

## RESPONSE TO COMMENTS IN RED

### THEME 1: PLACE & ENVIRONMENT

<p><b>Summary:</b> Strong support in general for this Theme, with the majority making no comment. There are many areas mentioned that would not come under the Town Council jurisdiction and would be dealt with by TDC or KCC. The responses are summarised below, with individual responses given if they vary greatly within the subject.</p>
<p><b>Supports:</b> 1,3,4,6,7,8,9,11,12,14,15,17,18,19,20,21,22,23,25,26,27,28,30,31,32,33,34,36,37,38,39,40,41,42,44,45,46,47,48,49,50,51,52,54,55,58,59,60,61,62,63,64</p>
<p><b>Objects:</b> 5,24</p>
<p><b>Neither Support nor Object:</b> 10,43</p>
<p><b>Comment Summary and Response:</b></p> <p><b>(GENERAL COMMENT) 4</b> 4 - Broadstairs is a great little town, we don't need to have any great changes , or it will not be the great little place people want to come too , so only small changes not a big re-plan that the new people that have moved into the town want.</p> <p><b>Response to Comments:</b> Noted</p> <hr/> <p><b>(TREES/HEDGES/PLANTING) 1,2,18,36,40</b> 1 - Retain existing trees and plant new mini forests where possible to tackle climate change, produce better air quality and improve health and wellbeing. 2 - When trees and hedges are lost to development or for other reasons there is currently no policy for mitigation planting. Perhaps the town council can formally adopt and promote the methodology proposed in the tree strategy and lobby TD C to adopt it.</p>

**18** - We need more trees and habitats for our wildlife given that so many fields and gardens have been lost to building.

**36** - I think it is important the three towns continue to have a green wedge to separate them to prevent Thanet becoming an urban sprawl. Farmland should be retained for growing crops to reduce independence on imports.

**40** - Would like to see more trees planted and the ones we have to be looked after better i.e. cut back ivy which is killing a lot of trees

**Response to Comments:**

The neighbourhood plan has extensive policies on trees BSP3A Protects important trees in the parish and BSP3F has mitigation planting for any trees that are lost. BSP3G refers to hedges and the council is recommending that any trees more than 15 years old are not removed.

No changes to the NDP required.

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**(ENVIRONMENTAL/CLIMATE/HEALTH)** 14, 9,15,42,48,24,16,35,56

**14** – Good words but are the planning decision consistent with these themes? There is a lot of development in Broadstairs at the moment and we are losing biodiversity. Planning decisions have to follow the adopted planning framework for the area which is the Thanet Local plan and the current Broadstairs & St. Peter's Neighbourhood Plan. Updates will be made to policy CC2 to include the requirements for Biodiversity Net Gain as set out in the Environment Act 2021.

**9** – Specific focus on less polluted sea in Thanet. Bringing back no mow May. Replace noisy polluting strimmer's etc – bring back the humble rake. The town council wholeheartedly supports protection of the sea and not polluting, however, there is unlikely to be planning applications within the sea area.

**15** – Please don't spray noxious weed killer all over the pavements, it kills wildlife and pets. The town council does not use weed killer on any of its maintained land. However, KCC and TDC land is not within the remit of the NDP and out of Town Council control.

**42** – I think B&STPTC should press for solar panels being fitted to new developments wherever feasible. The Town Council fully supports the provision of solar panels and is looking at installing them on Council owned properties. Furthermore, policy SP37 in the Thanet Local Plan, supports the provision and reterofitting of renewable technology.

**48** – Wish we could get the shops to use less plastic. This is not within the remit of the NDP, although community projects to reduce plastic use will be looked at by the Town Council.

**24** – We have clean air No response required.

**16** – The 4<sup>th</sup> point is unambitious and therefore a bit of a mute point ... it should say ... Improv biodiversity and nature that is here. It's not great as it is. It is unclear where the commenter was referring to. However, policy CC2 will be updated to include the requirements for biodiversity as set in the Environment Act 2021.

**35** – To ensure we have clean air, it is imperative that all log burners are banned. Along with bonfires. It is the only way we are going to have clean air going forward. Log burners and bonfires are not subject to planning applications and therefore the NDP is unlikely to resolve this.

**56** – TDC Page 13 -Climate change and sustainability - text should read policy SP37 Noted, amend text to read SP37.

CC1, p15 -The NPPF states that planning policies should 'prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of...air...pollution' (174e) The current policy wording of CC1 should refer to 'unacceptable levels' in order for it to be deliverable. The policy wording as it stands would be difficult to assess and implement

**Noted and policy updated to better reflect the wording of the NPPF. Refer to schedule of amendments.**

CC2, p16 -The policy should refer to the Neighbourhood Plan area rather than a postcode as that is the area to which policies in the NP apply. Biodiversity Net Gain will become mandatory from November 2023 - this policy should reflect this, however, the NPPF supports the requirement for BNG now. The policy should require planning applications to provide at least 10% BNG in line with the Environment Act 2021. P15/16 Reference to the NERC duty - this has been amended by The Environment Act 2021 section 102 (3) **Noted and policy updated to refer to biodiversity net gain. Refer to schedule of amendments.**

**9** - This sounds like it's been copied from standard policies ,dreamt up by some bureaucrat. Improving air quality, you could start by building less housing which means more traffic .But that's not going to happen as it's against government policy.so a neighbourhood plan that can't get off the drawing board. **No response required**

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**(GREEN SPACES/PARKS) 8,22,57**

**8** – The area needs to work on ensuring green spaces are protected and promoted for everyone to use,. More needs to be done with rubbish, especially from beach visitors. **The Town council are positively promoting green space through the NDP and actions to reduce litter in the community projects section.**

**22** – Green Spaces need to be preserved and not built on. It would seem that any space that is available is built on in Broadstairs which would see to contradict the previous statements. **The Town council are positively promoting green space through the NDP. When sites are allocated as Local Green Space they cannot be built on.**

**57** – I believe it is vital that the two green spaces located at St Peters should be included within the plan. **Please refer to the Local Green Space background document which has assessed which Green Spaces will be included.**

**Response to Comments:**

**There are no new green spaces noted within document.**

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**(HIGHWAYS/TRAFFIC/PATHS) 10,12,20,32,37,47,49,54**

**10** – Before any changes in The town regarding traffic & parking there should be a proper consultation with Road users

**12** – Pedestrians should have priority

**20** – Under the heading of traffic management, the summer chaos in Percy Avenue and botany road need to be addressed. It must be 3 years since it started to become a problem and so far nothing has been done.

**32** – The High Street from Queens Road, Albion Street and Charlotte Street should be closed to all traffic from 10.00 am to 4.00 pm. Where there's a will, there's a way.

**37** – Trafficking control in lower part of Broadstairs needs addressing.

**47** – Parking at schools is an issue, with parents parking on yellow and zig zag lines, over driveways and up on pavements, compromising safety of the children.

**49** – Pedestrianised high street at certain times of the day

**54** - A more comprehensive bus service is necessary at our end of Broadstairs if we want to be more environmentally friendly and reduce emissions. Something like the Loop which is a fabulous service and which we used so much when we only had a short walk to the bus stop.

**Response to Comments:**

The Town Council actively lobbies KCC regarding traffic and aspirations for sustainable travel within the neighbourhood area. Despite this, it is difficult to set a planning policy for traffic and planning movements on principle highways. It is agreed that additional work needs to be addressed to assess what exactly the aspirations of the community are. This will be taken and discussed at a Council meeting but there are no changes that can be made at NDP level regarding this.

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**(TOILETS) 19**

**19** - Clean toilets ! Hygiene for the environment would be a start , as a child I remember sending money so third world countries had running water and a toilet on sewage system how about Broadstairs !

**Response to Comments:**

Toilets are currently cleaned by TDC. The Town council are in active discussion with TDC regarding this service and a community project will be set out in the Neighbourhood Development which will include as assessment of the current toilet provision and a viability assessment of taking over the toilets.

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**(NOT WITHIN OUR RESPONSIBILITY) 5**

**5** -There is no mention of ensuring Manston airport is opposed at all opportunities. If reopened, this will kill our environment.

**Response to Comments:**

**Please note that the DCO regarding Manston Airport has now been approved. However, this does not come under BSTPTC NDP.**

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**(TOWN COUNCIL) 21,9**

**21** - The town needs a single point of contact to address residents issues. Ward councillors are disinterested unless there is an imminent election. **Please refer to the Town Council website and the Town council contact telephone number.**

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**(DISABILITY) 52,29**

**52** – More access and consideration for those with a physical or visual disability. **The Town Council takes disability inclusion very seriously. The council actively promotes the process of improving access to all town council owned buildings. National policy and the Disability Act 2010, both promote the provision of disabled ramps etc at national level and through law, and therefore its inclusion in the Neighbourhood Plan is not required.**

**29** - Improve disability access and around the town and beaches. This should include increasing the number of disabled parking spaces. **Disabled parking spaces are considered by KCC for townn areas and TDC owned car parks. These cannot be provided through the NDP.**

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THEME 2: IMPROVING THE BUILT ENVIRONMENT

<b>Summary:</b> Again, strong support, though a lot of concerns regarding the building of houses, especially on greens spaces.
<b>Supports:</b> 1,3,6,7,8,9,13,14,15,18,19,20,22,23,25,26,29,30,32,33,35,36,37,38,39,41,42,44,45,46,47,48,49,50,51,54,55,59,60,61,62,63,64
<b>Objects:</b> 5,10,24,34,52
<b>Neither Support nor Object:</b> 12,11,56
<b>Comment Summary and Response:</b>  <b>(GENERAL COMMENT) 4</b> 4 - As pointed out, people come to our little town to see it as it is, not the way a lot of other small towns have gone, keep us like we are and only small changes. <b>Noted</b> <hr/> <b>(TREES/HEDGES/PLANTS) 1,3,36,28,48,56</b> 1 - Plant trees to make all these things happen. Create mini-forests throughout the area. <b>Redraft policy BSP3 to include the advocacy of new tree planting in addition to the protection of new trees. The TC actively promotes those who wish to plant additional trees for mini woodland areas.</b> 3 - The cliff tops need to be cleared of shrubs and weeds to maintain the views from the walkways, especially above Viking Bay and stone Bay. <b>Not an NDP issue, however some weeds and shrubs are there for wildlife purposes and would need to be referred to TDC.</b> 36 - Please see comment entered in previous theme. <b>Refer to previous response.</b> 28 - More trees and more provision for the kids <b>Noted. The NDP is actively trying to achieve this, policy BSP3 will be improved to include encouraging new development to provide trees.</b> 43 - Please do not cut down anymore trees or build on the green fields that surround us. Houses are being squashed in everywhere. <b>Noted, the policy approach in the NP supports this.</b> 56 – <b>TDC BSP3, p24</b> The p24 TDC objects to this policy. Application for works to protected trees do not fall under the Council's Development Plan, therefore Policies BSP3b, BSP3c, BSP3d, BSP3e cannot be applied in the determination of application made under the Town and Country Planning (Tree Preservation) (England) Regulations 2012. Therefore, these policies would have no weight in the determination of the

applications they are designed to address. The previous wording of the policy is sound (in conjunction with Local Plan Policies GI06 and QD02), as it relates to the consideration of trees within planning applications. Neighbourhood Plan policies should not include procedural matters, and cannot commit the local planning authority to a particular process for determining applications, either for development or works to protected trees. **Policy BSP3 has been redrafted following the comments from TDC, please refer to schedule of amendments. This policy now also includes the promotion of new planting in all new developments in accordance with the drafting of the original tree policy in the Neighbourhood Development Plan First Edition.**

**(PLANNING) 11,14,45,10,34,52,2,27,31,40,53,57**

**11** - Why are they building at Joss Bay? **Please refer to the Planning portal on the TDC website.**

**14** - Again, it is important that these themes are properly observed in the day-to-day planning decisions. I have noticed new developments in this area with artificial grass, much paving. How is this consistent with the themes? **All planning applications will have to adhere with the up-to-date development plan which includes the NDP. Artificial grass and paving would be included in any landscaping or a proposed scheme. Artificial grass will be included in the pre-text to the biodiversity policy due to it being a poor habitat.**

**45** - It is vital to keep as much green and open space as possible, prioritising the redevelopment of brown field land and redundant/empty buildings. **Noted. This is a key aspiration of the NDP.**

**34** - Deep concerns regarding housing development. **Noted.**

**52** - I feel that generally it is good but the continuing use of taking land for the construction of new housing. Consideration must be given to the fact that the infrastructure i.e. schooling chemists shops is not sufficient unless these are considered in future projects. **The NDP is not allocating any housing development. This is approved at the district level through the Thanet local plan. The Thanet Local Plan, in consultation with service providers, considers the special planning of services within its area.**

**2** - There should be a condition on new builds that they have 'A' rated insulation and efficiency, use air or ground source heat pumps, have grey water reuse systems and solar panels. **Policy CC1 promotes sustainability in new developments. It will be for the Local Planning Authority, when determining planning applications, whether they will condition the sustainability elements.**

**31** - Ensuring sufficient, affordable housing should be a priority. Balancing the need for holiday accommodation and homes needs to be addressed with a variety of approaches. **There is no active planning process on existing buildings that can prevent them from being used as a holiday let, however new builds could potentially be prevented from being holiday lets through planning condition, this would have to be dealt with at the Local Planning Authority level.**

**40** - We must stop building any more houses on green belt land **Noted. Policy already looks at this through our green wedge policy.**

**53** - Builders are forever putting pressure on the green wedge and it's Thanet District council that gives planning them permission. You cannot protect a vista. **There is currently adopted vista policy within the first addition of the NDP.**

**57** - I believe the number of planning applications that are delegated to TDC planning officers has increased significantly over the years, planning officers appear to be unregulated or challenged in their decisions? I feel the town council should be more vocal in support of local residents facing continuing over development within the area. **Judicial review process enables planning decisions to be challenged if required.**

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**(ENVIRONMENTAL/CLIMATE/HEALTH) 8,20,49,16**

**8** - Outdoor healthy initiatives need to be subsidised to make the most of the beaches and parks. Cycling initiatives should be a priority to reduce traffic and encourage more to use bikes and feel safe to do so. Current cycle lanes are not fit for purpose. Other countries have been much more successful at this. More built up area of Broadstairs should have the opportunity to access to growing vegetable patches. More wildflowers as started in Pierremont to encourage wildlife. Improve recycling opportunities. **Noted. These ideas are actively supported although they cannot be delivered through NDP policy. Project ideas will be referred to the Town Council.**

**20** - The final point about air quality and healthy living sounds like an import from London, it is not relevant to Thanet. **Please refer to our Air Quality Policy CC1.**

**49** - Outside gym equipment on both eastern and western esplanades **This is TDC land and dealt with through their Parks and Open Spaces.**

**16** - Again, sustain the nature and biodiversity is a pretty poor objective. Should really say improve. **It is an objective supported through policy. On this basis the objective does not need to be updated.**

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**(LOCAL GREEN SPACES/PARKS) 18,22,56**

**18** - Stop building on our green spaces, no more please. **The NDP actively promotes the retention of green space within the neighbourhood area.**

**22** - As I mentioned previously , preservation of any green space is important , protection of trees is important. I'd like to see a halt to all new building in the area as I believe we are already too densely built on **see above response.**

**56 – TDC BSP5, p28** - The Council objects to this policy. The proposed LGS at Joss Bay should not be included as it would be contrary to the Council's approach to designating LGS as set out in the Report on Assessment of Local Green Space Proposals (part of the Local Plan Evidence Base):

'A standard approach has been taken to all the cliff top areas proposed. These are already protected by the protection of open space designation and in some places, international nature conservation designations. Clifftop areas have been excluded from the designation as they provide an extensive area around the district and 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 more than local use'. **Disagree. No amendments required as this only refers to the picnic area. A full assessment of local green spaces has taken place at local level through our own matrix system, contained in the Local Green Space background document, which is an active and encouraged element of the NPD planning process.**

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**(HERITAGE/BUILDINGS/CONSERVATION) 5**

5 - While conservation and heritage are important, the town needs to progress and embrace challenging design too. **Noted**

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**(HIGHWAYS/TRAFFIC/PATHS) 6**

6 - the infrastructure in, around and through St Peters is already badly congested, major road improvements need to be considered before ANY further development is considered. Most local roads are gridlocked during peak times and only 1 pinch point along Church St/Vicarage Road needs a 2nd one to balance traffic. It can take upwards of 45 minutes to travel any short distance. Parking is another contentious issue with so many vehicles parked on double yellow lines, on pavements (very narrow in St Peters), and on corners to say the least. Refuse collection and emergency vehicle access is often compromised. **Noted regarding congestion in the neighbourhood area. This cannot be resolved through planning policies in the NDP but the Town council will actively lobby KCC and will promote this through a community project.**

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**(NOT WITHIN OUR RESPONSIBILITY) 5**

5 - Again, no mention of Manston. Stop the airport and use that ugly eyesore to build sufficient houses without having to build on other green belt land. **Manston is not in the Neighbourhood Area. Please refer to previous comments on Manston.**

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**(TOWN COUNCIL) 24**

24 - This is not the job of the council. **The Government, through the localism act 201,1 gave parishes the right to produce a NDP.**

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**(BEACH/SEA/SEAWEED) 15,30,47**

15 - Please ensure no sewage polluting our beaches, this is so bad here.

30 - can you be sure the sewerage treatment plant is working as a healthy and safe operation

47 - Sewage leaks into the sea need to be addressed.

**Response to Comments:**

**It is agreed that Southeastern water and sewage issues relating to the spill reports has a negative impact on the area. The TC will support all other local authorities and businesses in the area to lobby to resolve this issue.**

**(OMISSIONS/CORRECTIONS) 58**

**58** - You have typed a theme twice or misplaced another theme. **This error was corrected**

**THEME 3: DESIGN OR DO YOU CONSIDER SOMETHING NEEDS CHANGING?**

**Summary:**

Anti-social behaviour is highlighted under this theme, along with concerns regarding planning (over development/infrastructure).

**Supports:**

1,3,4,5,6,11,13,14,17,18,19,20,21,22,23,24,25,26,29,31,32,33,35,37,38,39,40,41,42,44,46,47,49,50,55,59,62,63,64,10,51,54,9,61,28,48,45,8

**Objects:**

52

**Neither Support nor Object:**

12

**Comment Summary and Response:**

**(GENERAL COMMENT) 12,1**

**12** - People should have priority **Agree and noted**

**1** - Engage thousands of young people and families in the delivery of these outcomes. **Noted**

**(PLANNING) 10,51,54,52,2,7,57,8**

**10** - There are far too many houses being built in the area without any thought on the pressure of traffic more residents more pressure on Doctors hospitals and schools which are going to effect all our services local residents will suffer **The NDP is not allocating any development. All housing development and infrastructure, including services, are dealt with at the TDC local plan level.**

**7** - Ease up on new buildings. Infrastructure insufficient to cope. **As above**

**51** - Bungalows should not be changed into houses -bungalows in short supply plus the character of the area changed . Dumpton park drive has lost its character with too much modern development allowed **National permitted development rights now enable bungalows to be altered into houses without planning permission (in some cases). The NDP actively promotes local character through design.**

**54** - When considering housing schemes it is important to consider the needs of those who need social or low cost housing rather than force them out of the area with all the gentrification that is occurring **NDP is not allocating housing and the Thanet Local Plan sets threshold levels of affordable housing that have to be adhered to on all local developments.**

**52** - Please refer to my previous answer **Please refer to previous response.**

**2** - 'Good design' is subjective. This needs more work to clarify what it means, so it is not councillors' personal preferences. **Agreed. This is why AECOM has written a local design code for the area.**

**57** - Ongoing over development appears to be uncontrolled, loss of farmland, infilling, garden development, poor design etc. **Please note we have a new design code from AECOM.**

**8** - New builds to have facilities to promote communities, healthy living and social cohesion. **Agree. The NDP does not actively prevent this. The national planning policy framework promotes healthy communities and sustainable development.**

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**(HIGHWAYS/TRAFFIC/PATHS) 9**

**9** - Higher quality of street furniture/lighting **The NDP can only deal with the provision of these facilities on Town Council owned land.**

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**(NOT WITHIN OUR RESPONSIBILITY) 27**

**27** - How are you going to stop antisocial behaviour, when most new building is being snapped up.by London boroughs who are moving their problems into Thanet. **Personal opinion noted.**

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**(BEACH/SEA/SEWERAGE) 15,34,36,8**

**15** - We must ensure clean beaches, No sewage discharges! **Refer to comments previously made on sewerage discharge.**

**34** - I feel Broadstairs Viking Bay should be given an extensive makeover, (looking jaded) **The NDP promotes a Seafront Character Zone, policy BSP4, which deals with this.**

**36** - Pressure must be kept on Southern Water to ensure the supply of drinking water and sewage disposal is adequately managed now and in the future. **Please note previous response to sewage.**

**8** - Better access to free water especially at beaches to prevent antisocial behaviour. Permanent BBQ stands for people to use and prevent usage of throw away BBQ's, more family friendly facilities for those using the beach who don't have access to a beach hut. **Agree. Town**

Council is looking at providing a water fountain at Viking Bay. Other local authorities have provided permanent BBQ stands and these have attracted antisocial behaviour.

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**(OMISSIONS/CORRECTIONS)** 61,58,60

**61,58,60** - Theme 2 and Theme 3 seem to be the same wording both with one bullet point repeated **This error was corrected**

**45** - there is a typo in this section's heading — **checked and amended**

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**(ANTI-SOCIAL BEHAVIOUR)** 28,48,16,30,43,43,53,45

**28** - More police **This is not an NDP issue**

**48** - There was some noise in Pierremont Park and some damage but the police acted quickly. This needs to continue as soon as it starts.

**Agree, the TC is actively working to resolve the issues of anti-social behaviour.**

**16** - Encourage a reduction in antisocial behaviour is all well and good but again is a bit weak. It would be better to say put in place activities and youth centres where young people can congregate safely and feel supported **Youth centres are already provided within the area and this cannot be dealt with through planning policy.**

**30** - there are many incidents of vandalism in the town and on the fringes , how is this going to be tackled **The TC is actively working to resolve the issues of anti-social behaviour.**

**43** - Do more about anti social behaviour for every group who tries to improve Broadstairs there is another group who comes along to vandalise it. We tidied up the graves in St.Peters and more than once someone has come along and emptied the bags of weeds and brambles back over the graveyard. **Noted.**

**53** - Antisocial behaviour has increased at Westwood since the new houses have been built. Pierremont park continues to be a no-go area despite dispersal orders being put in place dippy kids smoking dippy substances. **Please see previous comments on Pierremont park.**

**45** - Recently there has been quite a dramatic increase in antisocial behaviour throughout the town, which left unchecked will impact on our much needed tourism industry and the control of this definitely needs to be prioritised. **Noted**

**(LOCAL GREEN SPACES/PARKS)** 8

**8** - A cafe in the parks would make them more inviting to all **Although this is a positive idea this could not be delivered under the NDP. The provision would not be prevented through the NDP if they were to be provided through a commercial enterprise.**

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**(DESIGN CODES)** 56

**56 – TDC** p30 -Paragraph 129 of the NPPF states the following in relation to the preparation of Design Codes: ‘Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code’ Was there any community engagement in the preparation of the Design Code? A statement would be useful setting out how the Design Code was produced in line with government guidance. **The design codes were completed during the lockdown phase in 2020 and were undertaken with the NDP sub committee which includes community members. The consultation on the design codes was undertaken during this neighbourhood plan consultation period, where people have been asked to comment on them. The code as stated is generally design regarding building design and not major development in the area. The design code acts as a background document to the neighbourhood plan policy. It is not a design code standing in its own right. The design code was paid for by locality funding on local plans. AECOM have provided methodology and their record for producing Neighbourhood Plans.**

Initial comments on Design Code:

Policy review doesn't consider the design policies of the Local Plan, nor heritage policies, all of which are relevant.

Figure 10 doesn't show the 2009/2010 extensions to the Broadstairs Conservation area north and south - incorrect.

The section 3.5 uses the terminology “Heritage Asset Areas”, when in a number of instances the areas have no Heritage Assets when applying the NPPF definitions, should be changed to “Character areas”.

DC.04.08 Materials & Colour Palette - states “Development should use a common palette of locally distinctive vernacular building material, comprising of local red brick, rendered facades and colour washed external walls; red tiles, Kent pegs or slate for gable, pitched and hipped roof;” - This should include a “such as” clause, as there are a significant number of yellow multistock bricks used in the Conservation area.

**TDC comments reverted to AECOM and changes made to the Design Code background document.**

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#### **(HERITAGE ASSETS) 56**

**56 – TDC** BSP7, p33 - Whilst we appreciate the sentiments behind the Heritage Asset Areas, it is our view that areas under that term should be better related to Heritage Assets rather than townscape features, which was the focus of the previous Area of High Townscape Value policy.

The descriptions included in the Design Code don't relate directly to Heritage Assets. **Name changed back to Areas of high Townscape Value.**

p34 -Last paragraph, the phrase ‘to meet contemporary needs and expectations’ could be used to argue modern additions to listed buildings which are not always supported i.e. ensembles etc **All changes to listed buildings require listed building consent and these would be looked at on an individual basis.**

BSP8, p35 -The Local List should be prepared in accordance with Heritage England's Heritage Listing Advice Note in order for it to carry any weight <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/> **Agree. This has been done.**

THEME 4: IMPORTANCE OF THE ECONOMY OR DO YOU CONSIDER SOMETHING NEEDS CHANGING?

<b>Summary:</b> Parking, toilets and traffic are the main items of interest, but still a good amount of support for this area.
<b>Supports:</b> 4,7,10,17,20,21,23,25,26,28,30,31,33,35,36,37,38,39,41,42,44,48,49,54,55,57,59,63,64,11,15,1,18,47,52,45,61,22,9,46,14,8
<b>Objects:</b> 24,50
<b>Neither Support nor Object:</b> 3,6,43,56,24
<b>Comment Summary and Response:</b>  <b>(GENERAL COMMENT) 20,30</b> <b>20</b> - Final point. We are a seaside town, don't get hung up on providing entertainment for a wide range of interests. That is a job for cities, if you want to indulge in a specialist interest to where they are and don't go to the seaside. <b>Thank you for your comments.</b> <b>30</b> - I have made my comments and I wait and see what actually happens  <b>(PLANNING) 11,12,62,27</b> <b>11</b> - Too many estate agents in the High Street <b>Due to the Use Class Orders it is out of the control of the NDP what commercial units are used for.</b> <b>12</b> - Non food outlets should be prioritised <b>As above</b> <b>62</b> - There is a real lack of space for small businesses locally. Many properties which used to be offices are now Airbnb's <b>The current policies in the NDP actively promote business use BSP11</b> <b>27</b> - TDC have ruined the high st by building the out of town shopping centres. Landlords charging high rents. <b>The NDP actively supports shopping areas under BSP10</b> <hr/> <b>(HIGHWAYS/TRAFFIC/PATHS) 15,32,34,50,8</b> <b>15</b> - The roundabouts should be attractive and welcome everyone, not scruffy <b>Noted</b> <b>32</b> - As previously stated regarding the High Street etc. <b>See previous comments re the high st</b>

- 34** - Broadstairs Town Centre perhaps be made a One Way System **There is currently no aspirations to make it a one way system.**
- 50** - You need to look after the residents about the traffic changes if any and not so much the visitors **The NDP is not promoting any traffic changes**
- 8** - Better organisation of roadworks. **This is relevant to KCC**
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**(TOILETS) 1,18,13,19,40,53**

**1** - Upgrade or replace all the public toilets. Charge a usage fee if necessary.

**18** - Please keep our lavatories clean and we need more public toilets.

**13** - Far better toilet facilities are required for the modern visitor.

**19** - Toilets !!!!

**40** - Money needs to be spent on existing facilities i.e. toilets

**53** - If you wish to create a welcoming environment for visitors you could start with the public toilets, which are a disgrace to say the least. But one was sold off to create a Cafe. Locals might appreciate this also as they visit the seafront on a regular basis.

**Response to Comments:**

**The toilets are currently owned and maintained by TDC. The TC is always actively seeking to establish how we could improve these facilities. And will set out a community project to assess viability of taking over the toilets.**

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**(NOT WITHIN OUR RESPONSIBILITY) 47**

**47** - Save the Winter Gardens and Theatre Royal

**Response to Comments:**

**This is not within the neighbourhood area.**

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**(TOWN COUNCIL) 24**

**24** - You killed the high street **Please note the support for the high street in the NDP**

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**(DISABILITY) 52,29**

**52** - Agree and consider ensuring that facilities for the disabled are also a priority **The NDP does not prevent facilities for the disabled if these come through as a planning application. These will be looked at on an individual basis and would need to conform to the Disability Act 2010.**

**29** - This should also include reference to disabilities. **The NDP does not prevent facilities for the disabled if these come through as a planning application. These will be looked at on an individual basis.**

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**(ANTI-SOCIAL BEHAVIOUR) 45**

**45** - Please see previous comments regarding antisocial behaviour

**(OMISSIONS/CORRECTIONS) 61,58,60 –**

**61** - Importance of the Economy is Theme 4 not 3

**58** - The second Theme is the same as the first. Why?

**60** - This is Theme 4 not 3 **(These errors have been corrected)**

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**(PARKING) 22,5,51,27,2**

**22** - The cost of parking in Broadstairs is ludicrous. To encourage business , trade , visitors this must be addressed. Why during the busy summer months i.e. the school summer holidays , does the council not look at a temporary park and ride. I am sure the schools or local farmers would be happy to provide the space and opportunity to earn some extra income

**5** - You really need to look at parking, or lack of it.

**51** - Parking , we should encourage people to shop more locally by allowing at least 30 mins free parking on street or even an hour but I doubt if TDC would even consider this ! Been away in Northumberland , no parking charges for the first hour in small towns and where there were charges it was always around £5 for the whole day not the extortionate prices we have to pay here

**27** - Inadequate parking with high charges. Does not encourage visitors and residents to visit.

**2** - We need better parking for coach visitors and a free first 30 minutes for all visitors

**Response to Comments:**

**The TC does not own or maintain any of the car parks within the area.**

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**(TOURISM/LEISURE) 9,15**

**9** - Encourage artisan shops that are good for local residents as well as tourists **Due to the Use Class Orders it is out of the control of the NDP what commercial units are used for.**

**15** - More facilities/festivals for young people. Improve representation of all faiths **Noted**

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**(PUBLIC TRANSPORT) 46**

**46** - With regard to transport, would like to see a complete review to take into consideration the areas left without good transport links for those having to use buses. What more can be done regards encouragement to leave car at home during peak times and more traffic management by police and local councils. **This is done at county level.**

**16** - There is little more you can do with the roads to provide good traffic management etc. it would be better to actually reduce the amount of tourist traffic on the roads. For example, putting in place a FREE bus service every 15 mins, from let's say Thanet parkway station, to the beaches of Ramsgate Broadstairs and Margate (and every main beach in between) would provide people with a real alternative to trying to park near a seafront. Yes, it would cost, but it would actively help solve a problem. **Please see response regarding parking in the town.**

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**(TOILETS) 14,2**

**14** - As with many of your respondents I'm sure, I'd support immediate day to day improvements to public facilities such as toilets. I do think the rubbish problem is being addressed. **Please see previous comments re public toilets**

**2** - Public toilets are a perennial problem. It must be possible to sort this out. Other councils have managed it. **Please see previous comments re public toilets**

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THEME 5: HEALTH & WELLBEING OR DO YOU CONSIDER SOMETHING NEEDS CHANGING?

**Summary:**

Strong Support, though there are concerns regarding the policies on air quality/pollution – both mentioned within planning and environment.

**Supports:**

2,3,4,8,9,10,13,19,21,22,23,25,26,27,28,30,31,32,33,34,37,38,39,40,41,43,45,50,51,52,54,55,57,58,59,62,63,1,14,42,48,46,15,18,47,49,61,64

**Objects:**

24

**Neither Support nor Object:**

6,11,12,29,36

**Comment Summary and Response:**

**(GENERAL COMMENT)** 53,56

**53** - This is getting repetitive **Noted**

**56 – TDC** P4, third para and p5 para beginning 'Section 1' -A second referendum may not be necessary depending on the Examiners conclusion as to whether the modifications materially change the nature of the neighbourhood plan.**Noted**

P5 First para - amend as follows (new text shown in capitals) : ' A NDP provides the policy base, **ALONG WITH THE THANEL LOCAL PLAN 2020 AND THE KEN WASTE AND MINERALS PLAN** [delete 'in law'] to determine planning applications in the local area, in our case the Broadstairs & St Peter's Parish' **Agree, amendment made.**

Broadstairs & St Peters Town Council has carried out a significant amount of research and work to update their Neighbourhood Plan to bring it up to date with new policies and initiatives, and to align with the plan period for the Local Plan review. The Council appreciates the amount of work, time and effort of those involved and is in general support of the 2nd Edition Neighbourhood Plan. **Noted**

**(PLANNING)** 1,14,7,17

**1** - Stop the building on open land. Use only brownfield sites. Use the open land for wellbeing provision. Plant thousands of trees. **Refer to previous comments made on these issues.**

**14** - What does this mean in practice? Are all new developments assessed for impact on air quality? **Please see previous responses to air quality.**

**7** - Too much building leads to too much traffic, hence pollution. **Please note our air quality policy number CC1**

**17** - Not enough doctors/surgeries and a very stretched hospital as things stand today. This needs addressing before adding to the local population with new housing. **The NDP is not proposing any new housing.**

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**(ENVIRONMENTAL/CLIMATE/HEALTH)** 42,48,16,20,35

**42** - Pollution is not just air pollution. Consider light and noise pollution as well. **These are harder to address in an urban area where there is already development present.**

**48** - I find it healthy here. litter picked up Viking bay sand maintained well **Noted**

**16** - Again without policies fresh air especially for those living by the main roads isn't really possible to increase. Saying it's people choice to drive isn't really fair unless there are alternatives in place. **Comments noted please refer to policy CC1**

**20** - Seems almost irrelevant. Don't get hung up on providing special things to keep residents healthy. It's the seaside, air pollution is not a problem. This item looks like an excuse to save war on drivers. **It is noted that it is a seaside area however there are areas of air pollution in the town.**

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**(HIGHWAYS/TRAFFIC/PATHS)** 46

**46** - Looking at traffic management in busy areas

**Response to Comments:**

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**(TOILETS)** 15

**15** - Clean toilets and streets – **see previous comments**

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**(NOT WITHIN OUR RESPONSIBILITY)** 18,47,49,5,36

**18** - Broadstairs needs a public swimming pool. **There is a swimming pool at Upton Junior school that is open to the public. There is no funding in place for the local authority to provide a swimming pool.**

- 47 - Provide easier access to doctors and dentists
- 49 - Mental health 1st aid training for people at a discounted rate
- 5 - Again, ensure Manston airport is not reopened.
- 36 - Encourage more GPs and dentists to Thanet in general.

**Response to Comments:**

Access to services is planned at the strategic level through the Thanet local plan and Manston airport is not in our area.

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**(TOWN COUNCIL) 24**

24 - Your a town council not the government. Under the localism act 2011 local communities can produce a NDP

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**(OMISSIONS/CORRECTIONS) 24,60 – (Error was corrected)**

24 - This should be Theme 5 not 3 - this section does not appear to have been carefully checked for consistency

60 - This is Theme 5 not 3

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**(ANTI SOCIAL BEHAVIOUR) 44**

44 - I believe tackling antisocial behaviour, particularly in Broadstairs town in the evenings, should be a factor to address when considering peoples well-being. Please note the NDP actively looks at anti social behaviour in the community project section.

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**(PARKING) 64**

64 - Parking must make sure locals can access drives !!! Agree that this can be an issue with antisocial parking. Yellow lines and dropped kerbs are dealt with through TDC and KCC.

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**OTHER COMMENTS**

**Summary:**

A general overview of previous comments made, plus feedback from statutory consultees who did not complete within the Themed questions.

**No other Comments:**

2,3,6,7,8,9,10,12,15,19,20,23,24,25,26,27,30,31,32,34,35,36,37,38,39,40,41,42,43,44,45,46,47,52,54,55,57,59,62

**Comment Summary and Response:**

**(GENERAL COMMENTS) 4,11,17,54,60,68**

4 - just what I have already said

11 - Not if all the proposals are adopted **Unsure what this relates to**

17 - I would like to see refinements as suggested above. **Please refer to responses on previous comments**

51 - so much to read , would be easier if it was sent out in paper format **Paper copies were available at the library and Pierremont Hall. It is more sustainable to undertake online**

60 - A lot of hard work to update the plan - much appreciated **Noted**

68 - Natural England does not have any specific comments on the Broadstairs & St Peter's Neighbourhood Development plan 2023-2040. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. **Noted**

**(TREES/HEDGES/PLANTS) 61**

61 - Important new policies concerning the environment, especially trees and hedgerows, are a very welcome addition. **Noted**

**(PLANNING) 33,50**

33 - More priority and with great urgency a new policy should be brought forward for thousands of new social houses to be built and owned by the local authority because the first step on the ladder for house ownership is out of reach , and private renting is now over priced because of the policy of local governments leaving rented accommodation to the private landlord, thus missing out on valuable income and employment opportunities. **The NDP is not promoting the allocation on any new housing development regardless of tenure.**

50 - To look very carefully at the building of new housing estate and large plots of land being used for development **The NDP is not promoting the allocation on any new housing development regardless of tenure.**

**(LOCAL GREEN SPACES/PARKS) 13,22,66**

13 - Preserve green spaces, and areas of woodland, at all costs. **The NDP actively tries to achieve this.**

22 - I hope that the need for expanding the amount of green spaces is seriously considered, we have beaches and some parks but small Green spaces are also important **Noted however to allocate a local green spaces it has to adhere to the requirements of the NPPF Para 101-102**

66 - Policy BSP5: Designation of Local Green Spaces (page28 of the draft Plan) Southern Water supports the current wording of Policy BSP5.

Southern Water supports the current wording of Policy BSP5:

*The sites shown on Map 6 listed in Appendix 2 are designated as Local Green Space to the end of the Plan period.*

*Proposals for development in a designated Local Green Space will not be supported, unless they are ancillary to the use of the land for a public recreational purpose or are required for a statutory utility infrastructure purpose* **Noted**

**71 - Broadstairs and St. Peter's Neighbourhood Plan 2nd Edition Consultation ('the Draft Plan')**

**Land fronting Park Avenue, Dumpton, Broadstairs and St Peters, Thanet under title number K61934 ("the Property")**

We act on behalf of the above-named client (Parkstairs Ltd) and are instructed to respond to the proposed designation of the above Property as a Local Green Space as set out at Appendix 2 of the Draft Plan.

It is our position that the Draft Plan fails to satisfy three of the basic conditions required of a neighbourhood plan and in doing so, will not pass examination. The removal of the proposed designation of our client's Property as a Local Green Space we consider, would rectify such a flaw. In this regard we invite you to consider the enclosed Consultation Response Form and opinion of our Counsel, Andrew Parkinson.

We look forward to receiving confirmation that the Local Green Spaces designation has been removed from our client's Property in due course. **The Local Green Space was selected following an assessment of Local Green Spaces in the Local Green Space background document. It is understood that the landowner removed protected trees without permission and under the Town and Country Planning Act 1990, there is a duty requiring landowners to replace a tree removed, uprooted or destroyed in contravention of an Order. The owner has been ordered to replace the trees and has lost an appeal against this. The NDP sub-committee wishes to proceed with the inclusion of the Park Avenue woodland in the Neighbourhood Plan as a Local Green Space and its inclusion meets the Basic Condition requirements.**

**(HIGHWAYS/TRAFFIC/PATHS) 64,67**

**64** - No parking on pavements which results in prams and wheelchairs using road, **Agree antisocial parking can be a problem in certain places but without specific areas this is difficult to respond to.**

**67** – Highways England - We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and are the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Broadstairs & St. Peter's Neighbourhood Plan, our focus will be on any potential impact to the A2 trunk road and M2 motorways.

We have reviewed the consultation document and observe that it does not contain any specific details of housing or employment allocations.

Consequently, until such specifics are included in the plan, we are unable to give an informed view in regard to the potential impact that any housing or employment developments in the Broadstairs & St. Peter's area could have on the SRN. Accordingly have no further comments at this stage. **Noted – we are not allocating any development within the plan.**

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**(TOILETS) 29**

**29** - There is no specific reference to the toilet facilities being improved and maintained! **See previous comments re toilets**

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**(NOT WITHIN OUR RESPONSIBILITY) 18,49**

**18** - Given the increase in fuel and heating prices we need to be able to still use our coal log fires. **The NDP does not prevent this.**

**49** - More mentoring opportunities to help young people find work and support their entrepreneurial skills **This does not come under our jurisdiction**

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**(TOWN COUNCIL) 1,14,21,48,53,58,63**

**1** - It has noble aspirations. Now involve the local population in its delivery. **Noted**

**14** - I think it is a good plan in principle but it needs to be pursued more vigorously and applied to all day to day development and planning decisions. Otherwise it is just words. **Noted. If the NDP is 'Made' it will become the statutory development plan for the area.**

**48** - t is good but easy to write harder to implement **as above**

**21** - Reinstatement of a harbour master. The harbour is the key focus of the town and it is left I unadministered. TDC rely on local volunteers to paint and litter pick the area, there seems to be no overall plan for the area **The foreshore area is within the remit of TDC**

**53** - Start again with some properly thought through objectives and not copy cat policies. Ask the local people what they would like to see done , I'm certain it's not the same as much of this. **The NDP goes through active consultation to ensure the NDP represents the thoughts and aspirations of the public.**

**58** - Bearing in mind the errors, what can be done to ensure the consultation process is properly dealt with? **It is noted that there were some errors on the portal. These were rectified and the consultation period extended to enable people to comment.**

**63** - The principles are good, albeit there appears to be a huge overlap between categories. I'm assuming the next part will be the detail which will ensure the aims are met....**This regulation 16 consultation will provide reflection on the current contents of the NDP and any changes will help finalise the plan ready for submission.**

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**(HERITAGE BUILDINGS) 16**

16 - The valuing of the local heritage etc is all good **Noted**

**(ENVIRONMENTAL/CLIMATE/HEALTH)** 16,66,68

16 - the environmental aspirations are mediocre and unambitious at best. **Although we would like to go further on these, the NDP is just to look at planning and new development within the area.**

66 - Section 8.1.1 Climate Change and Sustainability (from page 13 of the draft Plan) Southern Water We support the commitment to the Thanet Local Plan Climate Change Policy SP37 made in this section of the Neighbourhood Plan (page 14). **Noted**

Omission/Amendment:

This section might also benefit from additional references to the Thanet Local Plan 2031 Policies on Surface Water Management and Technical Standards (CC02 and QD04 respectively) for their content on sustainable drainage and achieving the Building Regulations optional standard for water efficiency appropriate to areas of serious water stress.

Water efficiency:

The south east is classified as an area of serious water stress\*, and a variety of factors such as an increasing need to limit surface and groundwater abstractions, increase drought resilience, meet the needs of a growing population and adapt to climate change, all combine to present both challenges and opportunities to change the way we manage water. Whilst tackling this challenge will require a multi-faceted approach, there is an opportunity for all levels of the planning system to play their part, by ensuring through planning policy that new development is required to meet higher standards of water efficiency. \* Water\_stressed\_areas\_\_\_final\_classification\_2021.odt (live.com)

High standards of water efficiency in new developments equate to greater long-term sustainability – with the potential to delay or reduce the need to increase abstraction or find new water resources. The Thanet Local Plan Technical Standards Policy QD04 adopts the optional standard for water efficiency: **This information is included within the Thanet Local plan**

All new development will be expected to meet the new technical standards as follows: 1) internal space standards as set out in Table 13; 2) water efficiency standard of 110litres/person/day. We could not find a reference to this Policy within the Neighbourhood Plan, and page 13 of the Plan refers to a

2016 water consumption target of 140lpppd. **We will check the update to the Climate Local Kent. Please refer to the schedule of amendments.**

Sustainable drainage:

The NPPF (2021) paragraph 161 requires that plans (after applying the sequential test to locating development sites) manage any residual flood risk by:

(c) using opportunities provided by new developments and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management). Well-designed sustainable drainage systems help to reduce the volume of surface water entering the foul sewer system. Sustainable drainage systems will be key to helping neighbourhoods respond to the impacts of climate change into the future, as acknowledged by Policy CC02 in the adopted Local Plan for Thanet District.

Since 2019, water and sewerage companies have been able to adopt certain types of SuDS. On the basis of this, and the evidence provided above, Southern Water is strongly encouraging SuDS for all development, to help reduce pressure on the existing sewer network. More detail is available in the attached Development Policy, along with Southern Water's criteria for SuDS adoption that can be found here - <https://www.southernwater.co.uk/media/4532/suds-outline-guidance.pdf>.

Southern Water would therefore welcome and support the inclusion of a policy requiring the use of SuDS in all new development

**68** - Natural England does not have any specific comments on the Broadstairs & St Peter's Neighbourhood Development plan 2023-2040. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. **Noted**

**(TOURISM/LEISURE) 28**

**28** - More outdoor space and activities for the younger people **As per previous response. NDP does not prevent activities coming forward, it provides a planning framework.**

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**(ANTI SOCIAL BEHAVIOUR) 28**

**28** - more police around the estates

**Response to Comments:**

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**(OMISSIONS/CORRECTIONS) – 65,66**

**65** – Culmers should read as a “Permanent Right of Way” and not “Public Right of Way **The long West-West path through Culmer's Amenity Land is a Permitted Right of Way, however, the shorter North – South path from Caernarvon Gardens to The Pathway, is a Public Right of Way.**

**66** - New Policy to support the provision of infrastructure: Southern Water To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy to support proposals that come forward to deliver or maintain necessary infrastructure.

Southern Water may have to provide additional water or wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward in order to deliver or maintain necessary infrastructure.

We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2021) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.

Although the Parish Council is not the planning authority in relation to water or wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

Southern Water proposed amendments

To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:

*New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.*

**This is already within the Thanet local plan. The NDP is not developing any local sites and consider that it is not required at this stage.**

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**(THE GREEN WEDGE) 66**

**66** - Policy BSP1 The Green Wedge (page18 of the draft Plan) Southern Water is unable to support the current wording of this policy BSP1 as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and future development allocated in the Local or Neighbourhood Plan.

Southern Water fully understands Broadstairs & St Peters Town Council's desire to protect the countryside and prevent settlement coalescence. However, as set out in our responses to the Pre-Submission and Submission stages for the previous Plan (in 2018 and 2019 respectively) we are unable to support the current wording of this policy BSP1 as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and future development allocated in the Local or Neighbourhood Plan.

Although silent on 'Green Wedges', the National Planning Policy Framework (NPPF) (2021) sets out the intention to protect the countryside and prevent settlement coalescence through its Green Belt policies, for which it establishes:

- The intention in paragraph 147 of ruling out inappropriate development 'except in very special circumstances'.
- In paragraph 148 that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations.

- In paragraph 150 that 'certain other forms of development are also not inappropriate' including 'engineering operations'.
- Also in paragraph 103 of the NPPF that Local Green Space policies should be consistent with those for Green Belts.

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential water or wastewater infrastructure (e.g a new pumping station) required to serve new and existing customers. This is because there can be limited options available with regard to location, as the infrastructure would need to connect into existing networks.

This interpretation is compliant with Policy SP25 adopted for 'Green Wedges' within the current Thanet Local Plan:

Policy SP25 - 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 [...] **2) essential to be located within the Green Wedges.**

By ruling out all development other than that associated with agricultural, sport or recreational uses, Policy BSP1 would therefore not meet the basic conditions necessary for a Neighbourhood Plan, to:

- have regard to national policies and advice contained in guidance issued by the Secretary of State.
- be in general conformity with the strategic policies contained in the development plan for the area.

#### Proposed amendments

To ensure consistency with the NPPF we recommend the following addition to Policy BSP1 (additional text underlined):

Any proposed new development, including change of use of land and buildings in the 'Green Wedge' areas, will not be supported, except for:

- a) open sports facilities and recreational uses, with any related built development being kept to the absolute minimum necessary and will be sensitively located.
- b) agricultural uses.
- c) where very special circumstances can be demonstrated, such as for essential utilities infrastructure, where there are no reasonable alternative sites available.

**BSP1 as drafted does not prevent utility infrastructure to be provided and should be read in conjunction with the Thanet local plan on the same issue.**

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(MARINE) 69

#### 69 - Marine Management Organisation Functions **Noted**

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

#### **Marine Planning and Local Plan development**

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

### **Marine Licensing and consultation requests below MHWS**

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: [marine.consents@marinemanagement.org.uk](mailto:marine.consents@marinemanagement.org.uk).

### **Consultation requests for development above MHWS**

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

#### **Minerals and Waste Local Plans and Local Aggregate Assessments Noted**

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

**(NATIONAL GRID) 70**

**70 - About National Grid Noted**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Proposed development sites crossed or in close proximity to National Grid assets:**

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to National Grid infrastructure.

**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:

[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

**Electricity assets**

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.

National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>