

General										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	Comment ID	Attached documents	What changes do you suggest to make the document legally compliant or sound?	Submission Method
Agnew	Richard	516	Gladman		Object	<p><b>Duty to Cooperate</b></p> <ul style="list-style-type: none"> <li>▸ The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act, 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross boundary strategic issues throughout the process of plan preparation. As demonstrated through the outcomes of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non- adoption of the Plan.</li> <li>▸ Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration as set out in the PPG, it is clear that it is intended to produce effective policies on cross boundary strategic. In this regard the Thanet Local Plan must be able to demonstrate that the Council has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirements to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.</li> </ul>	1545			Email
Bambridge	Sam	458			Object	<p>As an elected District Councillor for Westgate-on Sea Ward I wish to make representations in connection with Thanet District Council's (TDC) consultation on its draft Local Plan – Pre-Submission Publication version which was published in August 2018 and I would like my representations to be made available to the Secretary of State at the examination stage.</p> <p>My representations are as follows:</p> <ol style="list-style-type: none"> <li>1. TDC has not demonstrated effective cooperation with Dover District Council (DDC) on Manston Airport and housing market areas. These are strategic matters which cross administrative boundaries. I believe this to be a contravention of the National Policy Planning Framework.</li> <li>2. The draft Local Plan contains no specific strategic policy for the Manston Airport site. I believe that securing the future of Manston Airport should be a strategic priority, that consideration of Manston's future should be a matter for co-operation between TDC and DDC and that no such co-operation has taken place.</li> <li>3. The Employment Land Review highlights the fact that there is far more land allocated to employment than is reasonably required. In my view some of this surplus employment land should be given over to housing, rather than</li> </ol>	1310			Web

					<p>remaining unused and undeveloped. I understand that this view is supported by both DDC and Canterbury City Council. As a Westgate-on-Sea district Councillor I am unhappy about the excessive designation of 2000 houses to our area. Some of these houses could be allocated to this un-used employment land instead of building on Westgate and Birchington's grade 1 agricultural land.</p> <p>4. There is an imbalance between projected housing numbers and job opportunities. GL Hearn suggested 3000 jobs was the likely figure, however the draft local plan stipulates an extra 2000, totalling job creation of 5000 positions. There is no evidence of where these positions are coming from, although, we're hoping that Manston Airport will be re-established giving us a chance, however in the absence of the airport there is a glaring discrepancy between housing numbers and job creation, especially noting our high unemployment figures.</p>				
Behrendt	Mark	423	Home Builders Federation	Object	<p>Response by the House Builders Federation to the Thanet Local Plan</p> <p>Thank you for consulting the Home Builders Federation (HBF) on the Draft Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p> <p>We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.</p> <p>Duty to co-operate The Council's evidence indicates that Thanet is in a housing market area which includes Canterbury and Dover. Whilst some joint working is evident between Thanet and the other two authorities the degree of joint working and the HMAs ability to meet its own needs has not been articulated by the Council in its evidence base or in the local plan. We could find no separate statement on the Duty to Co-operate on which to base our comments and as such reserve the right to comment further on these matters during the examination in public of the Thanet Local Plan.</p> <p>Plan period Plan period is unsound as it is inconsistent with national policy We have some concerns regarding the approach taken by the Council in setting their plan period. At present the plan period runs from 2011 to 2031 which will mean that on adoption this plan would have less than 12 years left. Such a short time period is contrary to the 15 year time frame for plans recommended in paragraph 157 of the NPPF. This short plan period means that any delays in the delivery of the strategic allocations in the plan will lead to the Council being unable to meet its long term housing needs. In order to plan effectively for longer term needs the Council must look at adopting a plan of at least 15 years from the point of adoption.</p> <p>Conclusion At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 182 of the NPPF, in the following key areas:</p>	1201		<p>In order to plan effectively for longer term needs the Council must look at adopting a plan of at least 15 years from the point of adoption.</p> <ul style="list-style-type: none"> <li>• The response to market signals of 19 dwellings per annum is insufficient and could not reasonably be expected to have any impact on affordability as required by PPG;</li> <li>• The use of a stepped trajectory is inappropriate and pays no regard to the significant back log in delivery;</li> <li>• Policy SP19 on housing mix does not provide sufficient flexibility with regard to the mix of housing to be delivered on each site and as such is ineffective;</li> <li>• The affordable housing requirement is not supported by the Council's evidence on viability;</li> <li>• The adoption of the nationally described space standards has not been justified as set out in PPG; and</li> <li>• The plan's policy on decentralised energy is not consistent with national policy.</li> </ul>	Email

					<ul style="list-style-type: none"> <li>• The plan period is not consistent with national policy which recommends a minimum of 15 years;</li> <li>• The response to market signals of 19 dwellings per annum is insufficient and could not reasonably be expected to have any impact on affordability as required by PPG;</li> <li>• The use of a stepped trajectory is inappropriate and pays no regard to the significant back log in delivery;</li> <li>• Policy SP19 on housing mix does not provide sufficient flexibility with regard to the mix of housing to be delivered on each site and as such is ineffective;</li> <li>• The affordable housing requirement is not supported by the Council's evidence on viability;</li> <li>• The adoption of the nationally described space standards has not been justified as set out in PPG; and</li> <li>• The plan's policy on decentralised energy is not consistent with national policy.</li> </ul> <p>We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.</p>				
Cooper	Barbara	514	Kent County Council (KCC)	Observation	<p>Minerals and Waste: As the Minerals and Waste Planning Authority, the County Council is responsible for ensuring that mineral resources are not needlessly sterilised by other forms of development thus ensuring that a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development. This safeguarding approach is supported by the National Planning Policy Framework (NPPF) and locally in the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). The NPPF requires that development proposals should not be permitted within mineral safeguarding areas where they might constrain potential future use of the economic mineral resource. As such, the policies within the KMWLP aim to prevent the sterilisation of Kent's potentially economic mineral assets.</p> <p><u>Mineral Safeguarding</u></p> <p>The Minerals and Waste Planning Authority notes that within Thanet District there are very few safeguarded minerals. These are shown on the Minerals Safeguarding Areas (MSA) as outlined in the Policies Maps of Policy CSM 5 Land-Won Mineral Safeguarding of the KMWLP. It is noted that the site allocations for new permanent development do not coincide with these MSAs in the Thanet District.</p> <p><u>Waste Management Facility Safeguarding</u></p> <p>Policy CSW 16: Safeguarding of Existing Waste Management Facilities of the adopted KMWLP outlines the need for existing and permitted waste management facilities to be safeguarded. It also requires that the Minerals and Waste Planning Authority for Kent is consulted for any proposed new development located within 250m of safeguarded waste management facilities. This is to ensure that the proposed new developments do not compromise the ongoing and lawful operation of the safeguarded waste management facilities.</p> <p>The Minerals and Waste Planning Authority for Kent wishes to remain involved in</p>	1536			Email

					<p>the process of the Thanet District Council Local Plan and would be keen to engage on minerals and waste matters as the plan emerges. Should you require any further information regarding the above or wish to discuss it further, please contact a member of the Minerals and Waste Planning Policy Team at <a href="mailto:mwlp@kent.gov.uk">mwlp@kent.gov.uk</a> or on 03000 422370.</p> <p>Waste Management</p> <p>Kent County Council Waste Management operates a network of eighteen Household Waste Recycling Centres (HWRCs) and six co-located Waste Transfer Stations (WTSs) and demand on these sites is at unprecedented levels. As a result of additional demand generated by housing growth, this could result in a requirement to build more, larger sites or invest in the maintenance or repair of existing HWRCs and WTSs. At Margate HWRC and Richborough HWRC, we are expecting a significant increase in waste throughput as a result of significant housing development. It should be noted by TDC that all of the sites referred to in the submitted documents are within a 20 minute drive time of both Margate HWRC and Richborough HWRC.</p>				
Crutchlow	Mark	426		Object	<p>Here we go again I have a feeling of de-ja vu from 2015 when the last local plan was put out to consultation, I , like many 100's of others took time to respond to this showing in most cases objections to the proposed housing increases that at the time stood at 12,000.</p> <p>Why is it expected, that with a target of 17,500, that peoples views would have changed?</p> <p>But you are not even including our views from 2015 even though the plan remain a muddle and in some cases far worse than the proposals laid out in the 2015 draft. That is shameful.</p> <p>I list below some of the main concerns in bullet point form:-</p> <ol style="list-style-type: none"> <li>1) Housing increases are not fully evidence based. Being told "the Government says so" does not reflect the actual local population growth figures.</li> <li>2) The existing and planned infrastructure is woefully inadequate to cater for such a large increase in population on a relatively small coastal peninsular.</li> <li>3) in regard to point 2 my concerns are that there is insignificant funding available to pay for it all.</li> <li>4) Scant regard to local concerns that have been ongoing since the last draft plan went out to consultation especially in regard to the loss of Grade A farmland.</li> </ol>	1215			Email
D'Angelo	Silvio	422		Observation	<p>Thanet has not need any more house for Regict from other part of England of for immigrant that don't belong to this country that want us to go down to their standard instead of them come up to our standard.</p> <p>England made big mistake already many years ago by giving millions of people an English passport - you just have to look around and you will hardly see an English</p>	1200			Paper

						face any more - the land that you want to use to Build Houses is needed to produce food to feed them. So stop immigration immediately and throw out any one who does not belong to England and England would be a much better place.  Italian but care for England				
Dawes	Jenny	59			Support	Impressed by the quality of the draft - with the notable exception of late changes brought about the decision of members supporting RSP's DCO application. Concerned that these changes may render the document unsound.	170			Web
Favell	Dorothy	490			Object	<p>I wish to make various objections, using references to documents and websites where necessary, in connection with Thanet District Council Draft Local Plan. I do not have time to complete the questionnaire, or find that it meets my requirements, and suspect that TDC have made this deliberately long and difficult to dissuade people from completing it. My research leads me to believe that this is a ploy used by many local councils. I object to the way TDC have "promoted" the local plan. Birchington in particular has a higher than average concentration of people over the age of 65, at 36% (the national average is 19%) and a huge majority of these do not own a computer let alone know how to use the internet. It is wrong for TDC to rely on the internet and social media or newspapers. A much fairer, more democratic way of letting people know about the local plan would have been to delay the publication of the plan until April, and by giving everybody a notice with their council tax demands. <b>This would have involved the council in minimum cost.</b> I suspect that the fact that there is an election in May was the reason this was introduced just after Christmas with the cut-off date planned before purdah.</p> <p>It is my understanding that the local plan of 2006 is still a legal document and remains the operative plan until superseded by a new one. Statements in that plan about restrictions on farmland development are still valid but I feel TDC have rushed through this new draft local plan because it should have been completed several years ago, and they are vulnerable to developers.</p> <p>I also believe the consultation period should have been extended due to the complexity of it.</p> <p>To conclude, I have left out many of the points raised in the local plan, not because I agree with them, but because my main personal concerns are that the proposed use of agricultural land in Birchington should be taken out of the plan, I am questioning the need for 17,200 houses overall, I am disputing the number of jobs forecast, and I advocate Manston Airport remaining as a functioning airport with only aviation related activities.</p> <p>Other documents used in the writing of my objections:  <a href="https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans">https://www.gov.uk/government/policies/giving-communities-more-power-in-planning-local-development/supporting-pages/local-plans</a></p>	1360			Email

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Hurst	Derek	445		Object	<p>(1) I am not in favour of the Local Plan</p> <p>(2) To build on A1 Grade farm land is wrong we need this land to grow our food</p> <p>(3) London Councils will buy up some of this land for their own people not for local people, I am fully against this</p> <p>(4) Our local medical services would not be able to cope with these extra people</p>	1274			Paper
Hutson	Laura	348	Sport England	Observation	<p>Thank you for consulting Sport England on the above named document. Please find herein our formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are</p>	1037			Email

						fit for purpose to meet demands for participation now and in the future.  We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">http://www.sportengland.org/facilities-planning/planning-for-sport/</a>				
Jefferies	Spencer	46	National Grid	Hannah Bevins - Wood Plc	Observation	National Grid has appointed Wood to review and respond to development plan consultations on its behalf.  We have reviewed the above consultation and can confirm that National Grid has no comments to make in response to this consultation.	113			Email
King	R	364			Object	I write to oppose the proposed ill conceived local plan which will bring no benefits to Thanet or surrounding districts. I wish to be kept informed of any hearing.	1061			Email
Kirkaldie	Malcolm	382			Object	This Plan can best be summed up as a rigged local plan that significantly fails the local residents of Ramsgate. It is not cohesive in its format and set up. We have in its time scale scale consultations on top of consultation that will have significant affects on and within Ramsgate, without any cumulative assessment or even any proper scoping. The issue of Blight has not been addressed in the draft local plan regarding Manston, in fact TDC has gone outside of the law to tell a vociferous group of people (SMA) how to write in on the local plan this is institutional discrimination to say the least, let alone a wilful disregard for the local electorate with regards to how a local authority should conduct themselves. We also have Inspectors called in without any knowledge of what they or anyone one else discussed?  In short this plan fails to protect a large part of Thanet's community...namely Ramsgate which has and is being overdeveloped without proper EIA's and an assessment of the cumulative affects of developments where the quality of life is significantly appalling. The consistent failures to obtain planning gain (sec 106) have been ignored in this rather dishonest and distasteful document.  An area action plan to deal with the Manston issues later on is inappropriate to say the least. The lack of strategies within this draft plan such as Transport, Heritage, Open Space and Biodiversity to be possibly debated further on is again inappropriate. I have a lot of evidence based work to back up my claims of a past and future failings of this plan.  Its no good TDC preaching to us that we need to write in about lawful planning issues when its clear that this isn't a plan led approach its been a political led approach.	1121		Email	
Lamb	Kyla	373	Minster Parish Council		Object	Minster Parish Council has played an active part in the consultation process in the period leading up to the publication of the Local Plan; together with a substantial number of its residents, we have shown a great deal of active interest in contributing to the contents of this plan, e.g. meetings, leaflets, social media. Yet, disappointingly, we have seen no response within the current plan to the detailed	1071			Paper

					<p>concerns raised by us on behalf of our residents.</p> <p>We question the overall soundness of this plan having regard to the following points: -</p> <p>We do not think the plan has been positively prepared because it is based on an over optimistic strategy with reference to employment opportunities, infrastructure requirements and its overall future sustainability.</p> <p>Finally, in 2013 Minster Parish Council produced a Community Led Plan which was compiled following extensive work to gather the views of the residents, e.g. an early Neighbourhood Plan. This identified the perceived needs for the village and a clear priority was accommodation for the elderly.</p> <p>Thanet District Council assured us that this would be taken into account when preparing the Draft Local Plan. In 2015 the Draft Local Plan was published and reflected none of the priorities in the Community Led Plan. In response to the consultation thousands of residents yet again expressed their views on the key points. The amended Draft Local Plan was published in 2017 and, once again, none of the views and objections expressed by our residents had been taken into account.</p> <p>The current Local Plan subject of this examination remains stubbornly resistant to the representations of the residents of Thanet and specifically Minster.</p> <p>Can this Local Plan be considered sound when the district council has not entered into constructive dialogue with the community and has not sought alternative strategies?</p> <p>Furthermore, it appears that no regard has been given to the Localism Act, 2012. It has clearly not been 'positively prepared' to reflect development and infrastructure requirements and has most certainly not considered reasonable alternatives.</p> <p>In the view of Minster Parish Council this plan is not sound.</p>					
Margate Estates		460	Margate Estates	Zena Foale-Banks - Nexus Planning	Observation	<p>These representation are submitted on behalf of Margate Estates.</p> <p>Since acquiring Dreamland in November 2017, Margate Estates have invested more than £50 million in Dreamland and more widely, Margate. Margate Estates have been working tirelessly to put Dreamland on the map as an entertainment, corporate and wedding destination and brought the event spaces back to life, and through investing in other improvements in the surrounding area. By association, their works to Dreamland are making an important contribution to the viability and vitality of Margate and its continued regeneration.</p> <p>Margate Estates is dedicated to ensuring that Margate's unique appeal is utilised to its utmost potential and that the town becomes a 'year-round' destination. Margate Estates is committed to this resurgence, and aims to build Dreamland into a world-class entertainment venue and provide workspace and facilities for creative industries to thrive.</p> <p>The submission of these representations on behalf of Margate Estates forms part of the longer term management and development aspirations for Dreamland, and for Margate more widely.</p> <p>In accordance with Paragraph 16 of the NPPF, these representations consider whether the plan as prepared is 'sound'. These representations also seek to</p>	1312			Web



					<p>enhance the policy context for opportunities for regeneration within Margate.</p> <p>Paragraph 16 of the NPPF states that:</p> <p><i>Plans should:</i></p> <p><i>a) be prepared with the objective of contributing to the achievement of sustainable development;</i></p> <p><i>b) be prepared positively, in a way that is aspirational but deliverable;</i></p> <p><i>c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</i></p> <p><i>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</i></p> <p><i>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</i></p> <p><i>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</i></p> <p>Nexus Planning has reviewed the Draft Thanet Local Plan – 2031 – Pre Submission Publication version (9 August 2018) in the context of Paragraph 16 of the NPPF, and has provided comments and recommended amendments on selected policies as identified below.</p> <p>[Representations made against specific policies - SP02, SP06, SP08, SP11, SP12, SP34, E07, HO1, H10, HO24, TP06, TP07)</p> <p><b>Closing</b></p> <p>Margate Estates seeks to contribute positively to TDC’s vision for Margate as a fashionable seaside resort based on its unique assets of a sandy beach, harbour, and rich townscape. Margate Estates supports the continued and sustained regeneration of Margate, particularly through the revived Dreamland Heritage Amusement Park and other development opportunities. We trust that the representations raised are aligned with TDC’s vision for Margate, and that this provides an opportunity that would benefit local residents as well as visitors to Margate.</p>			
Messenger	Carol	383		Object	<p>I am Councillor of Thanet District Council, I am not against having a local plan, but I am disappointed the emerging plan that has been produced, does not consider many factors that are very specific to the area of Thanet. The overall housing number has not included the effects of Brexit, we have already seen a decrease in population growth with the recent ONS figures. Our local GP’s surgeries and schools are at capacity.</p> <p>My self and other councillors requested that the Local Plan final public consultation be longer than six weeks and officer’s advice was that it must be six weeks, when the guidelines state at least six weeks. The documentation that was available for public view was confusing and misleading, as it showed a tracked changed document, which to most of the public made no sense. When this was raised with the officer I was advised that the Local Plan team felt the presentation of the documentation was acceptable. How is it possible to consult with the public if they don’t understand what they are looking at? The website was a mess of</p>	1130		Web

						<p>documentation. I have viewed other councils' local plans and it was properly indexed and far easier to read and was one document not a multitude.</p> <p>The Strategic Transport Strategy was not complete when the plan went to consultation, so the public couldn't comment on this in conjunction with the LP. The strategy has a relief road going through the Northern Grass on Manston but Manston (SP05) is not part the local plan. Again, very confusing for people. To date no modelling has been produced, so we don't know how sustainable this proposal is given the number of new homes suggested. I hope that you will come to similar conclusions that the plan in its current form isn't fit for purpose and that council reevaluates the housing number that is sustainable and carries out proper consultation with the public.</p>				
Pannell	janet	498			Observation	<p>THANET DISTRICT AS A WHOLE -I understand the district council has a duty to produce a development plan to set the guidelines for the district but I have some concerns I would like to put forward in this letter.</p> <p>Firstly as a lay person I have to say that I found the amount of booklets/documents/plans at the local library overwhelming. There was too much to read through and what I did read I did not understand fully so I am just commenting on what I personally am concerned with at present.</p>	1392			Paper
Ptarmigan Land and Millwood Designer Homes		493	Ptarmigan Land and Millwood Designer Homes	Joshua Mellor - Barton Willmore LLP	Support	<p>We generally support the Council's proposed strategy and approach to meeting its housing growth requirements. We support the Council's identification of the strategic housing site at Birchington, however there are changes required to the proposed allocation policy and boundary in order for it to be effective. Please see attached representations for more detail.</p>	1375		To discuss housing strategy and Strategic Site at Birchington (as land promoters)	Email
Ptarmigan Land and Millwood Designer Homes		493	Ptarmigan Land and Millwood Designer Homes	Joshua Mellor - Barton Willmore LLP	Observation	<p>7.0 CONCLUSION</p> <p>7.1 As acknowledged in these representations we generally support the Council's draft Local Plan, albeit a number of policy changes are required in order for it to be found "sound".</p> <p>7.2 The current spatial strategy is considered to be positively prepared and reflects the constrained nature of the District (e.g. by coastline and existing close-nit settlements). The identification of 'Strategic Sites' adjoining existing settlement boundaries is supported and will assist in the delivery of the Inner Circuit link road, a key element of the Local Plan.</p> <p>7.3 The Strategic Site at Birchington is vital for the delivery of the link road, with sections of this proposed to run through the Site and remove traffic from existing congested and polluted sections of the highway network. Further, the Strategic Site will provide a significant contribution towards meeting the housing requirements of the District, in a sustainable location.</p> <p>7.4 The Council's Evidence Base confirms the Strategic Site at Birchington is an appropriate and deliverable location for housing development. Detailed technical work undertaken by the Promoters further demonstrates the suitability of the Site in this</p>	1390			Email

					<p>regard.</p> <p>7.5 These representations and the accompanying Development Capacity plans demonstrate the Site is able to achieve the Strategic Site policy requirements without the need for land not under the control of the Promoters (i.e. the Church Commissioners land). The policy should be amended to reflect this and to ensure its requirements can be effectively achieved.</p> <p>7.6 Further, the allocation boundary should be amended to reflect existing field boundaries, including additional land under the control of the Promoters adjoining the existing allocation. This land would be utilised to provide additional open space and other Green Infrastructure (including landscaping), providing additional benefits of the Strategic Site allocation.</p>				
Schembri	Angela	387	RPS Planning & Development Ltd	Object	<p>Paragraph 35 of the NPPF requires that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound.' The NPPF says that plans are 'sound' if they are:</p> <ul style="list-style-type: none"> <li>• Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>• Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>• Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>• Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ul> <p>For the following reasons, which are expanded on throughout this letter with reference to the NPPF, RSP considers that the draft Local Plan as it currently stands is 'unsound':</p> <p>There is no specific, strategic policy in the draft Local Plan for the Manston Airport site. Paragraph 21 of the NPPF states very clearly that strategic policies should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues). The future of the Manston Airport site is a strategic priority for the area and a cross-boundary issue (as confirmed in paragraph 9.1 of the TDC Duty to Cooperate Statement – July 2018). In accordance with paragraph 23 of the NPPF, there should be a strategic policy covering this site and RSP suggest that this policy should continue to safeguard land at Manston Airport for aviation uses (see below for further comment on Manston Airport).</p> <p>TDC's assessment of and strategies for housing and employment are not integrated and they do not take full account of the relevant market and economic</p>	1136			Email

					<p>signals (paragraph 31 of the NPPF). TDC has failed to agree matters with Dover District Council (DDC) on Manston Airport and housing market areas which are strategic matters that cross administrative boundaries and this is contrary to the requirements of paragraph 24 of the NPPF. DDC has also raised concerns about the surplus level of employment land identified in the draft Local Plan. Whilst TDC did provide a response in November 2017, this matter also remains unresolved.</p> <p>Paragraph 24 of the NPPF states that local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Paragraph 26 makes very clear that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.</p> <p>The Future of Manston Airport; Housing Market Areas and the Employment Strategy are 'strategic issues for cooperation' that have been identified by TDC in its Duty to Cooperate Statement (July 2018). It is acknowledged from this document that there has been some cooperation with neighbouring authorities on these matters. However, there remains outstanding concerns. Dover District Council for example still have concerns on all three of these issues.</p> <p>Specifically in relation to Manston Airport, there is no evidence provided to demonstrate what engagement there has been between TDC and Kent County Council on this matter or indeed between TDC and relevant bodies including Local Enterprise Partnerships for which the future of Manston Airport is a key issue. This is contrary to the requirements of paragraph 25 of the NPPF.</p> <p>It would appear from what is written in paragraphs 9.24 to 9.30 of the TDC Duty to Cooperate Statement (July 2018) that there has been no dialogue with DDC or CCC on this matter since December 2017. The suggestion is that as the new Local Plan no longer allocates Manston Airport for mixed-use development, that the previous concerns especially from DDC may have been satisfied thereby negating the need to continue dialogue. This is not adequate and joint working should continue with all relevant bodies.</p>			
Scott		511		Object	<p><b>The Local Plan and associated consultation process has been complex and confusing and the process has been inadequate</b></p> <p>The original 2015 Local Plan and associated consultation process was felt to be overly complex and confusing (see the DCLG Committee expectations on this process) and was not been reviewed or improved for the 2017 Consultation. It has also has not been properly user friendly to all sections of the community despite the published intentions of Thanet Council. As a result all the consultations, because of its limited and poor publicity, constrained nature and shear overload of information has not been acceptable or fit for purpose.</p> <p>Also the consultation for the Transport plan has been confusing and has not been in step with the Local Plan, which is exceptionally worrying.</p> <p><b>The initial Strategic consultation in 2013 which fed into the 2015 draft local and is the basis for the draft local plan is out of date.</b> In 2013, participants of the initial consultation were asked to think about allocating 7 thousand houses in Thanet.</p>	1442		Email

					<p>Four years on, the OAHN was calculated as 17,100 houses, meaning that this initial consultation for the housing allocation is now irrelevant - the figures have changed so much. There has been no proper consultation for the housing figure of 17,100.</p> <p>People attending a consultation regarding 17,100 houses may have suggested that a new town should be built rather than the individual allocations bolt onto to existing towns. This could have saved large areas of agricultural land and also the distress caused by the adhoc bolt on allocations to towns and villages. Such a new town could have been competently planned with its own infrastructure and services and not added pressure to the existing individual towns (see Otterpool New Town).</p> <p>In order to demonstrate the probity of the consultation process allied to fostering confidence, <b>the Local Plan should be withdrawn, comprehensively reconsidered and redrafted to reflect the representations made and take on board the views of the community, especially as the housing numbers have changed inordinately since the 2013 consultation.</b></p> <p><b>Localism Act is dead</b></p> <p>It has been a real shock to local people to find that they had no real say in the allocation of the housing in the Local Plan. Quex and TDC have worked together to get the best deal for them, without consulting with the local residents of Westgate-on-Sea first. This is not Localism and the Localism Act is dead.</p> <p>Also, the needs of the local communities have not been taken into consideration and there are real concerns about the amount of thought that has gone into these allocations. There has never been an adequate analysis of the impact of new development proposals on the infrastructure (highways, water, welfare, education and social) to demonstrate the designation of any of the proposed housing areas.</p> <p>Moreover, the infrastructure delivery plan that was originally promised for 2015 is even now not in its final form, which is necessary to ensure that infrastructure will keep pace with developments. This is aggravated by the phasing, or lack of proper phasing, of new developments in a structured manner that would guarantee the delivery of adequate infrastructure to support development. The outcome of the lack of a proper realistic implementation policy would mean by the end of the plan period there could be no mitigation of the problems caused by the growth and addition of the potential 17000 households to an already over-crowded and stretched and, in instances, neglected infrastructure that we have in Thanet. <b>In the absence of a fully costed implementation programme and open book funding plan, the Draft Local Plan is considered to undeliverable in the manner proposed.</b></p>				
Solly	C	419			<p>Object</p> <p>Thanet Local plan over many years has had many guises, and have lead the council itself into indecisions over many matters. I have stated that the local plan has a split personality due to the issues has and currently faces. As a resident who has tracked and had a active interest in the local plan and have met council leaders and councillors since the 2015 draft local plan consultation.. Since the draft local plan in 2015, it has become very unclear on Thanets vision for the future. The main reason is the matter over Manston airport which has caused to me to have a local plan with 2 scenarios in which it has wrestled with both.</p>	1191			Email

					<p>Because of this unclear approach to the plan I don't consider this plan to have a positive approach which fails the tests of soundness. The various options exercised on the plan have conflicted with the general strategy of housing, road design, and the use of greenfield land for development (for which I am most concerned of). The local plan has 2 transport plans depending on the outcome of the airport which confuses the matter further. It is also unclear on what intervention will mean for the local plan this has caused further ambiguity on where this plan treads onto the path of examination.</p> <p>In 2015 the draft local plan was heavily objected to by mainly residents of Birchington, Garlinge and Westgate, as well as supporters of returning aviation to Manston airport. My concerns of losing high quality agricultural land is my highest priority, living in Birchington the plans for the loss of agricultural land along with similar concerns in Garlinge and Westgate was unacceptable. However with the pressure of many revisions of the OAN (for which initially there were heavy objections to 12000 houses), the increase of OAN to the current number of 17140 as now exacerbated and magnified the issues surrounding the local plan.</p> <p>In the ministerial foreword in the 2012 NPPF it states:</p> <p>“This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this. In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities.”</p> <p>Thanet's local plan has become the document which has excluded people and community alike, with targets being imposed despite the common view in Thanet that this is not a realistic concept, especially when we consider the job growth of 5000 jobs with a future population of 27000 people. It has been noticed that the 2014 ONS projections are not being realised in the local plan so far (we are 7 years in the plan period already). The debates which have happened in the public area and in council chambers have lost the point of having a positive and popular plan for the future of Thanet. It is no wonder that the publication has been pressed by the secretary of state by imposing an intervention to publish the plan which has been changed at the last minute (July 2018).</p> <p>It should be commented that the process has not included people or considered them, it was commented that the engagement with the public should be improved from the feedback in the 2015 consultation, now we are now at the publication stage, no improvement has been made. I did write to the council on the publication of the plan, that the paper copies in public libraries was on the main plan document was out of date, as well as the large scale map. An addendum was produced to read beside the main document and map. This in my opinion has further obfuscated the information in the local plan, especially where deletions of policy have occurred. With also a large number of documents being released and updated only for the period of publication itself (a period of 6 weeks to read and comment). Council members have also not had all of the information and a plan which was not available to read to make an informed decision on which</p>				
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					<p>the local plan was approved for publication due to the pressure of intervention. I believe this document has not been passed democratically which considering the NPPF foundations are on the localism act, certainly goes against clear and transparent local government.</p> <p>Again ministerial foreword for the localism act states:</p> <p>“For too long, central government has hoarded and concentrated power. Trying to improve people’s lives by imposing decisions, setting targets and demanding inspections from Whitehall simply doesn’t work. It creates bureaucracy. It leaves no room for adaptation to reflect local circumstances or innovation to deliver services more effectively and at lower cost. And it leaves people feeling ‘done to’ and imposed upon - the very opposite of the sense of participation and involvement on which a healthy democracy thrives.”</p> <p>The way the local plan has been produced and publicated is certainly opposite to “a sense of participation and involvement”.</p> <p>I have made my comments on the local plan publication, policy by policy which follows. My basis of my comments is from the village of Birchington, for which the local plan imposes a town status (without plan or policy) on the people of this village irrespective of what their views are. The fields around Birchington is the finest quality of farmland in the country, it should be conserved preserved and respected for the work it does for the nation as a whole. The local plan threatens Birchington and other areas of Thanet without a clear vision.</p> <p>The document is also available at the web address:  <a href="http://bit.ly/CSolly_representation">http://bit.ly/CSolly_representation</a>.</p>					
Stevens	Angela	163			Object	<p>The proposals in this draft Local Plan are not fit for purpose. The proposed housing allocation is ludicrous and will ruin Thanet. We are unique in our coastal area with surrounding prime agricultural land. We have a large airport that has been totally ignored in this plan, despite there being a so far, successful DCO to reopen it. There is the proposal for Parkway Station we don’t want or need. Proposal for a ring road that doesn’t join up! A disgrace and not fit for purpose. I suggest TDC go back to the drawing board and start again!</p>	702		Start again!	Web
Trotter	AR & PJ	388			Observation	<p>Re : Consultation regarding the final version of the Draft Local Plan to 2031</p> <p>We have tried to look at the above mentioned document on the Council's website and found it very difficult to access. We therefore went to the Council's offices at Cecil Square and asked to see the paper copy of the final version of the Draft Local Plan to 2031. You can imagine our surprise when we were given a cardboard box full of documents. There must have been over 1000 pages of information and it was quite impossible for us to digest all this data. We do feel that the Council should have produced a leaflet summarising the main features of the Draft Local Plan.</p> <p>We are also concerned that our letters dated 19th February 2015 and 15th March 2017 commenting on the Draft Local Plan will not be submitted to the independent Planning Inspector.</p>	1137			Paper
Twizell	Heather	512	Natural England		Observation	<p>Thank you for your consultation on the above dated 23 August 2018 which was</p>	1443	NE Comments.		Email

					<p>received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b><u>Summary</u></b></p> <p>Natural England has reviewed the Draft Local Plan and accompanying appendices together with the Habitats Regulations Assessment (HRA), Sustainability Appraisal (SA) and Draft Thanet Transport Strategy. Our comments on the policies are provided in Annex 1, followed by comments on the HRA, SA and Transport Strategy in Annex 2. Please note that we have not provided comments on all policies but those which have most influence on environmental issues. Natural England has no comment to make on the policies not covered in this response.</p> <p>The Plan has many positive aspects including strong protection for designated nature conservation sites, recognition of the importance of such sites sitting within wider ecological networks and the provision of a standalone policy on Green Infrastructure (GI). We particularly appreciate that you have taken account of our previous advice and created a separate policy outlining the Thanet Coast SPA Strategic Access Management &amp; Monitoring (SAMM) Strategy as we believes this has helped greatly with clarity.</p> <p>We are satisfied overall with the conclusions of both the HRA and SA although we have provided some advice on how certain aspects of these could be made clearer. We welcome the efforts your authority has made over the last few years in bottoming out the potential impact of your housing allocations on golden plover, which are a feature of the Thanet Coast and Sandwich Bay Special Protection Area (SPA).</p> <p>We have suggested a significant number of amendments and additions to both policies and supporting text throughout the Plan. In our view these could all be taken forward as minor modifications but if they were all acted upon they would leave the Plan much stronger and more coherent in delivering for the natural environment, one of the three central tenets of genuinely sustainable development as set out in the National Planning Policy Framework (NPPF 2012, paragraph 7, bullet point 3).</p> <p><b><u>Recent developments in national policy and future proofing the Plan</u></b></p> <p>Since the last full consultation on the Local Plan (Preferred Options, 2015) Defra has published its 25 Year Environment Plan. We are therefore taking this opportunity with the Submission Draft consultation to highlight this important progression in Government policy on development and the natural environment.</p> <p>The 25 Year Environment Plan sets out key Government aims to conserve and enhance the natural environment. The first of these is to achieve <b>environmental net gain</b> through development, namely new housing and infrastructure. This can be achieved by securing measures for net gain through Local Plans.</p>	pdf (343 KB)		
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						<p>Net gain is also referred to more prominently in the recently revised NPPF (July 2018). We are aware that if you submit your draft Local Plan to the Secretary of State within six months of the revised NPPF being released then it will be assessed against the original 2012 version which only makes minimal reference to the concept of net gain. However, we would encourage you to start thinking about this issue now so that you are in good position when the opportunity to make significant revisions to the Plan comes around.</p> <p>To help you with this we have provided some further detail around how environmental net gain could be addressed by the Plan in Annex 3.</p>				
Twizell	Heather	512	Natural England		Object	<p><b><u>The Vision: the Council's aspirations for 2013</u></b></p> <p>The Vision currently contains extremely limited references to those themes which falls within Natural England's remit. There are currently no references to biodiversity, net gain or GI. Bullet point 6 does refer to Thanet capitalising on its 'natural assets' and we welcome the commitment to protecting and managing these positively for the longer term but we believe the Vision should go further and aspire to the enhancement of these (as previously stated in our response to the 2015 Preferred Options consultation). Some re-wording of bullet point 6 would then provide a better context for Strategic Priority 4.</p> <p>We would encourage you to consider including a more specific driver in the Vision around GI, particularly the publicly accessible elements. We believe this is particularly important given the acknowledgement within the Plan that Thanet has the second highest population density in Kent, a number of highly deprived wards and pockets of urban decline and that open space is a scarce commodity within Thanet's urban areas.</p>	1444			Email
Twizell	Heather	512	Natural England		Object	<p><b><u>4 – Environment Strategy</u></b></p> <p>Our overarching comment made on this section of the Local Plan in response to the Preferred Options consultation remains relevant here. This section continues to contain a wealth of useful information but the broad policies around GI and biodiversity remain extremely generic. We maintain our stance that individual policies could be more specific and locally distinct while recognising the challenge that the inter-relatedness of many of the issues poses.</p>	1453			Email
Twizell	Heather	512	Natural England		Observation	<p><b><u>Annex 3 – Detailed advice on net gain</u></b></p> <p>The draft Local Plan currently sets out the protection for designated sites of international, national and local nature conservation value, priority habitats and wider biodiversity across a number of strategic and development management policies. However, it is a fact that most developments still result in biodiversity loss. Considering the significant housing need identified for Thanet District, Natural England strongly advises that you begin to formulate a policy framework that seeks to reverse this trend for the Local Plan period.</p> <p>As mentioned at the beginning of this letter, in the recently published 25 Year Environment Plan the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted and reversed. This</p>	1483			Email

					<p>includes a specific commitment for <b>environmental net gain</b> through development including new housing and infrastructure. The revised NPPF has also been strengthened in its requirements for securing net gain through development, and Defra will be consulting later this year on making this mandatory.</p> <p>Net biodiversity gain ensures all residual losses from a development are accounted for and addressed; each scheme should then provide additional biodiversity gain over and above the residual loss. The Defra biodiversity net gain metric offers a clear, methodical and tested means for developers to use when calculating the net gain required from individual planning proposals.</p> <p>Going forwards it will be necessary for Local Plan Policies to embed provision for biodiversity net gain through development and you may wish to consider including more detailed guidance for developers on achieving net gain.</p> <p>We suggest the following measures are incorporated into the Local Plan at the earliest opportunity for significant revision, either through policy wording, or a more detailed Supplementary Planning Document:</p> <ul style="list-style-type: none"> <li>▪ <b>Biodiversity metric</b> – developers should apply the Defra biodiversity metric, which is a clear and methodical calculation for net gain in biodiversity for individual planning proposals. The metric is currently being updated by Defra and Natural England to include a wider range of habitat types and incorporate the wider benefits of GI. It should be available this autumn.</li> <li>▪ <b>Net gain plans</b> – development applications for all development types are required to submit a net gain plan which clearly sets out the ecological issues of the proposals, including clear accounting for residual biodiversity loss and how this is addressed, as well as additional ‘net gain’ provision which can be on and/or off-site. You may wish to consider what threshold may be applied to development. We advise that where known ecological interests occur (e.g. ponds, bat roosts etc.), or proposals involving at least 0.1ha of greenfield land, a net gain plan should be required to address these issues. A standard template for net gain plans may be useful to provide consistency and to facilitate policy reporting and auditing.</li> <li>▪ <b>Approval by council ecologist</b> – net gain plans should be approved by the Council’s ecologist or retained ecologist.</li> </ul>				
Twyman	Paul	324		Observation	<ol style="list-style-type: none"> <li>1. In brief, the background information on which the policies are based are unsound in a number of respects; the justifications for policies are ill thought out and in some cases illogical; and the documentation provided to the public has been deficient.</li> <li>2. In at least two public libraries the full documentation was not provided. In at least one library the vital Addendum published on July 2018 was missing and the public were provided with a disorganised pile of documents in a battered cast off A4 box. Lever arch files were presumably beyond the Council's budget.</li> <li>3. The Council's web site has gone through various changes in design, navigation, and content but is still not as user friendly as it ought to be.</li> </ol>	987			Email

					<p>4. The result of these poor arrangements, a problem with the Council's public consultations and public involvement generally which has prevailed for some years, is that there has been the proliferation of misleading information on social media. This, coupled with the activities of pressure groups, some with members who resort to unpleasant "trolling" type activity, has resulted in skewed public knowledge and debate. The involvement of local politicians and the way some of them have conducted themselves in the "debate" has been particularly unfortunate. I suggest, with respect, that the relevance of this to the Inspector is that he/she should not be swayed by the "number of votes", as it were, but instead pay due attention to the quality of the factual and intellectual basis of the comments.</p> <p>5. Another procedural matter, which might become especially relevant in the event of a judicial review of any future decision by the Inspector or Ministers, is that it was announced some months ago that in the light of the local authority's failure to progress the local planning process with sufficient speed, the Ministry's Chief Planner would be sent in to deal with Thanet planning matters. I find it both remarkable and regrettable that no reference is made in the vast amount of documentation to the role of the Chief Planner and his minions in the work on the preparation on this Draft Plan. There is a potential question of conflicts of interest here.</p>				
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