



Strategic Planning Team
Thanet District Council
PO Box 9
Cecil Street
Margate
CT9 1XZ

BY EMAIL ONLY

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 423203
Ask for: Alessandra Sartori
Email: alessandra.sartori@kent.gov.uk

21 March 2023

Dear Sir/Madam,

Re: Broadstairs and St Peter's Neighbourhood Plan Review 2nd Edition - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Broadstairs and St Peter's Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

KCC has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

7.0 The Broadstairs & St Peter's Area

Public Rights of Way (PRoW): KCC requests that reference is made within the Neighbourhood Plan to the PRoW network within the parish, and the new National Trail - the England Coast Path. These assets are of significant benefit to the area's landscape, character and infrastructure. KCC also requests inclusion of the Definitive Map for the parish to support the Neighbourhood Plan. A copy should be held by the Town Council, however, the County Council is able to provide this if necessary¹. KCC also recommends that a statement is included within the Neighbourhood Plan regarding the increasing importance of the PRoW network for sustainable connectivity and active travel across the town and the wider area, with use beyond leisure opportunities.

Heritage Conservation: The Neighbourhood Plan covers an area that is significantly larger than the historic town of Broadstairs, including large rural areas and other areas that have only been developed relatively recently. It is therefore appropriate in the Neighbourhood Plan

¹ prow@kent.gov.uk

to consider the history of the full area – not just the town of Broadstairs. At present, however, the Neighbourhood Plan only considers the town of Broadstairs and St Peter's and only from the medieval period onwards. As such, it is the view of KCC that the Plan is therefore neglecting an important and potentially very useful part of the area's past.

KCC notes that Palaeolithic handaxes (c. 700,000 BC to 10,000 BC) have been found from three locations in the area and much of the brickearth in the area has been classified (following KCC research) as being of moderate potential for the recovery of further Palaeolithic finds. Only a small number of Mesolithic flints (c. 10,000 BC to 4,000 BC) have been found locally but the area covered by the Neighbourhood Plan is particularly rich for Neolithic and later finds. There have been several discoveries of Neolithic flint implements (c. 4,000 BC to 2,000 BC) from the area including along the cliffs between Broadstairs and North Foreland Lighthouse, St Peter's and Dumpton Gap and Neolithic occupation sites have been found at Stone House School, Dumpton Gap Road, Thanet Reach Business Park and Westwood. There may even be a Neolithic flint mine close to Dane Court Grammar School. There are also numerous ring-ditches in the area, observable from aerial photography. These represent funerary monuments, and many are likely to be later Neolithic or Bronze Age (c. 2,000 BC to 700 BC) in date. There are a large number of Bronze Age sites from the area. These include occupation sites, enclosures, field systems, barrows and metal hoards making the Broadstairs area one of the richest in the county, and probably the country, for the period. As the part of the country closest to the continent, the area is also rich for Iron Age finds (c. 700 BC to AD 43). Settlements have been found at Lanthorne Road, South Dumpton Gap, Vale road and North Toreland Road. A possible defended enclosure has been observed near North Foreland Lighthouse and there are hundreds of records of iron age coins being found in the district. There are also more than 20 recorded Roman sites in the area (c. AD 43 to AD 410), including occupation sites, possible villas, cemeteries and rural sites. Finally, the area includes many Early Medieval sites (AD 410 to AD 1066) that pre-date St Peter's including cemeteries containing archaeologically rich burials and sunken-feature buildings.

The above summary demonstrates the rich archaeological heritage of the area. All periods of the past have left an imprint in the landscape of Broadstairs and the surrounding area and significant discoveries continue to be made. The archaeological heritage of Thanet is one of the richest in the entire country and KCC would suggest that it can serve a wide range of uses for the Broadstairs community. For example, it can add character to the area, whether existing or new build; can be used for educational and tourism purposes; contribute to health and well-being; and help social inclusion. A Heritage Strategy can be used to consider the opportunities provided by the area's heritage. KCC would draw attention to the [Dover Heritage Strategy](#) as an example for the Town Council to review and consider how these opportunities can be developed within the Broadstairs and St Peter's Neighbourhood Plan.

8.0 Vision and Objectives

PRoW: KCC is supportive of the Vision for the neighbourhood and would request that Objective 9, which considers that good transport and traffic management practices are developed for the benefit of residents and visitors, is amended. The Town Council should encourage the modal shift to walking, cycling and riding as an alternative to driving. This should therefore be reflected in transport infrastructure.

9.0 Planning Policies

PRoW: As a general statement, KCC is keen to ensure that its interests are represented within the local policy frameworks of the parishes in Kent. KCC is committed to working in partnership with Town Councils to achieve the aims contained within the KCC [Rights of Way Improvement Plan](#) (ROWIP). This aims to provide a high-quality PRoW network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work and visit.

KCC strongly recommends that reference and consideration is given to the PRoW network and KCC's ROWIP. Reference should be included within the Neighbourhood Plan to enable successful partnership working between KCC and the Town Council to continue and deliver improvements to the PRoW network in Broadstairs and St Peter's. Joint delivery of the ROWIP will ensure significant benefits, including access to additional funding opportunities. This is evidenced in the ROWIP Key Themes 'Evolution of the network' – Section EN04, 'Rights with responsibilities' – Section RR01 and 'Efficient delivery' - Sections ED02 and ED07.

Emergency Planning and Resilience: The County Council suggests that an Environmental Sub-Committee could be formed which could look to agree specific targets around the three main objectives set out within section 9.1.1 which focus on improvements to air quality, biodiversity and the built environment. The County Council would also recommend that policies seek to support actions such as the exploration of biodiversity opportunities, to better promote positive environmental outcomes.

9.1 Place and Environment

Sustainable Urban Drainage Systems (SuDS): KCC, as Lead Local Flood Authority, observes that consideration has not been given to drainage infrastructure or surface water management within the Neighbourhood Plan. This was mentioned in the 2018 Broadstairs and St Peter's Neighbourhood Plan Regulation 16 Consultation. Previous comments made in respect of that consultation therefore still apply and KCC asks that they are taken into consideration:

The Broadstairs and St. Peter's Neighbourhood Development Plan does not include any consideration of drainage infrastructure or surface water management. Unfortunately, this locality has experienced local drainage and flood problems in the past as documented in the [Thanet Stage 1 Surface Water Management Plan](#) (May 2013).

The more recent [Flood Risk to Communities Thanet](#) (June 2017) indicates that there is no specific risk to dwellings; however, if the area is to accommodate growth, it is important that any potential impact on drainage infrastructure is appropriately mitigated.

The County Council would encourage the consideration of a section within the Neighbourhood Plan with respect to infrastructure. This should include consideration of how infrastructure should be provided, and how sustainable drainage should be implemented within any new development.

Good practice supports drainage which is integrated within open space, at the surface and which provides multi-functional space. This is supported in the NPPF, which promotes drainage systems which are multi-functional; for example, biodiversity, landscape and amenity benefits can be provided through surface pond systems rather than below the ground crate attenuation.

9.1.1 Climate Change and Sustainability

PRoW: KCC recommends that the importance of sustainable, active travel as a key element of achieving change should be included in the Neighbourhood Plan. This should reflect the extent to which the PRoW network meets the likely future public need in contributing towards more sustainable development.

9.1.2 Clean Air

Policy CC1 Clean Air for Residents

PRoW: KCC recommends that this policy references transport and travel, as replacing private vehicle journeys with active travel should help to address low carbon targets, air quality issues, and improve public health. KCC ROWIP policy is to improve and upgrade the PRoW network where it links with amenities, public transport nodes, work, and education to increase the attractiveness of walking, cycling and riding as an alternative to driving (Action 2.2). KCC collaborates with planners to secure PRoW within green space and green corridors, both of which actively ameliorate air pollution.

9.1.3 Improving Biodiversity

Policy CC2 Biodiversity

Biodiversity: KCC recognises that this policy refers to all planning applications providing at least ten percent Biodiversity Net Gain. The wording includes applications excluded from the need to deliver Biodiversity Net Gain under the Environment Act, for example, small applications such as a single garage.

KCC would therefore recommend that the policy is amended in line with the Environment Act and the relevant applications which are required to provide Biodiversity Net Gain are specified.

9.2.2 The 'Green Wedge'

Heritage Conservation: As the text notes, the 'Green Wedge' approach will be important to helping the area retain its distinctiveness and character. However, to help protect the wedges, it will be important to help people value them in their own right, not just as barriers to development. This is more likely to happen if people understand the history of these areas and a process called landscape characterisation can contribute to this. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. Although the [Kent Landscape Assessment](#) includes a broad consideration of the

history of the landscape, to fully comprehend how it has developed and to identify those aspects which make it unique, more detailed assessment is needed. The [Kent Historic Landscape Characterisation](#) (2001) is a tool for understanding this historic context and should be used at a strategic level to inform decisions taken regarding landscape character. Ideally, this county level study should be deepened to be more relevant at the district and local level as has recently happened in the Hoo Peninsula and in Tunbridge Wells Borough. KCC would welcome further discussion on this matter.

Policy BSP1: The 'Green Wedge'

PRoW: KCC advises that the text should include specific reference to PRoW within the Green Wedge to be retained for connectivity. The text should also identify ways to ensure improvement opportunities are taken to access this resource. Good public transport and active travel links to open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites.

9.2.3 Important Views and Vistas

PRoW: KCC requests that the Neighbourhood Plan includes the significance of the views and vistas from the PRoW network. Where proposed developments will have a significant effect on PRoW, the PRoW network should be designed into the infrastructure and landscape planning of the site, to ensure they are not considered as an afterthought.

Policy BSP2: Important Views and Vistas

PRoW: It is requested that this policy is also amended to reflect the importance of the views and vistas from the PRoW network, in order to protect the benefits that the PRoW network brings.

9.2.5 Seafront Character Zones

PRoW: KCC recognises that Broadstairs and St Peter's is home to a large area of coastal access and to the significant asset of the England Coast Path and the Viking Trail promoted route. The Neighbourhood Plan should ensure that reference is made to the England Coast Path, a newly created long distance walking route with National Trail status, delivered locally in partnership between KCC and Natural England. The Neighbourhood Plan should seek to ensure that proposals do not adversely affect the existing PRoW network or National Trail.

Heritage Conservation: KCC supports the definition of the Seafront Character Zones in order to conserve the character of the area's sea frontage. However, KCC would highlight that there are numerous heritage assets along the coast that need to be identified and protected during any works intended to enhance the quality of the Zones. Some of these assets are the remains of First and Second World War defences and ancillary infrastructure. While these are not often considered to be "beautiful", they are nonetheless key survivals from Thanet's past and with appropriate interpretation can help tell the story of the area in a way that still resonates with people today. The [Kent Historic Environment Record](#) (HER) lists more than 50 defence sites that will fall in Seafront Character Zones, although the defences of Thanet have never been studied in detail, so it is not known how many of these survive today. A heritage

survey of the Seafront Character Zones would help identify survivals of this and other eras and therefore help in their management and use by the community.

9.2.6 Protecting Important Spaces

PRoW: KCC is supportive of this section, but would request that the benefits of the PRoW network are included, so it is protected and enhanced. This will give sustainable access to open spaces and buildings as part of the green infrastructure.

Heritage Conservation: KCC notes that open spaces have an important role to play in conserving and promoting the heritage of Broadstairs and St Peter's. Some of the open spaces are heritage assets in their own right representing urban spaces that have been designed as public amenities or that reflect the wealth and aesthetic tastes of private individuals, historically. Other open spaces may not be assets in their own right, but they may contain heritage assets in the form of, for example, historic structures or buried archaeological sites. Others again can be important in that they allow heritage assets to be displayed, for example, where a listed building is located next to an open space. As such, any alterations to open spaces need to be considered for the impact that they may have on the historic environment of the area.

Whether considering large and well-known or smaller and possibly even new sites, it will be essential that they are fully understood before major changes can take place. Over the last few years, KCC has been working with volunteers from the Kent Gardens Trust to review the gardens of other districts in order to better understand the history and development of the gardens and their surviving remains. These reviews are accompanied by Statements of Significance for each garden that allows the Local Planning Authority to be informed effectively in the development management process. The information also makes it easy for the Local Planning Authority to include the gardens on a list of local heritage assets. If the Town Council wishes to understand their green spaces better, this could be an effective way to achieve this. KCC would welcome further discussion on this matter.

9.2.7 Community Facilities

Policy BSP6: Sustaining Community Facilities

Provision of County Council Community Infrastructure and Services: KCC would draw attention to the current public consultation² on community services, which makes proposals to change the delivery of some community services in Broadstairs. The public consultation runs from 17th January to 26th March 2023, and the Town Council is encouraged to participate to help provide effective support for residents in the neighbourhood.

9.3 Design

PRoW: KCC considers that reference should be made to the KCC ROWIP, as it is a statutory (nationally required) policy document. Considering the importance of this resource, there should be a requirement for development applications to show recorded PRoW on their plans. Where PRoW would be directly affected by development proposals, the County Council seeks to ensure that plans clarify intentions for positively accommodating, diverting

² <https://letsta.k.kent.gov.uk/community-services-consultation>

or enhancing paths. It is requested that additional text is inserted into the policy wording that encourages applicants of new developments to engage with KCC at the earliest opportunity. This would allow KCC to review proposals for access improvements and consider appropriate developer contributions for PRow network enhancements.

9.3.2 Areas of High Townscape Value

Policy BSP7: Areas of High Townscape Value

Heritage Conservation: KCC is supportive of this policy as it will help conserve areas of historic character in the neighbourhood.

9.3.4 Local Heritage Assets

Heritage Conservation: The text states that the Town Council will create its own list of local heritage assets. KCC supports the need to identify heritage assets which, although not designated, play an important role in local character and so should be protected during the planning process. However, there is concern that the Town Council appear to be developing their own approach in isolation from other areas of the district. This is highly unusual and has not been seen elsewhere in Kent. A district-wide approach to local heritage assets is needed, with the Local Planning Authority committing to developing a district-wide list of local heritage assets. This has already happened in several districts in the county. Developing such a list at a very local level, for example for a Neighbourhood Plan, risks the local heritage assets of Thanet being identified and conserved according to a wide range of different systems and criteria, therefore making the process less efficient and effective to inform and influence decisions and approaches of the Local Planning Authority.

Irrespective of how this develops, KCC notes that the list of local assets needs to be added to the HER if the information is to be available for development management decision-making more generally. The Kent HER should also be a starting point for information gathering for the project, as the database may contain information on heritage assets that the Town Council is unaware of, particularly archaeological and military or industrial assets. At present, the HER lists more than 530 archaeological sites and buildings in the study area, many of which might qualify as local heritage assets. KCC would therefore ask to be contacted by a member of the project as soon as possible to discuss this matter³.

9.3.5 Building Design Guidelines

Policy BSP9: Design in Broadstairs & St Peter's

PRow: KCC recommends that the policy is amended to include reference to the KCC ROWIP. Considering the importance of this resource, there should be a requirement for development applications to show recorded PRow on their plans. Where PRow would be directly affected by development proposals, plans should clarify intentions for positively accommodating, diverting or enhancing paths. The Neighbourhood Plan should seek to ensure that proposals do not adversely affect the existing PRow network. It is requested that additional text is inserted into the policy wording, stipulating that applicants for new developments engage with KCC at the earliest opportunity.

³ heritageconservation@kent.gov.uk

Provision of County Council Community Infrastructure and Services: KCC supports the objective of promoting quality design in the built environment and actively encourages well designed places that consider and prioritise local context; distinctive identity; coherent built form; high-quality placemaking; intelligent movement and connectivity; sustainable homes and buildings; lifetime use; and preservation of natural resources.

9.4.1 Our High Streets and Shopping Areas

Policy BSP10: Shopping Areas

PRoW: KCC requests that this policy includes specific mention of improving and enhancing the PRoW network to enable safe and attractive walking and cycling connections, and links from new developments to facilities.

9.4.2 Employment Development

PRoW: The Neighbourhood Plan should ensure that new employment developments incorporate good sustainable transport connections within the community with high quality walking and cycling infrastructure available, which can link local amenities together. This will allow and encourage sustainable commuting to workplaces by providing accessible, safer travel opportunities. KCC also recommends that the replacement of private vehicle journeys with active travel should be encouraged in the Neighbourhood Plan.

Policy BSP11: Retention of Employment Space

PRoW: KCC advises that Clause (d) needs to include sustainable connectivity / active travel regarding “...existing or planned infrastructure”.

Policy BSP13: live-work space

PRoW: KCC requests that specific inclusion of the PRoW network and active travel in included in Clause (b) of this policy, which considers that proposals for small scale live-work development must be in a location which is reasonably accessible by means other than a private vehicle.

Provision of County Council Community Infrastructure and Services: KCC recognises that this policy supports proposals for small scale live-work development, provided they are consistent with all other policies in the Neighbourhood Plan. It is noted that any proposals for small scale live-work development would be assessed for development impact on KCC services (including education, waste and community services) where the dwelling numbers fall within the criteria for developer contributions. Requests by KCC will be made for development contributions to mitigate the impact of the new development where appropriate.

9.4.3. Tourism

PRoW: KCC understands that tourism is an important industry for Thanet parishes and that the landscape is a key attractor. Sustainable tourism is a way of supporting rural areas, providing jobs, and supporting community services. The PRoW network and the KCC ROWIP has a critical role in this, and specific mention should therefore be included of KCC supporting improvements to walking and cycling routes where they can assist the Town Council’s tourism objectives.

Heritage Conservation: KCC would recommend that the Town Council considers the Dover Heritage Strategy (page 68) to see some of the ways that the area's heritage can contribute to increasing the amount and quality of the tourism of Broadstairs and St Peter's.

Policy BSP14: Sustaining Leisure and Tourism Assets

PRoW: It is understood that the parish is home to a large area of coastal access and to the significant asset of the England Coast Path and Viking Trail promoted routes. This policy should therefore ensure that reference is made to the England Coast Path and the PRoW network bringing significant tourism opportunities to ensure “*long-term viability of the existing leisure and tourism asset*”, mentioned within the policy.

9.5 Health and Wellbeing for Residents

PRoW: KCC notes that the PRoW network provides substantial opportunities for active travel and outdoor recreation, which can help to address issues associated with health, wellbeing and air quality. The KCC ROWIP Key Theme of ‘Active Lifestyles’ seeks to increase health and wellbeing benefits and address health inequalities through active travel and recreational activity. Walking for Health walks can lead to improvements in health and active travel can aid reduction in air pollution levels, through changes in transport modes. The PRoW network and the benefits it provides should therefore be included within this section.

Policy BSP15: Uses promoting health and exercise

PRoW: KCC requests that the text is amended to include specific reference to the PRoW network, which provides significant user enjoyment with important health benefits and the benefit of access to the wider natural environment.

10.0 Community Projects

Transport and traffic management

Highways and Transportation: KCC, as Local Highway Authority, welcomes the measures proposed to sustainably manage transport and congestion in the neighbourhood and would recommend that further study is undertaken to support these community projects. KCC would welcome further engagement with the Town Council in respect of any further evidence collected.

11.0 Monitoring and Review

PRoW: KCC advises that the Definitive Map for the parish and the KCC ROWIP should be included within the appendices for the Neighbourhood Plan.

Appendix 1: Design guidelines for Seafront Character Zones

PRoW: KCC requests that the KCC ROWIP is specifically mentioned in Appendix 1. The inclusion of the ROWIP will aid decision-making and promote good design in both PRoW and countryside access management. It is KCC ROWIP policy to provide advice and

guidance to landowners, planning authorities and developers (Action 5.1). It is therefore requested that KCC is directly involved in future discussions regarding projects that will affect the PRow network, both directly and with a wider countryside impact. KCC can then advise on the design and delivery of these projects, ensuring that new routes successfully integrate with the existing PRow network. KCC would welcome future engagement with the Town Council to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.

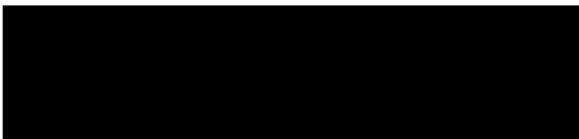
General Comments:

PRow: It is recommended that PRow contributions should be identified to ensure that paragraph 98 of the [National Planning Policy Framework](#) is upheld, *“that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”* Specific mention should also be made of improving and enhancing the PRow network to enable safe and attractive walking and cycling connections and links from new developments to community facilities. An increased population and increase in tourism will undoubtedly add to the pressure and importance of the surrounding PRow network. It is therefore critical to secure funding to ensure these highly regarded links are not degraded. Developer contributions are used to upgrade existing routes or create new path links that address existing network fragmentation issues. KCC would advise that consideration should therefore be given to the investment of development contributions towards the PRow network.

Minerals and Waste: KCC notes that the area has no land-won safeguarded minerals or mineral importation, handling or mineral products producing facilities. The area has limited capacity of safeguarded waste management, including a low intensity skip hire company and house clearance and clothing re-use recycling companies. However, as these are marginal, this is not considered an omission within the Neighbourhood Plan.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



Stephanie Holt-Castle
Director for Growth and Communities