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Dear Mr Fitt

**Thanet Local Development Framework – Core Strategy Preferred Options
Consultation Document “Shaping Our Future”**

Thank you for your letter of 15 October 2009 inviting comments on the above document.

As the Government’s adviser on the historic environment English Heritage is keen to ensure that the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.

Please find attached detailed comments on the content of the document.

English Heritage would strongly advise that the Council’s own conservation staff are closely involved throughout the preparation of the LDF, as they are often best placed to advise on local historic environment issues and priorities, sources of data and appropriate options relating to the historic environment.

Our comments relate solely to the content of the above document and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may have adverse effects on the historic environment.

Yours sincerely

Alan Byrne
Historic Areas & Planning Adviser

2 PEN PORTRAIT OF THANET

Thanet is, as noted in para. 2.4, rich in history. However, this brief portrait does not, in our view, give sufficient emphasis to the significance of the historic environment of the district as it is currently manifested. This goes beyond a catalogue of designated assets, important as these are, to a more pervasive, complex and rich tapestry of historic sites and areas that arise in large part from the traditional activities within the area of agriculture on the inland side of the peninsula and seaside resort and port functions on the coast. The significance of this historic structure should not be under-estimated.

4 MAJOR ISSUES FOR THANET

English Heritage agrees with the main thrust of this section; the primary issues for the District are undoubtedly related to addressing the social and economic imbalance in the area. We note that at several points in the text, the quality of the environment, which we read as including the historic environment, is noted as a positive characteristic and will be maintained. We support a strategy which sees the outstanding historical and environmental assets of Thanet as part of the solution to tackling these issues rather than an impediment to them.

The Challenge

Para 4.13 makes the link between delivering the change to address economic and social difficulties while maintaining the environmental quality of the area. The measure of quality of life has a close association with quality of environment, whether this is preservation of good quality existing built development or design of new buildings. Attraction of high-end economic activity and a skilled workforce (para.4.14) will be immeasurably aided by good quality housing and town centre environments and a range of cultural and leisure facilities. Thanet has these in abundance already and should ensure they are maintained and built upon.

Our Economy

Major new investment in such locations as Kent International Airport and Westwood Cross and the existing employment locations will undoubtedly be necessary to provide the levels of additional job opportunities required to address the economic under-performance of the area. The smaller scale, specialist and start-up opportunities that may be afforded by the ample older buildings and sites of the district, should be noted. Thanet has the potential for a stronger small business and enterprise sector, especially one based on the cultural and creative industries, and the adaptability and scale of historic buildings is often very well suited to these sectors. We suggest some reference to this is included in this section.

Housing

Though not directly an issue for English Heritage, in some locations the imbalance in the housing dwelling type is reflected in the quality of the housing stock, for example in the condition of building fabric and streetscape appearance. The retention and appropriate repair of good quality existing housing, of which Thanet has a good amount, should be identified as part of the strategy of a re-balancing of the stock towards family and larger units.

Place Based Issues

Margate & Cliftonville

While we generally agree with this synopsis of the issues affecting these locations it should be noted that in the case of Margate (para.4.28) in particular significant early strides have been made towards achieving a successful cultural, heritage and leisure-led strategy of improving the town. Large resources have already gone into the Old Town (HLF funded townscape scheme), seafront and harbour (e.g. Turner Contemporary) and, more recently, the Dreamland site (DCMS 'Sea Change', HLF and EH funding of plans and programmes) which are effecting a change in perception and image. It is essential that the LDF recognises and capitalises on these by reinforcing the framework for these projects and the associated work of the Margate Renewal Partnership.

While west Cliftonville undoubtedly exhibits the underlying social and demographic problems besetting the area, it is nevertheless an area with a strong and coherent historic character. The impression should not be given, as may be the case with the current wording of paras.4.29-4.30, that major physical alteration and widespread demolition would be the means of solving these issues. It is our strong conviction that the retention and enhancement of the extant built environment could and should be the principal means of achieving both a physical and social-economic transformation of the area in a sustainable way.

We support the identified issues for the historic seaside towns of **Broadstairs** and **Ramsgate**; both are distinctive and have strong character that should underpin new activities and development. Continued investment in the historic fabric of the towns, such as the HLF Townscape heritage initiative in Ramsgate, should be supported through policy in the Core Strategy.

The Villages

Thanet's rural villages have good quality environments and are largely designated as conservation areas (at least in their cores). They should retain their essential rural character and the trend to suburbanisation that is evident in some locations should be resisted. The focus of new development in the major urban areas in preference to

villages is supported, but where development is to take place it should strongly reflect their historic scale and form.

5 Vision

English Heritage broadly supports the 'Vision for Thanet in 2026' as set out in paras.5.3 to 5.15; we see no fundamental need to change them but suggest the following amendments which we suggest will help to clarify and strengthen the purpose of the statement:

In the first sentence of para.5.3 add: **with an outstanding environment** after "unique place".

Revise the fifth bullet point to read: **A year-round strong and vital cultural and leisure sector that complements the traditional seaside tourism economy of the coastal resort towns.**

In para.5.5 add in the second sentence: **of appropriate scale and design** after "mixed-use developments".

6 STRATEGIC OBJECTIVES

We are in agreement with the objectives as set out but suggest the following for clarity:

Thanet's Economy

We suggest that there should be specific reference to provision of tourism and cultural infrastructure in appropriate locations such as hotels, conference facilities and holiday accommodation.

A Beautiful Thanet

There should be specific mention here of Thanet's exceptional built historic environment and ancient monuments and the desire to preserve and enhance them and their settings.

Accommodating development....

Add: **including the repair, reuse and adaptation of existing buildings where necessary to maintain existing character** at the end of the last bullet point.

7 PREFERRED OPTIONS

It is not within English heritage's remit to comment on all the options considered by the Council but those that touch on our sphere of responsibility are commented on below.

A) The Role and Identity of Thanet's Towns and Villages

Support the Preferred Options

C) The Development Pattern

Agree, subject to specific policies to protect existing environmental quality and character.

D) providing for Economic Prosperity

Option D1 should include a caveat relating to maintaining environmental quality. The scale of the development and intensity of use of the airport has potential to impact upon the tranquillity and enjoyment of Thanet's open countryside and coastal areas and the enjoyment of its heritage and seaside resorts.

F) The Coastal Town Centres

In F2 add: **with a strong culture, leisure and tourism emphasis** after "projects and measures".

8 ILLUSTRATIVE DRAFT CORE STRATEGY

The Draft Strategy

We suggest that **The Goal** is extended to include reference to the environment, e.g. add to the end of the sentence: **within a high quality environment**.

Priority and Strategic Aims

At para.8.9, bullet point 4 change wording to read "**rich seaside heritage, historic environment, and diverse townscapes and landscape**".

In the section 8.10 The Strategic Proposals add "**while recognising environmental limits**" to the end of sub-section 1). And in 3) make reference to Margate's growing reputation as cultural destination.

The District Wide Strategy

The second sentence of Policy DCS1 relating to Kent International Airport should be amended to give stronger weight to environmental considerations; "managing environmental impact" is insufficient when national policy advice requires development to be in accordance with the highest possible environmental standards and requirements.

Strategy for Thanet's Places

Strategic Sites and Areas

Kent International Airport (Manston)

Policy DCS3 – English Heritage would not object in principle to more intensive use of the airport and some additional development of facilities and supporting activities as long as these are strictly contained within the present operational area. However, we cannot give unconditional support to this policy as presently worded. There are scheduled monuments and listed buildings in proximity to the airport which would be affected by physical expansion. Increasing use of the airport also brings potential to impact on wider environmental quality (through noise and pollution levels and additional traffic generation) including on the enjoyment of open rural landscape, coastline and historic towns and villages. This would be to the detriment of other objectives in the plan and so the references in the policy to environmental concerns should be considerably strengthened.

Policy DCS7 – Parkway Station

There is a scheduled ancient monument in the area adjacent to Lord of the Manor Roundabout (an Anglo-Saxon cemetery) which could be impinged on by a station in this vicinity. We suggest that the indicative map is revised to show the boundary of the area identified as having potential for a rail station moved to the west away from the scheduled area.

The Coastal Towns

Margate and Cliftonville

We agree with the analysis of the issues set out in paras.8.77-8.90.

Margate Town and Seafront

English Heritage supports the thrust of Policy DCS15 – Margate Town and Seafront but in paragraph A) would like the words “where feasible” removed from the first bullet point (it is always feasible to enhance the built environment given the will and resources) and the final word, “heritage” is replaced by **environment** – this is the appropriate term to use and reflects government guidance.

We support the rest of this policy.

Cliftonville West

Policy DCS16 should make reference to the desirability of preserving and enhancing those parts of the area that are identified as being of high townscape quality, perhaps by amending the third bullet point appropriately.

Ramsgate

English Heritage supports the policies in this section.

CORE POLICIES

Policy DCS19 – we generally support this.

We support policy DCS20 but suggest the wording of sub-section D) after “expected to” should be revised to read: **preserve and enhance the character, appearance and function...**” to be more reflective of national policy guidance and accepted terminology.

Policy DCS21 is supported as the distinction between the built up areas of Thanet is largely defined by their separation by green areas.

We support DCS22 but request removal of “where possible” and move “context” to follow “respect” in the second bullet point.; i.e. – “**..respect context and enhance the character and identity of its...**”.