

Matter 15 – Green Infrastructure and Open Space (Policies SP22-SP24, SP29-SP32 and GI04-GI07)

Issue 1 – Landscape Character – Policies SP22-SP23

Q4. Is the approach in Policy SP22 to “protect areas of open countryside” consistent with national planning policy in the Framework?

CPRE Kent considers that Policy SP22 is consistent with the NPPF for the following reasons:

The first bullet point in paragraph 114 of the NPPF explains how local planning authorities are required to set out a strategic approach, planning positively for the protection of green infrastructure.

Annex 2 (Glossary) defines green infrastructure is defined as:

“A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.”

The Green Wedges identified in the Local Plan are accessed by PROW, with the Thanet Coastal Path following the seaward edge of the Green Wedges between Birchington and Westgate-on-Sea, and between Margate/Cliftonville and Broadstairs. These PROWs provide quality of life benefits for local communities.

Paragraph 109 of the NPPF sets out that the planning system should protect valued landscapes and minimise impacts on biodiversity, including halting the overall decline in biodiversity. There is a Local Wildlife Site in the Green Wedge between Margate/Cliftonville and Broadstairs. This, together with the Green Wedge, provides environmental benefits.

NPPF paragraph 109 also sets out that the planning system should protect soils, with paragraph 112 requiring local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land (BMV).

The Agricultural Land Classification (England) [ALC] shows the Green Wedge between Margate/Cliftonville and Broadstairs as Grade 1 and the Post 1988 Classification shows that some is Grades 2 and 3a (both BMV). The ALC shows the Green Wedge by West Dumpton as Grades 1 and 2 (BMV).

Protecting areas of open countryside satisfies the NPPF guidance.

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Issue 3 – Protection of Open Space and Playing Fields – Policy SP29 and GI05

Q1. Are policies SP29 and GI05 consistent with the criteria set out in paragraph 74 of the Framework?

Section 8 of the NPPF recognises the important role that open space plays in terms of facilitating social interaction and creating healthy, inclusive communities.

CPRE Kent is concerned that Policy SP29(1) will result in the loss of open space to tourism uses. Reference to appropriate scale and design in the policy makes clear that built development on open space would be considered acceptable.

Allowing loss of open space to tourism would not be consistent with the NPPF. Paragraph 74 of the NPPF states:

“existing open space ... should not be built on unless ... (bullet point three) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

It is not clear how tourism uses – whatever their scale and design – could be considered compatible with the aim of preventing the loss of open space. Reference to scale and design implies an acceptance of built development on open space, and, unless for alternative sports and recreational provision this would not be consistent with the NPPF.

Tourism uses can be of a very different nature and scale to sports and recreational buildings as well as serving a much wider clientele.

Accordingly, CPRE Kent does not consider that the inclusion of tourism is consistent with the NPPF, and that policy SP29 should be amended.