## **Chapter 5 - Community Strategy**

Document Section Path	Healthy and Inclusive Communities SP36
Document Part Name	SP36

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	5 - Community Strategy -Healthy and Inclusive Communities 5.1 The National Planning Policy Framework (NPPF) acknowledges the link between planning and healthy communities and states that the planning system should support strategies to improve health and cultural wellbeing, promote healthy communities and identify policies that will deliver the provision of health facilities. It encourages policies that will facilitate social interaction and healthy inclusive communities. 5.2 Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystems and will contribute to coherent and resilient ecological networks. 5.3 The NEA & Marmot Review (2010) demonstrate the positive impact that nature has on mental and physical health. High quality natural environments foster healthy neighbourhoods; green spaces encourage social activity and reduce crime. The natural environment can help children's learning. Health issues are addressed in this plan in the following policy areas:  Housing quality and design Transport  Economic development, employment skills and training Access to and provision of local services  Community safety and crime Access to fresh food Access to the natural environment 5.4 The following policy sets out how the Plan will contribute towards a healthier community. Policy SP36 - Healthy and Inclusive Communities The Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities. Proposals will be supported that: Bring forward accessible community services and facilities, including new health facilities, Safeguard existing community services and facilities,		1094	083 Bara John Birchington attachment.p df(769 KB)	Email

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						3. Safeguard or provide open space, sport and recreation 4. Promote healthier options for transport including cycling and walking, 5. Improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops, 6. Create social interaction and safe environments through mixed uses and the design and layout of development, 7. Create greener neighbourhoods and improve biodiversity and access to nature. 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. The evidencing for the health benefits of green environment have already been evidenced earlier in my representations on this document.				
Davies	Julie	147	CPRE Kent		Object	Should also refer to the incredible edible network in Thanet.	Point 5 should read: Improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops and the Incredible Edible Thanet initiative.	395		Web
Hutson	Laura	348	Sport England		Observation	Policy SP36 Health and wellbeing – Active Design I note that within the document there are references to creating healthy and inclusive communities and creating social interaction and safe environments through mixed uses and the design and layout of development – such as walkable neighbourhoods. Sport England believes these references would be further strengthened by specifically referencing Sport England's Active Design Guidance.  Sport England and Public Health England have recently refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in		1040		Email

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						physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:				
						Active design We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.				
						Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.				
						That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.				
						Ten principles				
						The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.				
						The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.				
						The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.				
						Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.				
						http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design				

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Jones-Hall	Samara	295			Observation	of the 28-mile circular Viking Coastal Trail (one of the most attractive leisure cycle routes in Kent) which links up with Regional Route 15 of the National Cycle Network, has 2 canoe trails, seal and bird watching walks and our walk from Ramsgate's Royal Harbour to Margate Walk was voted in the Top 100 Walks in Britain (the only walk on the list from Kent). Natural England has found that for every £1 spent on establishing healthy walking schemes, the NHS could save £7.18 in the cost of treating conditions	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.  This is line with Objective 2 of the Department for			Web

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							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.  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.  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.  Further it will destroy and			
Ransom		153			Observation	This is a good policy, but reducing the amount of	diminish Thanet's landscape character and local distinctiveness.	575		Web

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						productive farmland by building on it will not increase access to a healthy food supply.				
Solly	С	419			Observation	"Conserve and restore the sense of tranquillity which persists in local areas and the dark skies, and minimise street lighting or design lighting to limit light spill and glare from the plateau which has the potential to be visible across a wide area of Thanet and beyond. Conserve and enhance the intact rural character away from the urban area and along rural lanes."  Healthy lifestyles and activities should reflect the findings of the Open Space Strategy, Playing Pitch Strategy and Sports Facility Strategy 2017 Executive Summary June 2018 report in the evidence base especially with	Conserve and restore the sense of tranquillity which persists in local areas and the dark skies, and minimise street lighting or design lighting to limit light spill and glare from the plateau which has the potential to be visible across a wide area of Thanet and beyond  Policy should reference the Open Space Strategy, Playing Pitch Strategy and Sports Facility Strategy 2017  Executive Summary June 2018 report in the evidence base to improve general health and the issues of obesity.	1230	Solly tranquility map.jpg (125 KB)	Email
Stevens	Angela	163			Observation	TDC please take note of your own statement taken from NEA and Marmot Review (2010), before covering Thanet in houses and concrete!  "High quality natural environments foster healthy neighbourhoods; green spaces encourage social activity and reduce crime."	Thanet is unique due to green spaces, agriculture, villages and coastal settlements. To build and turn Thanet into an urban sprawl will cause untold problems, as we have a highly deprived area. The NEA and Marmot Review (2010) should be observed.	648		Web
Twizell	Heather	512	Natural England		Support	4 – Community Strategy Paragraphs 5.2 and 5.3 – Natural England welcomes the inclusion of these paragraphs following the advice we provided on the Preferred Options document in 2015.  Policy SP36 - Healthy and Inclusive Communities Natural England particularly supports clauses 4 and 7 in this policy.		1464		Email
Ward	Linda	157			Observation	Increasing population in an already impoverished area will add to health problems. Especially as infrastructure is at breaking point, agricultural land will be lost and unemployment will be increased.		465		Web

Document Section Path	QEQM Hospital Margate SP37
Document Part Name	SP37

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Dove	Clare	298			Object	This presumes that we will have a hospital at the QEQM. Save the Stroke Unit and Thanet should fight to stop NHS England cutting beds and fund this hospital properly.		913		Web
East Kent Hospitals NHS Foundation Trust		232	Lee Evans Planning	Cathy McNab - Lee Evans Planning	Support	The East Kent Hospitals University NHS Foundation Trust <b>Supports</b> the retention of an allocation for the strategic provision of health and related services at the The Queen Elizabeth the Queen Mother Hospital (QEQM) and the relocation of the green wedge and urban boundaries to the south eastern boundary of this allocation.		781		Web
East Kent Hospitals NHS Foundation Trust		232	Lee Evans Planning	Cathy McNab - Lee Evans Planning	Object	This objectionhas been phrased in terms of the National Planning Policy Framework 2012 (NPPF 2012) because: Annex 1 of the National Planning Policy Framework 2018 (NPPF 2018) paragraph 214 states that the previous framework (2012) will apply for the purposes of examining plans submitted by 24 January 2019 The Thanet District Council (TDC) Local Development scheme 2/7/18 chapter 3 anticipates submission stage of the Local Plan as October 2018 with examination to commence in February 2019. However, mention is made of the new NPPF 2018 as well, as this has been referred to in some of the Council evidence base documents.  The objection is made on behalf of the East Kent Hospitals University NHS Foundation Trust (the Trust) with respect to The Queen Elizabeth the Queen Mother Hospital (QEQM). The Trust is responsible for 5 hospitals over 5 districts: The Queen Elizabeth the Queen Mother Hospital, Margate, Thanet District The William Harvey Hospital, Willesborough, Ashford The Kent and Canterbury Hospital, Canterbury, Canterbury District Buckland Hospital, Dover, Dover District Royal Victoria Hospital, Folkestone, Folkestone and Hythe District As well as services at Estuary View Medical Centre in Whitstable, Canterbury District		782		Web

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						The NPPF 2012 states in paragraph 162 that in the production of its local plan a Local Planning Authority should work with other authorities to assess the quality and capacity of infrastructure for health and its ability to meet forecasted demands and take account of the need for strategic infrastructure. Paragraph 156 states that the strategic priorities for an area should be set out in a local plan including strategic policies to deliver health, community and social infrastructure. Paragraph 178 outlines the duty to co-operate on issues that cross boundaries particularly those relating to the strategic priorities set out in paragraph 156. Paragraph 179 states that:  "Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans'  NPPF 2018 (paragraph 20) identifies a range of strategic issues that need to be addressed through Local Plan strategy and strategic policies, including c) community facilities (such as health, education and cultural infrastructure). Paragraphs 24 – 27 outline the requirements for maintaining effective cooperation in particular:  Paragraph 25 – 'Strategic policy making authorities should collaborate to identify the relevant strategic matters which they need to address their in their plans. They should also engage with their local communities and relevant bodies including infrastructure providers'  Paragraph 26 – 'Effective an on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary'  The Queen Elizabeth the Queen Mother Hospital (QEQM) provides emergency, acute and other health services to East Kent with a catchment area of the districts of Thanet, Canterbury and Dover and to some extent for specialist services to resident				

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						Therefore, it is submitted that policy SP37 and its associated allocation is considered strategic and as such consultation and engagement should have taken place with the Hospital and the Trust in land allocation and designations and formulating the policy to ensure that it meets their long term strategic needs.  The Council's Duty to Co-Operate Statement includes healthcare under infrastructure as one of its Key Strategic Issues for co-operation in paragraph 9.1 and in paragraph 9.46 states that one of the key organisations that the Council sought to engage was the Health Authority with respect to future requirements for QEQM. However, the Council's statement does not make any reference to engagement of consultation with the trust and beyond representations made on previous renditions of the plan the Trust is not aware of any engagement that has taken place with respect to future requirements for QEQM nor with respect to the changes to the reduction in the size of the allocation or the formulation of the policy.  The Council's Annual Monitoring Review 2017 states that the CCG has been consulted with respect to healthcare provision but not the Trust. The CCG have oversight of the wider health outcomes for the population within their district. However, the CCG are made up primarily of GP's and while they may buy services from hospitals they do not necessarily understand the strategic and day to day operational requirements of the hospitals in their areas. The NHS Foundation Trusts provide and operate the ambulance services, emergency care services, and associated hospital and mental health services and it is therefore submitted that they are the principal organisation that understands their strategic requirements and as such should be consulted during the production of				
East Kent Hospitals NHS Foundation Trust		232	Lee Evans Planning	Cathy McNab - Lee Evans Planning	Object	Planning Policy Framework 2012 (NPPF 2012) because:	Make the changes to Policy SP37 and supporting text as outlined above	786	Section_9 (2).pdf (70 KB) Submission	Web

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						plans submitted by 24 January 2019 The Thanet District Council (TDC) Local Development scheme 2/7/18 chapter 3 anticipates submission stage of the Local Plan as October 2018 with examination to commence in February 2019. However, mention is made of the new NPPF 2018 as well, as this has been referred to in some of the Council evidence base documents.  The objection is made on behalf of the East Kent Hospitals University NHS Foundation Trust (the Trust) with respect to The Queen Elizabeth the Queen Mother Hospital (QEQM). The background to this objection is that the Proposed Revisions to Draft Local Plan (Preferred Options) 2017 did not include a policy with respect to the QEQM Hospital which is a primary employer and main healthcare provider in East Kent and therefore provides a vital piece of strategic health infrastructure. The NPPG paragraph 12-018 (now relocated to Plan-making Guidance) stated that key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself. Therefore, the Trust objected to its non-inclusion (as attached).  In 2017 Lee Evans Planning on behalf of the Trust submitted proposed wording for supporting text and a policy as follows:			Local Plan 2018 submitted to TDC.pdf (42 KB)	
						The Council recognises the importance of the QEQM Hospital and the range of services it provides for the community for Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is, therefore, supported in principle.  The main area of land available lies to the southeast of the existing hospital and medical and health related development will be supported there.  Trust proposed POLICY 32A - QEQM HOSPITAL, MARGATE  The Council will support proposals to improve, expand, reconfigure and consolidate the range of medical facilities available at the QEQM Hospital. To provide for this land to the south-east of the existing QEQM Hospital, Margate, is identified for health related development. The Council will				

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						support the provision of new medical and health related facilities on the site subject to compliance with other				
						relevant plan policies.				
						While the Trust <b>support the inclusion of a policy</b> with respect to the QEQM Hospital and its associated				
						allocation, they <b>object to the wording</b> of Policy SP37				
						submission publication draft of the Thanet District Local				
						Plan (2018) and the supporting text (paragraphs 5.5-5.8).				
						In the submission publication draft of the Thanet District				
						Local Plan (2018) the Council have simply brought forward				
						the text and Policy CF4 with respect to the QEQM Hospital				
						from the 2006 Local Plan. It is, therefore, submitted that				
						this policy and its supporting text is not consistent with				
						national policy, positively prepared, justified or effective,				
						for the following reasons:				
						The Trust was not consulted on the policy and the				
						proposed wording put forward by the Trust in the previous				
						consultation does not appear to have been considered.				
						Reutilising text and policies from the 2006 plan means that				
						they predate both the NPPF 2012 and the updated NPPF				
						2018 as well as the associated NPPG and have not been				
						reviewed in light of up to date national policy guidance.				
						Nor does a 12+ year old policy necessarily meet the strategic needs of the Hospital and Trust.				
						The policy and supporting text is long and its meaning				
						unclear in places. For example what the Council will				
						require with planning applications as the text of the policy				
						appears to be asking for a master planning exercise, green				
						travel plan and traffic impact assessment to be undertaken				
						with any new development, which may not be a				
						proportionate requirement depending on the scale of the				
						development proposed.				
						The policy is not positively worded with phrases such as				
						"No other development will be permitted".				
						The policy is unnecessarily restrictive of the use that the				
						allocated land can be put to (promoting car parking) and				
						does not allow flexibility for the changing nature of				
						hospital provision and healthcare or allow for the hospital				
						to meet its operational needs.				
						The policy is outdated and unjustified in its requirements				
						as development of built form including dwellings has been				
						permitted by the Council up to the new urban/green				
						wedge boundary to the north and south of the allocated				
						land, therefore, restricting the development of this land to				
						an open form of development and car parking is not				

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						consistent with recent planning decisions on adjacent land. It also does not allow the Trust to make the most efficient use of land.  The Policy is repetitive of other policies in the Local Plan and other draft and adopted documents which deal with safe and sustainable transport and travel plans (Policies SP41 and TP01), transport infrastructure (SP43) and the draft Transport Plan, car parking provision (Policy TP06) landscaping and green Infrastructure (Policy GI06), Landscape Character Areas (Policy SP23) and General Design Principles (Policy QD02).				
						On these grounds the Trust respectfully request that the Inspector would consider the modifications below to the supporting text and policy along the lines of that previously proposed by the Trust who has taken into consideration the Council's wish for efficient use of the site which is supported by the NPPF 2018 Chapter 11. (Please note that additions are underlined and removals are struck through.)				
						5.5 The Council recognises the importance of the QEQM Hospital and the range of health services it provides to the community of Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is, therefore, supported in				
						principle. The main area of land available lies to the southeast of the existing hospital. As such this land is identified on the policies map for the future expansion of the hospital to meet future needs to the south-east of the existing hospital. Part of this land was previously designated as Green Wedge land, but has been released exceptionally to				
						meet the health and social needs of local people so the Council will support medical and health related development on this land. However, in order to safeguard the Green Wedge in the longer term, new development at the hospital should involve the minimum fresh land take necessary. Accordingly 5.5a The Council will expect all elements of detailed				
						expansion proposals to make the most efficient use of the existing and allocated site. This should include appropriate use of multi-storey development as far as is compatible with the effective working of the site and the creation of a				

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						pleasant environment for both patients and			
						staff, <del>and while</del> limiting visual impact on			
						the <u>adjacent</u> Green Wedge <u>and countryside</u> .			
						5.6 To minimise the visual impact of new development on			
						the Green Wedge, it would be desirable for open less			
						<u>densely developed</u> uses, <del>such as car parking,</del> to be located			
						on the allocated landsite rather than amongst the high-			
						density development within the existing hospital. Existing			
						tree screens along Ramsgate Road and along the footpath			
						should be retained wherever possible. In the interests of			
						sustainable pedestrian and cycle movement it is desirable			
						that a <u>direct</u> route <del>as direct as possible</del> is retained for the			
						existing footpath connecting Ramsgate Road with St			
						Peter's Road.			
						5.7 The hospital has frontages to Ramsgate Road and St			
						Peter's Road, both of which are Primary Distributors in the			
						local road hierarchy, <del>and</del> where it is important to maintain			
						free flow of cross-town and longer distance traffic. <u>As the</u>			
						hospital is already a major generator of traffic in the area			
						<u>when</u> supporting improvements and expansion of the			
						hospital <u>are proposed</u> it is essential that the opportunity be			
						taken to rationalise and improveconsideration needs to be			
						<u>given to current</u> access arrangements, <u>traffic generation</u>			
						and sustainable travel. In accordance with the relevant			
						<u>transport policies in chapters 6 and 18 specific proposals</u>			
						will be required to <u>undertake</u> <del>reflect</del> a traffic impact			
						assessment, <del>of such proposals and to</del> incorporate suitable			
						access improvements to accommodate any resultant			
						increases in traffic and appropriate access for 'Blue Light'			
						vehicles <u>and potentially necessitate</u> the implementation of			
						a Green Transport Strategy for the hospital.			
						5.8 The hospital is already a major generator of traffic in			
						the area, and the Council will wish to see the			
						implementation of a Green Transport Strategy for the			
						hospital, which can be implemented in parallel with			
						development permitted by this Policy. An essential element			
						of this Strategy should be to encourage the greater use of			
						public transport by staff and visitors. The <u>recent</u>			
						<u>construction</u> <u>creation</u> of new staff accommodation on site			
						should help to work towards this objective.			
						Policy SP37 - QEQM Hospital, Margate			
						Land to the south-east of the existing QEQM Hospital,			
						Margate, is identified for release for expansion of the			
						hospital. No other development will be permitted on this			
						site.			

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						Development for hospital purposes should meet the following criteria:  1. Proposals should be designed to involve the minimum take of fresh land, consistent with the need to provide a pleasant environment for patients and staff;  2. Development proposals should demonstrate how more effective use can be made of the hospital site as a whole;  3. Proposals should incorporate the retention of the existing footpath and provision of a substantial landscaping screen;  4. Proposals should incorporate a comprehensive review of access arrangements associated with the hospital and access provision should reflect the findings of a specific traffic impact assessment;  5. Proposals should be compatible with a green transport strategy for the hospital;  6. The level of car parking associated with new development should be limited to the minimum necessary within the context of the green transport strategy; and  7. New parking areas should, as far as possible, be located on the newly allocated site.  The Council will support proposals to improve, expand, reconfigure and consolidate the range of medical facilities available at the QEQM Hospital. To provide for this land to the south-east of the existing QEQM Hospital, Margate, is identified for health related development. The Council will support the provision of new medical and health related facilities on the site subject to compliance with other relevant plan policies and the following:  Proposals should be designed to make the most efficient use of land while taking into account the need to provide a pleasant accessible environment for staff and patients and considering the visual impacts on the adjacent countryside.  As appropriate, proposals should provide for the retention of the existing footpath connecting Ramsgate Road with St Peter's Road and appropriate landscaping planting to provide screening.				
Goodban	Rex	236	R A Goodban & Son		Support	facilities for the proposed increase in population.	Expansion of the hospital to match growing need, and to cease the removal of services such as the stroke unit.	719		Web

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Johnson	Elisabeth	51	Monkton Residents Association		Observation	Bearing in mind that many people are unable to use public transport to access the hospital and there is inadequate parking there now, the new parking proposals do not seem realistic.		139		Web
Webber	Beau	192	Save Manston Airport association		Observation	"a specialist stroke unit can not be placed at QEQM because the appropriate staff can not be attracted to this part of the country":  https://youtu.be/uuXaDeoFTc4 - A reopened Manston Airport with £0.5 Billion investment will revitalise Thanet and make all the difference to QEQM.		652		Web
Webber	Beau	308			Observation	With £0.5 Billion investment in Thanet, and 10s of thousands of jobs, funding and expansion of both Canterbury and Margate hospitals should be forthcoming, as will the staff to work at them:  "a specialist stroke unit can not be placed at QEQM because the appropriate staff can not be attracted to this part of the country":https://youtu.be/uuXaDeoFTc4  - A reopened Manston Airport with £0.5 Billion investment will make all the difference.	Put in place cooperation with Canterbury, where I live, and Dover	919		Web

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Alltoft	Wendy	196			Support	Why is a new medical centre being proposed when we keep hearing about possible closure and problems with the QEQM, surely we need to ensure that the QEQMcan cope with the current population of Thanet and not put lives at risk by suggesting people can travel to Canterbury or Ashford with life threatening conditions. Investment should be made to maintain and improve our current health facilities before we think of new ones. By building more houses in this area then an even bigger problem is being caused, very shortsighted.		579		Web
Solly	С	419			Observation	The site should be on a area of well connected sustainable transport, to allow bus travel and provide good car parking facilities.	Include Sustainable transport options to the site and car parking.	1231		Email
Stevens	Angela	163			Support	SP38 Comment: Any new medical unit at Westwood should be similar to the Minor Injuries unit in Whitstable, to relieve the already stretched QEQM, which will hopefully be considered as a 4th specialised Stroke Unit, to serve Thanet residents who cannot possibly wait for an ambulance and get to William Harvey Hospital in Ashford within an hour.	Although I mostly agree with this statement, the car parking situation at QEQM needs more careful consideration. It is already dire, with double yellow lines on both the roads outside both ends of this busy hospital. How is "the minimum parking required" worked out? Parking is already an issue at QEQM and with more expansion, more parking space is needed.  I also sincerely hope Thanet is granted Specialist Stroke Unit status, to avoid unnecessary deaths due to our geographical position. It takes at least half an hour to get out of Thanet from Broadstairs. With the wait for an ambulance of a Priority 2 Stroke, plus an hour long drive from the Thanet Way, it is dangerous to the health and safety of Thanet residents to expect people to go as far as Ashford before being treated by stroke experts.	651		Web

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Stevens	Angela	163				Consideration should be given for a Minor Injuries Unit at Westwood Cross, like the one at Whitstable, to relieve QEQM A&E, which is at breaking point.	See comment above. Make it a minor injuries unit.	653	Web
Ward	Linda	157			Observation	Hopefully not destroying more agricultural land?		466	Web

Document Section Path	Community and Utility Infrastructure SP39
Document Part Name	SP39

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
Giddins	Rod	62			Observation	I refer to Policy SP39. The Plan provides no evidence from water supply and sewage disposal authorities that sufficient water will be available to meet the proposed increase in population. When questioned on this the answer seems to be that it will be up to the relevant company and statutory authorities to make sufficient provision but surely the Plan should demonstrate how this will be met? Thanet is already one of the driest parts of the UK and climate change is likely to have a great impact here in the future. I assert that before agreeing future growth, all statutory authorities (whether health, transport, water etc.) should demonstrate how they will provide services and facilities to meet that planned growth so that specific proposals can be contained in the Local Plan.		169		Email
Mayall	С	473	Southern Water		Object	Southern Water is the statutory water and wastewater service provider throughout Thanet, and as a major utility provider in the district, supports the spirit of Policy SP39; to ensure development is supported by the requisite community and utility infrastructure. New and improved water supply and wastewater infrastructure will be required to serve the development proposed in Thanet's Local Plan, and/or to meet stricter quality standards in the treatment of water and wastewater. This is likely to include improved local sewers and water mains, and potentially strategic assets such as trunk sewers, pumping stations and treatment works.  Southern Water has a statutory duty to serve new development, however it is not possible to identify, in a complete and precise manner, all water and wastewater infrastructure schemes required up to the end date of the Local Plan (i.e. 2031). Instead, investment schemes will be identified and delivered in parallel with development through the water industry's regulatory price review process on a five yearly investment plan basis.		1361		Web

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						Delivery of infrastructure improvements needs to be supported by Local Plan policies, and Southern Water considers that in order for Policy SP39 to be sound, support for the provision of such infrastructure by utility providers should be made explicit. This would be in line with the requirements of one of the core planning principles contained in paragraph 17 of the National Planning Policy Framework 2012 (NPPF), which is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. In addition, National Planning Practice Guidance (NPPG) Paragraph: 001 Reference ID: 34-001-20161116 states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'. Therefore, whilst Policy SP39 seeks to ensure that development will not be allowed without provision for utility infrastructure, it does not positively support the delivery of water and wastewater schemes that are likely to be identified during the life time of the Plan.  Southern Water is unable to support Policy SP39 as sound because it does not adequately support delivery of strategic water or wastewater infrastructure necessary to serve existing and new development across Thanet District through the lifetime of the Local Plan. We consider that this is inconsistent with national policy, in particular paragraph 17 of the NPPF and Paragraph: 001 Reference ID: 34-001-20161116 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 SP39 (new text underlined):  Development will only be permitted when provision is made to ensure delivery of relevant and sufficient community and utility infrastructure. New and improved utility infrastructure will be encouraged and permitted in order to meet the identified needs of the community. Where appropriate, development will be expected to contri				

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Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Observation	Development of land west of Cliffsend will deliver relevant and sufficient community and utility infrastructure as part of this site strategic allocation. Benefitting extensively from its proximity to the new Parkway Station.	See attached submissions on behalf of Edward Spanton Farms Ltd and attached report from CSA.	704	2914_04_A Landscape Overview for land to west of Cliffs End, Kentpdf (7.9 MB)	Web
Sykes	Anthony	31			Observation	It is unlikely that there is sufficient water or the ability to process sewage to sustain this number of new dwellings. Southern Water cannot keep up with current demands. eg Thanet beaches vunerable to sewage discharges at times of high rainfall.		61		Web
Trotter	AR & PJ	388			Observation	INFRASTRUCTURE There is a real risk that the Stroke Unit at the QEQM Hospital at Margate could be moved to Ashford. This could lead to the QEQM Hospital being downgraded from an A & E centre to a minor injuries unit which is completely unacceptable. We also have the prospect of GP doctors retiring and the general practice doctors being concentrated in 3 super surgeries. It is difficult to see how they would cope with the burgeoning population. The schools would have to be expanded to cope with the increase in population.		1151		Paper
Ward	Linda	157			Observation	The provision of necessary infrastructure should be in place before development is allowed to begin.		467		Web

Document Section Path	Provision of Schools SP40
Document Part Name	SP40

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Bromwell	Michelle	50				Another school at Westwood cross? Why at Westwood? We have an absolute glut of schools locally, all condensed within a few miles of each other. The roads between 8-9 & 14:30-15:30 are already in total chaos. There are some children who do walk (although have no understanding of road safety) but I'm absolutely amazed by the amount of children who are driven to school and disgusted by the parents who think nothing of parking illegally around the school gates. If this is how the parents want to raise their children then make them drive out of the urban areas and allow the locals to enjoy their space. The road infrastructure around Westwood Cross is woefully inadequate and has been for far too long. There will be an increase in accidents on these already congested roads and narrow pathways, especially around schools at these times.		118		Web
Cooper	Barbara	514	Kent County Council (KCC)			PRoW and Access Service: The suitability of a site for the expansion of a school should take into consideration sustainable accessibility and deliver sites where possible, with good links to the existing PRoW and cycle networks.		1514		Email
Sitch	Sue	38	Mr			There are not enough local primary school places for our current population, parents are having to travel . Do not seem to be looking at pre school requirements eg nursery places	Reduce the plan by 50%. Address all the current requirements firstley	87		Web
Solly	С	419			,	Details from KCC Growth and Infrastructure Framework (GIF) report show funding gaps for Primary and secondary education for which normal funding arrangement may not meet costs in full. Full Funding must be available as part of a planning application. Provision for early years, Primary and Secondary Education have funding gaps.	Ensure that full funding is available to address funding gaps that exists.	1232		Email
Stevens	Angela	163			Observation	The existing academy/secondary school near	Due diligence and very careful	655		Web

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					Westwood Cross in Thanet rarely fills its places.	consideration needs to be given to this future project regarding need and also traffic flow, which is ridiculously slow as it is around Westwood Cross and all roads leading to it.			
Ward	Linda	157			Existing schools are already oversubscribed and at breaking point now so this needs to be a matter of priority before any development can be started.		468		Web