

Thanet District Local Plan Examination

April to May 2019

Further Statement by Lee Evans Planning

On behalf of Friend Growers

Matter 15 - Green Infrastructure and Open Space

(Policies SP22-SP24, SP29-SP32 and GI04 -GI07)

Main Issue 1: *Landscape Character - Policies SP22-SP23*

Issue 1 – Landscape Character – Policies SP22-SP23

The wording of the Pre-Submission Publication Draft Thanet Local Plan - 2031 (the draft Local Plan) refers to the NPPF 2012. Paragraph 214 of the NPPF 2019 notes that *“The policies in the previous Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019.”* However, as wording of Local Plan policies may need to reflect current Government guidance we have referred to both Frameworks in our submission.

Question 1

What is the justification for the green wedges referred to in Policy SP22?

There does not appear to be any publically available analysis or justification for the extent and location of the Green Wedges. In their Environmental Topic Paper TDC has indicated that the Green Wedges have been brought forward since before the 1984 Local Plan and few changes have been made to the policy since its incorporation in the 1998 Local Plan.

The original objective of the green wedges was to provide spatial separation between Thanet's towns by protecting those areas of open farm land adjacent to the coastal urban areas while also protecting the countryside core of Thanet. This purpose has become eroded by the now continuous ribbon development between Margate and Ramsgate from the QEQM Hospital and Westwood Cross and new housing allocations to the west. This has left the green wedges as isolated green pockets. The developments at Quex Park and Vincent Farm and the potential development at Manston Airport further exacerbate this.

It is submitted that **there has not been sufficient analysis of the Green Wedge designations** with respect to their relevance and extent pertaining to the draft Local Plan allocations and previous development to justify their location and extent.

Question 2

How were the green wedges identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?

Please refer to the answer to Question 1 and the following:

The Environmental Topic Paper the Council has indicated that the Green Wedges have been brought forward since before the 1984 Local Plan (page 31/32); this appears to be the primary evidential justification for the allocations.

However, the Council themselves note in their Environmental Topic Paper that:

However, as they adjoin the existing built up areas of the towns their locations are nonetheless sustainable in many other respects. We will need to take a clear and balanced approach in considering their importance alongside the need for sustainable locations for new homes (page 33).

This sentiment expressed in the Council's evidence document does not seem to have been carried through into the text of Policy SP22.

Our client considers that the **whole of Thanet's rural core** from Haine Road to Westgate and Birchington is of equal agricultural and landscape value to the Green Wedges and **should be afforded equal status and protection** as shown by the Council's Landscape Character Assessment. The vast majority of the countryside and Green Wedges is Grade 1 and 2 agricultural land and one of the Green Wedges is so developed that it is now identified as urban in landscape terms (Figure 3.2 Thanet Landscape Character Assessment). The Landscape Character Assessment identifies the open views of the interior to be of significant value. The Vincent Farm development, the proximity of Quex Park development and any future redevelopment of Manston Airfield for residential use will have a dramatic and irreversible impact on the open landscape character of Thanet's rural interior.

It is submitted that **the whole of the rural area including the Green Wedges should have been reassessed** in light of the previous urban extensions and the greenfield allocations proposed by this Local Plan including the potential housing development at Manston Airport and allocations/designations should have been made on the basis of sustainability and impacts on/protection of landscape character.

Question 3

Are the green wedges justified, effective and consistent with National Policy? Are there any significant factors that indicate that sites should not have been designated?

Given the lack of an evidence base or a review of the Green Wedge designations it is difficult to ascertain if there are any significant factors that indicate that the Green Wedges should have been amended, as stated above our client considers that the whole of the rural area should have been reassessed in light of previous and proposed developments.

While paragraph 170 of the 2019 NPPF gives weight to protecting and enhancing valued landscapes Green Wedges do not carry the same significance as green belts. Paragraph 139 of the NPPF 2019 and Paragraph 85 of NPPF 2012 outline what should be assessed and considered when defining Green Belt boundaries in plans including:

- consistency with the development plans strategy for meeting identified requirements for sustainable, and
- not including land which is unnecessary to keep permanently open, and
- being able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

In this instance it is not clear that the Council have gone through this assessment process to ensure that the Green Wedges are appropriately considered and drawn, therefore, it is submitted that the evidence has not been provided to show that the Green Wedges are justified and consistent with National Policy.

The boundaries of the Green Wedges also are drawn very tightly to the built-up area of the adjoining towns preventing rural development in these sustainable urban edge areas. Our client submits that whole of the rural area should carry the same level of protection especially in light of the mounting pressure for development land. The current Green Wedge allocations disadvantage business, farmers and landowners within them in comparison to equally valuable rural land (both in landscape and agricultural terms) outside of the Green Wedges.

Question 4

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

It is submitted that the approach in Policy SP22 is more stringent than the protection given to Green Belts (a more restrictive designation) in the NPPF2019 (paragraphs 143-147) and NPPF 2012 (paragraphs 79-92) and does not provide for sustainable growth and development of rural businesses in accordance in NPPF 2019 paragraph 83, therefore the policy is overly restrictive and negatively worded so is not consistent with national policy.

Paragraph 83 NPPF 2019 (paragraph 28 in the NPPF 2012) recognises that the **following economic developments** are appropriate in rural areas:

- Businesses
- Agricultural and other land based rural businesses
- Rural tourism and leisure developments
- Local services and community facilities

Paragraph 145 and 146 of the NPPF 2019 (paragraphs 89-90 of the NPPF 2012) provide for a range of appropriate activities, developments and uses that would be appropriate in the Green Belt, which currently appear to be excluded, by the wording of Policy SP22, from the less significant designation of Green Wedges including:

- Buildings for agriculture and forestry
- Facilities for outdoor sport and recreation
- Replacement and infill buildings
- Redevelopment of brownfield sites
- Reuse and extensions to existing buildings.

While the Council’s wish to retain and protect the visual spaces between towns is understood, there is a need for these areas of land to be allowed flexibility to remain productive and for the policy to permit the efficient and effective use of this land. The landowners/businesses within these areas need to be able to adapt to a rapidly changing economic environment to ensure the continued economic viability of their businesses and land and the continued maintenance and management of the land within these area.

In *Sienkiewicz v South Somerset District Council* [2013] EWHC 4090 (Admin), Lewis J it was noted that:

“The Framework would support the grant of planning permission for even a large scale expansion of a business in a rural area assuming, of course, that any adverse effects of the proposed development were considered acceptable and the proposed development was otherwise acceptable in planning terms. That approach appears, for example, from paragraph 28 of the Framework which says planning policies should support economic growth in rural areas in order to create jobs and prosperity.” [28]

It is submitted that the policy as currently written is not consistent with national policy provides no scope for agricultural, rural businesses and tourism uses and adaptation. It is, therefore, requested that acknowledgement - either within Policy SP22 or within the supporting text - **that agricultural, horticultural, tourism and rural business buildings and associated uses may be required within the Green Wedge** and that such proposals would constitute *“essential development”* to be located within the Green Wedges as they are not able to be located elsewhere.

The following amendments have been proposed to Policy SP22 and its supporting text to clarify what development would be necessary and appropriate in the Green Wedge

Proposed amendments

Green Wedges

4.5 ...

4.7 The three Green Wedges differ in size and character. The largest is the one that separates Margate and Broadstairs. Substantial areas of this Green Wedge consist of high quality agricultural land in large open fields without fences or hedgerows. Other parts have isolated belts of woodland. The other two Green Wedges which separate Birchington and Westgate, and Broadstairs and Ramsgate are though considerably smaller, consisting predominately of agricultural land, still ~~but~~ perform a very significant function and, due to their limited extent are also potentially more vulnerable to development pressures.

4.8 ...

4.11 Some areas of the Green Wedges are vulnerable to development pressures, and some sites within them have been suggested as housing allocations. The Council has assessed the sites put forward in the Green Wedges and found that the allocation of some sites proposed in the Green Wedges would cause less harm than others. However, although allowing some small scale development may not significantly diminish the Green Wedge, the cumulative impact of several small scale developments could be of detriment to the Green Wedges and cause new development pressures where there are currently none. It could also set a precedent of releasing Green Wedge

sites and result in further development within the Green Wedges which would diminish their functions.

While protecting the amenity importance of the areas of open land in the Green Wedges that separate the towns it is necessary to recognise that this land also needs to have productive use to ensure its continued management and maintenance. As such there are certain land uses such as agricultural, horticulture, tourism and recreation that will from time to time necessitate the building of temporary and permanent structures. These should be small in scale and be kept to the minimum necessary to support the use and be design and located in a manner sensitive to the openness of the Green Wedge.

4.12 The Council considers the Green Wedges still perform a highly significant function which overrides the need for development, and should continue to be protected through planning policy and meet the strategic objective of retaining the separation between Thanet's towns and villages with the following policy.

Policy SP22 - Safeguarding the Identity of Thanet's Settlements

Within the Green Wedges new development (including changes of use) will ~~only~~ be permitted if it can be demonstrated that the development is:

1. not detrimental or contrary to the following aims, to:
 - ~~Protect areas of open countryside between the towns from the extension of isolated groups of houses or other development.~~
 - Ensure physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness.
 - Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, ~~for the enjoyment and amenity of those living in, and visiting, Thanet.~~
 - Increase access and usability without compromising the integrity of the Green Wedges.

Or

2. essential necessary to be located within the Green Wedges, such as essential buildings and uses associated with:
 - agricultural, forestry or horticultural usage of the land,
 - reuse or redevelopment of existing buildings or brownfield sites,
 - rural tourism,
 - shown to be necessary for a rural business.

Open sports and recreational uses will be permitted subject to ~~there their compliance being no overriding conflict with other policies, the wider objectives of this plan~~ objectives and the stated aims point 1 of this policy.

Development proposals should include measures to improve the visual and biodiversity values of the Green Wedge.

~~If granted, any associated~~ Any built development ~~must~~ should be kept to the ~~a~~ minimum, ~~essential, small in scale and be necessary~~ to support the ~~open~~ use. It should also be well related to adjacent urban edge and sensitively designed and located to retain openness of the area.

Proposals for ~~policy compliant~~ development that ~~includes measures that will create or enhance wildlife habitats and biodiversity within the Green Wedges, or will improve the quality of the Green Wedges by providing high quality public amenity space~~ will be supported.

Word Count not including appendices 2190

Appendix 1: Original objection to draft Thanet Local Plan

You are here: TDC Home Page > Environment & Planning > Planning > Draft Thanet Local Plan - 2031 - Pre-Submission Publication, Regulation 19 > View Comment

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Draft Thanet Local Plan - 2031 - Pre-Submission Publication, Regulation 19

View Comment

Comment Information

Document Section	Draft Thanet Local Plan - 2031 - Pre-S... Green Wedges SP22 [List all comments on this document part]
Comment ID	802
Respondent	William Friend - Friend Grower... [List all comments by this respondent]
Agent	Jeanne Taylor - Lee Evans Planning
Response Date	04 Oct 2018
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	See attached Statement
Do you consider the document is Sound?	No
If no, Do you consider it is unsound because it is:	Not Consistent with national policy
What changes do you suggest to make the document legally compliant or sound?	See attached Statement
Do you consider it necessary to participate at the oral part of the examination?	Yes
Attachments	p03798.reps on behalf of friend growers.pre-submission thanet local plan july 2018.04-10-2018.pdf (105 KB)

Officer's Response Not yet available.

Proposed Change

Notes

REPRESENTATIONS ON BEHALF OF FRIEND GROWERS IN RESPONSE TO THE CONSULTATION ON THE PRE-SUBMISSION THANET LOCAL PLAN JULY 2018

IN RESPECT OF

- SECTION 4 - ENVIRONMENT STRATEGY;
- PARAGRAPH 4.4;
- POLICY SP21
- PARAGRAPHS 4.5 TO 4.12 AND POLICY SP22

LEE EVANS PLANNING REF: P03798

OCTOBER 2018

1. **Paragraph 4.4** of the draft plan sets out the Council's view that the countryside should be protected through planning policy but acknowledges that "*essentially rural development*" can be accommodated within the countryside.

The following sentence states:-

"The only exception to this will be proposals for development that meet the criteria set out in Paragraph 55 of the NPPF..."

and then setting out the "special circumstances" as specified in Paragraph 55 of the 2012 NPPF.

However Paragraph 55 clearly relates only to **housing** in rural areas and in particular **new isolated homes in the countryside.**"

We submit that **Paragraph 4.4** does not reflect the Paragraph 55 guidance by applying the "*Paragraph 55 text*" to **any and all** development proposals in the countryside.

Paragraph 4.4 should therefore be revised to clarify that the "*acceptable development criteria*" relate solely to housing.

In addition the line beginning "*such a design should*" followed by four bullet points – to follow Paragraph 55 - should relate only to the case of "*the exceptional quality or innovative nature of the design of the dwelling*" – see extract from NPPF 2012 – the design requirements are indicated by a dash rather than solid bullet point.

In addition, and despite Paragraph 214 of the 2018 NPPF, the text should now be revised to reflect Paragraphs 77 to 79 of the 2018 NPPF and in particular **Paragraph 79** and the "*circumstances*" whereby isolated new homes can be permitted.

2. We would also submit that **Section 4** of the draft plan should also reflect paragraphs 83 and 84 of the 2018 NPPF entitled '**Supporting a Prosperous Rural Economy**'.

Inclusion of this NPPF text would enable application proposals for the following developments to be considered against up to date planning guidance and thus in accordance with **Paragraph 83** which states that:-

“Planning policies and decisions should enable”.

The 2018 NPPF recognises that the **following economic developments** are appropriate in rural areas:-

- Businesses
- Agricultural and other land based rural businesses
- Rural tourism and leisure developments
- Local services and community facilities

3. Policy SP21 – Development in the Countryside

We submit that this policy does not accord with Paragraphs 83 and 84 of the 2018 NPPF entitled **Supporting a Prosperous Rural Economy**.

Paragraph 83 states that *“planning policies and decisions should enable”*

However the wording of Policy SP21 requires the demonstration of need for a particular development that would override the need to protect the countryside.

We submit that the wording of Policy SP21 is negative in requiring a need for development to be proven.

Paragraph 83 notes that the following are appropriate developments in rural areas:-

- Businesses
- Agricultural and other land based rural businesses
- Rural tourism and leisure developments

4. Paragraphs 4.5 to 4.12 and Policy SP22 – Green Wedges

Paragraph 4.7 of the draft plan acknowledges that the Green Wedge between Margate and Broadstairs contains substantial areas of high quality agricultural land.

The text does not however acknowledge that land in the other two Green Wedges is also agricultural land.

Part 2 of proposed **Policy SP22** acknowledges that some development is *“essential”* to be located within the Green Wedges.

We would comment that the boundaries of the Green Wedges are drawn very tightly to the built-up area of the adjoining towns.

The “farmsteads” which form the operational and maintenance bases for this agricultural land will generally fall within the Green Wedge areas.

The General Permitted Development Order Provisions recognise the need for agricultural buildings etc. by removing the requirement for specific grant of planning permissions for agricultural buildings etc. where specified criteria are met.

Paragraph 83 of the 2018 NPPF notes that “*planning policies and decisions should enable*” the development of agricultural businesses.

We would therefore request acknowledgement - either within Policy SP22 or within the supporting text - that agricultural and horticultural buildings etc. may be required within the Green Wedge and that such proposals would constitute “*essential development*” to be located within the Green Wedges.

We trust that our comments will be given due consideration and amendments made as we seek.

Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.

53. Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
54. In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.
55. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:
 - the essential need for a rural worker to live permanently at or near their place of work in the countryside; or
 - where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
 - where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or
 - the exceptional quality or innovative nature of the design of the dwelling. Such a design should:
 - be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;
 - reflect the highest standards in architecture;
 - significantly enhance its immediate setting; and
 - be sensitive to the defining characteristics of the local area.

7. Requiring good design

56. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

79. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:
- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
 - b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
 - c) the development would re-use redundant or disused buildings and enhance its immediate setting;
 - d) the development would involve the subdivision of an existing residential dwelling; or
 - e) the design is of exceptional quality, in that it:
 - is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

6. Building a strong, competitive economy

80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴⁰, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
81. Planning policies should:
- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 - b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
82. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Supporting a prosperous rural economy

83. Planning policies and decisions should enable:
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
 - b) the development and diversification of agricultural and other land-based rural businesses;
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

⁴⁰ The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society. HM Government (2017) *Industrial Strategy: Building a Britain fit for the future*.

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

84. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

4 - Environment Strategy

Protecting the Countryside

4.1 The National Planning Policy Framework (NPPF) states that local plans should take account of the roles and character of different areas, promoting the vitality of our main urban areas and recognising the intrinsic character and beauty of the countryside.

4.2 Thanet's open countryside is particularly vulnerable to development because of its limited extent, the openness and flatness of the rural landscape and the proximity of the towns. Thanet's countryside provides important landscapes that contribute to its sense of place, as well as making Thanet an attractive place that people want to come to. Much of the countryside is classified as 'best and most versatile agricultural land'. The countryside also supports a variety of habitats and species, particularly a number of important species of farmland birds which have declined in numbers over the last few decades.

4.3 There is a presumption against development in the countryside as the sites allocated in this plan meet the development needs of the district. The Council has assessed all of the sites put forward, and some have been allocated in rural settlements where this has been considered appropriate to meet the needs of sustainable development

4.4 The Council considers that it is essential to protect the countryside through planning policy in view of its vulnerability to sporadic forms of development and will locate all but essentially rural development in the Thanet towns. The only exception to this will be proposals for development that meet the criteria set out in paragraph 55 of the NPPF:

- The essential need for a rural worker to live permanently at or near their place of work in the countryside; or
- Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
- Where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or
- The exceptional quality or innovative nature of the design of the dwelling.

Such a design should:

- Be truly outstanding or innovative, helping to raise standards of design more generally in rural areas
- Reflect the highest standards in architecture
- Significantly enhance its immediate setting; and
- Be sensitive to the defining characteristics of the local area

The following policy seeks to achieve the objective of safeguarding the geological and scenic value of the coast and countryside.

Policy SP21 - Development in the Countryside

Development in the countryside outside of the urban and village confines, as identified on the Policies Map and not otherwise allocated for development, will not be permitted unless there is a need for the development that overrides the need to protect the countryside and any adverse environmental effects can be avoided or fully mitigated subject to the provisions of other policies.

Green Wedges

4.5 The coastal towns of Thanet are separated by three particularly important areas of open countryside which are known as the Green Wedges indicated on the policies map.

4.6 The Green Wedges are significant in shaping the character of Thanet which has historically been a 'horseshoe' of built development wrapping around the coast. The Green Wedges provide a clear visual break when passing between the towns, giving a recognised structure and identity to Thanet's settlements. The Green Wedges are distinct from other types of open space as they provide a link between the open countryside and land which penetrates into the urban areas.

4.7 The three Green Wedges differ in size and character. The largest is the one that separates Margate and Broadstairs. Substantial areas of this Green Wedge consist of high quality agricultural land in large open fields without fences or hedgerows. Other parts have isolated belts of woodland. The other two Green Wedges which separate Birchington and Westgate, and Broadstairs and Ramsgate are considerably smaller but perform a very significant function and, due to their limited extent are also potentially more vulnerable to development pressures.

4.8 There is very limited built development within the Green Wedges. The areas have level or gently undulating landform and generally sparse vegetation. The public perception of space, openness and separation is largely gained from roads and footpaths that run through or alongside the Green Wedges in undeveloped frontages. These factors allow many extensive and uninterrupted views across open countryside, enabling people to find the recreational, scenic or amenity resources they require without having to travel long distances. This is important as it adds to the quality of life and well-being perceived by people in the community.

4.9 The aesthetics of the Green Wedges are varied, and they are not always accessible to the public. There is an opportunity to enhance the Green Wedges by creating and enhancing wildlife habitats, for example working with landowners to encourage farmland birds, and to make the areas more accessible, potentially for recreation use. This may require changing farming activities. Funding may be available for environmental land management through Natural England's Stewardship Schemes.

4.10 Local Plan policies have historically been used to prevent urban sprawl, maintain the separation of the Thanet towns and prevent their coalescence, preserving their unique identities. The Green Wedge policy has been consistently and strongly supported at appeals. Inspectors' comments in appeal decisions, and the Inspector's Report to the Thanet Local Plan Inquiry, highlight the significance of the open countryside between the Thanet Towns, in providing visual relief in a highly urbanised area.

4.11 Some areas of the Green Wedges are vulnerable to development pressures, and some sites within them have been suggested as housing allocations. The Council has assessed the sites put forward in the Green Wedges and found that the allocation of some sites proposed in the Green Wedges would cause less harm than others. However, although allowing some small scale development may not significantly diminish the Green Wedge, the cumulative impact of several small scale developments could be of detriment to the Green Wedges and cause new development pressures where there are currently none. It could also set a precedent of releasing Green Wedge sites and result in further development within the Green Wedges which would diminish their functions.

4.12 The Council considers the Green Wedges still perform a highly significant function which overrides the need for development, and should continue to be protected through planning policy and meet the strategic objective of retaining the separation between Thanet's towns and villages with the following policy.

Policy SP22 - Safeguarding the Identity of Thanet's Settlements

Within the Green Wedges new development (including changes of use) will only be permitted if it can be demonstrated that the development is

1. not detrimental or contrary to the following aims to:

- **Protect areas of open countryside between the towns from the extension of isolated groups of houses or other development.**
- **Ensure physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness.**
- **Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet.**
- **Increase access and usability without compromising the integrity of the Green Wedges.Or**

2. essential to be located within the Green Wedges.

Open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies, the wider objectives of this plan and the stated aims of this policy. If granted, any associated built development must be kept to a minimum, essential, small in scale and be necessary to support the open use. It should also be well related to adjacent urban edge and sensitively located to retain openness of the area.

Proposals for policy compliant development that include measures that will create or enhance wildlife habitats and biodiversity within the Green Wedges, or will improve the quality of the Green Wedges by providing high quality public amenity space will be supported.

Views and Landscapes

4.13 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

4.14 Thanet has historically been recognised for its distinctive wide, simple and unrestricted views and dramatic chalk cliffs along parts of its coastline. The Thanet Coast is the longest continuous stretch of coastal chalk in the UK and is one of the reasons for its designation as Special Area of Conservation (SAC). Useful resources and guidance for the interpretation of landscape are the Natural England National Character Areas, the Kent Historic Landscape Characterisation (2001) which has identified the broad historic character of the landscape of Kent, and the Thanet Landscape Character Assessment. In addition KCC commissioned a Seascape Character Assessment for the Dover Strait (2015) which identifies the character areas associated with the Dover Strait from North Foreland to Dungeness.

4.15 Thanet has a distinct landscape area defined by the Wantsum channel which gave Thanet its "island" identity by separating it from the mainland. The Channel silted up around 1,000 years ago, and is characterised by former shoreline and port settlements and irregular fields bounded by roads, tracks and paths. The Wantsum has a history of reclamation and usage stretching back to at least the 12th and 13th centuries in connection with the considerable ecclesiastical estates in the region.