

Thanet District Council

Matter Statement

Matter 15 Green Infrastructure and Open Space
(Policies SP22-24, SP29-SP32 and GI04-GI07)



Issue 1 – Landscape Character – Policies SP22-SP23

Q1. What is the justification for the green wedges referred to in Policy SP22?

Thanet has the largest urban concentration within East Kent but with one of the smallest land areas. As a result, pressure for development of land within or near the urban areas is very high. The Council has historically and consistently sought to maintain and protect the individual identities of the Thanet towns to avoid the District becoming a single indistinct urban settlement. Green wedges allow for separation and important relief between the urban environments.

Green Wedges have been a consistent feature of local planning policy in Thanet since the 1980s. An original general policy designated the countryside between the urban areas of Margate and Broadstairs as a “Green Wedge” and was adopted as an Interim Development Control Policy in 1981. Prior to this an informal policy appears to have been operated based on the Thanet Town Map. The Policy was subsequently incorporated (as Policy CAC12) in the Thanet Urban Local Plan, adopted in 1984, and which was the first formally adopted Local Plan containing policies for the urban area. This Plan also designated a “Green Wedge” to separate Birchington and Westgate (Policy CAC12A). The Isle of Thanet Local Plan of 1998 included a policy protecting the Green Wedges (Policy CL6) – and the Green Wedges were confirmed in the subsequent Adopted 2006 Thanet Local Plan (Policy CC5). The Green Wedge policy and boundaries have been supported by Local Plan Inspectors at each stage and also by most Appeal Inspectors. The boundaries have changed between the different Local Plans to reflect changes in character and development.

Thanet has three Green Wedges that differ in size and character. The largest 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.

The green wedges identified in the plan therefore form an important settlement separation function between the settlements of Birchington and Westgate, Margate and Broadstairs, and Broadstairs and Ramsgate. They provide a clear visual break which helps to reinforce the separate identities of the towns. Green wedges although not specifically mentioned, resonate with the important aims of the NPPF, contributing to the identity and distinctiveness of neighbourhoods within the towns, maintaining and enhancing the character of the place and offering opportunities for leisure and recreation in places connected to the countryside, all as the framework advises. The Council contend that the green wedge serves an important planning function in avoiding coalescence and enhancing the urban form and structure of the towns. There has been continued support from early in the process, for the retention of the green wedges from the general public to bodies such as Natural England and Kent Wildlife Trust who see them as important to maintain settlement separation and the potential for using these areas to increase biodiversity.

Because of the well established green wedge policy in Thanet, the green wedges were factored in to the Sustainability Appraisal of the local plan (CD7.4) and were discounted as areas suitable for development for the following reason (see Appendix G1 page 404):

“As a result of Thanet’s limited geographical area and almost continuous urban coastal belt, the function of the Green Wedges remains highly important and is to be subject to continued protection. Thus any release of land in Green Wedges would be considered only exceptionally

where shortcomings in the sustainability merits of alternative housing sites making up the total requirement outweigh the importance of a site to the function of the Green Wedge.”

Q2. 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?

As set out above the green wedges have been included in a number of local plans going back to the 1980's. The original boundaries of the green wedges followed definitive boundary features such as roads, field boundaries and hedgerows on the ground. Since their initial conception the boundaries have remained largely unchanged with some adjustments to reflect changing circumstances. The boundaries have changed between the different Local Plans to reflect changes in character and development and are set out below.

Between 1984 and 1998:

- Birchington-Westgate: extended to the south to reflect the full gap between the settlements.
- Margate-Broadstairs: area of East Northdown Farm removed because of intensification of farm shop use; extended in Dane Valley area to recognise removal of previous housing allocation.
- Ramsgate-Broadstairs: included for the first time.

Between 1998 and 2006:

- Birchington-Westgate: minor extension to the south at King Ethelbert School to include playing fields/pitches.
- Margate-Broadstairs: sites removed west of North Foreland Road to reflect development in that area; extended in St Peters Church area to include Cemetery.

Between 2006 and 2019:

- Margate-Broadstairs: two significant areas removed - Westwood Lodge, in response to Appeal decision 2017; and at QEQM, to reflect the full extent of the site safeguarded for QEQM expansion required during the plan period.

The latter two have been treated as exceptions as there has been support from Inspectors at appeal where development has been proposed in the green wedge - more recently January 2018 TH/16/0394.

Paragraph 5.5 of CD4.4 Strategic Housing Land Availability Assessment (July 2018) states that the Green Wedge boundaries have been assessed as part of the SHLAA process where sites have been proposed within them.

The 2006 Local Plan Inspector's report recognised the importance of the green wedge in the plan.

“Green Wedges have a much wider function as expressed in the Plan. The essence of the Green Wedges is the permanent setting of open countryside around and between the Thanet towns. They are all highly significant in the local context providing visual relief in a highly urbanised area.”

“The aims of Green Wedges are to serve as a barrier to the further outward growth and coalescence of Thanet’s urban areas so that the separate physical identities of the towns are retained. They prevent the consolidation of development on the boundaries between the built up areas of the towns and the open countryside of the wedges. This particular site provides the only remaining gap between the towns of Broadstairs and Ramsgate.”

(comments relating to an objection to amend a Green Wedge boundary)

“In my view it would set a harmful precedent if it were to be removed from the policy designation.....In addition, if the designation were to be removed it would increase the pressure for development. I consider that significant development on this site would be detrimental to the character and appearance of the area and undermine the objectives of Policy CC5”.

“In my view small piecemeal developments are particularly damaging at the narrowest points of the Green Wedges where the separation between the urban development on either side of the Wedge is limited”

As part of the review of the local plan an Environment topic paper was produced in May 2013. This concluded that the main opportunities in relation to the green wedges were to perform a Green Infrastructure function, particularly in relation to biodiversity with regards to farmland birds and farmland bird corridors.

The separation function of the green wedges has been recognised more recently in the Thanet Landscape Assessment CD5.1, for example between Birchington and Westgate on Sea LCA2 and between Margate and Broadstairs LCA3, helping to maintain the individual distinction and identity of the settlements.

Q3. 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?

It is considered that green wedge policy is consistent with national policy. One of the core planning principles set out under paragraph 17 of the NPPF (2012) is to take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it. A similar approach was supported by the Inspector at the Canterbury examination. There was a similar settlement separation designation (Green Gaps) and in his report (2017) the Inspector stated that “There are no references to Green Gaps in the Framework. However, local plans should identify land where development is inappropriate. Taking account of the different roles and character of different areas is part of a core planning principle underpinning national policy. The Gaps can contribute to local distinctiveness and identity. In principle therefore, while they have been part of local planning policy for some time, they are also consistent with current national policy.” We are of the view the view that the same rationale applies here.

In addition, paragraph 157 of the Framework in respect of local plans identifying land where development would be inappropriate, has been supported at appeal. For example, the Inspector for the appeal decision OL/TH/16/0394 concluded that the proposal before him situated in the green wedge, “would also be contrary to Policies of the Framework which include that planning

should take account of the different roles and character of different areas, including recognising the intrinsic character and beauty of the countryside, and that local plans should identify land where development would be inappropriate, for instance because of its environmental significance.”

Although the green wedges are not designated Green Belt they perform a similar function and the five purposes for green belt are applicable in this context, namely:

- to check the unrestricted sprawl of large built-up areas - as discussed at previous hearing sessions Thanet is largely a continuous urban area punctuated by the main green wedges;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 114 of 2012 NPPF states that Local planning authorities should:

- set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;

The green wedges, although farmed in part, do provide a refuge for biodiversity particularly for farmland birds which are important for Thanet's biodiversity. Part of the green wedge around Broadstairs is also a Local Wildlife Site. The wedges in some areas provide and have the potential to provide functional land for the SPA eg Broadstairs. In the past Golden Plover and Lapwing were identified in the bird surveys of January and February 2016 on land in the Broadstairs/Margate green wedge. The green wedges also provide a valuable ecological network linking the coast and farmland for example between Birchington and Westgate, and Margate and Broadstairs.

The green wedges form part of the green infrastructure network of Thanet which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Natural England have requested an amendment to paragraph 4.6 of the plan to recognise this contribution.

They have suggested adding the following sentence to paragraph 4.6 which the Council is content to propose as an amendment:

“The Green Wedges also make a valuable contribution to green infrastructure for the District”

The green wedge designation is therefore an important component which enhance and contribute to the natural environment of Thanet and their protection can enhance biodiversity interest and can have a role in achieving a net gain in biodiversity. This is supported by the general approach set out in paragraph 109 of the NPPF 2012 and paragraph 170 d) of the 2019 NPPF.

The Environment Agency have also suggested a minor amendment to the wording paragraph 4.33 to reflect the water environment.

“4.33 Thanet boasts a wealth of natural features which contribute to the green infrastructure network, including internationally and nationally designated sites and

associated species, a magnificent coastline, chalk cliffs, geological features, **river and marshland systems** and areas of open countryside with distinctive landscapes and views. It is important that these are maintained and enhanced, and better linked to provide a comprehensive Green Infrastructure network.”

The Council’s view is that there are no significant factors that indicate that sites should not have been designated. There are areas of built form within the green wedge designation which tend to be either isolated or historic buildings, former farmsteads, convents and schools. To exclude them from the designation would have the effect of creating islands of development that could intensify and create an urban feel in an otherwise open landscape. The Council has applied the Green Wedge policy consistently, and although it does include some sites with development the built form is minor in the context of the wider green wedge areas or the wider land holding that contributes to the openness of the Green Wedge

Sites within the Green Wedge that already include some forms of built development are particularly vulnerable to development pressures, particularly small piecemeal developments that would gradually erode the edges. Such erosion is particularly damaging at the narrowest points of the Green Wedges where the separation between the urban development on either side of the Wedge is limited. Allowing development on or near developed sites would set a precedent, and whilst a single development proposal on its own may not have a detrimental impact on a green wedge, the cumulative impact of further development proposals would.

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

The phrase protect areas of countryside was a long standing aim for the green wedge approach as set out originally in the 2006 plan. It was felt that the aims of the green wedges as previously set out in text should form part of the policy. However, to improve the effectiveness of the policy and to be more compatible with the terminology used in the NPPF, it is suggested that the phrase protect areas of open countryside could be amended to read “**safeguard** ~~protect~~ areas of open countryside..”

Issue 2 – Landscaping and Green Infrastructure – Policies SP24 and GI06

Q1. What is the justification for listing types of Green Infrastructure in paragraph 4.36? Is this a policy requirement that proposals will be expected to provide? If so, should it be a specific policy requirement? Is the policy effective?

The intention of paragraph 4.36 is to provide examples of the types of green infrastructure that may be appropriate as part of a development’s green infrastructure provision. These are intended as examples and may not be appropriate in all locations as some may require particular site specific conditions. The requirement to provide green infrastructure is already set out in the policy.

In response to comments received from KCC, NE and Kent Wildlife Trust the Council is suggesting that amendments to paragraphs 4.36 and 4.37 to include reference to the Government’s 25 year Environment Plan. It is proposed to amend the text to paragraphs 4.36. and 4.37 and policy SP24 as follows.

4.36. There are various Green Infrastructure projects being progressed by the Council and other organisations, and also a number of community projects. These include Dane Valley Woods, Westbrook Undercliffe Nature Park, Friends of Mocketts Wood, Montefiore Woodland and the Windmill Community Allotments. All large development sites will be expected to contribute to Thanet's Green Infrastructure by providing any of the following: in line with Policy SP24 **which should include an appropriate mix, compatible with the surrounding landscape and habitats. The Government has recently published its 25 Year Environment Plan (2018) which seeks to connect people with the environment to improve health and wellbeing through the creation of new green infrastructure. At the local level further guidance on the provision of green infrastructure including provision of new rights of way and cyclepaths can be found in Kent Design.**

Delete bulleted list as now in new paragraph 4.37a

4.37. The Council seeks to continue increasing and enhancing Thanet's Green Infrastructure network, and will encourage new community Green Infrastructure projects by working with relevant organisations. The Council will produce a Green Infrastructure Strategy in consultation with relevant groups and organisations following adoption of the Plan. The Plan sets out the strategic approach to Green Infrastructure in policy SP24 which aims to deliver the strategic objectives by protecting, maintaining and enhancing biodiversity and the natural environment and creating a coherent network of Green Infrastructure. More detail will be added in the forthcoming Green Infrastructure Strategy. Provision of new infrastructure in new developments, particularly for informal recreation and dog walking can help to reduce the impact of visitor pressure on the nature conservation interest at the coast. It can also aid restoration of the landscape, improve biodiversity and improve connectivity between habitats or habitat features such as hedgerows. **Good Green Infrastructure can have additional benefits to the wider ecosystem services including healthy water and nutrient cycles, improved air quality, managing flood risk and water pollution and minimising the effects of climate change. There are more direct benefits to local communities including the enjoyment of the natural environment and improved health and wellbeing.**

Insert new paragraph after 4.37

4.37a Development proposals should, wherever possible and feasible:

- **create new wildlife and biodiversity habitats;**
- **integrate Sustainable Drainage Systems (SuDs);**
- **plant hedgerows and trees;**
- **provide green roofs;**
- **create ponds;**
- **create urban green corridors;**
- **create roadside verges;**
- **provide and manage new accessible open space including linear routes, for informal recreation/walking and dog walking and provide linkages between areas of open space;**
- **provide private gardens and play space;**
- **conserve and enhance the character of historic green spaces;**
- **provision of off-site enhancements;**
- **contribute to the enhancement of Thanet's Biodiversity Opportunity**

Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows and water bodies where appropriate;

- **reinforce and/or restore landscape character in line with the relevant landscape character assessment guidelines.**
- **Planning new Green Infrastructure assets to maximise their provision of ecosystem services including, but not limited to, improved air quality, natural flood management and climate change adaptation where appropriate;**
- **Other suitable planting schemes to provide biodiversity opportunities.**

Amend policy SP24 - Green Infrastructure

All development proposals should, ~~respect and~~ where possible, **safeguard** Thanet's Green Infrastructure network **and enhance it by integrating new multifunctional Green Infrastructure** provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between ~~them~~ **and providing new Green Infrastructure assets** should be identified early in the design process for major developments, **together with consideration of how they will be managed and maintained in the long term.**

Development should make a positive contribution to Thanet's Green Infrastructure network ~~by~~ **wherever possible and appropriate, by the incorporation, provision or fulfilment of those matters and objectives set out in para. 4.37 above.**

- ~~Creating new wildlife and biodiversity habitats~~
- ~~Providing and managing new accessible open space for informal recreation/walking and dog walking~~
- ~~Mitigating against the loss of an farmland bird habitats~~
- ~~Providing private gardens and play space;~~
- ~~Contributing towards the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows~~
- ~~Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment guidelines~~

~~Investment and developer contributions should be directed to improve and expand Green Infrastructure and provide connecting links where opportunities exist.~~

Q2. What is the justification for requiring a landscape survey under Policy GI06 for all development proposals that require a design and access statement?

The policy should apply to those developments where a landscaping scheme is deemed to be appropriate. For example, an urban site in an historic urban area may require a design and access statement but a landscape survey may not be appropriate. Therefore, it is proposed that policy GI06 is qualified as follows:

“When a development proposal requires a design and access statement **and the proposal is likely to have landscape implications**, it will include a landscape survey **will be required**. The landscape survey should describe the current landscape features on the application site, and demonstrate how the proposed development will provide landscaping and Green Infrastructure to enhance the setting of the development, where possible and appropriate, to:

- Create an attractive environment for users and occupiers
- Establish a sense of enclosure with hedges and trees
- Soften hard building lines and the impact of new buildings
- Provide screening from noise and sun
- Create new wildlife corridors and stepping stones
- Create new wildlife habitats and improve biodiversity **including the integration with surface water management**.
- Retain historic features including boundaries and layouts
- Improve connectivity between new and existing features

The developer will need to satisfy the Council that adequate arrangements to ensure continued maintenance of landscaping has been made. The Council may seek to secure arrangements for this purpose through a planning agreement.”

The policy has also been amended to address KCC concerns re: surface water management as this can help to increase biodiversity interest and can contribute to green infrastructure..

Q3. What is the justification for requiring developers to demonstrate that adequate arrangements have been made to ensure the continued maintenance of landscaping? Is this necessary for all development proposals, and how have the costs associated with this requirement been taken into account?

Maintenance of open space and landscaping often forms part of a legal agreement attached to a planning permission. Management companies are often established to serve the whole development and are often responsible for the management and maintenance of landscaping, open space and play areas.

It is justified to require developers to demonstrate adequate arrangements for continued maintenance of landscaping to prevent the deterioration of the development. Poor maintenance can lead to problems with anti-social behaviour for example, areas if areas become overgrown due to a lack of maintenance of trees and hedgerows then this can be attractive for anti-social behaviour and lead to a fear of crime creating no-go areas.

Maintaining landscaping in a development can help to improve the overall built environment

By having the requirement in the policy the developer is aware of any costs and will have been taken into account at the outset. It is not uncommon for developments to require occupants to contribute to the maintenance landscaping and communal areas within the development. This is usually carried out by a maintenance company. This is becoming increasingly important where a SuDS scheme is included in the overall landscaping and green infrastructure strategy for the development. A lack of maintenance can lead to surface water management issues and can cause flooding.

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?

Yes. The criteria set out in SP29 and GI05 broadly reflect the criteria set out in paragraph 74 of the NPPF and include additional criteria to reflect local circumstances. The nature of the largely continuous built up area of Thanet mean that open spaces and playing fields provide a welcome break to the otherwise continuous urban area. Playing fields can often be the only open space in the existing urban area and therefore form part of the character of that area. The policy is encouraging consideration of their contribution to visual amenity and where there is no contribution then the site could come forward for development subject to the other provisions of the policy being met.

Paragraph 73 of the NPPF recognises the contribution that open spaces can make to the health and well-being of communities, and thereby improving the general quality of life. Surplus playing fields can be used for alternative open space use as once built on they are lost forever.

One of the recommendations in the Council's review of open spaces (CD5.14) recommended the Renovation of existing playgrounds, or build new "green play" area and assess (S4)./ It also includes a recommendation to meet the quantitative shortfall of open space (P4/5). In addition the playing pitch strategy(CD5.15) recommends that playing fields should be protected in all but exceptional circumstances as set out in the NPPF. The study identifies a current shortfall in the provision of playing pitches for football in the district. It states that current playing fields are protected to meet current and future needs of the District.

Issue 4 – Local Green Space – SP30

Q1. How were areas of Local Green Space identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?

The Council undertook a public consultation of the Proposed Revisions to the draft Local Plan (Preferred Options) in 2017 (20th Jan - 17th March). As part of this consultation the Council invited proposals for sites to be considered as Local Green Space. This provided the opportunity for local communities to identify those areas that are of particular importance to them, and to propose them for inclusion as Local Green Space in the local plan. This is set out in paragraph 3.3 and table 1 of CD5.11 Local Green Space Report January 2018. A total of 47 comments were received in relation to the local green space section, of these, only 43 were proposed, the rest were general comments about the designation. After the assessment had been carried out it came to light that 6 sites in Westgate had been unintentionally omitted from the original work as they had been uploaded incorrectly onto the Council's consultation system by the representor. As soon as this was discovered those sites were assessed on the same basis using the same methodology as the original 43 submissions. This is set out in CD5.12 Addendum to the Local Green Space Report. Out of the 6 additional sites 5 were assessed as meeting the criteria and were approved by full council on 19th July 2018 for inclusion in the draft local plan.

As mentioned above the Council invited the submission of sites for inclusion in the Local Green Space designation at the Proposed Revisions to the Preferred Option Consultation. Proposers were asked to supply an Ordnance Survey map extract showing the extent of the area proposed.

Sites were then assessed using a standard proforma which is set out in Appendix 1 to CD5.11. This proforma was based on the criteria set out in the NPPF and NPPG this is set out in table 4 of CD5.11.

Following an initial desktop assessment all sites were visited, photographed and a proforma was completed for each sites assessing them against the NPPF and NPPG criteria. Where sites were already protected either through international designations or protected open space or allotment policies, these were assessed to see if the current protection was sufficient. A standard approach was taken to all the cliff top areas proposed. Clifftop areas have been excluded from the designation for several reasons. They are already protected by existing designations such as protection of existing open space or international nature conservation designations. They form part of an extensive area around the district. These areas may require full and complete access for engineering works for example, to deal with cliff stabilisation, coastal protection and coastal erosion. Local green space designation could prevent necessary and vital work in the interest of public safety, from taking place. These areas also have wider public use i.e. more than local use, by visitors and holidaymakers particularly during the summer months.

A multi-disciplinary group from across the Council including officers from Planning, Estates, Tourism and Sports Development discussed the approach to the assessment of sites and those that satisfied the criteria that should be included in the pre-submission local plan.

In total as a result of this process 19 sites met the criteria and have been designated local green spaces in the draft local plan. The evidence based documents documents that were used in assessing the sites were the criteria in NPPF and NPPG.

Q2. Are the Local Green Spaces consistent with paragraphs 76-77 of the Framework which state that such designations should only be used:

- **Where the green space is in reasonably close proximity to the community it serves;**
- **Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and**
- **Where the green area concerned is local in character and is not an extensive tract of land.**

Paragraph 76 states that local communities should be able to identify green areas that are important to them, for special protection through the local or neighbourhood plan process. Local green spaces should be identified when a plan is being prepared or reviewed. In response to this the Council invited local green space submissions at the revision to preferred option stage.

Paragraph 77 together with the relevant paragraphs of the NPPG have been used to set the criteria for assessment. This is set out in table 4 of CD5.11 which is replicated below

Criteria	NPPF / NPPG reference
Is the site in close proximity to the local community that it would serve?	NPPF paragraph 77 NPPG paragraph 014
Where the green area is demonstrably special to a local community and holds a particular local significance e.g. Is the proposals to designate supported by any of the following: A friends group, parish or town council, local community group, the Ward Member?	NPPF paragraph 77 NPPG paragraph 009
Does the site have visual amenity value?	NPPF paragraph 77
Does the site have historic significance? Local heritage asset? Setting of heritage asset?	NPPF paragraph 77
Does the site have recreational value? E.g playing field	NPPF paragraph 77
Is the site important for its tranquillity?	NPPG paragraph 013
Is the site important for its wildlife value?	NPPF paragraph 77
Is the site local in character and therefore not an extensive tract of land?	NPPF paragraph 77 NPPG paragraph 015

Issue 5 – Open Space, Parks, Gardens, Recreation Grounds and Allotments – Policies SP31-SP32 and GI04

Q1. What is the justification for requiring development proposals of 50 dwellings or more to provide natural and semi-natural green spaces in Policy SP31? What is the threshold based on? Will the policy requirement be achievable on all qualifying sites?

The threshold of 50 dwellings or more has been used in other policies in the Plan. However the policy requirement may not be achievable on all qualifying sites. Para 4.67 states that larger areas of open space will be delivered most appropriately through strategic allocations which should be reflected in the policy. The second paragraph of SP31 should be amended as follows:

Sites of 50 dwellings or more Sites allocated as Strategic Housing Sites will be required to provide natural and semi natural green space and local parks, formal

**gardens, allotments and recreation grounds to meet the standards set out in ~~Table 7~~
Table 12.**

Q2. Policy SP31 requires proposals to meet the requirements in “Table 7” – where is this set out in the Plan?

This is an error - the reference should be to Table 12

Q3. What is the justification for Policy SP32? How will decision-makers determine whether the need to protect the allotments is outweighed by the overriding need for a development?


The Council commissioned an Open Space, Sport and Recreation Assessment, Strategy and Action Plan to update previous evidence base documents dated 2006 and 2010. The Study was prepared to comply with Sport England Guidance documents ‘How to undertake and apply Needs Assessments for Sport’ and ‘Playing Pitch Strategy Guidance’. The consultants liaised with Sport England (and sports National Governing Bodies) during the preparation of the studies, and the final documents received Sport England ‘sign-off’. Although this work was commissioned as a whole, it was submitted to the Council as three separate documents - Open Space Strategy (CD5.14), Playing Pitch Strategy (CD5.15) and Indoor Sports Facilities Strategy & Appendix (CD5.16 & CD5.17)

The Open Space Strategy (CD5.14) identifies a current deficit in the provision of allotments which will increase by the end of the plan period in 2031:

7.16. There are 16 allotment sites in the district. The total area of these sites is nearly 25 ha. This is relatively close to current requirement of 28.2 ha. This undersupply increases by 2031.

7.17. A quantitative analysis of provision for “Allotments” is shown as Table 7.4.

GEOGRAPHICAL AREA	TOTAL NO OF SITES.	HA	POPULATION 2016 (2014-BASED MID YEAR POPULATION PROJECTIONS)	CURRENT PROVISION HA/1000	REQUIREMENT CURRENT	CURRENT DEFICIT/ OVERSUPPLY	POPULATION 2031	REQUIREMENT BY 2031	DEFICIT/ OVERSUPPLY 2031
Thanet District	16	24.46	140,937	0.17	28.2	3.74	161,527	32.3	7.84


 Deficit
 Oversupply

It is important that allotments are retained where they can perform an important open space function and contribute to the Council's wider sustainable development objectives.

Whether or not there is an overriding need for a development that outweighs the need to protect the allotment would depend on circumstances particular to that allotment including its location, proximity of alternative allotment sites and the demand/use of the allotment and also the availability of potential alternative sites for the proposed development.

Q4. Subject to meeting the first part of Policy SP32, what is the justification for also requiring alternative provision to be made? What criteria would need to be considered in providing alternative provision nearby?

If an allotment is lost to redevelopment and not under the circumstances of clause 2 of the policy (ie there is no longer a demand), an alternative site would need to be provided to ensure the deficit in provision is not increased and to provide an alternative site for existing users. This would normally be expected to be in an accessible location that existing users can walk to (the Open Space strategy indicates a standard of 400m - approximately a 5 minute walk)

Q5. What are the standards in Policy GI04 based on? Are they justified and supported by appropriate available evidence?

The Council commissioned an Open Space, Sport and Recreation Assessment, Strategy and Action Plan to update previous evidence base documents dated 2006 and 2010. The Study was prepared to comply with Sport England Guidance documents 'How to undertake and apply Needs Assessments for Sport' and 'Playing Pitch Strategy Guidance'. The consultants liaised with Sport England (and sports National Governing Bodies) during the preparation of the studies, and the final documents received Sport England 'sign-off'. Although this work was commissioned as a whole, it was submitted to the Council as three separate documents - Open Space Strategy (CD5.14), Playing Pitch Strategy (CD5.15) and Indoor Sports Facilities Strategy & Appendix (CD5.16 & CD5.17)

The standards in Policy GI04 are based on the Councils Open Space Strategy (CD 5.14). The Strategy uses the Fields in Trust Guidelines to apply a local standard to different types of open spaces in terms of hectares per 1000 population.

Tables 10 and 11 are based on the Fields in Trust Guidelines. Table 12 summarises the assessments carried out in the Open Space Strategy which identifies the current provision of the various open space typologies and the requirements by 2031 based on hectares per 1000 population and the Fields in Trust standards.

Q6. Have the cost implications of Policy GI04 been considered as part of the Plan's preparation? What impact would the policy requirements have on the viability of new residential development?

Appendix 1 of the Local Plan Viability Assessment (Assumptions Summary - CD1.4) considered that the cost implications of Policy GI04 would be absorbed within general build costs and planning obligations.

Q7. What is the justification for requiring developers to fund the ongoing maintenance and management of amenity and play areas? Is this appropriate for all development proposals, regardless of type, scale or location?

The ongoing maintenance and management of amenity and play areas required to be provided for residential developments of 10 or more dwellings (in accordance with Table 11) has been sought as part of a legal agreement. Management companies serving a whole development are often

responsible for the management and maintenance of play areas. This may not be appropriate for all development proposals, for example developments of less than 10 units, sites within the urban area with insufficient space to provide amenity/play spaces, or sites within the vicinity of an existing amenity/play space where it would be unfeasible to request the provision of additional amenity/play spaces. Financial contributions for the management and maintenance of existing facilities will be sought in these circumstances.

Issue 6 – Jackey Bakers – Policy GI07

Q1. What is the justification for requiring ancillary development at Jackey Bakers to be justified, and subsidise the sports use?

The Jackey Bakers sports ground is a Council owned facility. The existing building and sports pitches are in need of redevelopment as they are no longer fit for purpose. The building lacks modern facilities to comply with football in general, which has been commented on by the Kent Football Association. The site has also suffered from extreme vandalism. The parking area is substandard and needs resurfacing. Despite this, the site is still the premier facility for youth and adult football.

The Council's previous Sport and Active Recreation Strategy 2015-19 suggested the redevelopment of the Jackey Bakers Recreation ground creating a 'sporting hub' to tie in with nearby facilities but to date a way forward has not yet been agreed.

The Playing Pitch Strategy (September 2018) (CD5.15) recommends the redevelopment of the Jackey Bakers Recreation ground creating a 'sporting hub' to tie in with nearby facilities. Paragraph 3.50 of CD5.15 identifies the Jackey Bakers ground as needing improvement. It states that it is important that fit for purpose ancillary provision (changing and social facilities) are provided and this site is identified. It has been assessed as in poor conditions - The clubhouse servicing the pitches is of poor condition and needs rebuilding to allow better provision for the numerous pitches. The Council recognises that in order to fund the redevelopment of this site some ancillary development such as social facilities /clubhouse/function room may be necessary. The strategy suggests using developer contributions to help fund improvements to the site and identifies it as a priority site for improvement.

Q2. Is it clear to decision-makers, developers and local communities what the policy expects of proposals for new development? Is the policy effective?

It is agreed that the policy GI07 could be clearer and more effective. It is suggested that the policy be amended as follows:

Jackey Bakers sports ground will be promoted as the long-term primary sports venue for Thanet. **Proposals which will provide a 3G pitch and improve the facilities for football, rugby, cricket, hockey and other compatible sports will be supported. Proposals will need to include a new clubhouse with improved changing and social facilities.**

Where fully justified, the Council will permit ancillary development to subsidise the sports use. **This could include limited development of D2 (leisure facilities) or D1 (community facilities) or A3 (restaurants) uses.**