



## Fwd: Comments on the Local Plan by Thanet Trees

1 message

----- Forwarded message -----

From: **Annette Feeney** <[annette.feeney@thanet.gov.uk](mailto:annette.feeney@thanet.gov.uk)>  
 Date: Tue, 29 Oct 2019 at 11:33  
 Subject: Fwd: Comments on the Local Plan by Thanet Trees

message -----

From: **Amelia Gregory** <>  
 Date: Mon, 28 Oct 2019 at 16:52  
 Subject: Comments on the Local Plan by Thanet Trees  
 To: Annette Feeney <[annette.feeney@thanet.gov.uk](mailto:annette.feeney@thanet.gov.uk)>

From Thanet Trees:

Sustainability Appraisal:

Having been through this entire document it is obvious that not nearly enough is being done to consider sustainability and the urgent need to retain green spaces within Thanet, especially those which are the sites for mature trees. Thanet has just 2% tree coverage and this is diminishing yearly. Comparable districts have 30% tree coverage and more (figures: Friends of the Earth). What is ACTIVELY being done to counteract this? We cannot continue to fell trees and destroy wildlife habitats at the speed at which we are doing so. Wildlife in the UK has diminished by 50% in 50 years and many once common species are now at risk. Why do so few developments mention trees? Even when they are clearly a features of the site. Inadequate ecological surveys are done when developments occur and mitigations go unmet (see the Laleham Gap development site on Northdown Road for a sorry example of how these requirements are unmet) This document does nothing more than pay lip service to sustainability and is woefully inadequate in an age of climate change and diminishing habitats. Can TDC demonstrate that they have achieved net gain in biodiversity? What contribution has been made towards increasing biodiversity in Thanet? The sites I have picked out below are the ones I know personally, but I am sure there are many others which fail to meet agreed stipulations to protect our planet.

From the Statement of Common Ground with Natural England

[https://www.thanet.gov.uk/wp-content/uploads/2018/11/SoCG-with-NE-FINAL-signed.pdf?fbclid=IwAR1xYClhWYFr3ToFObhgK8oA81S1tTEUccEuA5ikQT7R8\\_822qsq29InWo](https://www.thanet.gov.uk/wp-content/uploads/2018/11/SoCG-with-NE-FINAL-signed.pdf?fbclid=IwAR1xYClhWYFr3ToFObhgK8oA81S1tTEUccEuA5ikQT7R8_822qsq29InWo)

SP24 “Development should make a positive contribution to Thanet's Green Infrastructure network by:

- Creating new wildlife and biodiversity habitats
- Providing and managing new accessible open space, including linear routes, for informal recreation/walking and dog walking
- Mitigating against the loss of any farmland bird habitats (This would sit better under SP27)

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 where appropriate)  
 Reinforcing and/or restoring landscape character in line with the relevant landscape character assessment  
 guidelines

This is not demonstrated - especially in the case of the Laleham Gap site on Northdown Road, where  
 inadequate care and mitigation of both wildlife and habitats has taken place.

It is also noted in this document that "Development will only be permitted under this policy where it can  
 be demonstrated that it will not adversely affect any designated nature conservation sites through any  
 pathway of impact, including increased visitor pressure." With this in mind I don't believe any of the  
 sites below meet Natural England requirements.

[https://www.thanet.gov.uk/wp-content/uploads/2019/10/SA-Report\\_Final-issue\\_20191003.pdf?fbclid=IwAR2B43XTBKAKAsNifQypNmLwvoBFuNG44USUIClWpt9H0SdCJkcxH3TShEY](https://www.thanet.gov.uk/wp-content/uploads/2019/10/SA-Report_Final-issue_20191003.pdf?fbclid=IwAR2B43XTBKAKAsNifQypNmLwvoBFuNG44USUIClWpt9H0SdCJkcxH3TShEY)

Laleham Gap:

### 2.17.2 Site information

Site Address: Land at former Laleham Gap school, Northdown Park Road, Cliftonville Margate, CT9 2TP

Capacity and Proposed Use: 10 dwellings

Instead of 10 dwellings we have 70 tiny houses massed onto this tiny patch of land - an increased amount  
 very likely to put significant pressure on the local amenities, not to mention the increased pollution due to  
 many more cars and traffic on the surrounding roads, which will be exacerbated by the lesser number of  
 mature trees.

11. To ensure that a sustainable pattern of development is pursued.

Redevelopment of the site would proactively a sustainable pattern of land use by providing dwellings near to  
 local facilities, on previously developed land.

This development has no obvious sustainability measures put in place. How was it allowed through  
 planning?

12. To conserve and enhance the character and quality of the area's landscape and townscape particularly  
 associated with town centres and coastal areas.

Redevelopment of the site would proactively contribute towards a better townscape, if quality design  
 standards are met.

The Laleham Gap Mulberry Place development does NOTHING to enhance the character of the area. It is a  
 hugely unattractive estate comprised of poorly built new builds in place of some beautiful heritage buildings  
 and mature landscaping, that could have been far better repurposed as community or co-housing. The new  
 buildings are cheap and badly built, which will be falling apart in 20 years or less. Shameful.

14. To improve air quality in the District's Air Quality Management Areas.

Provision of bicycle storage and electric vehicle charging points could help mitigate performance against this  
 objective.

Where are these?

18. To ensure development within the District responds to the challenges associated with climate change.

New developments offer an opportunity to proactively address climate change issues in Thanet and  
 implement more modern approaches to climate change adaptation and resilience.

Measures to promote climate change adaption and resilience should be confirmed as part of the planning  
 process.

In what way has this new development addressed climate change - what measures have been made to make  
 sure the new builds are sustainable? What was confirmed before this development went ahead?

## 20. To conserve and enhance biodiversity.

By redeveloping brownfield land, pressure may be lifted from other sites that retain a greater biodiversity value to the district. However, the existing playing fields may have current biodiversity value and this should be taken in to account during any site development.

Mitigation measures to provide opportunities to develop or enhance new and existing wildlife and biodiversity areas could be included to offset the impact of the proposed development. During development, important habitats could be identified and protected through design.

The Biodiversity on this site has diminished by a criminal amount - what was once a wildlife haven supporting protected species such as bats and slow worms is now stuffed full of cheaply built fleecy housing. The hedges along the lane between Northdown Road and the old school (where the trams passed) was once an important wildlife corridor. The hedges have been razed to the ground along with every tree along this path, which was once a wonderful woodland walk, much needed for Margate residents, who have so little green space in which to wander. Utterly shameful - nothing has been done to mitigate the huge loss of biodiversity on this site and in fact there are now plans to fell another tree on Northumberland Avenue that borders the site, just where the developers wish to place an entrance into the estate.

## 22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.

New development at this scale provides opportunities to use sustainably sourced and recycled building materials, though the effect is likely to be negligible.

At the planning stage, the section 106 agreement could include a requisite to explore the possibility of using locally sourced materials.

What was done to source sustainable, local or recycled materials on this development?

Former Laleham Gap site in Broadstairs:

## 20. To conserve and enhance biodiversity.

European designated sites and has the potential to increase recreational pressure through an increase in local residents.

By redeveloping brownfield land, pressure may be lifted from other sites that retain a greater biodiversity value to the district. The site is directly to the west of three European designated sites and has the potential to increase recreational pressure through an increase in local residents.

Mitigation measures to provide opportunities to develop or enhance new and existing wildlife and biodiversity areas could be included to offset the impact of the proposed development. During development, important habitats could be identified and protected through design.

This is hilarious - the whole site was a hugely important wildlife haven. It features many mature trees that would be at risk if it were to go ahead. Nothing is mentioned about the loss of tree cover, yet this is an extremely important factor in Thanet where we have the shockingly low figure of 2% tree coverage - according to Friends of the Earth latest figures.

[382 Northdown Road](#) (aka the Holly Tree pub)

Proposed: 50 dwellings

This site is subject to a live application and it is the view of Thanet District Council that this site could come forward as windfall.

20. To conserve and enhance biodiversity.

By redeveloping brownfield land, pressure may be lifted from other sites that retain a greater biodiversity value to the district. However, the existing playing fields may have current biodiversity value and this should be taken in to account during any site development.

Have they just copy and pasted this from the Laleham Gap one?

### 3.1.2 Site information

Site Address: Land at junction of Wilderness Hill, Dane Road, Margate Capacity: 14

Site Area: 0.43 ha

Current use: Unused vegetated land and three dwellings

### 3.1.4 Appraisal summary

No potentially significant effects have been identified.

### 3.1.5 Other planning considerations

No unusual site requirements have been identified by Thanet District Council (TDC). General design and other policies apply and are sufficient.

Planning permission was granted in February 2012 for 14 dwellings on this site (Ref: TH/11/0634). This permission has now expired.

How is it that the fact this is an important wildlife haven has not been flagged up? We are woefully short of trees in Thanet, just 2% tree coverage where comparable areas have 30% and more. Margate suffers particularly badly, yet no one at TDC has flagged up this site as being an important place for wildlife, in an area which is suffering the irreparable damage of Urban Creep - where every available space is developed.

6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.

The proposed site allocation could have a beneficial effect by helping to support Margate's town centre. Details of the proposed developments are unknown at this stage, but there is likely to be a positive impact if the design and mix of housing maintains the character and sense of place associated with the area.

Do you know what would really help to promote a vibrant community? Enough green space within the urban area.

18. To ensure development within the District responds to the challenges associated with climate change.

New developments offer an opportunity to proactively address climate change issues in Thanet and implement more modern approaches to climate change adaptation and resilience. Measures to promote climate change adaptation and resilience should be confirmed as part of the planning process.

The best way to address climate change issues would be to leave some wilderness spaces AS THEY ARE. Greenery is an important wildlife habitat, soaks up carbon dioxide and minimises pollution - as well as reducing ambient temperatures nearby. This area is near the Dane Valley which is prone to flooding. We need trees and greenery to help soak up water and minimise flood damage, especially as sea levels rise.

20. To conserve and enhance biodiversity.

By developing in an existing urban area, pressure may be lifted from other sites that retain a greater biodiversity value to the district. However, the site may have current biodiversity value and this should be taken in to account during any site development. Mitigation measures to provide opportunities to develop or enhance new and existing wildlife and biodiversity areas could be included to offset the impact of the proposed development.

What exactly would these mitigation measures be?

### 3.24.2 Site information

Site Address: South of New Street and East of High Street, Margate, CT9 1EE Capacity: 27

Site Area: 0.35 ha

Current use: Retail premises, partially vacant

There is no mention of the woodland areas on this site, including trees with TPO protection.

### 3.24.3 Site description

The site is located within Margate, which is located in the north east of Thanet.

The site currently comprises retail premises (including a café, a fast food restaurant, an antiques shop, a tattoo studio, a hair and beauty salon, Omega House) and a carpark and garages. Two of shops on High Street (which bounds the west of the site) are currently vacant. The site also includes an art studio.

Again - no mention of the mature trees on the woodland areas that take up half of this site.

6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.

The proposed site allocation could have a beneficial effect by helping to support Margate's town centre. Details of the proposed developments are unknown at this stage, but there is likely to be a positive impact if the design and mix of housing maintains the character and sense of place associated with the area.

Retaining these incredibly value mature trees would be the best way to promote health and wellbeing for the residents of Margate.

9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.

The site is brownfield land, so the redevelopment of this site would not adversely affect the natural, semi-natural and street scenes. It is likely that site redevelopment could proactively contribute towards this objective by ensuring quality design is implemented.

This site is NOT brownfield land, by any measured definition. It includes significant woodland areas, containing mature trees and diverse wildlife, including birds, foxes and potentially bats.

11. To ensure that a sustainable pattern of development is pursued.

Redevelopment of the site would proactively ensure a sustainable pattern of land use by providing dwellings near to local facilities, on previously developed land.

Not all of this land has been previously developed - a significant proportion of it has never been developed and supports old mature trees and all the attendant wildlife that lives in this biodiverse woodland habitat.

18. To ensure development within the District responds to the challenges associated with climate change.

New developments offer an opportunity to proactively address climate change issues in Thanet and implement more modern approaches to climate change adaptation and resilience. Measures to promote climate change adaption and resilience should be confirmed as part of the planning process.

The best way to do this would be to LEAVE THE TREES IN SITU - at a time when there are so many initiatives to push tree planting across the UK, we continue to fell trees across Thanet. We should be nurturing and making the most of those mature trees we have left. They cannot simply be replaced with saplings.

20. To conserve and enhance biodiversity.

By developing in an existing urban area, pressure may be lifted from other sites that retain a greater biodiversity value to the district. However, the site may have current biodiversity value and this should be taken in to account during any site development. Mitigation measures to provide opportunities to develop or enhance new and existing wildlife and biodiversity areas could be included to offset the impact of the proposed development.

The best way to mitigate would be to leave all the woodland areas in situ, providing a much needed area of greenery in an area almost totally devoid of greenery.

These comments are made on behalf of Thanet Trees.