

Response to Representations Received on the Broadstairs & St. Peter’s Regulation 14 Neighbourhood Development Plan

Comment	Comments	Neighbourhood Plan Sub-Committee Response
<p>BSP 1: The ‘Green Wedge’ Natural England Support</p>	<p><b>By restricting the development of the green-wedge it protects large areas of natural landscape from being lost to development, this ensures the ecosystem services provided by these green wedges will continue to provide benefits for Broadstairs &amp; St. Peter’s.</b></p> <p><b>These ecosystem services are the benefits provided by the natural environment, when the monetary value of these services can be determined then they can be thought of as providing natural capital.</b></p> <p><b>As such natural capital and ecosystem service concepts could be further applied to this neighbourhood plan.</b></p> <p>Enhancing natural capital is a concept within the NPPF (170. &amp; 171.) and throughout the 25-year plan</p>	<p><b>Noted – no changes required</b></p>
<p>BSP1: The ‘Green Wedge’ David &amp; Margaret Tate Residents Support</p>	<p>We fully support this approach and the Policy BSP1 “The Green Wedge” must remain a priority and be strongly defended.</p>	<p><b>Noted – no changes required</b></p>
<p>BSP 1: The ‘Green Wedge’ Ms Mayal</p>	<p>Southern Water fully understands the desire to protect the countryside and prevent coalescence. However, we are unable to</p>	<p><b>Disagree-No Changes required</b></p>

<p>Southern Water Object</p>	<p>support the current wording of this policy 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 or meet stricter environmental standards .Paragraph 99 of the revised National Planning Policy Framework (NPPF) (2018) identifies that "designating land as local Green space should be consistent with the local planning of sustainable development and complement investment in [...] essential services'. Paragraph 101 establishes that 'policies for managing development within a local Green Space should be consistent with those for Green Belts', within which, as set out in Paragraph 146, certain forms of development are not inappropriate, including 'engineering operations. The National Planning Practice Guidance recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works on new buildings) which mean otherwise protected areas may exceptionally have to be considered'. Accordingly, we propose the following additional text to Policy BSP1 (new text underlined)</p>	<p><b>Policy BSP1 has been written to be in accordance with the Thanet District Council policy: SP22 Safeguarding the Identity of Thanet's Settlements.</b>  <b>Policy SP22 does not include any reference to essential infrastructure. If policy BSP1 were to be amended to include 'essential utility infrastructure', it would no longer be in accordance in the overarching district development plan. NPPF, paragraph 13.</b></p>
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	<p><i>Any Proposed new development, including change of use of land and buildings in the 'Green Wedge' areas, will not be Permitted, except for:</i></p> <p><i>A) open sports facilities and recreational uses, with any related built development being kept to the absolute minimum necessary and will be sensitively located.</i></p> <p><i>B) agricultural uses</i></p> <p><i><u>C) essential utilities infrastructure.</u></i></p>	
<p>BSP 1: The 'Green Wedge' Megan Pashley Gladman Development Ltd Omission</p>	<p>Policy BSP1 states that change of use of land and buildings in the 'Green Wedge' areas will not be permitted outside a list of exceptional reasons. Gladman would like to take this opportunity to remind the Town Council that it is not within their or a Neighbourhood Plans remit to determine planning applications. We therefore recommend that where the policy makes reference to planning applications being 'permitted', the policy wording is amended to read 'supported'.</p>	<p><b>Disagree- No changes required</b> <b>NPPF paragraph 2 states that:</b> "Planning law requires that applications for planning permission be determined in accordance with the development plan<sup>2</sup>"</p> <p>The footnote states:</p> <p><b>"<sup>2</sup> This includes local and neighbourhood plans that have been brought into force and any spatial development strategies produced by combined authorities or elected Mayors (see glossary)."</b></p> <p><b>Policy to kept the same as Neighbourhood Development plans, once adopted, are used to determine planning applications with the policies having the same weight as a district Local Plan.</b></p>
<p>BSP 2: Important Views and Vistas David &amp; Margaret Tate Residents Support</p>	<p>We fully support this principle and think that it will be particularly valuable, and perhaps difficult to maintain in the light of proposals for increasing the number of wind turbines in the area with much larger turbines. The proposals could easily impact upon the sea</p>	<p><b>Noted – no changes required</b></p>

	<p>scene from many positions in Broadstairs. Policy BSP 2 has to be protected.</p>	
<p>BSP 2: Important Views and Vistas Megan Pashley Gladman Development Ltd Omission</p>	<p>Policy BSP2 and supporting Map 4, identify a number of important views and vistas where development proposals should respect and not detract from the identified important view or vista. We submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views. In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would ‘take it out of the ordinary’ rather than selecting views which may not have any landscape significance and are based solely on community support. Opinions on landscape are highly subjective, therefore, without much more robust evidence to demonstrate why these views and landscape areas are considered special, the policy in its current form will likely lead to inconsistencies in the decision-making process.</p>	<p><b>Disagree- No changes required.</b> <b>Extensive background work was undertaken to establish the important views and vistas located in the parish of Broadstairs &amp; St. Peter’s, this evidence justifies the inclusion of the policy (Significant Routes and Views background document).</b></p> <p><b>The current policy does not prevent new development occurring and already acknowledges that new development can be planned and developed to respect the views and vistas of the area.</b></p> <p><b>“Policy BSP2: Important Views and Vistas Development proposals should respect and not detract from the views and vistas set out in Map 4. Any proposals that negatively impact on the view and vista will not be acceptable.”</b></p>

<p>BSP 2: Important Views and Vistas Nathan Burns Natural England Support</p>	<p><b>Ensuring developments respect and do not detract from the important views and vistas of Broadstairs &amp; St. Peter’s, protects the landscape of the area.</b> <b>Despite the area not currently being designated as a: National Park, AONB or Heritage coast by protecting landscape at this juncture it ensures that protected landscape designation could theoretically be applied.</b> Ensuing developments are sympathetic to local character &amp; history is an aim of the NPPF (127.c.); preserving landscape features &amp; beauty is a major focus of the DEFRA 25-year plan, being mentioned ubiquitously throughout the document.</p>	<p><b>Noted – no changes required</b></p>
<p>BSP 3: Protecting and Providing Important Trees Nathan Burns Natural England Support</p>	<p><b>Supporting proposals which retain existing trees ensures the protection of very valuable Green Infrastructure (GI) assets.</b> <b>Expecting the provision of additional trees wherever possible, including off-site planting where required will further increase the GI within Broadstairs and St. Peter’s, and also increase the stock of natural capital within the neighbourhood.</b> Maintaining &amp; enhancing GI is in line with the aims of the NPPF (171.) and the DEFRA 25-year plan (3.3.i)</p>	<p><b>Noted and Agreed:</b> <b>Agree to add proposed additional text, to ensure the policy is inline with the aims of the NPPF.</b></p>

	<p>Enhancing natural capital is a concept within the NPPF (170. &amp; 171.) and throughout the 25-year plan</p> <p><b>Additional tree provisioning links directly with Biodiversity Net Gain policy and as such we recommend that wording is altered to incorporate this concept. For example:</b></p> <p><del>“The provision of additional, suitable trees on all new large planning application sites</del> <u>a net gain in the quantity of suitable trees will be expected</u>, unless supporting design guidelines for the development state that this is unachievable.”</p> <p><b>Alternatively, net gain concepts could be interwoven throughout section 8.1.3</b></p> <p>Providing net gains for biodiversity is a key focus of the NPPF (8. 170. 174. &amp; 175.) and the DEFRA 25-year plan (1.1.).</p>	
<p>BSP 4: Seafront Character Zones Nathan Burns Natural England Support</p>	<p><b>Appendix 1 as a whole contains very strong positive wording which will protect the sensitive areas of coast from harmful development, most of which are designated as European and national protected sites. Comments on individual categories are as follows:</b></p> <ul style="list-style-type: none"> <li>- <b>Category 1: development principles all contribute to increasing the value of Viking Bay as a GI component</b></li> <li>- <b>Category 2: restricting parking to control visitor numbers helps reduce he impacts of</b></li> </ul>	<p><b>Noted and Agreed:</b></p> <p><b>Agree to add proposed additional text as this is since to further enhance the policy and bring it in line with National policy.</b></p>

	<p><b>recreational disturbance on the interest features of the Thanet Coast and Sandwich Bay SPA &amp; Ramsar sites.</b></p> <ul style="list-style-type: none"> <li>- <b>Category 3: The wording of “The bay is both an area of outstanding natural beauty and...” should be altered as this area has not been officially designated as an AONB, a possible alternative is “<u>the bay is both a source of outstanding natural beauty and...</u>”</b></li> <li>- <b>Category 3: rigorously resisting development and discouraging sport/leisure activities at this bay will ensure the interest features of the Thanet Coast and Sandwich Bay SPA &amp; Ramsar sites present at Kingsgate bay are protected.</b></li> <li>- <b>Category 4: ensuring developments in this category do not detract from to the character of the area ensures the landscape of Broadstairs &amp; St. peters isn’t impacted</b></li> <li>- <b>Category 5: rigorously resisting development on undeveloped stretches of the coastline helps protect the interest features of the coastal designated sites as well as the landscape.</b></li> </ul> <p>Protecting designated sites is an aim mentioned ubiquitously through both the NPPF and the DEFRA 25-year plan</p>	
<p>BSP 4: Seafront Character Zones</p>	<p><b>8.1.4 Seafront Character Zones</b></p>	<p><b>Noted – no changes required</b></p>

<p>David &amp; Margaret Tate Residents Omission</p>	<p>It is essential that the facilities in these zones be properly maintained and improved, especially in the case of toilet facilities, which are verging on being a disgrace.</p>	
<p>BSP 4: Seafront Character Zones Nathan Burns Natural England Omission</p>	<p><b>Since this policy directly deals with the coast of Broadstairs &amp; St. Peter's the protected designations which apply to all of the coastline (sans Viking bay) should be mentioned- these designated sites are:</b></p> <ul style="list-style-type: none"> <li>- Thanet coast &amp; sandwich bay Special Protection Area (SPA)</li> <li>- Thanet coast &amp; sandwich bay Ramsar</li> <li>- Thanet coast &amp; sandwich bay Special Area of Conservation (SAC)</li> <li>- <b>Thanet coast Site of Special Scientific Interest (SSSI)</b></li> </ul> <p>Protecting designated sites is an aim mentioned ubiquitously through both the NPPF and the DEFRA 25-year plan.</p> <p><b>A biodiversity net gain policy should be implemented for any development which could impact these sites.</b></p> <p>Providing net gains for biodiversity is a key focus of the NPPF (8. 170. 174. &amp; 175.) and the DEFRA 25-year plan (1.1.).</p>	<p><b>Noted and Agreed</b> <b>Add in reference to SSSI as this was missed off the list in error.</b></p>
<p>BSP 4: Seafront Character Zones Robert Stone</p>	<p>Refers to 'residential areas' on eastern esplanade: there are 3 hotels (Bay Tree,</p>	<p><b>Noted and Agreed-</b> <b>Add reference to the three hotels on the eastern esplanade.</b></p>



<p>Bay Tree Hotel Object</p>	<p>Devonhurst + East Horndon) - Plan should recognise this</p>	
<p>BSP 4: Seafront Character Zones (also, Appendix page 42) Paul Verral Resident Object</p>	<p>As part of the seafront character zones you have listed Botany Bay as a Category 2 but this reads that you will be generally resisting parking. Botany Bay is I feel a case where parking needs to be reviewed. There is a small but inadequate and loose fill surface car park at the end of Botany Road. This quickly becomes filled and parking then prevents residents in the Palm Bay estate, Percy Avenue and the Kingsgate private estate getting in and out easily. I feel some additional space should be considered on the cliff top areas. In front of the Botany Bay Hotel the grass area is TDC and could surely permit a linear parking bay system face onto the coast that would take more cars than the current parking. If TDC could be persuaded to charge a small but reasonable payment this could be self-financing in a decade I suspect. The continued predominance of the bay in adverts and general media means it is going to continue to be popular and if we seek to increase tourism industries this must surely mean sensible and sensitive adjustments where demand is high.</p>	<p><b>Noted- no changes required to plan. Although it is acknowledged that parking is a significant issue that needs to be addressed in the wider Thanet area, it is considered to be out of the remit of the Neighbourhood Development Plan. Parking should be addressed at the district level and as part of a community projects section.</b></p>
<p>BSP 4: Seafront Character Zones Paul Verral</p>	<p>Although I understand what is proposed I do feel that you have missed including Seafront shelters. There are several on our beaches</p>	<p><b>Noted and Agreed Where seafront shelters are located in specific character zones these will be acknowledged, text to be amended accordingly.</b></p>

<p>Resident Omission</p>	<p>and although not well used I feel in the remoter areas they do provide a distinct feel to the character of a seafront, if they look well maintained. The District Council has not had the funds to repair them in recent decades and some such as Ethelbert Crescent in Margate face possible demolition or serious financial support to carry out the required repairs. The shelters within our coastal areas are still generally in good condition and could be protected and necessary annual work done to prevent future high costs of repairs. Be wary though, the Ramsgate Society undertook the ongoing maintenance of their towns seafront shelters and have faced considerable costs from continued vandalism. There is a report TDC commissioned about 4 years ago that tried to look for a solution. I understood that it was possibly an initial look prior to discussions with Town or Parish Councils on seafront shelters.</p>	
<p>BSP 5: Local Green Spaces Nathan Burns Natural England Support</p>	<p><b>This policy uses GI network concepts which is in line with the NPPF and 25-year plan. The commitment to designate local green spaces (LGS) provides statutory protection for important aspects of the overall GI network.</b></p>	<p><b>Noted- no changes required</b></p>

	<p>Maintaining &amp; enhancing GI is in line with the aims of the NPPF (171.) and the DEFRA 25-year plan (3.3.i)</p> <p><b>By providing a separate LGS document which identifies sites, to be conform with the NPPF (100.) these LGS designations should be used where the green space is:</b></p> <ul style="list-style-type: none"><li>a. In reasonably close proximity to the community it serves</li><li>b. demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife</li><li>c. local in character and is not an extensive tract of land</li></ul> <p><b>Since LGS are very important aspects of overall biodiversity of Broadstairs and St. Peter's a biodiversity net gain policy could be applied to them, to ensure that any developments that would impact them would be beneficial.</b></p> <p><b>Increasing accessibility to and within LGS should also be considered, where it doesn't significantly impact biodiversity, because by increasing accessibility to these sites its benefits mobility impaired residents/visitors while also increases the LGS' value as GI</b></p>	
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	<b>components by expanding the quantity of people who benefit from them.</b>	
<p>BSP 5: Local Green Spaces David &amp; Margaret Tate Residents Support</p>	<p>We are particularly interested in retaining and maintaining green spaces, which could well become casualties if financial cutbacks continue. Has the Town Council considered the use of volunteer or neighbourhood groups to help maintain them?</p>	<p><b>Noted- no changes required</b></p>
<p>BSP 5: Local Green Spaces Mrs J Matterface CT10 Parochial Charities Object</p>	<p>Objection to the inclusion of Culmer's Amenity Land in the Broadstairs Neighbourhood Plan.</p> <p>The land in question is private land forming part of the Charity of Richard Culmer who left 6 acres of land to the Vicar of St. Peter's Church so that the income could be used for the benefit of the poor and needy.</p> <p>There was no consultation or information notified to the trustees of the Charity of Richard Culmer that there was a proposal to include this land as part of the Open Green Spaces of the Neighbourhood Plan as was confirmed in an email from Danielle Dunn, Town Clerk, dated 22/11/2017. As a result, we were unable to comment at that point.</p> <p>The land is currently leased to Broadstairs and St. Peter's Town Council as a source of revenue for the charity so that it can continue</p>	<p><b>Disagree- No changes required.</b></p> <p><b>All sites that have been selected as Local Green Space have undergone an assessment to justify their inclusion, this is set out in the Local Green Space background document.</b></p> <p><b>Culmer's Amenity land is owned by the CT10 Parochial Charities, but their representation fails to acknowledge that although the site is owned by the charity, Broadstairs &amp; St. Peter's Town Council has a lease on the land that runs to 2033.</b></p> <p><b>Following comments received from the CT10 Parochial Charities prior to the publication of the Regulation 14 plan, the wording of the policy was amended to ensure the site would not be allocated as LGS beyond the end of the plan period. This would ensure flexibility for the CT10 charities beyond the plan period.</b></p> <p><b>In addition to the above, the Culmer's Amenity land has also been allocated as LGS in the Thanet Local Plan Regulation 19 version.</b></p>

	<p>helping many who are referred to us by statutory and non-statutory agencies - including QEQM, schools, the Beacon Mental Health Unit, Kent Social Services etc.</p> <p>It is currently the only income raised for the Charity of Richard Culmer, one of seven charities under the umbrella of the CT10 Parochial Charities.</p> <p>Were this land to be included in the Neighbourhood Plan as 'Open Green Space' it would lose its value with the result we would fail our fiduciary obligation to raise income for the Charity of Richard Culmer to assist 'the poor and needy of Broadstairs and St. Peter's.</p> <p>The column G shows TDC has 'no designation' on this land because it is privately-owned and, therefore, we request that it is removed from the Neighbourhood Plan as an Open Green Space.</p>	
<p>BSP 5: Local Green Spaces Paul Verral Local Resident Omission</p>	<p>The document does not seem to detail any requirement for quality of the landscape value for a site. The list does not include parks and open spaces and many of those listed were the result of planning requirements. Some were what used to be termed as 'bits left over after planning' of</p>	<p><b>Disagree- no changes required.</b></p> <p><b>Full details of how sites were selected can be found in the Local Green Space background document.</b></p>

	<p>which the Fairfield Road/Rumfields Road area is a good example. Owned by the Housing Association which owns the adjacent properties it is I believe commonly regarded as an eyesore and although may have wildlife value is not maintained to any standard. You also list Salts Drive open space which is I feel largely unknown to many people and I suspect hardly ever used by anyone. Is it worth retaining such areas and requiring them to be maintained when they are so hidden. Surely in these financially difficult times it would be better to have flexibility where such areas could be used for other purposes and the ongoing revenue maintenance costs put to more prominent sites.</p>	<p><b>Sites that weren't selected, such as significant parks and recreation grounds are already protected. Only sites that had no protective policy were considered for inclusion as LGS.</b></p>
<p>BSP 6: Safeguarding Community Facilities David &amp; Margaret Tate Residents Support</p>	<p>We strongly support the policy of change of use only as a last resort, but facilities must be used and not left empty.</p>	<p><b>Noted- Agreed- Amend policy to be 'sustaining community assets.'</b></p>
<p>BSP 6: Safeguarding Community Facilities Informal comments from TDC and sub-committee</p>	<p>Safeguarding community facilities can be quite restrictive, as sometimes a commercial element needs to deliver a community facility.</p>	<p><b>Noted- Agreed- Amend policy to be 'sustaining community assets'.</b></p>

<p>BSP 7: Areas of High Townscape Value David &amp; Margaret Tate Residents Support</p>	<p>An excellent initiative. How historical are the 5 areas? Can they be extended or increased in number? To our regret and concern more recent housing developments do not make sufficient provision for garaging cars or providing adequate off-road parking. The streetscape of many recent developments and those early ones where properties were built without garages (usually pre-war) is ruined by the presence of cars. Artists impressions submitted by developers never show cars parked on the roads. We understand the situation of modern families where 2/3 cars are owned, but more robust planning regulations and transport policies must be developed before we head into a real crisis.</p>	<p><b>Noted- no changes required</b></p>
<p>BSP 8: Local Heritage Assets Kerry Millet Resident Support and Omission</p>	<p>I propose that a certain number of properties built in post WWI - ie. 'arts &amp; crafts' buildings in the following location be considered for inclusion in the list of local heritage assets buildings not in a conservation area. Junction of Stone Road, Bishops Avenue and Park Road. (sketch plan provided)</p>	<p><b>Noted- Agreed</b> <b>Following a site visit of the area identified, the following addresses will be added to the local list:</b> <b>Bishops Avenue - Hamilton Lodge, Braeside Cottage, Whitewalls</b> <b>Castle Avenue - 37 and 41</b> <b>Stone Road – 91, 93, 103, 101, 99, 95</b> <b>Park Road - 2,3,4,7 and the Wainwright Building</b></p>
<p>BSP 8: Local Heritage Assets</p>	<p>9-15 esplanade are in conservation area</p>	<p><b>Noted-Agreed</b></p>

<p>Robert Stone Bay Tree Hotel Omission</p>		<p><b>9-15 Eastern Esplanade are contained in the Conservation Area. Amend the local heritage assets list to reflect this.</b></p>
<p>BSP 8: Local Heritage Assets Alan Byrne Historic England Support</p>	<p>We are content that draft Broadstairs and St Peter's Neighbourhood Plan appropriately values and defines the values and significances of the local heritage, and sets out a positive strategy for the conservation and enhancement of the local historic environment. The draft Neighbourhood Plan should consider the existing or emerging local plan policies for the historic environment and express through the Plan how the broader, strategic policies of the Local Plan should be put into action at the neighbourhood scale.</p>	<p><b>Noted- no changes required</b></p>
<p>BSP 9: Design in Broadstairs &amp; St. Peter's Nathan Burns Natural England Omission</p>	<p><b>Design which contributes to existing GI/ecological networks should also be encouraged i.e. green walls, green roofs, hedgehog permeable fences &amp; bird/bat nesting boxes.</b> Maintaining &amp; contributing to existing GI is in line with the aims of the NPPF (171.) and the DEFRA 25-year plan (3.3.i) Contributing to the wider ecological network is also an aim of the NPPF (170. &amp; 174.)</p>	<p><b>Noted-Agreed Green design guidelines to be added to the design appendix.</b></p>



<p>BSP9: Design in Broadstairs &amp; St. Peter's Alan Byrne Historic England Support</p>	<p>Neighbourhood planning offers an opportunity for local communities to embed their understanding of the positive features of their area's character and heritage in the planning decision-making process. We note the excellent Broadstairs and St Peter's Town Design Statement and welcome the neighbourhood plan's references to that document which will add to the weight attributed to it in the planning process (Policy BSP9 &amp; Appendix 5). In addition, we note the draft Neighbourhood Plan's consideration of the positive features of character areas both within and outside designated heritage (i.e. conservation areas) and valued seaside and townscape areas to inform decision-making.</p>	<p><b>Noted- no changes required</b></p>
<p>BSP 9: Design in Broadstairs &amp; St. Peter's Megan Pashley Gladman Developments Ltd. Omission</p>	<p>Policy BSP9 states that all planning applications in the Neighbourhood Plan Area, will only be granted planning permission if they take into account the design guideline set out at Appendix 5 of the draft plan. Whilst Gladman recognise the importance of high-quality design, planning policies and the documents sitting behind them should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution</p>	<p><b>Disagree- No changes required</b></p> <p><b>Paragraphs 124-126 of the NPPF clearly set out that it is suitable and desirable for the design of an area to be established by the people that live there.</b></p> <p><b>Paragraph 125 states:</b> <b>125. Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important</b></p>

	<p>in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the previous NPPF which states that: "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles".</p>	<p><b>role in identifying the special qualities of each area and explaining how this should be reflected in development</b></p>
<p>BSP 10: Shopping Areas Paul Verall Resident Omission</p>	<p>I have ticked omission but I am unsure whether this plan will be flexible enough to meet the coming challenges evident in the decline of major national shopping chains. There is increasing reliance by residents on internet shopping and so it seems to me inevitable that traditional shopping outlets in High Streets will struggle. We already have a mix in the shopping streets with residential and retail. It seems that allowing reuse of non-viable shops should be allowed if we are</p>	<p><b>Noted- but no amendments required.</b></p> <p><b>The Neighbourhood Development Plan needs to be in conformity with the District Local Plan and the district Local Plan is seeking additional retail in the existing town centres.</b></p>

	to avoid empty shopfronts that give some towns an air of decay and general gloom, a far cry from what people hope to see when visiting a resort for leisure purposes.	
<p>Comment on Economy 8.3 Nathan Burn Natural England Omission</p>	<p><b>Natural capital concepts could be mentioned here as maximising the natural capital of habitats within Broadstairs and St. Peter's will contribute to the local economy i.e. increasing tourism or reducing NHS spending by improving health and wellbeing of residents.</b></p> <p>Enhancing natural capital is a concept within the NPPF (170. &amp; 171.) and throughout the 25-year plan</p>	<p><b>Noted, but no change required.</b> <b>This concept is already being addressed in the Thanet District Local Plan and doesn't need replicating.</b></p>
<p>General Comment on Tourism David &amp; Margaret Tate Residents Omission</p>	<p>Tourism is the lifeblood of Broadstairs and St Peters and must be encouraged in a controlled manner. There is always a balance to be drawn between the wishes of residents who pay Council Tax and visitors who contribute to the local economy.</p> <p>Restaurants, public houses and some shops would not be viable and therefore available for residents without the income from tourists.</p> <p>We have to comment again on toilet facilities, which we find embarrassing. If we wish to attract visitors, improvements must be made. We add that residents would also welcome improvements.</p>	<p><b>Noted, but no changes required.</b></p> <p><b>Issues relating to toilet provision in the Broadstairs &amp; St. Peter's area has been dealt with under the Community Projects section of the Neighbourhood Development Plan.</b></p>

<p>General Comment on Tourism Nathan Burns Natural England Omission</p>	<p><b>It should be mentioned that the impacts of increased recreational disturbance, resulting from increased tourism, on Thanet coast and sandwich bay SPA &amp; Ramsar should be mitigated for.</b> <b>Possibly could be mitigated through existing strategic solutions.</b> Protecting designated sites is an aim mentioned ubiquitously through both the NPPF and the DEFRA 25-year plan.</p>	<p><b>Noted, but no change required.</b> <b>This concept is already being addressed in the Thanet District Local Plan and doesn't need replicating.</b></p>
<p>BSP 14: Safeguarding Leisure and Tourism Assets Ruth Bailey Resident Support</p>	<p>I generally support the plans but feel that they are too long term. Facilities such as the public toilets and car parks should, ideally, be taken under the control of BStPTC sooner rather than later. The Town could then determine the charges for the car parks and ensure the cleanliness and opening hours of the public conveniences. BStPTC would obviously need to be allowed to raise, or keep, a bigger share of revenue in terms of council tax or precepts in order to pay for the running of these important facilities. Installation of pay to use machines in public toilets would help with the ongoing maintenance costs. Businesses in town, particularly take away businesses, should be encouraged to clean up outside their properties, to reduce their use of packaging and to provide or sponsor bins in order to reduce littering. The Bandstand area should</p>	<p><b>Noted, but no changes required.</b> <b>Issues relating to toilet provision and car parks in the Broadstairs &amp; St. Peter's area has been dealt with under the Community Projects section of the Neighbourhood Development Plan.</b></p>

	be transferred under community asset procedures sooner rather than later.	
BSP 14: Safeguarding Leisure and Tourism Assets Alan Byrne Historic England Support	In setting out a positive strategy the neighbourhood plan identifies the desirable heritage-led regeneration initiatives that can contribute to supporting the area's economy, especially the tourism and leisure sectors (Policy BSP14), whilst also achieving social and economic benefits for the local community.	<b>Noted – no changes required</b>
BSP 14: Safeguarding Leisure and Tourism Assets Paul Verral Resident Omission	You do not mention coach parking. Currently the coach parking in Vere Road can only just about cope with demand. There is a high level of usage from not just British visitors coming by coach but the high level of demand from language schools who throughout the year have need of parking for coaches from France and Germany but also hired coaches for the large number of groups coming from Spain, Italy and other European countries or beyond. At the consultation meeting it was mentioned that the current system does not always work smoothly due to lack of enforcement on the waiting period at the seafront drop off point. I do feel that the Town Council should include these points within the plan.	<b>Noted- Agree Coach parking to be added into community projects section. This would need to be in the remit of Town Council, i.e. working with stakeholders, lobbying.</b>
BSP 14: Safeguarding	Safeguarding tourism facilities can be quite restrictive, as sometimes a facility may be in	<b>Noted- Agree Amend policy to be 'sustaining Leisure and Tourism Assets'</b>

<p>Leisure and Tourism Assets Informal comments from TDC and sub-committee</p>	<p>decline and no longer viable and this policy could limit its potential improvement.</p>	
<p>Town Council Projects Nathan Burns Natural England Support</p>	<p><b>Developing good transport and traffic management practices will help reduce greenhouse gas emissions and also reduce impacts of air pollution (and water pollution via surface run off) on the GI network and Thanet Coast &amp; Sandwich Bay SPA &amp; Ramsar</b> Encouraging sustainable transport is a major focus of the NPPF (9. Promoting sustainable transport) and improving air quality is also a specific aim of the NPPF (103. &amp;181.)</p>	<p><b>Noted – no changes required</b></p>
<p>Town Council Projects David &amp; Margaret Tate Residents General Comments</p>	<p><b>9.1 Town Facilities</b> The Town Council must give due diligence when considering taking over toilet provision. A large investment would be required to bring them up to good condition, together with ongoing maintenance. Attendants or regular inspections would also be necessary. As we would not be in favour of charges, is it possible to pursue a joint initiative with Thanet DC, that Council to refurbish and maintain the fabric, whilst the Town Council meet the cost of attendants/inspectors? <b>9.2 Litter and Waste</b></p>	<p><b>Noted – no changes required</b> <b>Dealt with in community projects section</b></p>

	<p>Outside the Town Centre, the residential areas appear to have become less clean. Everyone accepts that this is a “people problem” and we litter our own streets. Employing a litter warden may not be a priority, but a concerted education programme and volunteer “clean up” days may prove viable.</p> <p>Possibilities of vandalism and tampering puts us off drinking water fountains, but the consideration of reducing plastics is to be applauded.</p> <p>Waste recycling is a problem that should be tackled and regulated nationally. There are many directives and initiatives to increase recycling; so much so that there is a deal of confusion about what can be recycled, where and when.</p> <p>All district councils have a waste collection service, but there is a difference in what each district will accept. Neighbouring districts have different rules. It seems that the contractor determines what can be recycled and not the District Council.</p> <p>We are convinced that a national standard recycling scheme could be set up with all councils recycling the same items, resulting in more recycling and economies of scale.</p>	
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	<p>Wheelie bins are another confusion in that different councils adopt different coloured bins. In Thanet we have black, blue and green lids. In other districts I have seen purple and blue bins, let alone a consistency of black for land fill, blue for recycling and, green for garden waste. Again, I see economies of scale in procurement of standard coloured bins.</p> <p>It also seems strange that in Kent, district councils collect refuse and the County Council is responsible for waste disposal. When we lived in Wales we experienced collection and disposal by the same authority.</p> <p>We acknowledge that recycling is not part of the services run by the Town Council, but its effect does impact upon the area.</p> <p><b>9.4 Transport and Traffic Management</b> As relative newcomers to the area (moved from Norfolk 15 months ago), we are impressed by the bus service. Living close to the route of The Loop, we rarely use our car to visit the town centre. We have bus passes and if consideration were to be given to charging we would prefer to pay an annual</p>	
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	<p>figure of, say £20, as against a flat reduced fare of, say £1 per journey.</p> <p>We do see the problem of car parking around the beaches where residential streets are filled with cars in every available space. We are not convinced that a park and ride system would work as the roads are not wide enough to have a dedicated bus lane.</p> <p>Perhaps a completely new transport system of trams or mono rail may work, but at what cost.</p> <p>The area benefits from a good system of cycle/footpaths. Unfortunately, there is some neglect in terms of potholes, litter, weeds and overgrown hedges from neighbouring properties. We would like to be assured that there is an inspection rota of sorts. A cycle ride by members would be informative and beneficial. Again, use of neighbourhood volunteers/inspectors could be employed.</p> <p><b>9.5 Other Projects</b></p> <p>We fully support entering South East in Bloom, particularly if communities etc. will be the vehicle. If the Town Council undertake it, we feel that it will be left as a responsibility of the Town Council, again at a cost.</p>	
<p>Town Council Projects Beth Morris</p>	<p>Thank you for all you are doing to improve Pierremont Hall &amp; Pierremont Park for the better of our neighbourhood</p>	<p><b>Noted – no changes required</b></p>

<p>Resident Support</p>		
<p>Town Council Projects Paul Verral Resident Support</p>	<p>There is a 'wish list' it seems on page 39 of projects. I fully support the In-Bloom idea. I supported Broadstairs when you entered the Southeast in Bloom competition back in the 1990's when I was involved with the TDC parks section. We won it several times, even beating Guildford Council. However, times have changed and it will need a lot of effort to achieve this. It is possible and the town of Deal have done just that in the last few years and this last week were awarded Gold and overall winner of several categories. But they had good support from an ex-Mayor and strong residential support. I would suggest that if you want to try you start with a few It's Your Neighbourhood applications for sites such as the Clinic Bank and Post Office Bank at the Broadway, the car park planting at Albion Street and the bed at Ramsgate Road by Keston Court. At present the gardeners on our seafront are too stretched to achieve the standard required without additional support and there is no high level of input by businesses compared with towns such as Deal. I would be happy to discuss this further and show you what is needed. I currently volunteer as a South and Southeast in Bloom judge.</p>	<p><b>Noted – no changes required</b></p>

<p>Monitoring Nathan Burns Natural England Support</p>	<p>Having 5-year outcome goals ensures policies will be achieved and the commitment to review NDP every 5 years ensures policies will be effectively implemented in the long term.</p>	<p><b>Noted – no changes required</b></p>
<p>Other comments Ms Mayal Southern Water Omission</p>	<p>New policy to support delivery of utility infrastructure Southern water is the statutory water and wastewater undertaker for Broadstairs &amp; St Peter's and as such has a statutory duty to serve new development within the parish. Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. it is important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements. Could find no policies to support the provision of new or improved infrastructure within the neighbourhood plan. The revised National Planning Policy Framework (NPPF) (2018) in paragraph 28 states that 'Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include [...], the</p>	<p><b>Disagree-</b>  <b>Strategic Infrastructure is better dealt with at district level, in the Local Plan and through the Infrastructure Delivery Plan.</b></p>

	<p>provision of infrastructure [...] 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 and wastewater development Proposals, support for essential infrastructure is required at all levels of the planning system. Proposed amendment 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</p>	
<p>Other comments Sport England Object</p>	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from</p>	<p><b>Disagree- no changes required</b></p> <p><b>The Neighbourhood Development Plan has allocated Local Green Spaces and one of these is a sports pitch, Dumpton Park Drive.</b></p> <p><b>Sports pitch provision is better dealt with at the strategic Local Plan at county level to ensure that new pitches are located in the correct</b></p>

	<p>the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96 and 97.</p> <p>It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. <a href="http://www.sportengland.org/playingfieldspolicy">www.sportengland.org/playingfieldspolicy</a> Sport England provides guidance on developing planning policy for sport and further information can be found via the link below.</p> <p>Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="http://www.sportengland.org/facilities-planning-planning-for-sport/forward-planning/">www.sportengland.org/facilities-planning-planning-for-sport/forward-planning/</a> Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of</p>	
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	<p>assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the, relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and</p>	
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	<p>implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolandguidance">www.sportengland.org/planningtoolandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a> Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how</p>	
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	<p>any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improve.</p>	
<p>Other comments Equalities and Human Rights Commission General Comment</p>	<p>Local, Parish and Town Councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an</p>	<p><b>Noted- no changes required</b></p>



	impact on equality for different groups of people.	
Other comments Megan Pashley Gladman Developments Ltd General Comment	Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the BSPNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.	<b>Noted-no changes required</b>
Other comments Hannah Bevins Consultant Town Planner National Grid General Comment	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.	<b>Noted-no changes required</b>
Other comments David & Margaret Tate Residents Support	A thoroughly good job done by all concerned. We notice no mention of specific areas deemed suitable for housing development, but understand that development in the Westwood area is deemed to satisfy Local Plan requirements.	<b>Noted- no changes required</b>

<p>Other comments Alan Byrne Historic England General Comments</p>	<p>Your Neighbourhood Plan includes four Conservation Areas a large number of designated heritage assets including 137 Listed Buildings, notable the grade II* Parish Church of St Peter the Apostle, and two Scheduled Monuments (an Anglo-Saxon cemetery, Dane Valley Road and a Double ring ditch and two enclosures 400yds (360m) NW of Danes Court). It is important that the strategy for this area safeguards those elements which contribute to the importance of those historic assets. This will assist in ensuring they are enjoyed by future generations of the area and make sure it is in line with national planning policy.</p>	<p><b>Noted and Agree</b> <b>Refer to national guidance on Conservation Areas. Also, the potential to use the analysis toolkit for future projects.</b></p>
<p>General Comments Alan Byrne Historic England Omission</p>	<p>With regard to local heritage assets, the neighbourhood plan highlights the four conservations areas and the Areas of High Townscape Value and Seafront Character Areas that are desirable to preserve and enhance, including using mapping to identify the defined areas. It highlights key positive features including locally important buildings, trees, green areas, and open spaces, public realm, and views (Policies BSP1 –5 &amp; BSP7-8 and appendices 1-4). Further information on the valued features of the area’s character could be documented through local listing or</p>	<p><b>Noted-no changes required</b></p>

	<p>character assessment based on the Kent Historic Landscape Characterisation, available from the County Council's Historic Environment Record, and Historic England's character assessment toolkits.</p>	
<p>General Comments Alan Byrne Historic England General Comment</p>	<p>The conservation adviser at Thanet Council is the best placed person to assist you in the development of your Neighbourhood Plan's heritage related policies. He can help you to consider how the strategy might address the area's local heritage assets.</p> <p>We would also recommend that you speak to the staff at Kent County Council archaeological advisory service that look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also historic buildings, archaeological remains and landscapes that are not formally designated but may have local significance. It may also be useful to involve local voluntary groups such as the local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan. Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. These signposts a number of</p>	<p><b>Noted – no changes required</b></p>

	<p>other documents which your community might find useful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at the following website pages: <a href="https://historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/">https://historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/</a> &amp; <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>; and within the more general local plans guidance publications: <a href="https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-localplans/">https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-localplans/</a> &amp; <a href="https://historicengland.org.uk/images-books/publications/historic-environmentand-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environmentand-site-allocations-in-local-plans/</a>.</p>	
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