

Thanet's Profile and Key Issues Map 1 - Map of Thanet > Map of Thanet										
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
Cornwall	John	26	Scope4Learning		Object	I object to any possibility of running down Manston Airport (i.e the SDH plan) and I support the development of Manston as an aviation centre (the River Oak plan) for reasons spelt out below.	<p>The justifications for the fate of Manston airport are unsound, as yet. Nor has there been sufficient justification to go ahead with the SDH plan for a leisure facility and housing relegating Manston to a pleasure park and museum. Manston should be re-instated as an Aviation centre to provide sound industry and sustainable jobs as on the River Oak plan.</p> <p>The SDH plan promises the earth but I am certain they will not deliver. Besides they do not provide sufficient infrastructure in either education or health provision for the building of so many, many new houses.</p> <p>Yes, new housing is needed but gradual increase alongside the infrastructure that can only be developed when there are sustainable industries (like the Aviation Centre) and solid full time jobs. We do not need another leisure park that will take people away from the seafront, the Turner Centre and all those businesses that rely on tourism and entertaining tourists...it is a nonsense to make more competition. Look what has happened to the high street with the development of Westwood... the same will happen to Margate, Ramsgate and Broadstairs seafront if a large leisure park is developed! Don't do it!</p> <p>I object to the SDH plan to dismantle our historic Manston Airport which has plenty of scope for development. TDC admitted that the airport when it functioned brought in valuable visitors and commerce when it was running and there are companies who want to run flights despite the negative publicity.</p>	47		Web
cotter	mandy	296			Object	I object very strongly to the Manston Airport site being considered for anything other than Aviation related business and Aviation related activities. I object very strongly to the Manston airport site being used for housing. Manston MUST REMAIN as an AIRPORT if this area is to survive and thrive. If the Manston site is let go through shortsightedness to become brown-field - and then housing - Thanet will be	Policies EC4 and SP05 (or equivalent) should be retained so that Manston is designated an airport and for aviation related activities, and Manston Airport should NOT be on the TDC Brown-field Register.	861		Web

					<p>doomed to a future of overcrowding, congested roads, longer waiting lists for hospital, dentist, doctor appointments, etc.</p> <p>Therefore, policies EC4 and SP05 (or equivalent) should be retained, and Manston Airport should NOT be on the TDC Brown-field Register.</p> <p>Once gone, we can never get this major asset back!! The airport means future prosperity for Thanet!</p>			
dearing	john	269	Manston Parish Council	Observation	<p>I live close to Westwood cross and the report notes that the Westwood cross area suffers from traffic congestion. Putting aside inconvenience to local people, congestion will also deter shoppers who come in from outside the area. A new housing development is sited beside Manston Court road and close to Westwood cross, the road infrastructure should be improved dramatically before any further housing schemes are initiated. Otherwise, the centre of thanet will grind to a complete halt!</p>	<p>For the sake of both local people and for businesses, the transport/road problems should be addressed first, not tackled as a reactive exercise. The plan states that the area (Westwood Cross) does suffer traffic congestion. But, later in the report, says that " Thanet does not at present suffer significant levels of congestion... As experienced in urban centres elsewhere in Kent.". This report should focus on Thanet, and should not be dismissive of our traffic problems by comparing Thanet with other parts of Kent: this a poor strategy and indicates that road provision and maintenance is bad throughout Kent. In the next three years, the Thanet plan is to build another 4500 homes, this will mean a significant increase in vehicles. At present, small country Lanes, poorly suited two heavy use, are been used as rat runs by increasing number of drivers to avoid gridlock conditions on the main roads. Road improvements and provisions should come before the housing is built.</p>	807	Web
Gregory	Ian	283	Thanet District Council Conservative Group	Observation	<p>I am writing to reaffirm the view of the Conservative group on Thanet District Council concerning the Manston Airport site. We have always supported an aviation use for the site and are disappointed that the draft local plan does not contain policies which would clearly designate such a use. We understand that the Council's appointed aviation consultants, Avia, concluded that an airport at Manston would not be viable during the plan period and , as a result, the Council's evidence base could not support aviation related policies being applied to the site. Our issue is that we believe that any evaluation of viability is, to some degree, subjective.</p> <p>This view is supported by the fact that another highly respected aviation expert, Dr Sally Dixon, has researched the prospects for establishing a revived airport at Manston and concluded that it could potentially be very successful. Her report is included in evidence provided, by RSP, to Thanet council. We feel that the fact that there can be two expert reports reaching totally different conclusions about the same topic indicates that the term 'evidence', in this context, should not carry the same weight as other purely fact based evidence might.</p> <p>We are further encouraged in our view that an aviation use could be viable by the fact that RSP have now had their DCO application accepted for examination, demonstrating that private investors share our belief.</p>		827	Web

						If the Local plan can be seen as a blueprint for Thanet's future, then it should be aspirational. The District desperately needs the new employment opportunities for it's residents which a thriving airport could provide. The inclusion of policies to facilitate this would have demonstrated the Council's commitment to this aim.			
Hart	Sarah	272			Support	We cannot service the people that are already living here!!! I cannot get a Drs appointment for weeks and weeks. WE DO NOT NEED ANY MORE PEOPLE LIVING IN BIRCHINGTON>		811	Web
Hennessy	Susan	191			Object	I would like Manston Airport re-opened - it will bring prosperity and jobs to Thanet and I would like to see it up and running. It is a National Asset and must not be built on under any circumstances		548	Web
Hetherington	Jane	184			Support	My main concern as a Ramsgate resident is the appalling discrepancy that arises in the funding that Margate receives when compared to Ramsgate or indeed Broadstairs and why an endless pit of money appears to be available for improvements and projects within Margate, Turner, Dreamland, Seafront etc and yet Ramsgate has received no funding for schemes such as Project Motorhouse etc. It would appear that TDC is happy to let areas that are inherently far more attractive than Margate such as the Royal Harbour and Ramsgate Conservation areas deteriorate in order that Margate is allowed to flourish. As someone whom has been involved in the duplicity around funding for Project Motorhouse , I am astonished that TDC appear to be happy to allow the road to collapse as opposed to funding a project that would add hugely to the attractions of the area.	Little consideration given to areas outside Margate.	687	Web
Houghton	Max	145			Observation	There does not appear to be any mention of the jobs and prosperity that could flow from the re-introduction of Manston Airport as an operational airfield for both freight and passenger flights.	Take into account the re-opening of Manston and provide a plan that greatly enhances connectivity with the rest of Kent and Greater London in the form of new roads and direct airport to London rail line. There is no pointy about discussing housing requirements if there is a difficulty in identifying job prospects.	376	Web
Jones-Hall	Samara	295			Object	The quality of life for Thanet residents is under threat from the proposed 24/7/365 cargo hub. The DCO applicant ("RSP") has clearly stated that "significant adverse effects have been identified as being likely as a result of an increase in noise" in Ramsgate, Manston, Wade, West Stourmouth and Pegwell Bay. The RSP proposal goes on to say "aircraft noise would increase to a point where there would be a perceived change in the quality of life for occupants of buildings in these communities". In addition, to this there will be a huge increase in air pollution. The RSP's proposal will directly adversely and significantly affect the residents of Ramsgate whom already have a high incidence of poor health and average life expectancy significantly lower than the figures for Kent as a whole. The impact of and congestion on road vehicles and HGVs	The Local Plan must support the mixed-use development of the former Manston airport site and allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development. This is line with Objective 2 of the Department for Environment: Food and Rural Affairs single developmental plan updated 23 May 2018, the National Planning Policy Framework updated July 2018 and its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05, E06 Commercial aviation is not viable at the Manston site. A 24/7/365 cargo hub will blight tourism, regeneration,	856	Web

					<p>used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent's road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet's and Kent's villages, towns and businesses has not been addressed by RSP or been subject to a Health Impact Assessment; and - on 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 has not been addressed.</p> <p>This treats our land, our seas, our homes, our people, the very air that we Thanetians breathe, with the utmost contempt. We deserve better. Our children and grandchildren deserve better. They deserve to grow up breathing clean air, sleeping soundly at night, learning in some of the best schools in the country – and without noisy cargo planes flying overhead at less than 1,000ft at all hours, night and day.</p> <p>Further, whilst waiting for Manston there is a huge opportunity cost and loss. In relation to investment in the Royal Harbour and marina development. Elected members of TDC and Craig Mackinlay have chosen to not put any work into moving this forward. Perhaps for vested interests (MAMA airlines), apathy or for whatever reason. The prospect of a 24/7/365 cargo hub has also no doubt put off businesses investing in Thanet. To date I have not read about or heard about one single new business saying that they would move to Thanet if and when Manston reopened. Quite the contrary.</p>	<p>economy, heritage, employment growth and health of Thanet residents.</p> <p>Further, the impact of and congestion on road vehicles and HGVs used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent's road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet's and Kent's villages, towns and businesses is unacceptable nor has it been subject to a Health Impact Assessment; and - nor have travel times for all East Kent stroke victims to reach stroke unit in time as the nearest stroke unit is likely to be moved to William Harvey Hospital in Ashford been addressed.</p> <p>Further, it is a brownfield site which could be used to meet a significant proportion of district's housing needs instead the draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>Further, Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Lucas	David	215		Object	<p>Regarding Manston Airport, I feel it is extremely important that it retains its "aviation use only" status. Thanet is in a unique and advantageous position to be become a very significant player in the growing aviation industry nationally, which will obviously be a very important in the rejuvenation of mainly Thanet but also the whole of the SE.</p> <p>It would be utter madness to lose the gift that we have inherited and that other counties envy.</p> <p>I'm sure that the current council members do not wish to go down in history as being responsible for throwing out the baby with the bath water, so to speak.</p> <p>I therefore urge council to retain policies EC4 and SP05 or an equivalent, and that Manston must be removed from the TDC's Brown Field Register.</p>		654		Web
musselwhite	john	185		Observation	<p>I note that the report states the area has high quality farmland, which is true. Yet hundreds of acres of this will disappear under new housing, roads etc. Once gone ,never to be used again. This is a huge threat to this countries ability to be self sustainable and therefore to added to our</p>		538		Web

						balance of payments deficit. Surely this is not a good thing for the country.				
Ransom	Natasha	190	British Horse Society		Observation	<p>Thanet has one of the largest density equestrian communities in Kent. The hub of the community is at Manston. Two large riding schools are situated on Alland Grange Road and Woodchurch Road. On Woodchurch Road there are two other large to medium sized livery yards. In addition to these equestrian premises, there are livery yards on Vincent Road, Nash Road and at Quex Park. The other larger premises are Crumps Farm on Shuart Lane St. Nicholas and Plum Pudding Island at Minnis Bay. At Kingsgate there is a Riding for the Disabled premises and some private yards. Cliffsend, Minster and Monkton have small livery yards and privately owned yards. Manston, St. Nicholas, Acol and Sarre also have private premises.</p>	<p>The recognition of equestrian activities to Thanet's rural economy and the potential to increase equestrian tourism in the area. Thanet has 7 miles of rideable beaches. The riding schools provide NVQ training to school leavers in Thanet.</p> <p>It is worth noting the national statistics gathered by the British Equestrian Trade Association: The most recent British Equestrian Trade Association (BETA) National Equestrian Survey (2010-11) indicated that: 3.5million people (6% of the GB population) had ridden a horse at least once in the previous 12 months (this was conducted PRIOR to the 2012 Olympics in which the equestrian team raised the profile of the sport). In 2010 8% of riders considered themselves disabled in some way A quarter of all GB riders are under 16 years old. Of riders who ride out once a week or less, 46% cited access to safe off-road riding as a factor that would increase their riding opportunities. The estimated GB horse population, including both private and professional ownership, is just below one million horses (988,000). The estimated cost of the upkeep of horses is £2.8 billion (£3,105 average per horse) Other indirect consumer expenditure associated with equestrian activity is estimated at £557 million.</p> <p>As a "hobby" horse riding and equestrian activities have potential to contribute substantially to the local economy and provide a means of diversification for many of the local farmers renting out land and cutting hay or straw.</p>	546		Web
Shoul	Matt	107	FOCC - FRIENDS OF CLIFTONVILLE COASTLINE		Observation	<p>I wish to state that the ongoing work of FOCC - FREINDS OF CLIFTONVILLE COASTLINE - being focused primarily on the architectural heritage, preservation & protection of Cliftonville's dilapidated, ignored & at risk built environment, recognises a number of structures, other than the recently, albeit temporarily, 'saved' Newgate Gap Sea Shelter, some of which are listed, which seem to require ongoing, vigilant protection by the community, or could be permanently lost through successive Council's short term-ism & lack of recognition of its legal obligations to its listed & vulnerable built heritage. It is of significant concern that community groups such as FOCC may fail to recognise all risks associated with preserving/maintaining/protecting local heritage structures, whether listed or not, given that the Draft Plan does not explicitly state the Council's commitment to honouring it's legal obligations, regarding listed architectural & built environment heritage structures, as</p>	<p>Imperative guarantees are demonstrably essential, within the Draft Plan, to uphold & honour legal obligations to listed structures, our built heritage environment/architectural heritage, plus a commitment to an ongoing proactive approach to liaising & cooperating with local community built & natural environment action groups.</p> <p>Some listed structures, such as the Dane Park pissoir have been boarded up & falsely claimed to no longer exist by officials, however irrefutable evidence to the contrary exists & if this type of abject heritage failure is currently being repeated with other listed heritage structures, almost regardless of the legal failure of TDC/KCC to honour its commitments to listed status structures/buildings, the resulting cultural loss through heritage negligence will be a scandal & permanent loss to the immediate community & the UK as a whole.</p>	232		Web

					<p>well as presently unlisted heritage structures, which have been left to decline physically through lack of Council funding from Central Government &/or inadequate prioritising of safeguarding our heritage built environment structures.</p> <p>The financial attraction of Developer's proposals, amongst other factors, may see Thanet, in particular Margate, permanently lose its architectural heritage, during this era of austerity & apparent short term-ism, r.e. insensitive &/or reckless development.</p>				
Stevens	Angela	163		Observation	<p>10 The draft Local Plan seeks to maximize the opportunities available and deliver policy support to respond to the issues facing the area.</p> <p>Comment: The issue of whether to reopen Manston Airport is missing from the statement. This is a vital and existing asset in Thanet, which has a pending government DCO attached to it already at the pre-examination stage. The new, 23-stands airport, will create thousands of desperately needed jobs in Thanet and beyond, unlike construction jobs if houses were to be built on the airfield.</p> <p>11 Thanet is located in East Kent, in close proximity to continental Europe. It has three main coastal towns of Margate, Ramsgate and Broadstairs. The built up area is densely populated and forms an almost continuous urban belt around the north east coast. This is separated by areas of countryside between the towns and providing relief in the built area. There are also attractive coastal and rural villages.</p> <p>Comment: If the thousands of houses are allowed to be built in Thanet as proposed by TDC, those coastal and rural villages will cease to be attractive and Thanet will lose its unique ambiance, loved so much by locals.</p>	<p>The NPPF states that councils should listen to their residents! No evidence that TDC has done this.</p> <p>See comments above for changes and inclusion of protecting the airport, as the current Local Plan does.</p>	507		Web
Tamplin	Clifford	307		Object	<p>I have not had sufficient time to read, research and respond to the whole package of documents and I feel that the process is such that residents are excluded from participating fully in the process.</p> <p>So, my response is necessarily restricted to the parts in which I am most interested and have been able to read and research.</p> <p>First and foremost: Thanet does not have a housing shortage, it has an employment crisis. There are many empty plots of land around Thanet that have not been developed because there is not the demand due to the lack of employment in the isle resulting in the inability of the residents to buy property. The local plan as proposed does nothing to address this employment crisis and even exacerbates it by proposing gross over development of housing without commensurate employment growth.</p> <p>Economic development. The plan as laid out is wholly inadequate in how sufficient economic development will take place to fund the support services for the influx of</p>	<p>It fails to provide a basis for economic growth of Thanet and must include the provision of jobs at Manston Airport. It does not provide a sound and supportive transport infrastructure for Thanet and must be changed to provide a high speed road network for residents to get to surrounding cities and places of employment. See my previous comments</p>	912		Web

					<p>people describe in the OAN figures. There is already much un- or under-utilized commercial space in Thanet. For example the recent fire at the unused Cummins factory in Westwood. The local plan must be amended to show how the council will support the acquisition of new businesses to the area.</p> <p>Manston Airport. It is unconscionable that a critical national asset such as Manston would be destroyed when the country is starved of landing space in the southeast and the airspace around London is so congested. This must be retained as an asset for the country and to provide employment to the residents of Thanet.</p> <p>Road network. The proposed ring road (ICRIS) is poorly designed and fails to provide a strategic benefit to Thanet. It appears that it has been designed solely to facilitate the housing developers. Please review the proposal from the 1960s for the extension of the Thanet Way which was designed as a benefit for everyone. That proposal (which I strongly support) entailed upgrading the St Nicolas roundabout with flyovers to eliminate and separate traffic flows. It then extended the dual carriageway from Brooksend, straight up the hill following the public footpath to the junction of Manston Road, Park Lane and Acol Hill. Thence dual carriageway along Manston Road and Shottendane Road (with a spur to join the Canterbury Road by King Ethelberts School) to a cutover to Half Mile Ride and to Nash Road servicing Westwood industrial estate.</p> <p>Given the dearth of employment in Thanet, it is imperative that rapid road access is provided so that residents may quickly get to the three arterial exits to places of work. That is the A256 south to Deal/Dover, South West on the A28 to Canterbury and Ashford and the A299 Thanet Way to Medway and London. Any plan that does not provide full dual carriageway access without traffic lights or roundabouts in suboptimal.</p>				
Webb	Simon	8		Object	<p>How does the urban density of Thanet compare to that of the other District in Kent? My perception that Thanet is already over developed compared to (say) Dover and I therefore object to the planned increase in Housing particularly in Birchington, Westgate, Garlinge and Hartsdown.</p>	<p>I object to any further housing development in Birchington, Westgate, Garlinge or Hartsdown. These areas are already over developed and further development would blur the distinction between the separate towns/villages. It would also cause an unacceptable and unsustainable level of traffic and strain on already over crowded hospitals, schools, social services and roads.</p>	11		Web
Wraight	Kenneth	141	1959	Object	<p>I object because too many empty and neglected sites of industrial use are not being consolidated into a existing site and then using the recently vacated sites for housing</p>		353		Web

The Local Plan Strategy

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Agnew	Richard	516	Gladman		Object	<p>Overall Conclusions</p> <p>Having considered the Thanet Local Plan, Gladman is concerned about a range of matters including housing provision and how the plan deals with development outside the urban and village confine</p> <p>The Plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance the Council must start with clearly defining a NPPF and PPG compliant OAN by developing an unconstrained requirement which properly follows guidelines set out at national The Council should then develop a robust housing requirement using this OAN as a starting point.</p> <p>Due to our objections to the proposals and policies contained within this Local Plan, Gladman consider it necessary that we are given the opportunity to discuss our representations further at the Examination in Public in due course.</p>		1543		Email
Bianchi	Tania	144			Observation	<p>We have been living in Cliftonville for more than three decades.</p> <p>We suggest the heritage and amenity assets of Cliftonville are given the much needed and deserved care and attention, including funding and support for community initiatives.</p> <p>There is deep fondness for the Victorian and Edwardian architecture especially along the coastline (e.g. original shelters where walkers can take a rest while enjoying the green and the seaside panorama or the maintenance of unique historical buildings like Ethelbert Crescent).</p> <p>Maintaining historic identity is an effective way to raise pride in the community, value and respect for the environment and attraction for tourism both for leisure and business events.</p> <p>For these reasons, we strongly advise the council to support and endorse community initiatives and property owners aiming to restore the built environment to its former grandeur which would then be seen as an asset and encourage further investment in this area.</p>		373		Web
Dove	Clare	298			Observation	<p>The Vision: the Council's aspirations for 2031</p> <p>As an individual, and member of Thanet Trees where is the consideration for trees and woodland in the VISION? Thanet is one of the least wooded areas in the country and trees need to be considered in any future plans. Any new developments must be offset by the planting of trees as Sainsbury's did the first time it was built, but new trees also need to be planted throughout urban areas and in farming areas also. Thanet Trees suggest that it is imperative that every tree that is cut down in urban areas is replaced, and that new street trees are planted where possible, for instance on Northdown Road.</p>	Not effective in considering at least tree-planting such as Leylandii, to provide pollution uptake, habitats for wildlife and screening for ugly business parks and the like. Leylandii, whilst it has had a bad name in the context of unfettered domestic hedgerows it properties are excellent for boundaries in industrial contexts, to arable land and alongside roadways. There are many articles and scientific studies that confirm the	888		Web

					<p>These will improve the appearance and microclimate of the area, provide much-needed shelter during increasingly hot summers (which will increase as climate change continues), prevent runoff during times of high rainfall, mitigate pollution from vehicles, both noise and as pollution uptake, increase the wellbeing of inhabitants and increase wildlife in urban areas. The many benefits of trees are well known and they MUST be considered in the Local Draft Plan.</p> <p>http://www.cityoftrees.org.uk/why-trees-health-wellbeing</p>	<p>value of trees.</p> <p>https://www.sciencedirect.com/science/article/pii/S0169204611002349</p> <p>For Ivy:- https://www.sciencedirect.com/science/article/pii/S0048969710009836</p> <p>https://www.treecouncil.org.uk/Press-News/Hedges-reduce-the-impact-of-air-pollution</p>			
Gregory	Amelia	316	<p>Thanet Trees https://www.facebook.com/groups/2138824569723508/</p>	Object	<p>The Vision: the Council's aspirations for 2031: https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9428916</p> <p>Thanet Trees asks why there is no consideration for the role of trees and woodland in this vision? Thanet is one of the least wooded areas in the country and trees need to be considered in any future plans. Any new developments must be offset by the planting of trees, but new trees also need to be planted throughout urban areas and in farming areas also. Thanet Trees suggest that it is imperative that every tree that is cut down in urban areas is replaced, and that new street trees are planted where possible, for instance on Northdown Road. These will improve the appearance and microclimate of the area, provide much needed shelter during increasingly hot summers (which are increasingly likely as climate change occurs), prevent run off during times of high rainfall, mitigate pollution from cars, increase the wellbeing of inhabitants and increase wildlife in urban areas. The many benefits of trees are well known and they MUST be considered in the Local Draft Plan.</p> <p>http://www.cityoftrees.org.uk/why-trees-health-wellbeing</p>		956		Email
Gregory	Amelia	316	<p>Thanet Trees https://www.facebook.com/groups/2138824569723508/</p>	Object	<p>Sustainable Development https://consult.thanet.gov.uk/consult.ti/TLP_PRE_SUB/viewCompoundDoc?docid=9428628&sessionid=&voteid=&partId=9428916</p> <p>Thanet Trees believes there is not enough emphasis on tree planting and protection in the current Local Draft Plan. Trees are vital for human life, wildlife and the environment. Within an urban setting they not only mitigate pollution but provide shelter and protection against increased rainfall (due to more extreme weather brought about by climate change) by acting as soaks to reduce run off and flooding. In Thanet trees are cut down and not replaced. We have barely any mature trees. Why are they not considered in more detail in the plan?</p> <p>https://www.bbc.co.uk/news/science-environment-37813709 https://www.epa.gov/soakuptherain/soak-rain-trees-help-reduce-runoff</p>		960		Email
Houghton	Max	145		Object	<p>The 'Local Plan' is actually a wish list of strategic ramifications linked to the requirement for more housing. I note that from ONS figures the number of houses required in Thanet up until 2013 almost matches the expected population increase - roughly 17000 of each or one house per person! This seems a somewhat bizarre correlation. The Plan is littered with comments such as "cannot be predicted", "uncertain effect", "could result", "there is potential", "may help", "be expected", "are unknown" etc etc. These hardly help to bring confidence to the Reader. One cannot just build houses and hope that jobs will follow. It is the other way around which is why, for example, TDC should be going flat out to get both Ramsgate Port and Manston Airfield up and running which will be drivers for jobs and the resultant positive knock on effects for housing. I am also concerned about any supporting infrastructure to account for an increase in</p>	<p>As it is a 'Local Plan' it is not unreasonable to expect the Council to clearly identify the building sites and projected number of homes on each one (I appreciate the land has yet to be bought but TDC must have a priority list of sites).</p> <p>We then need a detailed explanation of the proposed infrastructure. Where will new road links go, exactly; how many more school places at nursery, primary and secondary school will be needed, where will the additional class rooms be located and where will the teachers come from;</p>	381		Web

						<p>population be it schools, health, Police, Fire, social facilities, sports fields, new transport links etc etc. Mention is made of these but very much en-passant with an expectation these will follow the house building. That is not an assumption I would be prepared to make as I suspect the reality will simply be that those facilities currently in place but now with a greater demand on their services. If I am wrong, what are the recruiting plans in place to bring more medical and teaching staff into Thanet?</p> <p>Without an unequivocal statement from Southern Water, in an area already with a limited water supply, as to where and how water would be provided for new residents it would seem foolish to even contemplate moving forward with such a house building scheme.</p>	<p>where, specifically, will new medical centres be positioned and where from and how will they be staffed: what exactly is the transport plan to be to match these developments? Do we have enough buses, trains, staff etc etc.</p> <p>Without the detail this Plan is just a wish list of Objectives that I suspect is simply 'templated' throughout the country with equally vague hopes and aspirations.</p> <p>Get into the detail if you want support.</p>			
Ptarmigan Land and Millwood Designer Homes		493	Ptarmigan Land and Millwood Designer Homes	Joshua Mellor - Barton Willmore LLP	Observation	<p>2.1 The NPPF 2012 put the 'presumption in favour of sustainable development' at the forefront of planning, to be seen as the 'golden thread' running through both plan making and decision taking (para 14). NPPF 2012 para 7 identifies the three overarching dimensions of sustainable development as an economic objective, a social objective and an environmental objective.</p> <p>2.2 As confirmed by paras 25 - 27 of the draft Local Plan, the plan has been prepared in line with the sustainable development principles of the NPPF 2012, seeking to positively deliver opportunities to meet the needs of the district, including economic, social and environmental gains. Para 29 of the draft Local Plan acknowledges that whilst the district has historically experienced social and economic problems, the proposed Local Plan strategy seeks to plan positively for economic growth and boost housing supply, in line with the Council's "high aspirations for growth".</p> <p>2.3 To do this, the draft Local Plan directs growth to areas based on a hierarchical approach, with the focus being allocating new development in highly accessible locations. This approach is supported and is consistent with the requirements of the NPPF 2012.</p> <p>2.4 To support growth, para 36 of the draft Local Plan notes the provision of infrastructure is "vitally important". The delivery of infrastructure to support existing communities and new development is one of the strategic priorities of the draft Local Plan.</p> <p>2.5 As detailed in para 6.24 of the draft Local Plan, a key element of the proposed strategy is the development of an Inner Circuit link road which will service new development as well as reduce pressure on the existing highway network. Proposed Policy SP47 (Strategic Routes) safeguards land for this purpose (as well as other road schemes and junction improvements) and notes all new development will be expected to make a proportionate and appropriate contribution to the provision of this 'key infrastructure'.</p> <p>2.6 Infrastructure provision is further required through proposed Policy SP01 (Implementation) which necessitates all new development to "fully meet its infrastructure requirements, whether directly on site or by contributing to that provision elsewhere, and to comply with the provisions of the Infrastructure Delivery Plan".</p> <p>2.7 A draft Infrastructure Delivery Plan (IDP, July 2018) forms part of the Evidence Base supporting the consultation, setting out how services and facilities will be provided to accommodate the proposed housing growth. Whilst the draft IDP provides a schedule</p>		1376	Web	

					<p>of infrastructure to support the overall plan growth, the document is currently a 'working version' which does not provide clarity with regard to infrastructure requirements to be delivered by specific sites or the estimated cost of this infrastructure.</p> <p>2.8 We support the infrastructure provisions of the draft Local Plan, including provision of the Inner Circuit link road, however it will be essential for the Council to demonstrate the plan requirements are deliverable, including clearly identifying infrastructure requirements and costs and ensuring this continues to allow developments to come forward viably.</p> <p>2.9 We reserve our right to comment further on the content and requirements of the IDP, once finalised.</p>				
Ransom	Natasha	190	British Horse Society	Object	<p>Failure to acknowledge an important equestrian community in Thanet has led to a lack of direct policy on Public Rights of Way or keeping open spaces accessible to horse riders. There are also missed opportunities to utilise the potential to grow equestrian tourism in the area which would benefit the economy. Limited mitigation strategies have been put in place to alleviate problems caused by siting new developments next to large livery yards and riding stables. Road improvements must consider existing vulnerable road users.</p>	<p>This plan should consider a specific policy under the Natural Environment and Green Infrastructure to protect and increase the Public Rights of Way network. There are very positive improvements on the Transport Infrastructure Plan but I believe that viewing the PROW network merely as a means to alleviate road traffic doesn't go far enough to protect it or work on improving access to the countryside. NPPF policy 8.75 states "Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails." This goes beyond transport needs.</p>	553		Web
Stevens	Angela	163		Object	<p>I disagree with this statement. "Westwood has strengthened its position as a retail destination, as well as being firmly established as a town centre, and has developed as an integrated community, with housing, business, leisure, sport and recreation, and education. This has been supported by investment in transport infrastructure creating a safe and attractive pedestrian environment at its centre." Westwood is NOT a town centre. Nor is it pedestrianised, except for in the heart of the various car parks by the sets of shops. It is a very disjointed shopping centre, which has had new homes built across the road from one set of shops, which are filled mainly with DFL's from London overspill! Local people can't afford the majority of new houses built. Unless people live in the 100 or so new houses, a car is needed to change centres and shop in another centre. Also, the infrastructure around Westwood Cross is gridlocked most of the time, from any direction into Westwood Cross. It is appalling most of the day!</p>	<p>Change the wording from 'town centre' to 'shopping centre'. A safe and attractive pedestrian environment at its centres, not just its centre, as if driven there, a car is needed to get from the M&S centre to the Matalan, or Homebase, or Tesco and Wickes centres. They are not connected at all, making the roads diabolical, due to volume of traffic all day.</p>	480		Web
Stevens	Angela	163		Object	<p>Point 30: The selection of key sites to accommodate new development of housing has included building new homes on Manston Airport. But, as stated by Inspector Nunn at the Public Inquiry in Summer 2017, held at Thanet District Council, the airport is still to be used for aviation only and Policies SP05 and EC4 are still valid, which seems to have been ignored throughout this emerging Local Plan. There is a DCO at the Pre-Examination stage, for the airport to remain just that - an airport! Objections have been received about the Stone Hill Park's plans of 2016 and 2018 for housing on the airport site, from the Environment Agency, Southern Water, Dover DC, MoD, etc., which appear to have been ignored by TDC in this emerging Local Plan, and the crucial Policies SP05 and EC4, which protect the airport, have been taken out, despite the majority of</p>	<p>The government's latest reports on the future of UK aviation have been totally ignored! The residents of Thanet's wishes have been totally ignored too! Thanet has a ready-made airport. Use it! It is also over an aquifer, hence the objections from the various agencies. These have also seemingly been ignored by TDC officers!</p>	482		Web

					Thanet residents wanting to retain the airport for desperately needed jobs!				
Stevens	Angela	163			Object Point 32 re infrastructure plans: A ring road has been planned around certain areas of Thanet, but it will cause chaos as it doesn't join up! Drivers will be able to get so far, then have to turn around or drive through residential areas to get back to a main road. It breaks in about 4 places.	I suggest KCC Highways and TDC get together and design an effective ring-road that doesn't keep breaking.	485		Web
Woodley	Diane	87			Object The plan, which I know the government is forcing on all councils, is not taking into account the fact that after Brexit we will need to supply our Country with more home grown food. So why build on what is acknowledged to be some of the richest most productive soil in the county? Also no one in their right mind builds that many houses without some infrastructure in place. In an area where the present infrastructure is failing the local people! The plan to build a new town is a much better option.		206		Web
Wraith	Kenneth	141	1959		Object For over four years Ramsgate and surrounding areas have benefited from quiet and lack of airport noise which is now a possible threat to these areas		354		Web

The Local Plan Strategy Key Diagram										
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
Elbourn	Bernard	131			Object	water related supply restrictions are missing	Correlate growth with available water supply.	316		Web
Hudson	Pam	240	Mrs		Observation	The Cliftonville coastline needs to be a part of strategic priorities 1 and 2. The heritage of the area needs to be strongly considered, to strengthen Cliftonville and Margate as a cultural destination with a modern seaside heritage museum to complement the burgeoning artistic offering. FOCC proposes that the coastline should be a key component of strategic priority 4, with a detailed plan to restore the coastline in place. In terms of objectives, FOCC hopes to partner successfully with the council to restore the heritage landscape for modern usage.		726		Web
Hudson	Pam	240	Mrs		Observation	Cliftonville has an economically independent, settled and mixed community structure, with the pride and confidence to invest in quality development and care for its local environment." FOCC considers it essential that the heritage and amenity assets of Cliftonville are given the utmost priority, in terms of funding and support for community initiatives. A reinvigorated coastline is the one of the best ways to revitalise the community, promote pride in the area and entice visitors down the coast to invest in new businesses.		727		Web
Hunt	Phil	118			Object	Thanet cannot support housing on the scale envisaged. If the council were to support Manston Airport instead of building houses that no one wants or can afford, then we would see a massive improvement in the prosperity of this area. By supporting the DCO & RSP would create huge opportunities for our young people in the field of aviation of which there is a world wide shortage. Please don't let this once in a lifetime chance go to change forever this very deprived area. Building houses is not the answer to unemployment just compounding the problem. Aviation is the future for this area.		248		Web
Norrington	Kenneth	200			Support	I support Manston Airport as part of the local plan and support EC4 and SP05 and Manston should be removed as and brown field sight.		598		Web
Wilson	Guy	214	red house farm (Manston) developments ltd		Observation	I am totally against any housing development on Manston Airport. i support the Riveroak option and the DCO and hope the Planning Inspectorate approves it		649		Web

Strategic Priorities and Objectives

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Alan Byrne/English Heritage		155			Support	<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.</p> <p>Historic England's comments on the relevant sections of the draft plan are as follows:</p> <p>The Vision: the Council's aspirations for 2031</p> <p>The Vision is very wide ranging and covers many areas beyond the scope of Historic England's remit but we note several references to the heritage, distinctiveness, character and unique qualities of the district and its constituent communities, and endorse the support shown for protecting and enhancing these.</p> <p>Strategic Priorities and Objectives</p> <p>Strategic Priority 1-we note the inclusion of the tourism and cultural industries sectors in this objective, both of which are underpinned by the historic environment of Thanet, and we wish to see strong employment and skills growth that builds upon the investment in heritage achieved through, inter alia, the Townscape Heritage Initiative in Margate and Heritage Action Zone in Ramsgate.</p> <p>Strategic Priority 2 - we are pleased to support the objectives that relate to tourism in the coastal towns, and to Margate's cultural offer and Ramsgate's historical and nautical heritage specifically.</p> <p>Strategic Priority 4- Historic England supports the objectives set out in this section which strongly commits the Council to protect, enhance and build upon Thanet's distinctive character, historic environment and heritage assets.</p>		426		Email
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>KCC is aware that the revised NPPF places strong emphasis upon the planning system enabling resilient and sustainable communities and landscapes, with reference to climate change. As a coastal district, Thanet is on the frontline of climate change within the Kent context, so there should be consideration within the aspirations that "Thanet's communities, infrastructure and landscape are resilient to climate change and other environmental threats, with adaptation and mitigation in place to address implications for flood risk, coastal change, water supply, biodiversity, air quality and the risk of overheating from rising temperatures."</p> <p>KCC recommends that the Local Plan acknowledges the central importance of delivering safe communities and infrastructure, which are resilient to climate change and other threats.</p>		1488		Email

						KCC recommends that Strategic Priority 4 includes consideration of resilience of Thanet's built and natural environment. KCC also recommends that an additional objective addressing resilience and the Stour Catchment Management Plan Objectives should be incorporated into this section.				
Davison	John	360			Object	To begin with congratulations on achieving Thanet's first Housing Local Plan since 2006. The fact that TDC now accepts the need for extra housing is welcome news. However, the Council's ideological obsession with aviation means they have arrived at a solution that neither central Ramsgate of the villages of Birchington or Westgate want. The Plan for 2,500 houses without real infrastructure at Birchington and Westgate while condemning the residents of central Ramsgate to planes flying 500 feet overhead is beneath contempt. still at least your map show the remaining greenfield sites are at North Foreland Golf Course and Kingsgate so the displaced residents of central Ramsgate know where to set up a refugee camp!		1057		Paper
Gregory	Amelia	119	Friends of Cliftonville Coastline		Observation	The Cliftonville coastline needs to be a part of strategic priorities 1 and 2. The heritage of the area needs to be strongly considered, to strengthen Cliftonville and Margate as a cultural destination with a modern seaside heritage museum to complement the burgeoning artistic offering. FOCC proposes that the coastline should be a key component of strategic priority 4, with a detailed plan to restore the coastline in place. In terms of objectives, FOCC hopes to partner successfully with the council to restore the heritage landscape for modern usage.	The Cliftonville coastline needs to be a part of strategic priorities 1 and 2. The heritage of the area needs to be strongly considered, to strengthen Cliftonville and Margate as a cultural destination with a modern seaside heritage museum to complement the burgeoning artistic offering. FOCC proposes that the coastline should be a key component of strategic priority 4, with a detailed plan to restore the coastline in place. In terms of objectives, FOCC hopes to partner successfully with the council to restore the heritage landscape for modern usage.	342		Web
Hudson	Pam	240	Mrs		Observation	The Cliftonville coastline needs to be a part of strategic priorities 1 and 2. The heritage of the area needs to be strongly considered, to strengthen Cliftonville and Margate as a cultural destination with a modern seaside heritage museum to complement the burgeoning artistic offering. FOCC proposes that the coastline should be a key component of strategic priority 4, with a detailed plan to restore the coastline in place.		728		Web

						In terms of objectives, FOCC hopes to partner successfully with the council to restore the heritage landscape for modern usage.				
Ransom	Natasha	190	British Horse Society		Object	Unfortunately there is a failure to comprehend the sheer volume of equestrian premises in the Manston area or their impact on the landscape and rural economy. The fields are mentioned in the Landscape Strategy as an unwanted intervention but have been around that area for over 40 years and provide livery incomes, tourist activities and training and employment for local young people. Strategic Priority 4 mentions "value of the coast and countryside, and facilitate its responsible enjoyment as a recreational and educational resource" but within the Local Plan most of the emphasis is on access to coastal areas with little reference to the central areas and the Public Rights of Way Network. Encouraging use of more inland walking and horse riding routes would also alleviate overburden on Thanet's SPA and RAMSAR coastal areas. Strategies should specifically mention protecting and enhancing the Public Rights of Way network.	Specific policy on Public Rights of Way. Acknowledgement of the impact of equestrianism on Thanet's rural economy and appropriate mitigation measures put in place in transport strategies to allow Thanet's riders to continue to use the roads safely.	560		Web
Shoul	Matt	107	FOCC - FRIENDS OF CLIFTONVILLE COASTLINE		Observation	It's imperative that re-greening Margate is stated as a Strategic priority in the Draft Plan, as inherent ongoing employment & training opportunities would follow from such an urban greening program - an explicit ongoing program of tree planting & requisite after care of trees within our urban areas necessitates a local workforce, trained in the upkeep & nurturing of trees - Margate is evidenced by the historic photographic record as being very significantly greener than it is currently & the quality-of-life enhancing effect of well maintained green urban streets is irrefutable.	The suggested program of re-greening Margate's urban areas with street trees would make a significant positive impact on the stated goals of the Strategic Plan r.e. local employment & training - plus returning Margate to a more tree populated urban area would render Margate in parity in this ecological regard with Ramesgate.	371		Web
Shoul	Matt	402			Object	It's imperative that re-greening Margate is stated as a Strategic priority in the Draft Plan, as inherent ongoing employment & training opportunities would follow from such an urban greening program - an explicit ongoing program of tree planting & requisite after care of trees within our urban areas necessitates a local workforce, trained in the upkeep & nurturing of trees - Margate is evidenced by the historic photographic record as being very significantly greener than it is currently & the quality-of-life enhancing effect of well maintained green urban streets is irrefutable.		1169		Email
Skerratt	Michael	254			Object	To whom it may concern. As a Thanet resident of some twenty years, I want to see Manston airport retained and reopened as an airport rather than any alternative use. A number of local councillors were elected by local people on the basis of their commitment to re-opening Manston as an airport, and to represent the views of the majority of local people who support the re-opening of the airport. Local councillors should honour that		771		Web

					<p>commitment, not turn face once elected, and continue to represent and take forward the views of the majority of the local population. Thanet council and her officers should be supporting the local members of parliament, not opposing them, in their commitment to maintaining and developing Manston airport as an airfield.</p> <p>Manston Airport is a vital piece of national infrastructure that, once lost, can never be re-instated. The process to acquire and re-open the airport through a Development Consent Order is now under way and it would be wrong to re-designate the airfield for alternative use in an attempt to frustrate this proposal. Manston airport is recognised by local people and nationally as an asset as an airfield, not as anything else, and the local council and her officers should also recognise and support this.</p> <p>I would like to see policies SP05 (Manston Airport site) and EC4 (Airsides development area) retained within the local plan, rather than their proposed removal and replacement. In support of the retention of Manston Airport status then Manston Airport must also be removed from the TDC brown field register.</p> <p>With an investment and improvement in high-speed rail links to the airport via a Thanet Parkway station, then Manston airport would be significantly more attractive as a viable alternative to LGW and LHR for either freight or passenger flights. The idea of a rail link to Manston airport is not a new idea and has been established for over twenty years ever since I moved to Thanet. I consider this a missed opportunity, which should have been implemented many years ago, and may have had a considerable bearing on the viability of the airport which we're now facing. The opportunity to reach the centre of London within 1 hour is highly significant both for airport passengers and commuters, and has a significant bearing on the sustainability of Manston airport as a passenger terminal. In this day and age, even with the current high speed trains it still takes too long to get to London from Thanet by train. At present the county council should consider the main reason for Thanet Parkway station as to service Manston Airport and not anything else, but that is outside of this local plan consultation.</p> <p>If the UK is going to be able to create new markets post- Brexit outside Europe then goods inward and outbound are going to have to travel a great deal further and largely by air. There will still be a significant market within Europe too, which will remain important to the UK for export but also to the EU for importing and sale of their goods to the UK.</p> <p>Without Manston Airport, Britain and particularly the South East will struggle to handle the traffic, which will be vital for our country's prosperity and growth now and in the future. It will be fifteen years at least before any new runway at LHR or LGW is up and running. Despite the economic forecasts and benefits of further capacity at either, currently there is limited capacity either for additional air freight or the predicted rise in passenger demand, and considerable local objection to further expansion at either site. It seems absurd to me that here we have a perfectly good airport at</p>			
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					<p>Manston, certainly capable of taking significant air freight traffic, which could meet an immediate need and quickly relieve pressure on LHR and LGW and free up passenger capacity there, but is being ignored and considered for primarily a housing development. With investment in the transport infrastructure, which should have been done years ago with some forward thinking and planning, then there is real potential to develop Manston airport as a freight hub and possibly for passengers too. How much heavy goods traffic do we see passing through Dover and Folkestone to and from the continent, which should indicate with improved road links the viability of Manston airport for freight.</p> <p>Thanet suffers from high levels of unemployment and social deprivation, with some of the lowest levels of household income in the south-east, and associated reduction in healthcare outcomes for the local population. I believe that we need to retain Manston as an operational airport, which with appropriate investment and development, would support significant expansion of additional local businesses around the airport site, either directly supporting the airport business or as potential customers resulting from the excellent transport links.</p> <p>This would provide much needed employment, as well as the opportunity to develop skills in technical, scientific and hospitality areas, where there are already nationally-recognised skills shortages. This could tie in with government apprentice schemes and local education providers. It would be short-sighted of the local council to allow redevelopment of the airfield for alternative uses, and a long-term view should be taken for the future of generations to come. It is becoming clearer that any redevelopment of the airfield for alternative uses will be focused primarily on residential development, with very little long term business development or additional employment opportunities. I have seen no firm evidence of the latter, despite the proposals, and would consider the employment prospects of the airport and related business as far greater than any redevelopment for alternative use.</p> <p>There are significant concerns around the high numbers of additional housing allocated and the associated environmental impact, including significant increase in pollution levels, poor air quality impacting upon local health, and further loss of green space in Thanet. Also the infrastructure plans are inadequate for vehicular, pedestrian and alternative modes of transport such as cycling. Westwood Cross is a prime example where road improvements were seen as an after thought, but should have been implemented before the development, and even now are still not great. Agreed restrictions are not monitored or enforced by the council, for example deliveries to the Tesco store on Canterbury Road, Margate near the Royal Sea Bathing Hospital site. There have been a number of fatal and serious accidents involving cars, motorcycles and cyclists, on the roads around Thanet, which are very hazardous, and unlikely to improve with potential significant residential development of the area. Many of these routes around the Westgate, Birchington, Westwood and Manston offer</p>				
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					alternative routes for locals, either as short-cuts or when the main roads are congested, but were not built or intended for heavy traffic, and remain dangerous particularly for pedestrians, cyclists, motorcyclists or when used by farm vehicles (as intended) or lorries. Yours faithfully				
Stevens	Angela	163			Observation Strategic Priority 4 - Safeguard local distinctiveness and promote awareness, responsible enjoyment, protection and enhancement of Thanet's environment, including the coast, countryside, rich seaside heritage, historic environment, diverse townscapes and landscape, biodiversity and water environment. Comment: Re the very first sentence, there is nothing more distinctive or significant in Thanet than its own Manston Airport, with its huge long and wide runway! Why has this valuable asset, currently being considered by PINS as a National asset as well as a local asset, been omitted from the emerging Local Plan?	See above. Include Manston Airport in all considerations of the emerging Local Plan.	531		Web
Stevens	Angela	163			Object TDC say, "Ensure development safeguards public and commercial water supplies in the principal chalk aquifer." Comment: Objections in the last TDC Public Consultations, from residents, the Environment Agency, Southern Water, MoD, Kent Police and others, about putting housing over the Thanet chalk aquifer, seem to have been totally ignored. Why?	Cooperate with residents more. We elect councillors who say they will deliver what we want that is best for Thanet. TDC officers seem to rule the roost at TDC and push forward what They want and not what the residents want. Nor are their current housing proposals in Thanet's best interest. The aquifer is Thanet's main water supply. To build thousands of houses there would drain our water resources.	533		Web
Stevens	Angela	163			Object Plan for sufficient new homes to meet local community need so that, irrespective of income or tenure, people have access to good quality and secure accommodation. Comment: The number of houses proposed by TDC does not in any way mirror the Local housing NEED in Thanet. We do Not want Thanet to become London's overflow and dumping ground for those disadvantaged people, just because it is cheaper for the London boroughs to buy property and house London residents in Thanet and East Kent.	The NPPF states that local authorities should reflect the need of their area and desires of their residents. Neither has been done by TDC regarding housing needs.	536		Web
Twizell	Heather	512	Natural England		Object Strategic Priority 4 We welcome the inclusion of this Strategic Priority – particularly Objectives 6 and 7. With regards to Objective 6, the recognition of the importance of creating 'a coherent network of Green Infrastructure' is particularly welcomed. We would still recommend that the word 'conserve' replaces the word 'maintain' in this objective as we believe the former better reflects the reality that nature conservation sites may be subject to change as a result of		1445		Email

					natural influences but this is not an issue if they are protected from development and appropriately managed.				
Twyman	Paul	324			Object In respect of particular policies, my professional opinion is that Strategic Priority 1, as amended in the Addendum, should revert to the original wording.	In respect of particular policies, my professional opinion is that Strategic Priority 1, as amended in the Addendum, should revert to the original wording.	988		Email
Webb	Simon	8			Object See below	I object to any further housing development in Birchington, Westgate, Garlinge or Hartsdown. These areas are already over developed and further development would blur the distinction between the separate towns/villages. It would also cause an unacceptable and unsustainable level of traffic and strain on already over crowded hospitals, schools, social services and roads.	12		Web
Wellbrook	Jacqui	20			Observation SP2 specifies plans for development of Margate, assistance for Ramsgate. Focus of any plans never give any degree of attention to Broadstairs.		32		Web
Wellbrook	Lee	21	Mr		Observation It is noticeable that, under SP2, the focus of the Plan's efforts are towards Margate ("Reshape... etc."), whereas Ramsgate ("Assist...etc.") and Broadstairs ("Enhance...etc.") are, yet again, given a lower priority and a diminished fraction of attention.		33		Web
Wraight	Kenneth	141	1959		Support This is ideal but not achievable with a 24hour cargo hub that's planned at manston		355		Web
Wraight	Kenneth	141	1959		Support Yes too this but not achievable with a possible threat from a 24/7cargo hub		356		Web

Plan Implementation and Infrastructure SP01										
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Agnew	Richard	516	Gladman		Object	<p>Strategic Site Policies</p> <p>Several of the Local Plan's proposals refer to the provision of new infrastructure or set policy In this regard Gladman remind the Council of the guidance set out in Paragraph 173 of the Framework, which states that "Plans should be deliverable. Therefore, the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened".</p> <p>Gladman submit that policies which seek developer contributions, should be properly tested for their effects on development viability and supported by an adequate evidence base.</p>		1544		Email
Barnett	Adrian	77			Object	<p>I am a little concerned that a green wedge marked on the whole policies map as being in Ramsgate is in reality in the Kingsgate area of Broadstairs and I suspect goes into other parts of Broadstairs and parts of Margate.</p>	<p>I do not believe that the document has been checked for accuracy. I have found a number of errors and I have only read parts of the document. Invalid information may cause people to come to incorrect conclusions and make inappropriate strategic decisions. For my part I think the information provided in this document should validated for accuracy and then re-submitted for people to comment on before it is submitted to the Secretary of State for independent examination.</p>	759		Web
Brain	Dayle	401			Object	<p>INFRASTRUCTURE</p> <p>Thanet aquifers are already at maximum capacity. We face water shortages every year. They are of poor quality and I am not confident they can accommodate the thousands of extra homes already built, let alone the thousands in this proposal. The sewage system is also under strain already. Effluent continues to be discharged into the sea and any walk round Margate will reveal blocked drains, with St Peter's Road regularly flooded in heavy rain. It worries me when I read Policy SP12 where 'connection to sewerage system and existing water supply' is flippantly stated without any thought to what effect this will have for all of us.</p> <p>The roads are already heavily congested, and are mostly in a terrible state of repair (as are the pavements). Noise pollution and carbon emissions have increased tremendously. Where also are the extra doctors, dentists and teachers mentioned to service the thousands of extra people? The Thanet unemployment rate is the highest ever, rising five times faster than the UK average. Where are the jobs for</p>		1164		Email

					these thousands of extra people? Cycle paths (TP03) whilst it is all very worthy establishing a 'network of cycle routes' what about the upkeep? I'm a cyclist and I'm constantly trying to swerve out of the way of rubbish and overgrown hedges. 12:13 'the developer will be responsible for the funding & arrangement of the ongoing maintenance and management amenity & play areas'. Who will monitor this and what contingencies are in place to (a) ensure this happens and (b) if the developer goes bust?			
Cocks	G C	104		Observation	The creation of "MASSIVE New Housing Estates" must provide all social support within the boundaries of such estates. These must go in to the fabric at the time of construction .		228	Email
Cooper	Barbara	514	Kent County Council (KCC)	Object	With reference to paragraph 149 of the National Planning Policy Framework, KCC recommends the following amendment: "The Council is keen to ensure that the Local Plan is fully implemented, not just the housing and employment sites, but the full range of policies, so that the Plan is successful in supporting long-term economic growth, resilience and regeneration for the area, and meeting the strategic objectives of the Plan."		1490	Email
Davies	Julie	147	CPRE Kent	Object	CPRE Kent has previously commented "The Infrastructure Delivery Plan is lacking in detail, and costs and funding sources should be resolved. Both S106 obligations and CIL will need to have regard to viability issues to ensure the level of levy set or obligations sought does not prevent the delivery of development in general. The Council should be confident of the viability of Local Plan proposals sites and this evidence should be available at the Regulation 19 consultation. It is not clear from the paragraphs and policies how the plan will feed into a Community Infrastructure Levy (CIL), nor what programme the Council have in place to work with partners to develop a Community Infrastructure Levy charging schedule as well as seek alternative funding opportunities." If anything the current draft Local Plan is even less clear now in 2018 than in 2017 and there are inconsistencies between separate parts of the Plan, for instance the Infrastructure Delivery Plan and the draft Transport Strategy regarding funding of individual projects - as shown on page 13 of the Infrastructure Delivery Plan as compared with Appendix C of the infrastructure proposals in Transport Strategy. There is a lack of clarity as to which way the Council is heading as far as the likelihood of pursuing CIL rather than Section 106 Agreements to fund major infrastructure. In the Local Plan and CIL Viability Assessment (Dixon Searle Partnership) the Council is advised that CIL may not be the right funding mechanism for delivering infrastructure. Extracts from the Dixon Searle report: 2.3.15 To date our experience of CIL and its interaction with		379	Web

					<p>strategic sites proposals has generally been that by the time the site-specific infrastructure and development mitigation needs are costed in (and usually secured through a negotiated s.106 agreement that also ensures the delivery of infrastructure in a timely way to support the development progression), little or no financial viability scope also remains with which to fund CIL payments. As above, however, this is a general statement at this stage and the application of any CIL progressed will require further consideration based on the LP as firmed up in due course.</p> <p>2.3.16 At this stage, the relevance of abnormal development costs is not known.</p> <p>2.3.17 Overall, we consider that these strategic sites early stages review outcomes certainly suggest reasonable prospects for viable development. However, the Council will need to consider the indicative surplus outcomes compared with its developing picture on likely significant planning obligations costs as more detail / cost information emerges.</p> <p>2.3.18 Therefore, we suggest that these scenarios and outcomes could usefully be reviewed further as the TDC proposals progress, and as the Council's work with involved development interests builds up; continuing the approach underway.</p> <p>Land value capture has been debated at a recent House of Commons Committee.</p> <p>Extracts from House of Commons. Housing, Communities and Local Government. HC 766. September 2018: Further reforms will be necessary if Section 106 is to provide the infrastructure and affordable housing that this country needs: (Paragraph 67)</p> <p>There is clearly an issue around capability in local authority planning departments and it is in the public's interest that this improves. Many local authorities are no match for developers and their lawyers. The Government should work with the Local Government Association to provide additional resources, training and advice to local planning authorities to ensure that they are able to negotiate robustly with developers and that local authorities are consistently able to contract for the appropriate level of planning obligations .</p> <p>Local authorities should consider using their existing CPO powers to enforce local plan policies, in particular in relation to affordable housing, where some developers seek to use viability assessments to avoid their obligations.</p> <p>The CIL Review Group recommended that a Local Infrastructure Tariff should be introduced, with a minimum level of developer contributions that cannot be negotiated away through the viability process, while ensuring local market conditions are recognised. This could help to address ongoing concerns around viability assessments and developers negotiating down local plan requirements. Notwithstanding the changes that have</p>				
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					<p>been made to the viability process within the Revised NPPF, the Government should give further consideration to the implementation of a Local Infrastructure Tariff in the future. (Paragraph 67)</p> <p>If the Community Infrastructure Levy (CIL) is to become an effective mechanism for capturing development value for the provision of local infrastructure, it requires considerable reform, as highlighted by the CIL Review Group. CIL is far too complex and the extensive range of exceptions need to be removed. Importantly, there has to be greater certainty that the infrastructure associated with development is actually delivered at the appropriate time, sometimes in advance of development commencing. It is regrettable that the Government has decided not to implement a Local Infrastructure Tariff, as recommended by the Review Group, which would address some of these concerns. We call on the Government to reconsider its rejection of this proposal. (Paragraph 77)</p> <p>The Mayoral CIL in London indicates that Strategic Infrastructure Tariffs that are simple, generally accepted and universally-applied could be effective mechanisms for capturing value to fund specific large infrastructure projects. The Government is right to explore how Strategic Infrastructure Tariffs can be extended across the country, and in particular to combined authorities, who may wish to seek advice from the Greater London Authority as to how such schemes can be successfully implemented. However, the Government should show greater urgency in this respect, given the CIL Review Group made its recommendations nearly two years ago. Care must be taken, however, to ensure that Strategic Infrastructure Tariffs create an additional source of revenue and do not undermine Section 106 receipts. Once a number of Strategic Infrastructure Tariffs are in place, the Government should undertake an assessment to ensure that they have indeed raised additional revenue and not simply diverted money from one pot to another. (Paragraph 78)</p> <p>CPRE Kent considers that the Community Infrastructure Levy (CIL) is likely to become the most effective mechanism for capturing land values and ensuring that developers pay for infrastructure. The existing S.106 system has no inbuilt guarantee of ensuring that all or any of the major items of new infrastructure are provided at an appropriately early stage of development.</p> <p>There is doubt locally that any of the major items of public infrastructure particularly the 'Inner Circuit' of roads can be delivered within the early stages of development due to the inadequacy of S.106 agreements and the incapability in the local authority planning departments who are usually no match for developers and their lawyers and it is in the public's interest that this improves.</p>				
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						CPRE Kent recommends that the full weight of the select committee's recommendations on land capture are taken on board and that Thanet Council follows the example of most other Local Planning Authorities in Kent by adopting the Community Infrastructure Levy (CIL) as a more effective mechanism for capturing development value for the provision of local infrastructure for the draft Local Plan.			
East Kent Hospitals NHS Foundation Trust		232	Lee Evans Planning	Cathy McNab - Lee Evans Planning	Support	The Trust support in principle Policy SP01 that all new development shall fully meet its infrastructure requirements either on site or by contribution to that provision elsewhere in accordance with the IDP and that this shall be secured by a range of mechanisms.		711	Web
Hanson	brenda	12			Object	<p>We are very concerned residents who live in Birchington and pay high council tax - not sure what for. We love where we live and the surrounding countryside and farmland - it is for crops NOT people. Thanet doesn't have the infrastructure - schools, elderly care, doctors, dentists, sewage, employment, road capacity nor transport for all these houses that are being planned.</p> <p>The ridiculous wording and length of the documents the Council have put on line are so transparent in their attempt to confuse, frustrate and prevent the ordinary, busy, lay person from understanding what Thanet council is actually proposing. Even the map is impossible to decipher. Bureaucracy at its very worst</p> <p>Following heated meetings between the council and local residents we are simply being ignored and absolutely no notice has been taken of what your constituents do and don't want in this area.</p> <p>Thanet councillors appear to be puppets of Kent county council, who in turn have their strings pulled by the government. No doubt large sums of money are probably being exchanged somewhere along the line. This whole plan has been a farce from it's inception and we can't see that anything will change in the future.</p> <p>Despite our best efforts we were unable to find the relevant parts buried amongst the long winded, bombastic wording of this proposal.</p> <p>We wish councils would remember that building houses does not create jobs - jobs create houses. Houses which need to be built on brown sites long before the arable farmland of Kent is being destroyed. Where will the garden of England be in the future?</p> <p>Thanet already has problems of its own with low wages, unemployment, homelessness, immigration and already poor road infrastructure, all this identified by the local council along with their statement that we are already at full infrastructure capacity.</p> <p>What is that the council do not understand when the residents say they do not want any more houses</p> <p>.</p>	Using simple English, and shorter. And what does the next question actually mean? I quote " do you consider it necessary to participate at the oral part of the examination?"	21	Web

Holden	Michael	49			Object	<p>a Our hospitals are already overstretched, especially since the rundown of K&C, who have bullied doctors out, and have now started on the senior care staff to make the situation workable. The obvious plan being to close it and build houses, and probably a private hospital.</p> <p>b Schools and Drs surgeries are already pushed to the limit, and teachers and doctors are reluctant to move into these positions.</p> <p>c My fundamental point is that the water supply and sewage/drainage is inadequate for the existing demand, at to put extra demand on to a system in such a poor state would be reckless, and to do so in the certain knowledge that the planning officer concerned should be liable to prosecution. The grounds being that it was passed in the certain knowledge that it WILL cause the use of stand pipes in the street for water, and raw sewage is already discharged into the Thames Estuary at least once a year so we can only guess how many more times. I would also point out that the risk to people and animals in these circumstances, as well as the green issues with polluting the waters and destroy the natural habitat. On these issues especially the body that approves THIS plan should be held to account, not least for the destruction of natural environment.</p> <p>P.S. This project will only supply more people looking for work, and destroy the work that is available in the tourist and fishing industries (who wants to sit in the midst of excrement?)</p>		117		Paper
Hume	Alister	341	Hume Planning Consultancy Limited		Object	<p>HPC considers that the viability assumptions presented within the Viability Assessment (and Update Report in July - August 2018) prepared by Dixon Searle do not reflect the local market dynamics arising from the geographical position of the Isle of Thanet relative to the more central areas of Kent. Given that the weighting in the revised National Planning Policy Framework (July 2018), for policy-compliant schemes, is for the land-purchase costs not to be taken into account in viability assessments, HPC believe on this basis that this component of the evidence base supporting the Local Plan will significantly affect the housing delivery rates within the district in the future. For these reasons, it is considered that the Local Plan is currently unsound.</p>		1025		Email
Jackson	Mike	173			Observation	<p>1 - Job Growth Strategy: Since Thanet District Council closed its Economical Development Unit this was the death knell in any future growth by business and entrepreneurs to move to Thanet and invest. There is no Job growth Strategy in TDC or its leadership and none proposed for the future.</p> <p>TDC (Thanet Distrct Council) have one eye on more homes being developed on the Isle with no infrastructure to support it, the most obvious thing when you first arrive in Thanet is</p>	Less dictatorial and more open to public scrutiny and suggestion.	493		Web

					<p>the lack of infrastructure, poor road layouts such as Bus stops on either side of the road blocking the movement of traffic on either side of the road in every town in Thanet.</p> <p>There are too many empty units on the too many industrial estates in and around Thanet which have been built with no concern for the local environment or again any structure put in place to take up the burden of any extra traffic including Heavy Goods vehicles,</p> <p>With the building of Westwood Cross Thanet district Council on giving that project the go ahead effectively killed off the High Street in Margate and other towns and villages, again Westwood Cross was built without any infrastructure put in place beforehand causing extreme traffic and pollution problems in and around the site. Businesses have opened and closed at Westwood Cross giving employers little type of future long term employment.</p> <p>The closure of many GP surgeries has created a gap in those being able to register with the limited amount of GP surgeries and when a GP appointment it is on a lottery first come first served basis, and local residents are sign posted to the QEQM A&E if they are unable to get a GP appointment.</p> <p>The amount of empty units all over Thanet means a re-think on whether these industrial estates are viable, given their locations and poor road links.</p> <p>Thanet is unique in that it has two ports, Port of Ramsgate plus Manston Airport and the HS1 service into Kings Cross, The two ports have both been poorly managed by both TDC (Port of Ramsgate and Manston Airport (sold to a property developer), The future of Manston Airport is looking brighter as a potential investor (RiverOak) are currently pursuing a DCO for the site and hope to develop it into a Cargo Airport, this would create many much needed varied jobs. The port of Ramsgate remains under the local authority with annual losses making it a burden on the local taxpayers.</p> <p>Tourism until the redevelopment of Dreamland in Margate was in decline like most seaside resorts. But with the new Turner Centre and re-opening of Dreamland, tourism has seen an upsurge, with HS1 offering a fast connection to London.</p> <p>Manufacturing in Thanet is a small part of the economy again because of the poor road links to major networks in Kent, a new road which by-passes Sturry would increase traffic flow to and from Thanet and would increase the potential of some inward investment.</p> <p>Thanet is losing more of its youth as there is a lack of industry and well paid employment for those students who gain exceptional grades in education, those who are left behind only have part time seasonal work available to the majority of them or unemployment.</p> <p>Unless Manston Airport is allowed to prosper and a partner</p>			
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						to help TDC in managing and attracting business to the Port of Ramsgate the future of Thanet is grim, TDC needs to engage more with big business outside Thanet rather than continuing to be insular, TDC needs a Chief Executive who has a track record of attracting inward investment from around not just the UK but from around the world. Unless there is a serious shake up of the management at TDC I cannot see any improvements in the future growth of Thanet especially in the employment sector.			
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Before a single extra new dwelling is started the road infrastructure needs much greater consideration. It is almost impossible to drive around Thanet now any new development either residential or commercial will only add to the present problems and these need to be solved first.		119	Web
Jones-Hall	Samara	295			Object	<p>I strongly object to the Council's decision to continue to prolong this issue and delay any progress or viable development of the Manston site by "proposing not to allocate the Airport site for any specific purpose in the draft Local Plan".</p> <p>The DCO Applicant ("RSP") has misrepresented and/or not factored in the negative impact of Manston's limited geographical location and its reliance solely on a poor road infrastructure for air-cargo, workers, passengers and fuel. RSP's reliance solely on a poor road infrastructure with a single motorway connection does not provide any resilience or alternative routes. M2 is the only "M" road in England that does not meet any other motorway at a junction. In 2017, there have been a number of severe and fatal incidents on the A299 and M2. RSP has incorrectly placed dependency on the Lower Thames Crossing to demonstrate surface access connectivity. Private finance necessary to support development of the Lower Thames Crossing is not yet in place and the Crossing is not scheduled to open until 2027 at the very earliest. RSP has incorrectly placed dependency on the Thanet Parkway railway as an alternative transport route to demonstrate surface access connectivity. Thanet Parkway Railway station is a passenger railway and not scheduled to open until 2021 at the very earliest. A funding shortfall of GBP 8.75m still exists. RSP has overstated access to high quality public transport. The high speed train (HS1) does not start until Ashford (about 60 minutes away by road and train from airport). The passenger train stops running to Ashford at 23:05 and starts again at 04:51am.</p>	<p>The Local Plan must support the mixed-use development of the former Manston airport site and allocate a specific purpose for the Manston site with regards to housing requirements and mixed-use development.</p> <p>This is line with Objective 2 of the Department for Environment: Food and Rural Affairs single developmental plan updated 23 May 2018, the National Planning Policy Framework updated July 2018 and its Local Plan policies including but not limited to SP02, SP09, SP12, SP21, SP23, SP34, SP36, E10, E05</p> <p>Commercial aviation is not viable at the Manston site.</p> <p>A 24/7/365 cargo hub will blight tourism, regeneration, economy, heritage, employment growth and health of Thanet residents.</p> <p>Further, the impact of and congestion on road vehicles and HGVs used to transport air-cargo, workers, passengers and fuel travelling to and from the proposed airport on Kent's road transport infrastructure and the associated carbon, nitrogen oxides and particulate matter emissions, noise and air pollution - on Thanet's and Kent's villages, towns and businesses is unacceptable nor has it been subject to a Health Impact Assessment; and - nor have travel times for all East Kent stroke victims to reach stroke unit in time as the nearest stroke unit is likely to be moved to William Harvey Hospital in Ashford been addressed.</p> <p>Further, it is a brownfield site which could be used to meet a significant proportion of district's housing</p>	879	Web

						<p>needs instead the draft Local Plan (endorsed by Thanet District Council but opposed by its officers) has pushed 2500+ houses to be built on Greenfield sites and in areas with little or no additional infrastructure.</p> <p>Further, Official Nomis statistics show that employment in Thanet has grown 13.8% since the closure of Manston Airport. General employment growth in Thanet mirrors 23% jobs growth in Tourism since closure of Manston. We must back winning strategy/proven success by investing in Heritage, Arts, Culture and Active Lifestyle related Tourism.</p> <p>Further it will destroy and diminish Thanet's landscape character and local distinctiveness.</p>			
Kirkaldie	Malcolm	382			Object	<p>The plan fails yet again to address the problems of open spaces and the excessive amount of housing in Ramsgate let alone the issues of Medical centre expansion with no ability to do this. It is not sustainable to make people go even further to see Dentists, Doctors and the ability of the local Hospital to cope, nor is it affordable for a majority of residents.</p>	1122		Email
Lamb	Kyla	373	Minster Parish Council		Object	<p>Infrastructure Requirements: It is generally accepted that even with the expensive provision of Parkway Station, for which it is generally acknowledged a large funding gap exists, the journey time to London will be improved by 1 to 3 minutes; hardly an incentive for businesses to relocate to Thanet.</p> <p>Perceived advantages of this additional station, which is less than 2 miles from the existing Minster Station, are grossly overstated and in themselves will lead to greater congestion on surrounding roads which particularly affects our residents. The Kent County Council Transport Plan makes no mention of any funding to improve the roads needed to support 17,000 houses in Thanet.</p> <p>There are 3 routes in and out of the Isle of Thanet and one of these passes through our parish; a local concern is that no significant improvement is planned to the A299 at Minster roundabout. This is despite the plethora of proposed housing development in the locality, many of the occupants of which will be travelling out of the area for employment reasons.</p> <p>It is the stated intention of this Local Plan that infrastructure improvements be made by the developers in terms of S.106 agreements and possibly the use of the Community Infrastructure Levy. The road infrastructure requires considerable improvements to support such a significant increase in housing.</p> <p>This approach is fundamentally flawed as it relies upon developer's willingness to provide the required infrastructure</p>	1073		Paper

					and could therefore adversely affect the viability of each proposed site. This is particularly relevant to the proposed "inner ring road" where many individual developers are involved; Thanet District Council has limited influence on bringing the infrastructure requirements together in a timely or effective manner. This results in a piecemeal approach to the delivery of a sustainable infrastructure for the proposed level of housing. Given this level of reliance upon developer contribution we firmly believe that this is not a sustainable strategy.				
Millar	Bill	513	NHS Thanet Clinical Commissioning Group	Observation	<p>By way of background, there are a number of drivers supporting the need for transformation in the way health services are delivered. These can be broken down into demographic, housing growth, service and premises.</p> <p>Demographic Drivers: Overall health and life expectancy in Thanet is generally worse than national averages with significant areas of deprivation. Deprivation is higher than average with about 26.7% (6,800) of children living in poverty. Life expectancy is lower than the England average and is 10.9 years lower for men and 6.2 years lower for women in the most deprived areas of Thanet than in the least deprived areas. 76% of the population have good or average mental health. However, 19,000 people have some mental health need and 4,400 people in Thanet have more than one mental health condition. The proportion of the local population in the 65+ age group is higher than the national average and is expected to grow significantly placing a major challenge on the provision of older people's services. Thanet also has the highest level of births in the Kent and Medway area, placing pressure on Maternity and Children's service</p> <p>Housing Growth Drivers: Thanet District Council has now published its Proposed Revisions to the Local Plan. This identifies a need for an additional 17,140 additional homes over the period to 2031. Based on an average population per dwelling of 2.4, this indicates an increase of over 41,000 residents or 29% above the c140,000 patients presently covered by the CCG This growth equates to the need for an additional 20 GPs based on each GP operating a list of 2,000 patients. The impact of the principle areas of development in relation to the GP practices are described in greater detail below.</p> <p>Service Drivers: To effectively address the health inequalities, financial and workforce challenges the CCG is working to transform service delivery through:</p>		1484		Email

					<p>A fundamental shift of core services from secondary care provision into the community so that patients can access effective and high quality services closer to home</p> <p>Implementation of the Primary Care Home model of care with a much greater degree of integration of community health and social care based upon a single point of access around GP practices.</p> <p>A national requirement for extended access in general practice across a 7-day period.</p> <p>Working to provide services to planned major housing developments in locations that currently have little or no spare capacity.</p> <p>Addressing the crisis in General Practice workforce vacancies across the area with some practices having held vacancies for over 12 months.</p> <p>Premises Drivers:</p> <p>The condition, location and utilisation of the GP estate is very mixed with over 56% of Practices categorised as red or amber in terms of condition. This consequently informs the CCG's view that estate should be invested in in order to provide facilities capable of delivering modern day health care to the existing patients along with future proofing the estate in response to the proposed population increase.</p> <p>NHS Thanet CCG's Primary Care Strategy identified ways to address these challenges including the implementation of Primary Care Homes. In December 2015 Thanet, through Thanet Health Community Interest Company, was chosen as 1 of 15 national rapid test sites for the PCH new model of care. This built on work already underway to bring Practices together in localities and has provided a framework to create 4 PCH's covering Broadstairs, Margate, Quex and Ramsgate. It is the intention that these PCH hubs will enable the delivery of the CCG's local care strategy, sustainability and transformation agenda.</p> <p>The key concepts of Primary Care Home are:</p> <p>The provision of care to a registered population.</p> <p>A recognition that unregistered citizens will need care provision in the geographic area covered by the PCH.</p> <p>Balancing the provision of personalised care, responsive to the need of an individual, with population health planning and provision.</p> <p>Sensitive workforce planning, consistent with the need of the registered population.</p> <p>Multi-disciplinary clinical and social care team service delivery.</p> <p>Purposeful rather than positional leadership within the organisation, with clinical leadership being a style of practice.</p> <p>Dismantling of historical organisational boundaries, working collectively through networked arrangements within modernised community healthcare premises, with access to diagnostics on site and a fully integrated IT system.</p>			
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					<p>Focusing efforts on the 'make or buy' decisions within care provision through the accountability of independently managing a capitated budget for the registered population. A strong affinity between participating practices and community services, which are not necessarily geographically co-positioned but would be normally sited within the boundaries of one CCG.</p> <p>An optimal population size served by the PCH which would be not less than 30,000, but normally not more than 50,000 people.</p> <p>A recognition that waiting for and access to NHS care remains the public's top concern and provides urgent, same day and pre-bookable appointments for the registered population. In Thanet, it was determined that each PCH would look after a registered population of 30,000 – 50,000 integrating out of hospital / local care across the primary, community, secondary and social care spectrum through the development of an Accountable Care Organisation which has general practice at the heart coordinating care across the system. To enable this, the CCG pledged to support Practices to determine premises solutions where the existing premises were not fit for purpose.</p> <p>Within the CCG area there are 4 distinct localities: Broadstairs Quex Ramsgate Margate</p> <p>The CCG has reviewed the physical quality of surgeries in its area. Of the 14 sites still operational, 2 are in the "Red" category, ie the premises are considered unsatisfactory with an identified need to improve facilities.</p> <p>6 are graded "Amber", ie premises are considered satisfactory but some areas of potential improvement have been identified. Premises in the "Red" and "Amber" category account for 57% of the total sites in Thanet CCG's area. There is therefore a defined need to further improve the quality of the premises from which primary care is delivered and to increase capacity to cope with existing need. The expected rise in demand for primary care services from the growth in new housing developments will inevitably add further strain to the ageing estate.</p> <p>The table below shows the current GMS floor space within each practice. NHS England guidance provides for an area of 0.08sqm per patient as a recommendation; the table clearly shows the huge overall under-provision of space based on current patient list sizes.</p> <table border="1"> <thead> <tr> <th>Practice</th> <th>Gross Internal Area</th> <th>Patient List (from www.nhs.uk)</th> <th>GIA/patient (sqm) NHSE</th> <th>Benchmark GIA from</th> <th>Operational under/over</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Practice	Gross Internal Area	Patient List (from www.nhs.uk)	GIA/patient (sqm) NHSE	Benchmark GIA from	Operational under/over										
Practice	Gross Internal Area	Patient List (from www.nhs.uk)	GIA/patient (sqm) NHSE	Benchmark GIA from	Operational under/over																

						(sqm)	uk)	guide: 0.083	NHSE (sqm)	capacit y (sqm)					
						Broadsta irs Medical Practice	222	7,174	0.03	595	-373				
						Bethesda Medical Centre	1,074	19,451	0.05	1,614	-540				
						Birchingt on Medical Centre	727	8,867	0.08	736	+9				
						Dashwoo d Medical Centre	846	10,129	0.08	840	+6				
						East Cliff Practice	1,382	15,693	0.09	1,302	+80				
						Minster Surgery	798	8,415	0.09	698	+100				
						Mockett s Wood Surgery	278	9,161	0.03	760	-482				
						Newingt on Road Surgery	451	7,859	0.05	652	-201				
						Northdo wn Surgery	700	9,994	0.07	829	-129				
						St Peter's	137	4,539	0.03	376	-239				

						<p>Surgery</p> <p>Summer 389 6,175 0.06 512 -123 hill Surgery</p> <p>The 822 11,997 0.06 916 -94 Grange Practice</p> <p>The 946 16,140 0.05 1,339 -393 Limes Medical Centre (incl. Garlinge)</p> <p>Westgat 533 10,147 0.05 842 -309 e Surgery</p> <p>In conclusion, if health care provision is not considered within the application process, or if s106 contributions cannot be permitted, a number of key risks have been identified that will potentially impact on primary medical care provision within Thanet: Increase in patient list sizes beyond nationally recommended guidelines; many practices are reaching crisis point in their patient/GP ratio – there is concern that this could result in unsafe practice. Services that become more difficult to access due to longer waiting times Impact on waiting times for routine GP appointments Removal of local services that are provided in GP settings and moved back to acute hospital settings in order to free up capacity within GP premises Closed GP lists with new patients having to go through an assignment process giving no guarantee of a practice of choice or that families can be kept together Closed GP lists with new patients having to travel further to register with a GP Although this response concentrates primarily on the physical premises requirements needed to cater for the additional patients expected in each locality, it is also important to note the current crisis facing GP recruitment and retention in Thanet as a whole. Many GP practices have unfilled</p>			
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					healthcare professional vacancies, and without a sustainable workforce, the future delivery of primary care services remains at risk.				
Read	Chris	344	South Thanet Constituency Labour Party		Observation When determining large scale planning applications we urge TDC to enshrine in the Local Plan the principle of the Community Infrastructure Levy and in consultation with local community groups to prioritise a plan of Thanet wide regeneration projects on which this money can be utilised. In common with other peninsula environments Thanet suffers from traffic congestion. To alleviate this CIL monies, largely dependent on progress of a large scale project such as SHP have already been ear marked for an inner ring road. utilising more strategically existing roads and building new roads to create an much needed inner loop. Without this inner ring road, traffic will not flow and pinch points will continue. It will also increase traffic on more sensitive and congested coastal roads. This will hamper commercial, personal and tourism interests. There is no scope for an alternative funding or route. The inner ring road also will provide a route to the proposed new Super Surgery to be based at Westwood Cross. Without this route access will be severely curtailed.		1030		Web
Sitch	Sue	38	Mr		Object I accept that nationally more housing is required but this proposal for Birchington and Westgate far exceeds what can be possibly for the villages can cope with for so many reasons, environmental, economic, infrastructural, educational. These plans need to be reduced by at least 50% to become feasible. The whole plan seems to be a 'knee jerk' reaction to the threat of the government stepping in.	Look first to what both Birchington and Westgate need to improve our current economic position before plans are put in place to possibly increase our current population by from 2011, by 51,420 (17,140 x 3 persons per house 2011-2031). Birchington current population approx 10,000 will increase by approx 4,800 (1,600 x 3 persons per house 2011-2031). Therefore for Birchington alone this is an increase of nearly 50%. This cannot be feasible	83		Web
Solly	C	419			Object Point 1: There is no mention of affordability in this statement and how it would be implemented, providing new homes under policy SP20 should be considered in the policy to deliver local need in the area. Thanet in particular due to its economic status should consider this option more carefully. 2 sites which have been approved under this local plan have already been challenged for viability. The 2 planning applications were: OL/TH/16/0376 – LAND REAR OF 2-28 KINGSTON AVENUE, MARGATE Where ““Members confirm that planning permission be deferred to officers for approval subject to securing a legal agreement for the provision of financial contributions as set out in the report and conditions outlined at Annex 1, including the provision of an affordable housing financial contribution in lieu of on-site affordable housing provision, as outlined in this report.” and OL/TH/16/1416 – LAND ADJOINING 1 CHILTON LANE AND CANTERBURY ROAD EAST, RAMSGATE.		1192	Solly Kent GIF.jpg (94 KB) Solly Kent Police extract.pdf (1.2 MB)	Email

					<p>Where ““Members approve the planning application subject to submission and approval of a legal agreement securing the financial contributions as stated, along with the reduced level of affordable housing provision.”</p> <p>Planning meeting minutes: https://democracy.thanet.gov.uk/documents/g4697/Printed%20minutes%2016th-May-2018%2019.00%20Planning%20Committee.htm?T=1&CT=2 This similarly caused a reaction in the press. News story: https://theisleofthanetnews.com/cutting-of-affordable-homes-on-thanet-developments-branded-as-profits-over-people/ The policy is not justified for soundness as it is not delivering the affordable housing as it is set to do. Point 2: CIL is not fully considered in the IDP as stated in the IDP “The Council is considering the preparation of a draft Community Infrastructure Levy (CIL) schedule in the near future, following quickly the draft Local Plan, if the principles set out in the draft Local Plan are agreed.” Funding streams under CIL could be a valuable form of securing funding for applications this could undermine the policy in providing Implementation. The Policy could be considered unsound by not being effective. Point 3: The IDP appears to not be fully completed as it is in draft (Version 2), it is therefore difficult to establish if a land site is viable and on reflect to the whole plan viability. I also notice that Kent Police made a representation which has not been taken onboard which does state many social aspects that should be considered. As stated in point 2 that CIL has been not been fully considered this can have “Social” impacts the local plan and as stated there is case law to support the claims. The comments are linked below and was submitted at the preferred options consultation. https://consult.thanet.gov.uk/gf2.ti/af/731202/120955/PDF/-/Hall_74_Kent_Police.pdf Point 4: With the Phasing being also considered in this policy there doesn’t appear to be any control or understanding the underlying dependencies on it. It is also possible with applications either not being applied or being unviable that this will affect the plan implementation and can affect other site deliveries. As I stated in my comments on the IDP at the preferred options consultation, it would be useful to declare what sites or what policy the dependences on the IDP item would be. There doesn’t appear to be any mapping on the requirements for the developer to understand their costs associated with development which would question viability of a planning application. Point 5: Policing costs have not been represented from the previous consultation. Kent police raised issues with infrastructure requirements it is stated that [see</p>			
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					<p>attachments]</p> <p>Point 6: There are significant funding gaps for Thanet as declared under KCC's GIF (Growth and Infrastructure Framework) as seen below [see attachments]</p> <p>KCC state that for the Infrastructure Requirements (From 2016 to 2031). The total cost for services and infrastructure is £475,175,000, The Total Funding: £288,386,000 with Secured funding: £9,325,000. Expected funding: £228,890,000. Gap: £175,789,000</p> <p>There is a large deficit of funding of services which is unclear where funding is coming from.</p>				
Steel	Richard	43		Object	<p>The water supply in Thanet is already extremely stressed and (as clear from the document) fragile/ vulnerable. Any development of the scale envisaged by this plan should be supported by well-researched evidence that major obstacles to effective sustainable development can and will be overcome. It is not acceptable to expect such a major infrastructural resource requirement to be addressed piecemeal by developers even 'though they may be working with relevant authorities. At present this vital aspect of the plan amounts to the "blind leading the blind".</p>	<p>A fully researched water supply and management strategy - also addressing sewerage - with a fully costed implementation plan to deliver the anticipated demand at the end of the plan period, including reasonable contingency, is required before any of the envisaged development can take place.</p>	97		Web
Stevens	Angela	163		Object	<p>Somebody needs to tell TDC, who apparently updated this emerging Local Plan a few months ago, about the ongoing development of the DCO on Manston Airport, so she can include accurate information about it - and the result and conclusions by Government Inspector Nunn about the Public Inquiry - into Manston Airport and its continued aviation only status.</p>	<p>include the latest status and information provided to TDC about the Manston Airport DCO, following the Public Inquiry of 2017, which affects every resident of Thanet, but which has been omitted.</p>	529		Web
Twyman	Paul	324		Object	<p>Similarly, in relation to transport and other infrastructure [Working Draft Infrastructure Delivery Plan, Updated July 2018] the assessment is feeble almost beyond belief. It tells us that "implementation is likely to be dependent on availability of resources" and then provides a table where line upon line on funding states "to be determined" or claims are made that projects would be "development funded". The very start of the draft Local Plan [page 2 para 3 - original version and not modified] refers to plans being "deliverable and realistic". The so-called "delivery plan" fails on both criteria. It is not a delivery plan but a naive shopping list.</p>		996		Email
Way	John	32	Thanet Area Committee	Observation	<p>Water Shortage-we are constantly under the threat, during dry weather conditions, of hose pipe restrictions. This has been more than emphasised during the recent heatwave.</p> <p>Sewerage Facilities-any Increase In housing would add to an already overloaded system that cannot always cope.</p> <p>Educational Provision -already a shortage of places and the village schools cannot be expected to cope with additional numbers.</p> <p>Medical Facilities-the doctors' surgeries are already full to the limit where It can be expected to receive</p>		66		Web

						adequate medical service.				
Webb	Simon	8			Object	See below	I object to any further housing development in Birchington, Westgate, Garlinge or Hartsdown. These areas are already over developed and further development would blur the distinction between the separate towns/villages. It would also cause an unacceptable and unsustainable level of traffic and strain on already over crowded hospitals, schools, social services and roads.	13		Web

Monitoring and Review

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
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Monitoring of the additional infrastructure, particularly a new road network which it is considered necessary in order to cope with the additional housing etc. will be key to the success of the plan.		120		Web
Lorenzo	Peter	37	The Broadstairs Society		Observation	The Broadstairs Society wishes to enter a general comment before delving into the bowels of the revised Local Plan. In 2015 when we responded to the first draft Local Plan we commented that whilst Central Government issued guidelines as to how to draft Local Plans it resulted in a 262 page document that took a long time to read, was pretty indigestible and difficult to comprehend. This latest version is even worse in that the only way to read it is via local offices or on computer. Furthermore the hard copies are different from the on line version and also have to be read in conjunction with other on line documents. The NPPF stresses community involvement: how is your method in any way on all fours with community involvement?		246		Web
Ransom	Natasha	190	British Horse Society		Support	Infrastructure must be in place prior to development to ensure safety or roads.		563		Web
Stevens	Angela	163			Observation	Effectiveness of the mitigation scheme (Strategic Access Management and Monitoring strategy) for the Special Protection Area. Comment: A Special Protection Area includes the marine environment around Pegwell Bay and off Ramsgate Port, which TDC has ignored by allowing Brett's to open a concrete mixing depot on the Port, without having done the statutory environmental reports, despite regular protests from local residents, who have to breathe in the carcinogenic dust from Brett's open piles of aggregate and sand, which is also affecting the protected areas of the bay and therefore fish and other marine life.	Do the necessary Marine Environmental studies and stop all business by Brett's until the results are received.	537		Web
Twizell	Heather	512	Natural England		Observation	Monitoring and Review We note that it is the Council's intention to 'monitor a focussed set of key indicators, which will give a clear indication of how successful the Local Plan Strategy is' and that these will relate to key works areas including national and international wildlife sites and the success of the SAMM strategy providing mitigation for recreational pressure impacts on the Thanet Coast and Sandwich Bay SPA. However, it is our observation that most local authorities struggle to come up with natural environment and GI indicators		1446		Email

					<p>that are genuinely focused on the success or otherwise of the Local Plan itself and are not largely influenced by outside factors. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following may be appropriate:</p> <p>Biodiversity</p> <p>Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance</p> <p>Percentage of major developments generating overall biodiversity enhancement.</p> <p>Hectares of biodiversity habitat delivered through strategic site allocations</p> <p>Green infrastructure/ access</p> <p>Percentage of the District's population having access to a natural greenspace within 400 metres of their home</p> <p>Length of greenways constructed</p> <p>Hectares of accessible open space per 1000 population.</p> <p>We recognise the advanced stage that the Thanet Local Plan is now at but if it is still possible to revise the indicators against which it will be assessed in the long term then we would welcome the opportunity to work with you on this.</p>				
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