Infrastructure network by:</p> <ul style="list-style-type: none"> • Creating new wildlife and biodiversity habitats • Providing and managing new accessible open space for informal recreation/walking and dog walking • Mitigating against the loss of any farmland bird habitats 	1434	Gillings Millwood.pdf (74.4 MB)	Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
							<ul style="list-style-type: none"> • Providing private gardens and play space; • Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows, where appropriate • Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment guidelines” 			
Repsch	John	126			Observation	<p>SP24 - 4.30</p> <p>High on the priority conservation list should be skylarks, which are endangered. They can often be heard at the back of King Edward Road - but for how much longer?</p> <p>Much biodiversity can be given a boost by retaining private gardens. Paving over gardens leads to flooding and loss of wildlife habitats, in the same way that concreting and tarmac-ing over great swathes of farmland does.</p>		745		Web
Samme	Linda	16	Manston Parish Council		Object	It is no good providing more green spaces, verges etc, when you cannot maintain what we have already		271		Web
Shoul	Matt	402			Object	<p>I wish to reiterate my concerns over inadequately detailed areas of the Draft Local Plan:</p> <p>As a founder member of FOCC - Friends of Cliftonville Coastline - I endorse & include the FOCC statement about the lack of explicit commitment within the draft plan to the vital importance of preserving existing trees in our urban spaces & in our streets & a policy of increasing the number of trees in Thanet generally & in particular the towns within Thanet:</p>		1166		Email
Sykes	Anthony	31			Observation	We need to keep our open spaces as Thanet has one of the lowest ratios of natural open spaces. Many of our current agricultural land house a wide variety of wildlife. Take for instance the land at the back of Garlinge and Westgate we have only just seen the return of flocks of skylarks. Thanet also lacks trees and a massive planting is needed to enhance the environment and combat pollution.	It pays lip service to green concerns.	58		Web
Twizell	Heather	512	Natural		Object	Green Infrastructure Network		1457		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
			England			<p>Paragraph 4.34 – we welcome the use of our definition of Green Infrastructure.</p> <p>Paragraph 4.36 – for increased clarity we would suggest altering the wording of the final sentence to ‘All large development sites will be expected to contribute to Thanet's Green Infrastructure by providing an <i>appropriate mix</i> of the following:’ Large development sites should have the capacity to provide a variety of GI elements but those chosen should be in keeping with the surrounding landscape and habitats.</p> <p>Paragraph 4.37 – Natural England notes your authority’s intention to produce a Green Infrastructure Strategy. We would strongly support this and would welcome the opportunity to work with you on it at the earliest opportunity.</p> <p>There is currently no reference in the supporting text (Paragraphs 4.29 – 4.37) or in Policy SP24 to the wider ecosystem services which good GI can provide including healthy water and nutrient cycles, improved air quality, managing flood risk and water pollution and minimising the effects of climate change. More direct benefits to local communities should also be picked up including enjoyment of the natural environment and improved health and wellbeing.</p> <p><i>Policy SP24 - Green Infrastructure</i> This policy already contains a number of good points, particularly around providing new publicly accessible open space and requiring large developments to design in GI at an early stage. However, as per our comments on the Vision we see GI as a key issue for Thanet, and so would like to suggest a number of amendments to the policy to improve its clarity and to draw in more of the points covered in the supporting text. For your convenience we have reproduced the policy in its entirety below, and indicated with strikethroughs and bold text the changes we recommend.</p> <p><i>All development proposals should respectprotect and where possible, enhance Thanet's Green Infrastructure network by integrating multi-functional Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between them and creating new ones should be included early in the design process for major developments along with consideration of how they will be managed and maintained in the long term.</i></p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p><i>Development should make a positive contribution to Thanet's Green Infrastructure network by:</i></p> <ul style="list-style-type: none">o <i>Creating new wildlife and biodiversity habitats</i>o <i>Providing and managing new accessible open space, including linear routes, for informal recreation/walking and dog walking</i>o <i>Mitigating against the loss of any farmland bird habitats</i> <i>(This would sit better under SP27)</i>o <i>Providing private gardens and play space;</i>o <i>Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges (including the introduction of linear features such as</i>o <i>native hedgerows where appropriate)</i>o <i>Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment guidelines</i> <p><i>Planning new GI assets to maximise their provision of ecosystem services including (but not limited to) improved air quality, natural flood management and climate change adaptation.</i></p> <p><i>Investment and developer contributions should be directed to improve and expand Green Infrastructure and provide connecting links where opportunities exist.</i></p>				
Ward	Linda	157			Observation	How can you be mitigating against the loss of farmland bird habitat when you are proposing to destroy farmland?		455		Web

Document Section Path	Biodiversity: International and European Sites SP25
Document Part Name	SP25

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Cooper	Barbara	514	Kent County Council (KCC)		Object	Biodiversity: KCC recognises that the reference to legislation for the Habitat and Specifies Regulation should be updated to 2012, as opposed to 2010		1509		Email
Kirkaldie	Malcolm	382			Object	<p>This aspect of this draft and its predecessor is appalling TDC has acted in an inappropriate way in this plan. The plan indicates Sandwich Bay as a significant area when its not even close to Pegwell Bays significance the two cannot be compared. Pegwell Bay has very reasonable public access Sandwich Bay is a private Estate and its in another LA area. There are open landscape issues where TDC has failed to protect the views over what was a stunning panorama and the lack of tree planting. On the question of tree planting TDC cannot monitor and enforce that aspect in the plan as it has not got a proper enforcement team to ensure any planning gain.</p> <p>TDC needs to get to grips with Natural heritage visitors and place in the local plan that they wish to build a Visitor Field centre at Pegwell bay.</p> <p>The plan needs to address the remediation issue of contaminated land near sensitive sites. Its no good putting out a consultation on biodiversity when we don't have a clue whats going to happen?</p>		1120		Email
Newing	April	322	Dover District Council		Support	<p>International Wildlife Sites</p> <p>The District Council supports paragraph 4.41 in the draft Local Plan to 2031 which identifies the Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site as a cross boundary matter. Additionally, DDC supports Policy SP25: Protection of the International and European Designated Sites which requires the consideration of the potential impact of future development proposals on environmentally designated sites, as well as associated mitigation measures.</p> <p>DDC's Thanet Coast SPA Mitigation Strategy (2012) monitors the potential impact of increased development in the Dover District on the qualifying bird species of the Thanet Coast and Sandwich Bay SPA. This Strategy is supported by an ongoing visitor disturbance study at Pegwell Bay and Sandwich Bay. As part of DDC's Local Plan Review, the evidence base to support the Strategy</p>		983		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						(2012) is currently being updated. In addition, a review of approaches being taken by neighbouring authorities across East Kent is ongoing to determine whether an equitable approach is being taken or whether there are any lessons to be learned for DDC. Future engagement with TDC on the outcomes of this work would be welcomed.				
Ransom		153			Object	Whilst supporting the policy's main principles, I feel it is imperative that NO development is allowed on these sites under any circumstances. Wildlife is under serious threat and needs to be protected at all costs.		567		Web
Solly	C	419			Observation	Para 4.39 - Update paragraph when able to refer post Brexit policies or directives, as EU policies may not be in law	Consider EU policies when the UK leave the European union.	1228		Email
Stevens	Angela	163			Observation	Re SP25, these special conservation areas don't seem to have been applied or even considered before allowing nearby Brett's onto Port Ramsgate, polluting the areas!		624		Web
Twizell	Heather	512	Natural England		Object	<p><i>Biodiversity: International and European Sites Policy SP25 - Protection of the International and European Designated Sites</i></p> <p>We welcome the efforts that your authority has made to ensure that this policy is factually correct and fit for purpose and appreciate having had the opportunity to provide comment on informal drafts. The only element that now requires alteration is the reference to the Habitats Regulations as these were revised last year – the policy should correctly refer to ‘The Conservation of Habitats and Species Regulations 2017.’</p> <p><i>Strategic Access Management and Monitoring Plan (SAMM) and the Thanet Coast Project</i> Paragraph 4.45 – this paragraph explaining the rationale behind the Zone of Influence (ZOI) for the Thanet Coast SAMM (namely the entirety of Thanet District) is currently quite unclear although we note that it has been taken verbatim from the SAMM Plan Main Report. However, it has been taken from the Executive Summary section and we believe that in this case compression has led to a loss of clarity. We suggest that you may wish to rephrase it along the following lines: <i>The zone of influence around a European designated site is the geographical area within which people will travel to visit it. To keep it to a manageable extent a zone of influence is usually set so as to capture the majority of visits or visitors, rather than every single one. The whole of Thanet District falls within a 6km radius of the</i></p>		1458		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<i>SPA boundary and evidence has shown the zone of influence for the site to extend further than this. Therefore residents from all new housing in Thanet have the potential to increase recreational pressure on the SPA and the mitigation approach set out in the SAMM strategy applies to the entire District.</i> Paragraph 4.48 – there is a typographical error here – the sentence should refer to the Thanet Coast Project.				
Ward	Linda	157			Observation	Your approach sounds fine but your plans would place natural sites at risk, especially the coastal marshes at Birchington.		456		Web
Wraight	Kenneth	141	1959		Support	All at risk from cargo hub		365		Web

Document Section Path	Strategic Access Management and Monitoring Plan (SAMM) and the Thanet Coast Project Table 8 - SAMM Tariff SP26
Document Part Name	SP26

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Barar		375			Support	Strategic Access Management and Monitoring Plan (SAMM) and the Thanet Coast Project. I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites. In conclusion, the council state “Policy SP26 - Strategic Access Management and Monitoring Plan (SAMM)” All proposals for new residential development will be required to comply with the Strategic Access Management and Monitoring Plan (SAMM) in order to mitigate against the in-combination effects of new development, through the pathway of recreational pressure on the Thanet Coast SPA and Ramsar site. A financial contribution based on the current tariff in table 8 and any subsequent amendments, is required in-perpetuity towards an access management scheme. This will be collected via a S106 payment. Developments for other uses that would increase recreational activity causing disturbance to qualifying species will be assessed on a case by case basis under the Habitat Regulations and may be required to make full or partial contributions towards the SAMM Plan if appropriate”. Therefore, I wish to state that with the retention of green corridors / wildlife corridors, around the strategic site SP14, funding to ensure its maintenance and preservation for qualifying species, can be included in funds collected via a S106 payment. I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites.		1085		Email
Dawes	Jenny	59			Support	The implications of the possible return of aviation to Manston make nonsense of this policy		157		Web
Sykes	Anthony	31			Observation	I am pleased that the work of the Thanet Coast project is valued. However I cannot see how the disturbance of wildlife can be avoided with the massive increase of new homes in the area. Our Coast is a major natural resource and needs protecting. The tariff is unlikely to mitigate these effects and is likely to disappear into the council coffers.		59		Web
Thompson	Andrew	162	Canterbury City Council		Support	We support draft Policy SP26 which will provide an appropriate mechanism to raise necessary funding to		478		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						deliver SAMMS and to mitigate the impacts of development in respect of the Habitat Regulations.				
Twizell	Heather	512	Natural England		Object	<p><i>Policy SP26 - Strategic Access Management and Monitoring Plan (SAMM)</i></p> <p>We have provided previous comments on this policy and are pleased to see that the majority of them have been incorporated. We would suggest one further, minor re-wording to improve clarity.</p> <p>The current wording of the sentence covering payment of the tariff makes it seem as though the payment must be made in perpetuity rather than a one-off payment going towards an in-perpetuity scheme. We would suggest moving the reference to in-perpetuity as follows:</p> <p><i>A financial contribution based on the current tariff in table 8 and any subsequent amendments, is required in in perpetuity towards an in perpetuity access management scheme.</i></p> <p><i>Protection, Conservation and Enhancements of Biodiversity Assets</i></p> <p>Paragraph 4.50 – Please note that the second sentence in this paragraph should refer to Natural England’s Standing Advice for protected species only. To date we have not produced any Standing Advice in relation to protected sites as is incorrectly stated here.</p> <p>Paragraph 4.52 – we would query the reference to ‘important species’ in this paragraph as the policy which it is introducing goes far beyond this.</p>		1459		Email
Ward	Linda	157			Observation	Not enough!		457		Web

Document Section Path	Protection, Conservation and Enhancements of Biodiversity Assets SP27
Document Part Name	SP27

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Barar		375			Support	<p>Protection, Conservation and Enhancements of Biodiversity Assets.</p> <p>4.50 Species protected under the Wildlife and Countryside Act, the Protection of Badgers Act, the Habitats Directive or listed in the Natural Environment and Rural Communities Act (Section 41) may be present on sites and would be a material consideration in the assessment of development proposals. Natural England have produced Standing Advice for protected sites and species in relation to planning applications which provide details of the potential existence of protected species, advice on whether survey reports are required, guidance on the survey requirements for protected species and advice on mitigation proposals. Developers should have regard to this advice as appropriate. 4.51 The open countryside within Thanet is known to support a number of important species as is recognised in the international and national designations. In addition, Thanet is also important for farmland birds due to its large areas of farmed countryside. Farmland birds have declined over the last few decades and so it is important to ensure that remaining populations are protected and allowed to increase. The Green Wedges which are a largely arable landscape, provide a dispersal route for migratory bird species which are present on the coast, especially during the winter season. Changing farming practices within the Green Wedges would help to increase populations of farmland and migratory birds by enabling more ecologically diverse habitat to be created. 4.52 The following policy seeks to protect, maintain and enhance biodiversity and wildlife, by recognising that important species should be protected and requires this to be considered in determining planning applications for development.</p> <p>In conclusion, the council state “SP27 - Biodiversity and Geodiversity Assets Development” proposals will, where possible, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets through the following measures:</p> <ol style="list-style-type: none"> 1. the restoration / enhancement of existing habitats, 2. the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development 3. the creation of linkages between sites to create local and regional ecological networks, 4. the enhancement of significant features of nature conservation value on development sites. <p>On sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be</p>		1086		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>present, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority”. I wish to comment that with the retention of green corridors / wildlife corridors this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites. Evidencing this policy, is the results of the latest Birchington Village Appraisal 2018 (see attached) which shows the majority of Birchington residents, attach significant importance to this issue, namely, 69.78% of the people who participated in the Birchington Village Appraisal 2018, consider ‘preserving green space’ and 67.17% consider ‘respecting the landscape’ an important issue. Furthermore, the District Council have a duty to conserving biodiversity – please see: https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity). This is confirmed with the following statement: 4.53 The Natural Environment and Rural Communities Act 2006 places a duty on public authorities to conserve biodiversity. The Council has been working with the Kent Nature Partnership to identify Biodiversity Opportunity Areas (BOAs) within the district in response to those priority habitats and species identified through the Kent Biodiversity Action Plan.</p>				
Blackburn	Camilla	385	Kent Wildlife Trust		Observation	<p>Thank you for inviting Kent Wildlife Trust to respond to your consultation on site allocations and policies within the draft Thanet Local Plan. We would like to take this opportunity to commend you on the content of this document with regard to the protection of the natural environment. We would like to make a few recommendations, as follows: The Trust fully supports the policies in Chapters 4 and 12. However, given the implementation deadline of the new NPPF, it may be advisable to reference the wording from the new NPPF (particularly paragraph 17 4) regarding 'mapping and safeguarding' and 'net gain'. This will make it clearer that policies within these Chapters are a requirement of the NPPF.</p>		1132		Email
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Biodiversity: KCC notes this his policy refers to the need for ecological surveys, however it does not make it clear that surveys are needed for all sites. Even when sites only have low number of protected/notable species, there is still a need for surveys and mitigation to be submitted with the planning application.</p> <p>Resilience and Emergency Planning: KCC recommends that the following sentences are considered by TDC for inclusion within this policy:</p> <p>5. Permanently wet sustainable urban drainage features should be sought</p>		1510		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>where technically feasible to provide benefits for aquatic wildlife</p> <p>6. Nativespecies should be used within landscaping schemes to enhance biodiversity and biosecurity</p> <p>7. Integralniches for wildlife should be incorporated into new development, such as swift bricks and bat tubes</p> <p>8. Wildlifefriendly gullies and other drainage features should be conditioned</p> <p>9. Boundaryfeatures suchas fences and walls should incorporate gaps to facilitate ‘hedgehog highways’</p> <p>10. Where trees are felled to make way for developments a proportion of resultant cordwood should be incorporated into landscaping schemes to provide a habitat for organisms reliant upon dead wood</p> <p>11. Landscapeand EcologicalManagementPlans shouldbe conditionedwherea ppropriate to ensure appropriate longer-term management of new and existing habitats</p>				
Dawes	Jenny	59			Support	Strongly support this policy but it is unsustainable if aviation returns to Manston		158		Web
Environment Agency		449			Object	Protection, Conservation and Enhancements of Biodiversity Assets Policy SP27 - Biodiversity and Geodiversity Assets. We find this policy “unsound” for the following reasons. The revised NPPF no longer includes the clause “where possible” with respect to the need for development proposals to “make a positive contribution to the conservation, enhancement and management of biodiversity”. All proposals must make a positive contribution. The Local Plan should also make it clear how the delivery of such positive gains be monitored.		1281		Email
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Important that this takes place wherever possible.		138		Web
Twizell	Heather	512	Natural England		Object	<p>SP27 - Biodiversity and Geodiversity Assets</p> <p>Given that both SP25 and GI01 (covering internationally and nationally designated nature conservation sites respectively) are both entirely protectionist in nature, we would advise that SP27 is a key policy to achieving the creation of coherent ecological networks across Thanet District.</p> <p>For future development in Thanet District to deliver for the wider natural environment the designated sites should be acting as reservoirs of species, with Policy SP27 making provision for buffering these, linking them and helping habitats and species to move and expand through the wider environment. High quality designated areas are central to resilient landscape and ecosystems but they are only part of the puzzle. They are a key component in establishing the large core areas and networks that are the building blocks for resilience - providing refugia and stepping stones supporting adaptation to climate change, and for delivering wider ecosystem benefits. Policy SP27 needs to make provision for the key principles for wildlife sites from the Lawton Review</p>		1460		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						(Making Space for Nature, 2010) – bigger, better, more and joined up. We would recommend adding a fifth point to this policy, ‘ <i>Mitigating against the loss of any farmland bird habitats</i> ’ as we believe this sits better here than under SP24.				
Wright	Kenneth	141	1959		Support	Think of the animals if cargo hub goes ahead		366		Web

Document Section Path	Protection, Conservation and Enhancements of Biodiversity Assets SP28
Document Part Name	SP28

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Barar		375			Observation	<p>4.54 The Biodiversity Opportunity Areas identify where the maximum biodiversity benefits can be achieved and the greatest gains can be made from habitat enhancement, restoration and recreation. These areas offer the best opportunities for establishing large habitat areas and/or networks or wildlife habitats. Thanet has two BOAs:</p> <ul style="list-style-type: none"> • Thanet Cliffs and Shore - covers the majority of the internationally and nationally designated coastal habitats, extending through Thanet as far as Whitstable. • Lower Stour Wetlands - The Lower Stour wetlands extend from the mouth of the old Wantsum channel across reclaimed marshland to the former mouth of the river Stour, and then continue around the coast to the Sandwich mudflats and sand dunes and the Lydden Valley. <p>4.55 As well as these identified sites, there is potential for habitat creation and enhancement in the Green Wedges, and sites designated for nature conservation. The Council will work with landowners, developers and other appropriate organisations to improve the opportunity for biodiversity. Developments should take into account their contribution to wildlife and seek to improve habitat connectivity in the wider area where appropriate through suitable landscaping schemes and new provision which can help to address the issues associated with the impact of climate change.</p> <p>4.56 The following policy aims to meet the strategic objective of protecting, maintaining and enhancing biodiversity.</p> <p>Policy SP28 - Biodiversity Opportunity Areas</p> <p>The Council will support proposals that enhance, maintain and protect the identified Biodiversity Opportunities Areas, particularly where proposals increase the biodiversity value of the site.</p> <p>Acknowledging that there are currently only two BOAs in Thanet, retention and enhancement of green corridors / wildlife corridors around SP14 will go some way to the creation of more and indeed, around any other sites identified as strategic. Therefore, more detailed information should have been available at this stage of SP14 as a strategic site – this is my only concern at</p>		1087		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						representation stage.				
Environment Agency		449			Object	SP28 - Biodiversity Opportunity Areas We support the objectives of this Policy. Climate Change Para 4.97: The Climate Local Kent Commitment is referred to as having an aim to "Reduce water consumption from 160 to 140 litres per person per day by 2016". This does not seem relevant to a plan for 2018-31, and invites comment. In 2016-17, average consumption in Southern Water's Kent Thanet Resource Zone was reported as 136 litres per person per day, and in 2017-18 it was 133 litres. Consumption varies according to the weather in the year in question. You may wish to reconsider the wording of the paragraph.		1282		Email
May	Raymond	238			Observation	The Council aims to protect, maintain and enhance biodiversity in the Thanet area. How does this equate to the reduced area of farmland that 17,000 houses would result in? Where would be the protection and enhancement of biodiversity at the Pegwell Bay Conservation area when RSP's 24/7 cargo hub develops and overflies the area?		799		Web
Twizell	Heather	512	Natural England		Support	Policy SP28 - Biodiversity Opportunity Areas Natural England welcome the provision of a policy covering the BOAs.		1461		Email

Document Section Path	Protection of Open Space SP29
Document Part Name	SP29

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/ English Heritage		155			Object	Policy SP29 -we support the intention of this policy but think reference to the historic significance of many green spaces have should be included; e.g. add 'heritage significance' into the final sentence.	reference to the historic significance of many green spaces have should be included; e.g. add 'heritage significance' into the final sentence.	932		Email
Barar		375			Object	<p>Protection of Open Space.</p> <p>Regarding policy statements 4.57 to 4.62, I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites. However, I feel policy statement 4.63 which states “For other developments, where provision cannot be made on site, or where an existing play space lies within the walking distance guideline of a proposed development the Council will seek a financial contribution either towards new provision or improvement of an existing facility. Applicable schemes may include the improvement of facilities at Hartsdown and improved provision at Jackey Baker's sports ground and proposed expansion” is unsound. Provision of green corridors / wildlife corridors in their current natural state around strategic area SP14 would simply requite the redrafting of the current housing plan tendered to accommodate it.</p> <p>Also, the improvement of Hartsdown and/or Jackie Baker’s sports ground is hardly local to Birchington and instead of being able to enjoy an open space within walking distance from anywhere in the village, residents would need to use their car or rely on public transport to reach these areas. Environmentally and preferentially, this is a poor substitute to replace what we have now and what could be lost forever when considering the protection of open space. This part of the proposed policy is not positively prepared, not justified and questionably effective. However, this policy concludes with “4.64 The following policies meet the objectives of promoting physical and mental well-being, safeguarding and enhancing the geological and scenic value of the coast and countryside, retaining the separation between Thanet’s towns and villages and enhancing biodiversity and the natural environment”, this continues:</p> <p>Policy SP29 - Protection of Open Space</p> <p>“Proposals which would result in the loss of protected open space</p>	<p>Applicable schemes may include the improvement of facilities at Hartsdown and improved provision at Jackey Baker's sports ground and proposed expansion” is unsound. Provision of green corridors / wildlife corridors in their current natural state around strategic area SP14 would simply requite the redrafting of the current housing plan tendered to accommodate it.</p> <p>Also, the improvement of Hartsdown and/or Jackie Baker’s sports ground is hardly local to Birchington and instead of being able to enjoy an open space within walking distance from anywhere in the village, residents would need to use their car or rely on public transport to reach these areas. Environmentally and preferentially, this is a poor substitute to replace what we have now and what could be lost forever when considering the protection of open space. This part of the proposed policy is not positively prepared, not justified and questionably effective.</p>	1089		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>as shown on the policies map either through built development or a change of use will only be permitted if:</p> <p>1. It is for an open recreation or tourism use and is of appropriate scale and design for its setting. Any related built development should be kept to the minimum necessary to support the open use and be sensitively located.</p> <p>2. There is an overriding need for development that outweighs the need to protect open space which cannot be located elsewhere. In this case provision of alternative open space of at least an equivalent size and quality must be provided in a suitable nearby location.</p> <p>3. There would be no material harm to the contribution the protected open space makes to the visual or recreational amenity of the area.</p> <p>New development that is permitted by virtue of this policy should make a positive contribution to the area in terms of siting, design, scale, use of materials and biodiversity”.</p> <p>I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors.</p>				
Dale	Joanne	234			Object	<p>As noted, open space is rare in Thanets' urban areas, and trees are increasingly scarce, particularly in urban areas, where there seems to be a systematic removal of trees which are never replaced. We have barely any mature trees in Thanet. Those in parks must be protected, and new trees must be planted wherever possible - particularly where they can provide protection, both from wind and Sun. Where there is little open space, trees provide sanctuary, greenery and places for wildlife to flourish. Why are trees not being considered in the Protection of Open Space Strategy?</p> <p>Research shows that trees and green space can lower blood pressure, slow down heart rate and bring down stress.</p> <p>https://www.royalties.org.uk/parks/the-reagents-park/things-to-see-and-do/gardens-and-landscapes/tree-map-why-trees-are-important</p>		718		Web
Davies	Julie	147	CPRE Kent		Object	<p>It will be important that relocated sites are not only in a suitable nearby location but that it is easily accessible from the area it has been relocated from. Suggest that in the two above polices the phrase ‘and accessible’ is inserted after ‘suitable’ and ‘nearby</p>	Point 2 should read: There is an overriding need for development that outweighs the need to protect open space	393		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						location’.	which cannot be located elsewhere. In this case provision of alternative open space of at least an equivalent size and quality must be provided in a suitable and accessible nearby location.			
Dove	Clare	298			Observation	<p>As noted, open space is a rare commodity in Thanet’s urban areas, and trees are also increasingly scarce, particularly in urban areas, where there seems to be a systematic removal of trees which are never replaced. We have barely any mature trees in Thanet, with all the benefits they bring. Those in parks must be protected, and new trees must be planted where possible - particularly where trees can provide protection, both from wind and sun. Where there is little open space trees can provide some sanctuary, providing greenery and places for wildlife to flourish. Thanet Trees demands to know why trees are not considered in the Protection of Open Space strategy.</p> <p>“Research shows that within minutes of being surrounded by trees and green space, your blood pressure drops, your heart rate slows and your stress levels come down.”</p> <p>https://www.royalparks.org.uk/.../tre.../why-trees-are-important</p>		911		Web
Gregory	Amelia	119	Friends of Cliftonville Coastline		Observation	<p>In Cliftonville in particular there are very few open spaces and yet there is no plan which specifies where these are or what type they are. There are also very few of the amenities which are mentioned here. FOCC proposes that local site drawings need to be included which show open spaces (and what typology they are designated) whether active or of heritage value. The disused amenities and Cliftonville Coastline as a whole need to be part of an overall regeneration plan. For instance the disused buildings built into the Newgate Gap need to be brought back into community use and the old Crazy Golf site needs to be made available to the community once again as it is meant to be.</p>	Better plans need to be made available.	253		Web
Gregory	Amelia	316	Thanet Trees https://www.facebook.com/groups/2138824569723508/		Observation	<p>Protection of Open Space</p> <p>https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9431508</p> <p>As noted, open space is a rare commodity in Thanet’s urban areas, and trees are also increasingly scarce, particularly in urban areas, where there seems to be a systematic removal of trees which are never replaced. We have barely any mature trees in Thanet, with all the benefits they bring. Those in parks must be protected, and new trees must be planted where possible - particularly where trees can provide protection, both from wind and sun. Where</p>		963		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>there is little open space trees can provide some sanctuary, providing greenery and places for wildlife to flourish. Thanet Trees demands to know why trees are not considered in the Protection of Open Space strategy.</p> <p>“Research shows that within minutes of being surrounded by trees and green space, your blood pressure drops, your heart rate slows and your stress levels come down.”</p> <p>https://www.royalparks.org.uk/parks/the-regents-park/things-to-see-and-do/gardens-and-landscapes/tree-map/why-trees-are-important</p>				
Hudson	Pam	240	Mrs		Observation	<p>In Cliftonville in particular there are very few open spaces and yet there is no plan which specifies where these are or what type they are. There are also very few of the amenities which are mentioned here. FOCC proposes that local site drawings need to be included which show open spaces (and what typology they are designated) whether active or of heritage value. The disused amenities and Cliftonville Coastline as a whole need to be part of an overall regeneration plan. For instance the disused buildings built into the Newgate Gap need to be brought back into community use and the old Crazy Golf site needs to be made available to the community once again as it is meant to be.</p> <p>Better plans need to be made available.</p>		733		Web
Stevens	Angela	163			Object	<p>P29 - Protection of Open Spaces proposal 2 - reply: There is NO overriding need anywhere in Thanet for development that outweighs the need to protect open space. Thanet is unique in that it is made up of top Class 1 and 2 agricultural land which should be protected for National use post Brexit, as well as now. The government algorithm of housing need does NOT fit all areas of the UK. Thanet is a prime example, being surrounded by water on 3 sides and consisting of 3 main coastal towns and villages of various sizes. To plan for thousands of houses, with no proof or evidence of need in the area, is ludicrous.</p>	Policy EC4 and SP05 also need to be given consideration in the Protection of Open Spaces section. Inspector Nunn of the Planning Inspectorate, decreed the Manston Airport site still an airport for aviation use only. It is omitted from most of this emerging Local Plan and the DCO, which has been accepted for examination, has been ignored too!	479		Web
Stevens	Angela	163			Object	<p>SP29 get out clause 2 in the summary, means that land is NOT protected at all if officers choose to allow Planning applications through!</p>	Take out the get out clauses which do NOT protect the land.	625		Web
Sykes	Anthony	31			Observation	<p>Not safe enough to protect. Open to abuse.</p>		60		Web
Ward	Linda	157			Observation	<p>There is no over-riding need on farmland. Use the 4000 unused</p>		458		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						houses and brownfield sites to satisfy local need.				

Document Section Path	Local Green Space SP30
Document Part Name	SP30

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Bacon	Joseph	255			Support	Cliftonville in particular, has very few open spaces and yet there is no plan which specifies where these are or what type they are. There are also very few of the amenities which are mentioned here. FOCC proposes that local site drawings need to be included which show open spaces (and what typology they are designated) whether active or of heritage value. The disused amenities and Cliftonville Coastline as a whole need to be part of an overall regeneration plan. For instance the disused buildings built into the Newgate Gap need to be brought back into community use and the old Crazy Golf site needs to be made available to the community once again as it is meant to be."		778		Web
Barar		375			Support	<p>Local Green Space</p> <p>4.65 "Local Green Spaces can be designated by communities through the local or neighbourhood planning processes. As set out in the NPPF, once designated, a Local Green Space will be afforded the same protection as Green Belts and new development will not be permitted other than in very special circumstances. The NPPF sets out the circumstances under which Local Green Spaces can only be designated:</p> <ul style="list-style-type: none"> • The green space is in reasonably close proximity to the community it serves. • The green area is demonstrably special to a local community and holds a particular local significance. • The green area concerned is local in character and is not an extensive tract of land". <p>I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors. Evidencing this response, it is the intention of Birchington Parish Council to setup and Implement its own Parish Council Neighbourhood Plan, whose policies concur with the recent Birchington Parish Council Village Appraisal 2018 (see attachment) and also http://www.birchington-pc.gov.uk/council/neighbourhood-plan/</p>		1090		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						One of the fundamental policies to be set up in the Neighbourhood Plan is the retention of unmanicured green corridors / wildlife corridors around Birchington (SP14).				
Darling	Steve	197	Dane Valley Woods		Support	<p>I am writing on behalf of the Steering Group of Dane Valley Woods.</p> <p>We wish to register our support for the designation of Dane Valley Woods as a Local Green Space under Policy SP30, following our previous submission with associated documentation on 14 March 2017 (attached).</p> <p>Steve Darling, Secretary (Dane Valley Woods).</p>		573	DVW_Aerial Map.pdf (348 KB) DVW_OS Map.pdf (193 KB) DVW_Detailed Submission for Local Green Space.pdf (22 KB) DVW_Land Management Plan 2014-2018.pdf (5.8 MB)	Web
Dunn	Danielle	499	Broadstairs & St.Peter's Town Council		Support	The Town Council supports Policy SP30. However, the Neighbourhood Development Plan now allocates policies.		1402		Email
Field		178	Dane Valley Woods		Support	Specifically in support of the preservation of Dane Valley Woods, this is possibly the only area of new woodland creation in Thanet, and recent wildlife surveys and tree health have demonstrated the long-term success of this project, despite the small team and miniscule budget that looks after it. It will only increase its relevance to the local community as a green space as it matures.		515		Web
Gregory	Amelia	119	Friends of Cliftonville Coastline		Support	What is the status of Coastal areas as green spaces along the cliffs? These do not seem to be considered.	There needs to be a better definition of green space - where do our coastal areas fit in?	252		Web
Hudson	Pam	240	Mrs		Observation	What is the status of coastal areas? We at FOCC believe these should be dedicated green spaces.		732		Web
Matterface	Jennifer	15	CT10 Parochial Charities		Object	<p>I am objecting as Chair of the CT 10 Parochial Charities to the inclusion of Culmer's Amenity Land in the Local Plan under SP 30.</p> <p>The land in question is privately-owned forming part of the Charity of Richard Culmer who left 6 acres of land in the</p>		24		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>centre of Broadstairs to the Vicar of St. Peter-in-Thamet Church in 1485 so that the income could be used for the benefit of the 'poor and needy'.</p> <p>There was no consultation or information notified to the charity's trustees that this land was to be included in the Open Green Spaces part of the Local Plan and, in fact, the town clerk, Danielle Dunn, confirmed this is an email to the then charity Chair, John Welsh, in an email dated 22/11/17. As a result we were unable to comment at that point.</p> <p>The land is currently leased to Broadstairs and St. Peter's Town Council as a source of revenue for the charity so that the trustees and the charity can continue to help many who are referred to us by statutory and non-statutory agencies including schools, QEQM Hospital, Social Services, The Beacon Mental Health Unit and other bodies. It is currently the only income raised for the Charity of Richard Culmer, one of seven local charities under the umbrella of CT10 Parochial Charities.</p> <p>Were this land to be included in the Local Plan as 'open green space' it would lose its value with the result we would fail in our fiduciary obligation to raise income for the Charity of Richard Culmer to assist the 'poor and needy' of Broadstairs and St. Peter's.</p> <p>We, therefore, request this privately-owned land be removed from the Local Plan.</p>				
Mayall	C	473	Southern Water		Object	<p>As currently worded, Southern Water cannot support this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure.</p> <p>During the time frame of Thanet's Local Plan, Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance (NPPG) recognises this scenario and states that <i>'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new</i></p>		1358		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p><i>buildings) which mean otherwise protected areas may exceptionally have to be considered’.</i> Therefore, utility infrastructure is considered to constitute the ‘very special circumstances’ envisaged by paragraph 76 of the National Planning Policy Framework 2012 (NPPF).</p> <p>As noted in paragraph 4.65 of the supporting text to Policy SP30, Local Green Space designation affords the same protection to land as green belt status and acknowledges that there may be ‘<i>very special circumstances</i>’where other considerations outweigh potential harm of a development within the Green Belt. In the case of utility infrastructure, one of these considerations would be that it supports sustainable development, in line with one of the core planning principles identified in the NPPF and the NPPG (Paragraph: 007 Reference ID:37-007-20140306) which states ‘<i>Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area</i>’.Furthermore, Paragraph 90 of the NPPF identifies ‘<i>engineering operations</i>’ as one of the forms of development which are ‘<i>not inappropriate in Green Belt</i>’. Southern Water therefore considers the current wording of Policy SP30, which sets out 4 circumstances (not including essential utility infrastructure) in which built development will only be permitted, does not take account of the relevant criteria of the NPPF and NPPG set out above.</p> <p>Southern Water is unable to support Policy SP30 as sound because seeks to restrict the 'very special circumstances' in which development may be permitted in an otherwise protected area, as envisaged by the NPPF. We consider that this is inconsistent with national policy, in particular paragraphs 76, 88 and 90 of the NPPF and Paragraph: 007 Reference ID:37-007-20140306 of the NPPG. 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 SP30 (new text <u>underlined</u>):</p> <p><i>[...] Proposals for built development on a Local Green Space will only be permitted in the following circumstances:-</i></p> <p><i>1) the built form is minimal and essential to the operation of the Local Green Space;</i></p> <p><i>2) the development represents a suitable extension to an existing structure</i></p>				

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						3) <i>the development is an acceptable or reuse of an existing building on the site</i> 4) <i>the development is essential for public safety.</i> 5) <u><i>the development is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available</i></u>				
Twyman	Paul	324			Object	SP 30 - local green space - should include the two Birchington sites, suggested by Mr Solly.	SP 30 - local green space - should include the two Birchington sites, suggested by Mr Solly.	994		Email

Document Section Path	Provision of accessible natural and semi-natural green space SP31
Document Part Name	SP31

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Barar		375			Support	<p>Provision of accessible natural and semi-natural green space</p> <p>4.67 The provision of larger areas of open space will be delivered most appropriately through strategic allocations and should be considered integral to the masterplanning of development proposals.</p> <p>4.68 The Open Space Strategy (2017) identifies an under provision of natural and semi-natural green space based on the fields in trust guidelines of 1.8ha per 1,000 population, of 190.19ha by 2031. New developments will be required to make provision in line with the Fields in Trust guidelines.</p> <p>4.69 Alternative natural and semi-natural open space on new developments can also help to relieve some of the recreational pressure on the coast particularly that associated with the impact on protected species as highlighted in the Strategic Access Management and Monitoring Plan (SAMM).</p> <p>4.70 The following policy seeks to ensure the recommended provision of natural and semi natural green space, parks, gardens and recreation grounds is provided for and will contribute to Thanet's Green Infrastructure network.</p> <p>Policy SP31 - Provision of Accessible Natural and Semi Natural Green Space, Parks, Gardens and Recreation Grounds</p> <p>The Council will require suitably and conveniently located areas of usable amenity space, adequate to accommodate the demands for passive recreation generated by residential development. New greenspace provision should, where possible, be linked to existing greenspace, Green Wedges and/or the wider countryside and public rights of way network, away from the coast, to maximise its value. Such provision should seek to enhance the opportunities for biodiversity.</p> <p>1. Sites of 50 dwellings or more will be required to provide natural and semi natural green space and local parks, formal gardens, allotments and recreation grounds to meet the standards set out in Table 7. Natural and Seminatural green space will be expected to improve the biodiversity potential of the area</p> <p>2. The Council will expect appropriate arrangements for</p>		1091	083 Bara John Birchington attachment.pdf (769 KB)	Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>maintenance and management to be made. The responsibility for which will be vested in a particular individual, or, subject to commuted payment to meet such costs, in the district, town or parish council. Such arrangements will be secured by entering into a planning agreement.</p> <p>3. Any areas of accessible natural and semi natural green space, parks, gardens and recreation grounds created by virtue of this policy will be protected from development by policy SP29- Protection of Open Spaces.</p> <p>I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors. Evidencing this policy, is the results of the latest Birchington Village Appraisal 2018 (see attached) which shows the majority of Birchington residents, attach significant importance to this issue, namely, 69.78% of the people who participated in the Birchington Village Appraisal 2018, consider ‘preserving green space’ and 67.17% consider ‘respecting the landscape’ an important issue.</p>				
Cooper	Barbara	514	Kent County Council (KCC)		Object	PRoW and Access Service: KCC is supportive of this policy and its intention to link new greenspace to the public rights of way network to provide important links to the wider countryside.		1511		Email
Kirkaldie	Malcolm	382			Object	<p>The state of Thanet’s sport and open space is a joke and this plan fails to address how it expects to maintain any Sport and Open space let alone increase the above for the amount of over expansion of houses in Ramsgate. I see no evidence that TDC has even looked at or respond to the MENE by Natural England which significantly impacts on the viability of this current plan.</p> <p>The fact is that putting church yards and verges/walkways in to pad out public open space/Green wedges does not cut it. The failure to deal with the need for more open space and Sports Pitches in Ramsgate for the proposed increase of houses is against policy. On the question of allotments this plan fails to plan for the increase? The plan should indicate that it supports a bid to have the Seafront promenade from East to West on the register of Parks/Gardens and include it and the Conservation areas</p>		1125		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						as THI's.				
Ptarmigan Land and Millwood Designer Homes		493	Ptarmigan Land and Millwood Designer Homes	Joshua Mellor - Barton Willmore LLP	Object	6.4 Policy SP31 (Provision of Accessible Natural and Semi Natural Green Space, Parks, Gardens and Recreation Grounds) highlights that sites in excess of 50 dwellings are required to provide green space to meet the standards as set out in "table 7". Whilst the acknowledgement of specific standards of green space is supported, the referenced standards (table 7) are not included in the draft Local Plan. To ensure the plan is effective, and therefore found "sound", the required standards need to be added		1387		Email
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Observation	The Attached CSA Landscape Overview and Concept Master Plan conforms with Policy SP29; SP30 and SP31	See attached submission from CSA	698	2914_04_A Landscape Overview for land to west of Cliffs End, Kent_.pdf (7.9 MB)	Web
Twizell	Heather	512	Natural England		Object	<p><i>Provision of accessible natural and semi-natural green space</i></p> <p>Paragraph 4.69 – we would strongly urge you to consider removing this paragraph in its entirety. We feel that its inclusion could provide a hook for developers trying to avoid making the appropriate contribution to the Thanet Coast SAMM. Table 3 in the SAMM Main Report makes it clear that while the provision of on-site greenspace in new developments may help to an extent it is not sufficiently well supported by the evidence to form an element of the SAMM Strategy. The provision of natural and semi-natural open space should be pursued on the grounds that it forms part of genuinely sustainable development and contributes to the health and wellbeing of local residents.</p> <p>Notwithstanding the above concern Natural England fully supports Policy SP31 - Provision of Accessible Natural and Semi Natural Green Space, Parks, Gardens and Recreation Grounds</p>		1462		Email

Document Section Path	Allotments SP32
Document Part Name	SP32

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Davies	Julie	147	CPRE Kent		Object	It will be important that relocated sites are not only in a suitable nearby location but that it is easily accessible from the area it has been relocated from. Suggest that in the two above polices the phrase 'and accessible' is inserted after 'suitable' and 'nearby location'.	Point 1 should read: There is an overriding need for development that outweighs the need to protect the allotments which cannot be located elsewhere. In this case provision of alternative allotment space of at least an equivalent size and quality must be provided in a suitable and accessible nearby location to serve existing users.	394		Web
Samme	Linda	16	Manston Parish Council		Object	Allotments are a very good way of letting people grow things for themselves/others. They should NEVER be built on		272		Web
Stevens	Angela	163			Object	The above statement protects allotments unless officers choose not to! Disgraceful procedure!		626		Web
Ward	Linda	157			Observation	an overriding need can always be found where profit is concerned!		459		Web
Ward	Linda	157			Observation	Allotments are a valuable community asset and should be preserved as such.		463		Web

Document Section Path	Quality Development SP33
Document Part Name	SP33

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/English Heritage		155			Support	Policy SP33 - support.		933		Email
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Provision and Delivery of County Council Community Services: KCC welcomes the use of design review as a tool for design dialogue and design quality management though TDC may want to keep their options broader in the SP 33; that developers may be required to seek a review other than just in those instances listed in their draft. Those instances could be examples rather than a finite list.</p> <p>There are a range of other tools to help ensure that new development is built to the highest attainable quality which could be included. In particular, further consideration could be given on how to engage communities in the development of their settlements as early as possible so that they are involved in the design too.</p>		1512		Email
Lorenzo	Peter	37	The Broadstairs Society		Support	The Society supports this policy		82		Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Observation	Land west of Cliffsend will comply with Policy SP33	Development of land west of Cliffsend will comply with Policy SP33 and the NPPF and NPG.	699		Web
Ward	Linda	157			Observation	No quality is high enough to compensate for the destruction of high grade agricultural land.		464		Web

Document Section Path	Heritage SP34
Document Part Name	SP34

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/English Heritage		155			Object	Policy SP34 - we support the policy; consideration could be given to specific reference to 'heritage at risk' in the second bullet point.	consideration could be given to specific reference to 'heritage at risk' in the second bullet point.	934		Email
Barar		375			Support	<p>Policy SP34 - Conservation and Enhancement of Thanet's Historic Environment</p> <p>The Council will support, value and have regard to the historic or archaeological significance of Heritage Assets by: Thereafter please refer to point 4 which states “Facilitating the review of Conservation Areas and the opportunities for new designations”</p> <p>I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors. Evidencing this policy, is the results of the latest Birchington Village Appraisal 2018 (see attached) which shows the majority of Birchington residents, attach significant importance to this issue, namely, 69.78% of the people who participated in the Birchington Village Appraisal 2018, consider ‘preserving green space’ and 67.17% consider ‘respecting the landscape’ an important issue.</p>		1092	083 Bara John Birchington attachment.pdf(769 KB)	Email
Bianchi	Tania	144			Support	<p>We have been living in Cliftonville for more than three decades.</p> <p>Regarding</p> <p>1. protecting the historic environment from inappropriate development,</p> <p>2. encouraging new uses where they bring listed buildings back into use, encouraging their survival and maintenance without compromising the conservation of the building or its historical or archaeological significance,</p> <p>cited in Policy SP34 - Conservation and Enhancement of Thanet's Historic Environment:</p> <p>We suggest the heritage and amenity assets of Cliftonville and Margate are given the much needed and deserved care and attention, including funding and support for community initiatives (like the The Newgate Gap Project).</p> <p>There is deep fondness for the Victorian and Edwardian architecture especially along the coastline (e.g. original</p>		375		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>shelters where walkers can take a rest while enjoying the green and the seaside panorama, or the maintenance of unique historical buildings like Ethelbert Crescent) and also Art-Deco examples like the Lido Complex or the popular Winter Gardens.</p> <p>Maintaining historic identity is an effective way to raise pride in the community, value and respect for the environment and attraction for tourism both for leisure and business events.</p> <p>As the Policy SP34 states, we also believe that working with property owners and community initiatives (besides stakeholders) both protect and enhance the historic environment. For these reasons, we strongly advise the council to support and endorse community initiatives and property owners aiming to restore the built environment to its former grandeur which would then be seen as an asset and encourage further investment in this area.</p>				
Gregory	Amelia	119	Friends of Cliftonville Coastline		Observation	<p>In line with all of the above, FOCC suggests that there needs to be a concrete plan put in place to restore and rejuvenate the Cliftonville coastline in particular. At present there appears to be recognition of the importance of our heritage landscape, and key features such as the Winter Gardens and the Lido whilst not having a cohesive strategy to develop and look after the whole area. The coastline was created to be enjoyed as a whole, and so it must be considered once more, if visitors and locals are to make the most of this unique and special environment. We propose that there is an urgent need to protect and restore those heritage assets most at risk, and consider, through communication with the local community, how best amenities could be updated to accommodate modern lifestyles. FOCC propose that the Newgate Gap shelter and management of the surrounding landscape will become a pilot project to show how this could be done, and our members would like to be included in any future discussions.</p>	FOCC suggests that there needs to be a concrete plan put in place to restore and rejuvenate the Cliftonville coastline in particular, taking into account both the heritage of the area and the need for amenities to accommodate modern lifestyles. Our members would like to be included in future discussions on how to make this happen.	279		Web
Hartley	Tricia	510	Ramsgate Town Team		Observation	<p><u>Historical features:</u> We would like to see the Plan recognise the huge number of sites of historical interest in Ramsgate. (For the recent Heritage Open Days, for example, by far the most places open in Thanet were in Ramsgate.) We believe the Local Plan should:</p> <p>Focus on Ramsgate as a tourist destination for its historical as well as its coastal interest, in conjunction with community groups and Historic England. Ramsgate's HAZ should be highlighted, along with TDC's plans to work with HE & the community to preserve, enhance & make the most of</p>		1439		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						Ramsgate's historical assets. Commit to rigorous use of TDC's enforcement powers to ensure that buildings in the Conservation Area are properly maintained. (The reference to the dilapidated buildings in the town centre is galling when residents depend on TDC to enforce building maintenance and this does not happen.) Commit to ensuring that, where sites of historical interest are earmarked for housing or other new uses, frontages and as many original features as possible are preserved to maintain the streetscape (eg the old Gas Works, Police Station and Fire Station.)				
Jones-Hall	Samara	295			Observation	<p>I strongly believe TDC has been both irresponsible and negligent in its duties in refusing to allocate a specific purpose for the Manston site and by supporting a purpose that will have a signifiant and severe impact upon Ramsgate and Thanet's ability to achieve all if not any of its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, 2P36, E05, E06, E10</p> <p>RSP's Proposal omits loss or harm to the significance of designated and non-designated heritage assets and their settings, from physical works or indirectly, e.g. through surface transport or over-head flights. These include but are not limited to:</p> <ul style="list-style-type: none"> - Ramsgate has the only Royal Harbour in the UK (1821); - Ramsgate has its own Meridian Mean Time is 5 minutes 41 seconds ahead of Greenwich Mean Time; - Ramsgate Maritime Museum is in the Clock House on the quayside in Royal Harbour, where the Ramsgate Meridian is situated; - Four Gold Anchor Award complex marina is situated in the Royal Harbour; - Shrine of St Augustine; - Ramsgate Montefiore Synagogue & Mausoleum are designated by Jewish Heritage UK as one of the Top Ten Synagogues of Britain; - Royal Temple Yacht Club (1857) and the title Royal was confirmed in 1897; 	<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</p>	899		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>- Sailors’ Church and Harbour Mission (1878);</p> <p>- Royal Victorian Pavilion;</p> <p>- Around 900 listed buildings of which five are Grade I and eleven are Grade II and 400 are residential;</p> <p>- Ramsgate is second only to London for its Georgian and Victorian buildings and only to Bath for its Regency architecture;</p> <p>- Home to the Grange the first so-called 'modern' house, built by architect Augustus Pugin, who designed the interiors of the House of Parliament;</p> <p>- Ramsgate Tunnels (the UK’s largest network of Civilian Wartime tunnels);</p> <p>- Ramsgate’s Royal Esplanade is a conservation zone and the buildings, including the croquet clubhouse, are Grade II listed;</p> <p>- Wellington Crescent Lift is Edwardian and over 100 years old and currently a working cliff lift in Ramsgate;</p> <p>- Awarded the first Heritage Action Zone in 2017 by Historic England;</p> <p>- Ramsgate’s history can be traced back to 449 AD and includes landings by Anglo-Saxons, Romans and Saints;</p> <p>- Ramsgate has a rich history of Literary, Architecture and Art heroes.</p> <p>St Augustine (the first Archbishop of Canterbury) landed nearby to bring Christianity to England. St Laurence-In-Thenet Church (St Laurence-In-Thenet Church) churchyard extends to three and a half acres and contains over 1400 graves dating back as far as 1656. Ramsgate was an important garrison town in the Napoleonic Wars and in 1821 around 40,000 men were landed here. Ramsgate rallied behind the war effort when it became a main point of departure for the “Little Ships” that crossed to Dunkirk to rescue Allied troops.</p> <p>Samuel Taylor Coleridge, Arthur Ransome, Wilkie Collins, Vincent Van Gogh, Sir Francis Cowley Burnand, James Tissot, Stanislaw de Karłowska, Anthony Buckeridge, Elizabeth Fry, Hans Christian Anderson, Daniel Defoe and Jane Austen,</p>	<p>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+ 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>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>whose brother lived in the town. Charles Dickens also performed on stage in the Town. Karl Marx and his daughter lived here. Charles Darwin stayed here, and the World's Greatest Showmen, Buffalo Bill and PT Barnum, both brought their circus shows to town. The latter also brought General Tom Thumb. James Tissott painted 15 paintings of Ramsgate. Joseph Mallord Turner painted Ramsgate's Royal Harbour. Vincent Van Gough inked a View of Royal Road Ramsgate whilst working as an assistant schoolmaster here in Ramsgate. Augustus Pugin is regarded as being one of Britain's most influential architects and designers designed many of the buildings around Ramsgate.</p> <p>William Powell Frith's 'Ramsgate Sands' proved a great success with the public. Its reception at the Royal Academy in 1854 was so enthusiastic that a guard-rail was installed to protect it from the crowds keen to examine the details at close hand. Queen Victoria expressed an interest in buying it. Queen Victoria had visited Ramsgate several times with her mother between 1825 and 1836 and had stayed in Albion House (now a successful boutique hotel since the airport has closed), visible in Frith's composition as the highest building overlooking the beach. Many of Ramsgate seafront remains the same and is visible in Frith's painting.</p>				
Jones-Hall	Jason	228			Observation	<p>As previously stated, the proposed plan and objective to "protect the historic environment from inappropriate development" must surely by definition include reversing the TDC decision to hold the Manston Airport site for potential airport development. This is not consistent with protecting the historic environment.</p> <p>New uses for historic buildings and environment must include a wider and more innovative approach towards public engagement and consultation. In this regard, I strongly advocate close attention and engagement with the Pioneering Places East Kent project, funded through Arts Council, HLF and Historic England's Great Place scheme and with Ramsgate Harbour as a focal point in Thanet, with partners including Turner Contemporary.</p>		922		Web
Lorenzo	Peter	37	The Broadstairs Society		Observation	<p>Whilst The Society supports the words in this policy past experience with working with the District Council on reviewing the Local List resulting in promises not being kept and the Societies left hanging means that we are sceptical</p>		84		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						unless the Council follows through.				
Margate Estates		460	Margate Estates	Zena Foale-Banks - Nexus Planning	Object	Policy SP34 identifies that the Council will value and have regard for the historic environment within Thanet. In order to further promote the conservation and enhancement of Thanet's heritage assets and ensure that policies are unambiguous, we suggest that text is included within the policy, which supports the sensitive and sustainable regeneration of important heritage assets by allowing for flexibility of in the provision of other required contributions detailed within the emerging Local Plan.		1321		Web
May	Raymond	238			Observation	The Council is committed to the conservation and enjoyment of the historic environment of Thanet and considers the preservation of that heritage as an economic asset. This position is at odds with its continuing support for aviation activity at Manston. The 24-7 cargo hub proposed by RSP, the only use that would be economically viable, would affect the many listed building in south Ramsgate over which these cargo aircraft would fly at low altitude. Similarly, the enjoyment of the historic environment, particularly, the Royal harbour, seafront and cliff areas, would be adversely affected.		796		Web
Meredith	Belinda	132			Support	I am a member of the Friends of Cliftonville Coastline. I am writing in support the concerns raised by the chair Amelia Gregory. The document needs more detail especially for Cliftonville heritage and maintenance. Belinda Meredith		319		Web
N		257			Object	A large majority of the heritage buildings in Ramsgate are under the flight path of the airport. They are not eligible for double glazing and are part of our draw to bringing tourists and revenue into the area. A cargo hub with night flights will create these points of interest to be unworthy for residences, due to the nature of the building. What provision have TDC put into place to safeguard our heritage buildings from the pollution and noise damage of cargo aircraft coming into Thanet at such a low altitude, as the runway is less than 4 miles away to the sea and the height of cargo planes over Ramsgate is from 800m down to 100m.		900		Web
Orton	Geoff	323			Observation	The LP hasn't quite grasped the importance of 'heritage' to the local economy – despite the recent public announcement		986		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						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.				
Shoul	Matt	107	FOCC - FRIENDS OF CLIFTONVILLE COASTLINE		Object	<p>As a founder member of FOCC - Friends of Cliftonville Coastline - I contributed to the drafting of the following statement & endorse it in it's entirety:</p> <p>In line with all of the above, FOCC suggests that there needs to be a concrete plan put in place to restore and rejuvenate the Cliftonville coastline in particular. At present there appears to be recognition of the importance of our heritage landscape, and key features such as the Winter Gardens and the Lido whilst not having a cohesive strategy to develop and look after the whole area. The coastline was created to be enjoyed as a whole, and so it must be considered once more, if visitors and locals are to make the most of this unique and special environment. We propose that there is an urgent need to protect and restore those heritage assets most at risk, and consider, through communication with the local community, how best amenities could be updated to accommodate modern lifestyles. FOCC propose that the Newgate Gap shelter and management of the surrounding landscape will become a pilot project to show how this could be done, and our members would like to be included in any future discussions.</p> <p>FOCC suggests that there needs to be a concrete plan put in place to restore and rejuvenate the Cliftonville coastline in particular, taking into account both the heritage of the area and the need for amenities to accommodate modern lifestyles. Our members would like to be included in future discussions on how to make this happen.</p>	<p>In line with all of the above, FOCC suggests that there needs to be a concrete plan put in place to restore and rejuvenate the Cliftonville coastline in particular. At present there appears to be recognition of the importance of our heritage landscape, and key features such as the Winter Gardens and the Lido whilst not having a cohesive strategy to develop and look after the whole area. The coastline was created to be enjoyed as a whole, and so it must be considered once more, if visitors and locals are to make the most of this unique and special environment. We propose that there is an urgent need to protect and restore those heritage assets most at risk, and consider, through communication with the local community, how best amenities could be updated to accommodate modern lifestyles. FOCC propose that the Newgate Gap shelter and management of the surrounding landscape will become a pilot project to show how this could be done, and our members would like to be included in any future discussions.</p> <p>FOCC suggests that there needs to be a concrete plan put in place to restore and rejuvenate the</p>	282		Web

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
							Cliftonville coastline in particular, taking into account both the heritage of the area and the need for amenities to accommodate modern lifestyles. Our members would like to be included in future discussions on how to make this happen.			
Stevens	Angela	163			Object	Manston Airport is online to be considered an NSIP and if granted the airport will be reopened, which has been ignored in this SP34 statement. Manston Airport is approximately 100 years old and of VITAL heritage importance. It served as a vital part of both WW1 and WW2. Many locals have relatives who served there and it has a very special place in the hearts of many residents. It is not considered viable as it stands, but with 23 aviation stands instead of 2, and as a unique UK cargo and passenger hub, it WILL be viable, so should be considered as a heritage asset and be protected by retaining policies SP05 and EC4, which are in the current 2006 Local Plan, but have been removed from this emerging Local Plan.	TDC officers have ignored Inspector Nunn’s conclusions in the Public Inquiry, about retaining Manston Airport for aviation only . They have ignored popular demand to retain the airport and have removed protection of the airport policies SP05 and EC4, which should be replaced. They have also not satisfactorily cooperated with RSP regarding the DCO and have repeatedly refused requests to present their plans to the full council. In fact councillors were warned by email not to go to any of the RiverOak presentations!	627		Web
Tessier	Deborah	127			Observation	I agree with the previous input from Friends of Cliftonville Coastline.		285		Web
Tessier	Deborah	127			Observation	Dear Sirs, I'm a regular visitor to Margate and would like to add my support to the comments of the group Friends Of Cliftonville Coastline. I feel that shelters including Newgate Gap must be preserved and renovated as well as other sea front remainders from the past: the old crazy golf opposite Dalby Square could be a beautiful green spot and The Oval needs lots of TLC to encourage people along from Margate. Shelters are vital in our climate. Colourful planting in the Spring and Summer also encourages visitors (Folkestone has done very well along those lines both cliff top and zigzag Pulhamite paths). Margate and Cliftonville's Pulhamite should be preserved too.		1154		Email
Wraight	Kenneth	141	1959		Object	Will all be affected by a 24/7 cargo hub		367		Web

Document Section Path	Climate Change SP35
Document Part Name	SP35

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>PRoW and Access Service: KCC considers that this policy should aim to:</p> <p>Promote safe and accessible developments, containing clear and legible walking, cycling and equestrian routes, and high quality public space, which encourage the active lifestyles; and</p> <p>Protect and enhance public rights of way and access and seek opportunities to provide better facilities for users, for example by providing links to existing rights of way networks including National Trails.</p> <p>Resilience and Emergency Planning: KCC recommends that this this policy is expanded to include the following:</p> <p><i>“Improving building resilience to climate change through the use of best available technology, design and positioning of new buildings Opportunities to reduce the impact of climate change on biodiversity, such as re-connecting fragmented habitats’ wetland recreation and creating new shaded habitats Expanding tree cover across urban areas to cool, shade, shelter public and private spaces. “</i></p>		1513		Email
Environment Agency		449			Object	Policy SP35 - Climate Change We support the objectives of this Policy particularly with respect to the need to find opportunities to reduce the impact of climate change on biodiversity.		1283		Email
Ransom		153			Observation	Opportunities should be taken to plant as many trees as possible and re-instate hedgerows. Trees absorb CO2 and produce oxygen, thus enhancing the urban environment. Hedges also absorb CO2 and produce oxygen, as well as providing habitat for wildlife and mitigating against soil runoff during heavy rainfall. Trees and hedgerows also take up excess ground water and help prevent flooding. New housing developments could incorporate solar panels.		571		Web
Solly	C	419			Object	<p>Point 1: Paragraph 4.97 seems out of date, surely the council will know if 140 litres a day per person has met its target (this is a target in 2016).</p> <p>Point 2: Exploration on the positive effects of using solar panels on houses and should be ensuring any large developments should be using such technology. Thanet has one of the longer sunshine hours in the country. There should be a reinforcement of allowing houses to be more sustainable to generate electricity new houses and commercial buildings.</p> <p>Point 3: Thanet is mostly grades 1 and 2 ALC for Greenfield sites. It provides, Economic, Social, and Environmental need. It provides land for</p>	<p>Possible carbon effects from the lost of agricultural land, and should be assessed. Consider the use of District heating and solar panels on strategic sites. Has assessment been made on renewable resources on Greenfield sites in the local plan? Update on evidence base in</p>	1229	Solly soil.jpg(57 KB) Solly Renew Energy.jpg (230 KB)	Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>the rural economy and jobs are dependent on the land (it is local and stops longer commuting times. It provides food and other uses like biofuels. It stores carbon as stated below which is a important role in climate change mitigation [see attachment]</p> <p>It is also highlighted in the climate change topic paper as “High potential areas for growth of biocrops for which previous season have yielded. The map for Renewable energy opportunities is shown below [see attachment]</p> <p>The value of Thanets soils should be recognised as it clearly offers benefits that should not be underestimated. With Brexit Food security will be and is a important national asset. Most of Thanets soils are Grade 1 and 2 ALC quality, The weight of consideration on whether this should be developed should be considered with the community itself with the benefits it provides.</p> <p>Point 4: There appear to be no assessment on the loss of agricultural land on this local plan, Greenfield sites consist of 91% of land used for housing. It can be argued that housing contributes to the greenhouse effect whilst the land it was built on used to store carbon to reduce greenhouse effect.</p> <p>Point 5: There appears to be no statement on the environmental effects of Thanet earth, which uses electricity and water and clarity on how this is sustainable. As seen in Policy SE08 light pollution is wasting energy and so more effort should be made to reduce light pollution and the loss of energy from the site. A study should look at whether this facility is environmentally sound. The idea for this type of farming is ideal for Holland (for which the Thanet earth is based on). However this idea im sure ideal for the floodlands of Holland, but is questionable for the Best and Most Versatile agricultural land in Thanet. The economic benefit should be weighed against the environmental factors..</p> <p>Point 6: It is stated that “Wave Height: The average wave height from trough to crest has increased by approximately 50cm since the 1960's. This will accelerate coastal erosion.” There doesn’t appear to a plan to look at funding for strengthening the sea walls or protection to the cliffs in Thanet. Maybe this should be considered that funding becomes available for this, this will also improve the SPA zone which is on the entire coastline of Thanet. It can be argued that population increase will increase the carbon released by the people who will live here (in cars and consumption). Very much in the same way that recreational effects can affect the SPA zones.</p> <p>Point 7: The document refers to EU law and directives which will not be in effect after Brexit. Also the paper was created in 2013 which maybe out of</p>	<p>regards to Brexit and EU directives</p> <p>Secure funding to against the problem of wave heights and protection of chalkcliffs on the Thanet coast line.</p> <p>Assessment of sustainability and its effect on the environment on the Thanet Earth site and mitigation of any further development of that site.</p> <p>Option to reduce dependency on centralised energy by 10%</p> <p>Update Paragraph 4.97 if out of date.</p>			

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>date.</p> <p>Point 8: It is stated that “South East Plan The South East Plan was revoked in March 2013 under the Localism Bill, however it included a policy NRM11: Development Design for Energy Efficiency and Renewable Energy which required greater use of decentralised and renewable or low carbon energy in new development, and that new developments of more than 10 dwellings or 1000m2 of non residential floorspace should secure at least 10% of their energy from decentralised and renewable or low carbon sources. It also encouraged the incorporation of renewable energy sources. An assessment of planning applications has been carried out to find out how this has been implemented in Thanet.”</p> <p>There is no further conclusion on this and if a 10% reduction of energy is possible by policy.</p>				
Twizell	Heather	512	Natural England		Object	<p><i>Climate Change</i> <i>Policy SP35 - Climate Change</i> Natural England welcomes the inclusion of clause 4 within this policy but we would recommend that for improved clarity and local relevance it is expanded slightly along the following lines:</p> <p><i>“New development must take account of.....opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast.”</i></p>		1463		Email