

Thanet District Council

Draft Thanet Local Plan

to 2031

Justification for Preferred Options

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Justification for the Preferred Options

The Council carried out a consultation on Issues and Options for the new local plan from 3rd June - 14 August 2013. Comments were invited on various options that could form new planning policies.

We have considered the responses to that consultation, and comments made in the Sustainability Appraisal report that was produced for that consultation.

The following tables set out the options that were considered, and why they have been accepted or rejected, to explain why the policies in the Preferred Options plan are considered to be the most appropriate.

Economy

Issues and Options Issue 1

Issue 1 - What level of employment growth should be planned for up to 2031?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP02 - Economic Growth

Non-Strategic

None

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
Level of employment to be planned for	1a – baseline scenario 1b – policy on scenario 1c – risk based scenario	Option 1b is likely to have the greatest benefits especially as it involves boosting the green economy.	Between baseline and high. The NPPF says we need to plan for all foreseeable types of employment growth. Given past poor performance there is a need for a step change in rate of economic growth in District. This option supports the Council’s Economic and	The Economic Lower growth option would not accord with positive economic strategy required by the NPPF. There are concerns regarding delivery of the Higher economic growth option given economic uncertainties and rate of

			Regeneration Strategy. It also supports population growth when combined with potential airport growth.	change to date. The Economic Baseline option would not deliver step change in employment growth needed or meet the growth expectations of the NPPF.
Should we plan for additional employment growth at the airport?		This option is still to be fully appraised for SA	Yes. It is realistic that there will be some growth at the airport over the plan period whether in relation to aviation operation or for alternative employment use., and we are required by NPPF to support such growth. The airport is a potential significant asset which needs positive planning framework to help in it's delivery of airport related or alternative development.	No. This option would be harmful to the airport's potential future and contrary to the NPPF's instructions to support all sectors of the economy. To not plan for additional employment growth at the airport would be ignoring a potential major opportunity. It would be stifling an important growth sector of the economy and wider impact and therefore contrary to the NPPF.
What level of growth at the airport	1d – additional low growth 1e – additional high growth 1f – no growth	The option for airport high growth resulted in the most positive and negative effects. It would support economic growth at the airport and would have positive effects for	Between high and low. Evidence from the Economic and Employment Assessment shows that a mid range is more realistic and deliverable. Evidence	The low growth option is not enough to sustain a functioning airport High growth is likely to be unrealistic given the uncertainty of aviation

		<p>the wider economy of Thanet and East Kent. Negative effects are associated with the effects of large scale employment growth such as greenhouse gas emissions from the construction and operation of new facilities. The low growth option had less dramatic effects and the no growth option had limited effects.</p>	<p>from the airport demonstrates that the no growth and low growth options are not viable. High growth, given the uncertainty of growth at the airport in the context of the 2009 Airport Masterplan is unlikely to be deliverable. Should the airport not be viable in its current form it is conceivable that some growth will occur here over the plan period.</p>	<p>generally and any alternative developments here are not likely to be significant in the plan's timeframe.</p>
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Issues and Options Issue 2

Issue 2 - How much employment land is needed and where?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP03 - Land Allocated for Economic Development

Policy SP04 - Manston Business Park

Policy SP07.2 - Eurokent Mixed Use Area

Policy SP07.3 - Thanet Reach Mixed Use Area

Non-Strategic

Policy E01 - Retention of Existing Employment Sites

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
How much employment land	<p>2a – use of forecast labour demand</p> <p>2b – use of past take up rate</p> <p>2c – maintain existing supply</p>	<p>Maintaining the existing supply of employment land and allowing for additional land to ensure flexibility and choice, performed the best.</p> <p>It was difficult to assess these options due to the</p>	<p>Provide the amount of land evidence indicates is required, plus additional land as a buffer This option provides for all types of economic development in accordance with the NPPF. This option</p>	<p>Simply providing the land that evidence indicates is required does not provide sufficient flexibility and contingency to accommodate all employment generating development that is not typically located on</p>

	<p>2d – include contingency when determining the amount of land to allocate</p>	<p>uncertainties about type and location of development however this will be overcome at the site allocations stage and potential development management policies will also help to mitigate against potentially adverse effects.</p> <p>The option to continue with policy protection was predicted as having the potential to result in a significant positive effect, particularly in terms of job creation and supporting economic growth. The option to cease the policy protection performed better in terms of its potential to have indirect benefits for housing by potentially allowing a greater area of land for housing and other types of development.</p>	<p>compensates for loss of employment land to other uses and allow for on off unpredictable developments, to support economic growth and provide flexibility.</p>	<p>employment land and any unexpected demand during the plan period.</p> <p>D – evidence suggests we do not need this much employment land, para 22 NPPF.</p>
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Type and Location	<p>2e – relax the uses permitted on some of the allocated employment sites to allow other employment generating uses outside of the B classes</p> <p>2f – maintain a variety of sites in a range of locations across the district</p> <p>2g – provide all employment land in a single location or cluster in the district</p> <p>2h allow other sites to be developed</p>	<p>The option to use the existing allocated supply from which to select sites is less likely to result in adverse effects and has the greatest opportunity to deliver beneficial effects. Concentrating employment sites in one area (at the single site or cluster) could disadvantage the rest of the District. The single site option could also result in residents having to commute longer distances to get to work and therefore they would be more reliant on the private car.</p> <p>The option to continue with policy protection for existing employment sites was predicted as having the potential to result in a significant positive effect, particularly in terms of job creation and supporting economic growth. The option to cease the policy</p>	<p>The existing supply is located in variety across the District and sustainability was a factor in their designation. Evidence in the economic and Employment Assessment and the Employment Land Review suggest that there is more than sufficient land allocated to accommodate the need to the end of the plan period and therefore there is no justification for allocating new sites.</p> <p>Consider, where appropriate, being flexible and using some of the existing allocated employment land for alternative purposes. This helps to accommodate all employment generating development which is supported by the NPPF. We should protect existing employment sites from the 2006 Thanet</p>	<p>Providing all of the employment land in a single location or cluster would not meet the needs of the different types of industry.</p>

		protection performed better in terms of its potential to have indirect benefits for housing by potentially allowing a greater area of land for housing and other types of development.	Local Plan following assessment of their contribution to the Plan's economic strategy.	
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Issues and Options Issue 3

Issue 3 - How can we promote our infrastructure assets?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP05 - Manston Airport

Policy SP09.3 - Ramsgate Port

Non-Strategic

None

This issue also informs Policy SP39 - New Rail Station in the Transport and Infrastructure Section

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
Airport	3a Policy safeguard 3b No policy safeguard	Continuing to safeguard the operation of the airport was assessed as being likely to have benefits in terms of contributing towards job creation, economic growth, supporting the visitor economy and providing measures to avoid potentially	3a. The NPPF requires us to plan for all foreseeable development and sectors of the economy. Having a policy relating to the airport allows us to include policy provisions which safeguard the environment. A flexible policy that allows	3b. This option would be harmful to the airport's potential future and contrary to the NPPF's instructions to support all sectors of the economy. To not plan for additional employment growth at the airport would be ignoring a potential major opportunity. It would be

		significantly adverse effects such as impacts on landscape, noise and air quality. Removing this policy safeguard has less positive effects, but there was a lot of uncertainty with the option to remove policy safeguards. This option still needs further sustainability appraisal.	alternative development should the airport not be viable should also be incorporated in order to cater for all foreseeable types of economic development in line with the NPPF.	stifling an important growth sector of the economy and wider impact and therefore contrary to the NPPF.
Rail infrastructure	3e – new station for airport and commuters 3f – no support for a new station 3g – support improvements to Ramsgate Station	The option for a new station is likely to result in more significant beneficial effects in terms of contributing towards employment, economic growth (particularly the visitor economy) and providing infrastructure to support modal shift. Mitigation measures can be used to ameliorate adverse effects. The option to increase capacity at Ramsgate station is likely to have beneficial effects for the District and Ramsgate in	Provide a new station to support economic growth and encourage sustainable travel. Evidence suggests that existing stations are at capacity and improvements to existing stations would not satisfy demand over the plan period stemming from residential and employment growth.	Not planning for a parkway could stifle economic growth. The NPPF requires that Local Plans make provision for infrastructure to build a strong, responsive, competitive economy.

		particular.		
Port	3c - continue to safeguard the port 3d – cease policy protection	The option to safeguard the port has the greatest potential benefits particularly with respect to supporting economic growth. It also contributes towards maintaining the towns sense of character as a port town as well as indirectly contribute towards transport infrastructure in Kent and the wider region.	3c. Safeguard the Port subject to criteria. The port provides an important economic function which supports economic strategy. The NPPF requires Local Plans to make provision for infrastructure that supports economic growth. Having a policy relating to the port allows us to include policy provisions which safeguard the environment.	3d. Ceasing policy protection for the port would potentially restrict economic growth opportunities and would be contrary to the NPPF.

Issues and Options Issue 4

Issue 4 - How should Thanet's Town centres develop?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP06 - Thanet's Town Centres

Policy SP07 - Westwood

Policy SP08 - Margate

Policy SP09 - Ramsgate

Policy SP10 - Broadstairs

Non-Strategic

Policy E04 - Primary and Secondary Frontages

Policy E05 - Sequential and Impact Test

Policy E06 - District and Local Centres

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
Retail role of town centres. Retail hierarchy	5a – maintain existing hierarchy	Maintaining the existing retail hierarchy and increasing the role of the	5a. Maintain existing retail hierarchy. The relative relationships	5c – Evidence suggests that given the uncertain future of retail there is no

	<p>5b – increase the role of the coastal town centres in convenience shopping</p> <p>5c – increase Westwood’s market share</p>	<p>coastal town centres in terms of convenience complement each other by helping to continue the current performance of the retail sector (e.g. minimising the leakage of retail spend outside of the District) whilst also supporting the role of the coastal towns, reducing the need to travel and the distance travelled. Maintaining the existing hierarchy would provide benefits for the town centres. Increasing the market share of Westwood would result in economic and job creation benefits at Westwood. However, these benefits are narrowly focussed and might, indirectly, result in adverse effects elsewhere in the Thanet.</p>	<p>between the town centres is not likely to change and therefore to change the retail hierarchy would be unrealistic and undeliverable. Evidence suggests that there is not the retail demand during the plan period to increase the market share of Westwood.</p> <p>5b. Increase the role of coastal town centres in convenience. Although this option is not likely to alter the ultimate pattern in the retail hierarchy it is desirable to increase the availability of convenience shopping close to the centres of population. This would reduce the need to travel and support local communities. This also helps to support the future of town centres for and increases footfall in the towns which enhances their vitality and viability.</p>	<p>market need or demand to increase market share at Westwood during the plan period and to do so could potentially harm the vitality and viability of the coastal town centres.</p>
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<p>Accommodating town centre development needs</p>	<p>5d - no specific sites for commercial leisure development</p> <p>5e – flexible policies to allow commercial leisure development in town centres</p> <p>5f – additional 20% floor space for A2-A5 uses in town centres</p>	<p>This option to be flexible in our town centres to enable leisure development is particularly positive in terms of job creation, supporting the economy, sustainable travel and the tourist economy. Adverse effects were related to consuming resources to construct and operate new development.</p> <p>The option to plan for additional floorspace to accommodate the need for restaurants/cafes, takeaways, drinking establishments and financial and professional services such as banks. This has the same sustainability impacts as the option above.</p>	<p>5d. Provide no specific sites for commercial leisure development in the plan as there is no need has been identified in the evidence documents.</p> <p>5e. Have flexible policies to allow commercial leisure development in town centres. Whilst there is no identified need, there is a need to be flexible if unexpected proposals come along in order to support economic development. Commercial leisure is a town centre use and therefore provision needs to be made in these locations. As we do not know what type of commercial leisure development is likely to come forward there is a need to be flexible.</p> <p>5f. Plan for an additional 20% floor space for A2-</p>	<p>None to reject</p>
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			A5 uses in town centres need to provide for all town centre development. This is required to provide a balanced and functional town centre, and increase the vitality and viability of town centres.	
Use of vacant premises in Ramsgate and Margate	<p>5g(i) – no policy requirement to accommodate need for town centre development in the existing premises where possible</p> <p>5g – Accommodate town centre development in town centre units</p>	<p>The option to accommodate the need for town centre development within existing vacant units was unlikely to have significant negative effects and was predicted as likely to have a positive effect on job creation, supporting the economy, sustainable travel and the tourist economy. Uncertain effects were those on townscape, heritage, air quality and water resource impacts.</p>	<p>5g. Accommodate town centre development in vacant town centre units within Margate and Ramsgate. The best location for town centre development is within the commercial core where many vacant units are located in Margate and Ramsgate. This is needed to support function and vitality of town centres. It would make efficient use of brownfield land and would improve the appearance of the town centres contributing to regeneration aims.</p> <p>The scope for sites outside of town centres is limited. The vacant units</p>	<p>5g (i) identifying additional land outside the core town centre to accommodate need would not be the most sequentially preferable location, and would not constitute the best use of land. This approach would extend town centres unnecessarily and be harmful to vitality and viability of the town centres especially in terms of footfall.</p>

			comprise the most sequentially preferable location and locating town centre development here would have the most positive impact on vitality and viability of town centres.	
Westwood	<p>5h – accommodate development within the existing commercial area</p> <p>5i – accommodate development on a new adjacent site</p>	<p>The option to accommodate need on sites outside of existing commercial areas scores negatively as it would potentially require development on greenfield land whereas the option to accommodate need in existing commercial areas supports the sustainable use of land by directing development to areas of previously developed land. Both options had positive effects in terms of supporting job creation and economic growth.</p>	<p>5h. Accommodate development within the existing commercial area. There is sufficient land available with the existing commercial area to accommodate development need to the end of the plan period. This would help to improve and consolidate the town the centre and would assist with regeneration aims and better permeability of the town centre. It would also be an efficient use of brownfield land. Westwood is already quite an expanse, extending further would cause fragmentation and reduce pedestrian connectivity. Existing</p>	<p>5i. Accommodating development on a new adjacent site is the least sequentially preferable location and would not be accordance with the NPPF. It could potentially harm the vitality and viability of the town centre particularly with regard to footfall.</p>

			commitments within the commercial areas provide for significant amount of the identified need during the plan period.	
Broadstairs	<p>5j – accommodate town centres development close to existing commercial area</p> <p>5k – accommodate need for town centre development at Westwood</p>	<p>The option to accommodate growth close to the existing commercial area scored the best especially in terms of accessibility, job creation, economic growth and the sustainable distribution of development and supporting a shift away from private car use to access the commercial core.</p> <p>The option to located growth at Westwood scores negatively against sustainability appraisal objectives as it draws away trade from Broadstairs detracting from the sense of place. Services would also be less accessible and</p>	<p>5j. Accommodate town centre development close to the existing commercial area. This is the most sequentially preferable option as it provides for the need where it arises and is therefore in accordance with the NPPF. It also reduces the need to travel for Broadstairs residents. It is the most sustainable option and promotes the vitality and viability of town centres as well as supporting local communities.</p>	<p>5k – This option is potentially harmful to viability and viability of Broadstairs as it is not providing for the need where it arises.</p>

		cannot easily be accessed on foot or by bicycle thereby requiring people to use the private car.		
District and Local Centres	5l allow retail development to support community needs	Having a policy that allows retail development in district and local centres to support community needs is likely to contribute towards sustainable economic growth, local sense of place and sustainable transport. This is on the basis that locating small convenience type shops in or close to residential areas would avoid larger retail units being developed that could detract and potentially weaken the market for larger retailers at main town centres.	5l – Allowing small scale retail development in District and Local Centres reduces the need to use car as it provides everyday convenience facilities on the doorstep. It supports community needs in close proximity to resident populations giving a local sense of place.	Not providing these facilities in District and Local centres would mean that people have to travel further to meet their everyday small scale shopping needs and this is not sustainable.
Thresholds for impact	5m – set local thresholds	Setting a local threshold	5m. Setting a local	5n No locally set

<p>tests</p>	<p>for town centre development outside town centres</p> <p>5n – do not set local thresholds for out of town centre development but use the NPPF thresholds</p>	<p>for impact assessment is likely to result in more beneficial effects than using the thresholds set out in national policy. This is on the basis that locating small convenience type shops in or close to residential areas would avoid larger retail units being developed that could detract and potentially weaken the market for larger retailers at main town centres.</p>	<p>threshold ensures that policy is responsive to local circumstances. The NPPF suggests that thresholds are set locally (although it does provide a default threshold where this is not the case). Due to the function and role of the town centres in Thanet there is a need for lower local thresholds to ensure vitality and viability of town centres</p>	<p>threshold. This option is not locally responsive and could be harmful to the main town centres. Not setting a threshold would be contrary to government advice as the NPPF encourages local planning authorities to set local thresholds.</p>
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Issues and Options Issue 5

Issue 5 - How can we support the rural economy?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

None

Non-Strategic

Policy E15 - New build development for economic development purposes in the rural area

Policy E16 - Conversion of rural buildings for economic development purposes

Policy E17 - Farm Diversification

Policy E18 - Best and Most Versatile Agricultural Land

Policy E19 - Agricultural Related Development

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
How to support the rural economy	6a – support farm diversification where it complements the farm function (subject to criteria) 6b – no policy support for	Supporting farm diversification is more likely to result in beneficial effects than no support because, by the use of criteria, it would allow the District to gain	5a – Support farm diversification. This options supports the rural economy and potentially contributes to the viability of farms. The option supports rural businesses	5b – No support for farm diversification. Not supporting farm diversification could stifle the growth and viability of the rural economy which would be contrary to the

	farm diversification	the benefits from agricultural diversification whilst avoiding many of the potential downsides (e.g. traffic impact, visual and landscape effects and adverse effects on nature conservation).	and employment generation is an aim of the NPPF. This optional also supports the food production industry which is important in Thanet. This option complies fully with the NPPF. Having a policy on farm diversification enables policy to set criteria stating what type of development is acceptable.	NPPF which states that Local Plans should support the rural economy and address barriers to the food production industry.
	6c – new build economic development in settlements 6d – new build economic development (subject to design and sustainability criteria)	Supporting new build economic development in settlements has beneficial effects on the local economy, the sense of place and sustainable transport (by locating development in settlements and thereby reducing reliance on private car use). However, the option may result in adverse effects without specific criteria or controls that limit the magnitude and extent of potentially adverse	A mix of 6c and 6d. New build economic development within settlements subject to design and sustainability criteria is in accordance with the NPPF as it supports the rural economy. The addition of sustainability and design criteria helps to achieve sustainable, well designed development.	Not supporting new build economic development in rural areas would be contrary to the NPPF. Not having a policy could lead to inappropriate development in terms of landscaping, design and access. Allowing new build development anywhere could result in isolated development which is unsustainable.

		effects.		
	6e – Policy support of new village shops and services 6f – policy support for existing shops and services	Both options would have positive and negative effects and neither one appears to perform better than the other in sustainability terms. There are beneficial effects on the local economy, the sense of place and sustainable transport (by locating development in settlements and thereby reducing reliance on private car use).	Both options selected (shopping and services at an appropriate level). This options supports rural communities by providing facilities on the doorstep and reduces travel so is sustainable.	Not supporting rural communities would be harmful to the rural economy and would therefore be contrary to the NPPF.
	6g – Protect best and most versatile agricultural land 6h – no policy support	Protecting best and most versatile agricultural land has the potential to contribute towards the economy, avoiding increases in flood risk and significant benefits for the protection of greenfield land from development. Not protecting best and most versatile agricultural land is not predicted as being likely to have any positive	5c. Protect best and most versatile agricultural land. This option complies with the NPPF supports the food production industry.	Not supporting best and most versatile agricultural land would not support the food production industry and would be contrary to the NPPF.

		effects.		
	<p>6i – policy support for agricultural related development including retail</p> <p>6j – policy support for agricultural related dwellings</p> <p>6k – No specific policy of agricultural related development</p>	<p>Supporting agricultural development, including dwellings and retail units are likely to have positive effects and the potential to contribute towards the economy, rural housing supply, job creation and reducing the need for people to travel to access jobs, services and local facilities. However because there are no specifics in relation to where development would occur, the effects on the built environment, landscape, heritage, ecology and the water environment are uncertain. Potentially adverse effects have also been predicted in terms of energy and resource consumption as well as waste generation because new development will result, to a lesser or greater extent,</p>	<p>Support both. These options support the rural economy and reduce the need to travel and are therefore NPPF compliant.</p>	<p>Not supporting these options would be harmful to the rural economy and would be contrary to the NPPF.</p>

		in these effects.		
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The following policies and options are currently undergoing the Sustainability Appraisal process:

Policy Name	Draft Policy Wording	Options
E16 Conversion of rural buildings	<p>Where it can be demonstrated that the building is not needed for agricultural use the conversion of rural buildings to other uses for economic development purposes will be permitted where all the following criteria are met:</p> <p>1) Their form, bulk and general design are in keeping with the character of the surrounding countryside.</p> <p>2) The proposed use is acceptable in terms of its impact on the surrounding area and the local highway network.</p> <p>3) Demonstrate through a structural survey that the building is capable of conversion.</p> <p>4) Any alterations associated with</p>	<p>Preferred option- to have a policy that supports conversion or rural buildings for economic development purposes as this is in accordance with the NPPF. The other option was no policy.</p>

	<p>the conversion would not be detrimental to the distinctive character of the building (or its setting), its historic fabric or features.</p> <p>5) If the building forms part of a complex of agricultural or industrial buildings, a comprehensive strategy is put forward which shows the effects on the use of the remaining complex, and on any listed buildings and their settings.</p> <p>6) Where the building currently contains protected species, mitigation should be provided.</p>	
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Issues and Options Issue 6

Issue 6 - How can we support the visitor economy?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

None

Non-Strategic

Policy E07 - Serviced Tourist Accommodation

Policy E08 - Self catering Tourist Accommodation

Policy E09 - Protection of Existing Tourist Accommodation

Policy E10 - Major Holiday Beaches

Policy E11 - Intermediate Beaches

Policy E12 - Undeveloped Beaches

Policy E13 - Language Schools

Policy E14 - Quex Park

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
How to support the visitor	7a – Hotel development	The effects of allowing	7a. Support hotel	Not supporting hotel

economy	<p>outside of town centres</p> <p>7b – No policy support for hotel development out of town centres</p>	<p>hotel development outside town centres are slightly better than not because it is assumed that allowing out of town centre hotel development will provide the space for facilities that are often also provided with high end hotels (e.g. Spa, leisure facilities and golf courses). As a result it is predicted that allowing hotels outside of town centres would be likely to have significant beneficial effect on the tourism sector.</p>	<p>developments in areas outside town centres subject to sustainability criteria. Evidence suggests that Thanet needs a range of tourist accommodation in order to grow the tourism sector of the economy. This enables employment generating development and is in accordance with the NPPF.</p>	<p>development in locations other than town centres could stifle the tourism economy which would be contrary to Thanet's Economic and Regeneration strategy and the NPPF.</p>
	<p>7c – support self-catering accommodation (subject to criteria except caravan accommodation at the coast)</p> <p>7d – no policy restriction for caravan accommodation at the coast</p> <p>7c - no policy support for self catered accommodation</p>	<p>Supporting self catering accommodation except for caravans at the coast performs the best, when compared against not restricting caravan accommodation at the coast, or having no support for self catered accommodation. This is because it allows caravan and self-catering development to contribute toward the tourism sector,</p>	<p>7c. Support self catering accommodation subject to criteria. Evidence suggests that Thanet needs a range of tourist accommodation in order to grow the tourism sector of the economy. This enables employment generating development and is in accordance with the NPPF.</p>	<p>Not supporting self catering accommodation could stifle the tourism economy which would be contrary to Thanet's Economic and Regeneration strategy and the NPPF.</p>

		<p>job creation and economic growth without some of the potential downsides (e.g. the visual effects of caravan accommodation on the coastline and the detrimental effect this can have natural environment as an important part of the visitor economy). Not restricting caravan accommodation at the coast performs the worst and is predicted as being likely to have a significant negative effect on landscape.</p>		
	<p>7f – policy support for new tourist facilities</p> <p>7g – no policy support for new tourist facilities</p> <p>7h – blanket policy protection of existing tourism facilities</p> <p>7i – policy protecting existing tourism facilities except where it can be demonstrated that the</p>	<p>7f. Support for new tourist facilities is likely to have a significant effect on job creation and economic growth in the tourist and visitor economy. A policy protecting existing tourism facilities except where it can be demonstrated that they are no longer viable also has the potential to have a positive effect on economic growth, the</p>	<p>7f; 7i; 7j</p> <p>Supporting new tourism facilities encourages economic growth and employment generation and is therefore in accordance with the NPPF</p> <p>We should protect sites that are considered important to Thanet’s visitor economy</p>	<p>7g; 7k</p> <p>Protecting all tourism sites to restrict their loss could potentially stifle economic growth and would be very difficult to deliver.</p>

	<p>facility is no longer viable</p> <p>7j – protect identified sites which are of particular importance to Thanet’s visitor economy</p> <p>7k – no policy protection of existing tourism facilities</p>	<p>sense of place or identity within existing settlements and would also contribute towards retaining important historic and architectural features that are linked to the current and historic tourist and visitor economy of the District. However, blanket protection without the criteria that would allow alternative uses where existing facilities are vacant and not used, would have potential adverse effects on townscape and a negative visual impact on visitors and their perception of the District as a destination.</p> <p>Policy to protect specific sites that are of importance to the visitor economy are likely to have a positive effect, on job creation, economic</p>	<p>i.e. Dreamland ads this helps to grow the tourism industry in line with the Council’s Economic and Regeneration Strategy. Hotel development is also an important element of improving the tourism industry. Policy wording will require hotels to demonstrate viability in order to restrict the loss of accommodation stock to attract the overnight visitor.</p>	
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		<p>growth and potentially the use of previously developed land. However, without this policy there would be a greater degree of uncertainty as to whether or not its effects would be positive or negative.</p>		
	<p>7l – continue policy support for language schools subject to criteria</p> <p>7m – remove policy support fro language schools</p>	<p>Supporting language schools is more likely to result in positive effects than not supporting them, particularly in terms of job creation and supporting economic growth. Any potentially negative effects of supporting new language schools can be mitigated by development management policies. Removing the policy could potentially over the long term have a negative effect on the economy, if opportunities to increase the provision in this sector are lost.</p>	<p>7l. Continue to support language schools subject to criteria</p> <p>Language schools are a major contributor to Thanet’s economy and should be encouraged in line with the NPPF.</p>	<p>Not supporting language schools could impact on Thanet’s economy and would be contrary to the NPPF.</p>

	<p>7n – support amusement arcades only in certain areas of Margate and Ramsgate</p> <p>7o – support amusement centres in town centres only</p> <p>7p – no specific amusement use policy</p>	<p>Options to support amusement arcades in certain areas of Margate and Ramsgate, and amusement arcades only in town centres are likely to have positive effects in terms of sense of place, minimising impacts on townscape, landscape, tourism and the efficient use of land. This is because of their criteria and safeguarding characteristics.</p> <p>Having no policy would not offer any protection or safeguards and could result in amusement use development occurring anywhere in the District, particularly at locations where they would have an adverse effect on nearby features of interest (e.g. listed buildings) or sensitive receptors (e.g. residential areas).</p>	<p>7n. Amusement uses should be supported in appropriate locations as they contribute to the wider visitor economy.</p>	<p>Not supporting this use may be harmful to the visitor economy and is therefore contrary to the NPPF.</p>
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	<p>7q – continue existing policy protection of beaches – three zones of beaches – major holiday beaches, intermediate and undeveloped</p> <p>7r – No policy protection</p>	<p>Zoning beaches has the potential to result in significant positive effects for the District as a result of ensuring that development only occurs near beaches that is appropriate to the type of beach. As a result the potential amenity, visual, landscape and ecological conflicts that might occur are avoided.</p> <p>Furthermore, it has the potential to indirectly support the character and sense of place associated with the different types of coastal area and beach environment.</p> <p>Without policy protection there would be significant adverse effects, some of which could not be mitigated or avoided without a safeguarding policy.</p>	<p>7q. Continue to zone beaches according to their character and level of facilities available. This approach protects undeveloped beached which are important habitats and directs development to the major holiday beaches in order to support the visitor economy. This assists with economic development and employment generation as well as protecting the environment and is therefore in accordance with the NPPF.</p>	<p>Not applying policies to the beaches depending on their character would potentially mean that development is directed to areas where nature conservation is more important. Providing certainty for development helps support economic development and therefore beach policies are considered important.</p>
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Issues and Options Issue 7

Issue 7 - How can we support communications infrastructure and home working?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

None

Non-Strategic

Policy E02 - Home Working

Policy E03 - Digital Infrastructure

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
How can we support communications infrastructure and home working	<p>4a – require all new developments to be provided with appropriate communications</p> <p>4b – no requirement for telecommunications infrastructure</p>	Requiring new developments to provide appropriate communications infrastructure has the potential to achieve a number of SA objectives by reducing the need to travel and supporting the creation of jobs and economic growth.	4a. Require new developments to provide telecommunications. It supports the local economy, reduces the need to travel so is more sustainable and is in accordance with the NPPF	Not requiring new developments to provide appropriate communications infrastructure is missing an opportunity to enhance local economic growth and competitiveness of the District.

	<p>4c – Provide policy support, subject to criteria for home working</p> <p>4d – no support for home working</p>	<p>A policy supporting homeworking would contribute to SA objectives by reducing the need to travel and indirectly helping to make residential areas more vibrant by increasing daytime activity.</p>	<p>Support home working subject to local impacts because it supports the local economy and reduces the need to travel and is therefore more sustainable</p>	<p>The NPPF requires that Local Plans to facilitate flexible working practices such as the integration of residential and commercial uses within the same unit so therefore not supporting home working would be contrary to the NPPF.</p>
	<p>4e – Provide policy support, for work hubs, particularly in rural areas</p> <p>4f – Make no provision for work hubs (provide them on business parks and within town centres</p>	<p>The option to provide allocations for workhubs would benefit rural areas as well as urban ones and would help distribute job creation and the economic benefits of business growth in rural areas. It also indirectly offers a sense of place and vibrancy to counteract the effects of commuter/dormitory settlements.</p>	<p>Make no specific provision but provide for work hubs on business parks and in town centres. Providing for enough land to accommodate work hubs is proactively meeting development needs in accordance with the NPPF. Providing for them on business parks is also sustainable as the employment sites have been assessed in terms of sustainability.</p>	<p>If workhubs are needed then not providing for them would be contrary to the NPPF. The NPPF requires that Local Plans identify sites to meet anticipated needs over the plan period.</p>

Housing

Issues and Options Issue 8

Issues and Options Issue 8 - What scenario should underpin the level of housing provision

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

SP11 Housing provision

Non-Strategic

None

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
8.2 What scenario should underpin the level of housing provision?	8a - Zero net migration (3,714 homes) 8b - Short Term Migration	All options would increase the housing supply but the higher ones resulting in greater house building and greater provision of affordable housing. Options 8b and 8d (reflecting higher housing numbers) have a number of	8d - Responses to consultation showed no clear consensus on this issue.	8a, 8c and 8e would not address future requirements taking account of migration and/or deliver the economic strategy. This approach would be incompatible with the NPPF and aspirations for economic and

	<p>(11,648 homes)</p> <p>8c - Baseline scenario (9,639 homes)</p> <p>8d - Strong growth in tourism & green sectors (11,791 homes)</p> <p>8e - Economy returns to recession (7,600 homes)</p>	<p>potentially significant negative effects associated with increased demands on key facilities such as healthcare educational and support for vulnerable people.</p> <p>The SA notes that the options are strategic and until potential locations are known do not factor in aspects such as refurbishment potential of existing stock, impact on designated sites and effect on landscape and townscape and tourist industry.</p> <p>The options associated with higher housing numbers will have greater employment and GVA benefits from spending on housing construction</p> <p>Under option 8d growth in the Green sector suggests more growth in sustainable sectors/industries which could include sustainable</p>	<p>Strong growth in tourism and green sectors is the basis of the Council's economic development strategy. The level of housing associated with that scenario is also comparable with that associated with migration trends (8b) and in terms of the NPPF is thus most likely to be regarded as in accordance with national policy. However, basing provision on the economic growth strategy and supporting delivery of that strategy through planning policy will help address the risk of perpetuating importation of more benefit dependent migrants.</p>	<p>employment growth.</p>
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		transport systems. This is reflected in 8d being the only option to show permanent direct benefits in terms of a sustainable public transport network allowing access to key facilities, services and employment without relying on private vehicles, developing key sustainable wider transport links including road, rail and air, conserving and enhancing biodiversity, reducing impacts of resource consumption and increased energy efficiency and proportion from renewables		
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The following policies and options are currently undergoing the Sustainability process:

Policy Name	Draft Policy Wording	Options
H01 (Aspect regarding Phasing of housing development)	Policy indicating release of allocated sites to be consistent with indicative phasing.	Preferred option retain policy. Regulation of land release is important to gear it with expected growth in demand and with provision of supporting infrastructure. Option no restriction.

Issues and Options Issue 9

Issues and Options Issue 9 - Broad approach to location of future homes

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

SP12 - Strategic Housing site Allocations

Non-Strategic

H01 - Housing Development

H02A et seq - non strategic housing allocations

H04 - Housing at Rural Settlements

H04A et seq - rural housing site allocations

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
9.1 - Broad approach to location of future homes	9a - Maximise development provisions within the existing built up areas of the towns and villages in order to minimise use of	For most SA objectives options 9a and 9b exhibit significant positive effects, whereas for option 9c most are negative.	9b – The NPPF generally encourages effective use of previously developed land and focusing development in sustainable locations. At the same time it states the	9a - would inevitably compromise factors acknowledged of importance in the NPPF and would not assist urban regeneration.

	<p>greenfield land.</p> <p>9b - Focus on urban areas but with criteria (e.g. to safeguard back gardens/family homes/sites that are not previously developed land)</p> <p>9c - Focus provision on greenfield sites and aim to restrict housing sites in the urban area to those important for regeneration.</p>	<p>Locating development in the urban areas will mean they are more likely to be served by existing public transport links and by services in locations where these are concentrated, and if located near healthcare and educational facilities will affect demand and capacity.</p> <p>Focussing development on greenfield sites increases the likelihood of affecting natural and semi-natural assets.</p> <p>As options are strategic it is not possible to predict how communities will be impacted. And this will need to be considered in detailed planning.</p>	<p>importance of access to quality open spaces for sport and biodiversity, heritage assets and the need to respect local character and add to the overall quality and character of areas, through quality design.</p> <p>The SHLAA indicates that significant housing potential exists in the existing built up/urban areas (including much on previously developed land) without compromising the environmental considerations referred to above. This approach is therefore considered compatible with national policy. This option is also compatible assisting urban regeneration.</p> <p>Responses to consultation showed strong consensus for focussing or maximising use of urban area.</p>	<p>9c -would overlook urban area opportunities and thus be incompatible with government's policy objectives encouraging effective use of previously developed land, and prioritising sustainable locations.</p>
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<p>9.2 -Distribution of greenfield housing land</p>	<p>9d - Single location</p> <p>9e - Small number of locations</p> <p>9f - Dispersed sites</p>	<p>The option of a single location and a small number of sites has lower negative impact than the dispersed sites option across a range of SA objectives.</p> <p>As options are strategic, the commentary is necessarily somewhat general and unable to comment on certain aspects</p> <p>Options associated with dispersed sites are noted as likely to increase risk of sprawling development, impact on natural and semi-natural resources and require most service alteration or increased car use.</p>	<p>9f - but recognising that some clustering and variation between sizes of sites may be beneficial (for example where grouped sites can form part of a wider strategic sites delivering key infrastructure).</p> <p>Potential greenfield housing site opportunities identified are of varying size and location. Some of these are clustered.</p> <p>In order to provide choice, optimise use of existing infrastructure capacity and avoid over reliance on delivery of a small number of large single sites the preferred option is to identify a portfolio of sites in different locations across the district.</p> <p>Over 50% of consultation responses on this issue supported this option.</p>	<p>9d & 9e - Limiting provisions to a single or very small number of large single sites may compromise consumer choice and deliverability of development.</p>
<p>9.3 - Location of greenfield housing land</p>	<p>9g - Adjoining the urban</p>	<p>Compared with other options, 9i and 9k show</p>	<p>9g & 9h - Adjoining the urban area with limited</p>	<p>9i - would be less sustainable (especially in</p>

	<p>area</p> <p>9h - Adjoining the villages</p> <p>9i - Freestanding countryside sites</p> <p>9j - In the Green Wedges</p> <p>9k – Housing in the form of a new settlement</p>	<p>significant negative effects in terms of sustainable access to key facilities and sustainable transport links between Thanet and beyond.</p> <p>Compared with other options, 9g & h show (respectively) significant and minor positive effects in terms of key facilities to support vulnerable people and reducing deprivation.</p> <p>Compared with other option 9j shows minor positive effects in terms of sustainable (non-car) access to key facilities, sustainable transport links between Thanet and beyond and a sustainable pattern of development,</p> <p>Assuming key facilities and transport links are more likely to be concentrated within and between built up areas, locating new development adjacent to</p>	<p>provision adjoining certain villages.</p> <p>Thanet is a geographically small district and the SHLAA shows that its extensive multi centred urban area and periphery offers significant housing potential and is generally well located regarding access to services.</p> <p>The larger villages already served with community facilities are also considered have some housing potential, for which locations adjoining their built confines may be appropriate, subject to scale and compatibility with their size and character.</p> <p>75% of responses on this issue supported the adjoining urban area location, and 39% adjoining the villages.</p>	<p>terms of access to facilities, infrastructure connections, community integration and likely impact on high grade agricultural land) than those within/adjoining existing built up areas.</p> <p>9j -As a result of Thanet's limited geographical area and almost continuous urban coastal belt, the function of the Green Wedges remains highly important and is to be subject to continued protection. Thus any release of land in Green Wedges would be considered only exceptionally where shortcomings in the sustainability merits of alternative housing sites making up the total requirement outweigh the importance of a site to the function of the Green Wedge.</p> <p>9k - would be</p>
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		existing urban areas will mean they are more likely to be better served. 9g and to a lesser extent 9h will ensure new development is served by existing transport links. 9j is likely to provide greater opportunities to integrate new development with existing transport links and infrastructure as the Green Wedges are long and thin areas between existing developed areas that already have public transport and other links.		unsustainable for the same reasons as freestanding countryside sites. In addition a new settlement would be incompatible with the district's limited geographical area, which embraces extensive urban areas and closely grouped villages. A single settlement would also risk over reliance on delivery, likely to be impacted by the need for very substantial investments in new infrastructure.
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The following policies and options are currently undergoing the Sustainability process:

Policy Name	Draft Policy Wording	Options
Settlement Hierarchy (no specific policy)	Settlement hierarchy is referred to in a separate topic paper and shown diagrammatically in the draft plan.	No alternative option identified as the hierarchy is reflcets NPPF principles, sustainability principles, analysis of existing hierarchy and results of public consultation.
SP12-17, H01 and H02A et seq - Housing site allocations	The Plan includes strategic and non strategeic housing land allocations.	No alternative option identified. Sites were selected following screening against sustainability and other relevant principles applied in the Strategic Housing Land Availability

		<p>Assessment, and subsequent consideration in terms of the strategy for the planned location of housing which reflects the NPPF, the interim sustainability appraisal and stakeholder consultation.</p> <p>Selection is reflective of variant of option 9f (clustering but mix of large and small sustainably located sites) and a hybrid option of 9g & 9h (adjoining the urban area and limited provision adjoining certain villages).</p>
<p>SP12-17, H01 and H02A et seq - Housing site allocations</p>	<p>Policy content of housing site allocations embraces a wide variety of requirements to safeguard factors of acknowledged importance including heritage and landscape, to secure transport, community and utility infrastructure and address housing need in line with the signals in the NPPF, and the evidence base. Some site allocation policies aim to increase the proportion of homes that are houses above those recommended in the SHMA.</p>	<p>Policy addresses factors of acknowledged importance.</p> <p>Dwelling completions in the district have in the last few years included a proportion of flats substantially higher than recommended in the SHMA. This aspect of the policy seeks to redress the balance.</p> <p>Alternative option no policy could result in such factors being overlooked and would likely significantly extend the time period within which the overall stock may come to reflect the balance recommended in the SHMA.</p>
<p>H01 Housing development</p>	<p>Policy stating circumstances and criteria where housing development will be granted (including restricting</p>	<p>Alternative options</p>

	non-allocated sites to previously developed land within existing built up confines) and resisting alternative use of allocated housing sites.	<p>1 Policy as outlined</p> <p>2 policy as outlined but excluding restriction on windfall sites to previously developed land and/or restriction alternative use of allocated sites.</p> <p>3 no policy</p> <p>The content and scope of the policy as outlined is preferred option being considered compatible with the NPPF and necessary to promote sustainable development and increase the housing stock.</p>
H01 (aspect relating to Area specific objectives)	Policy stating that housing development will be expected to reflect specific housing objectives according to location.	The objectives reflect the Strategic Housing Market Assessment and the Plan's strategic priority objectives. Without these the plan's priorities and housing needs may not be met. Alternative option no policy.
H03 Cliftonville	Policy expecting proposals to provide residential accommodation to improve poor quality homes, increase family homes, create mixed settled communities and improve the environment.	Policy considered appropriate response in seeking to reverse local social and economic deprivation and compatible with other Council initiatives to address this. Alternative option no policy.
H04 Housing at Rural Settlements	Policy indicating scale and location of housing development appropriate at	Policy considered appropriate to ensure scale of development reflects

	particular rural settlements, allocating specific sites and stating expectations on terms of addressing need for particular types of housing and community facilities.	sustainability principles and safeguards the character of individual settlements, to identify which rural sites are allocated as compatible with those criteria and to ensure proposals are responsive to need in respect of types of housing and supporting community facilities. Alternative option of no policy could lead to speculative and unsustainable proposals.
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Issues and Options Issue 10

Issue 10 - What types of new homes do we need to provide

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

SP13-17 Strategic Site Allocations

SP18 Type and size of dwellings

SP19 Affordable Housing

Non-Strategic

H2A-F Non strategic site allocations

H05- Rural Housing Need

H09 Non-self contained accommodation

H10 Accommodation for Gypsies and Travelers

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
10.2 – What type of market homes are needed?	10a - In line with guideline proportion included in Strategic	Of the limited number of SA objectives impacted this option shows no	10a -The SHMA and any bona fide update of it represent the key source of	Alternative guideline proportions - No robust alternative source of

	Housing Market Assessment	negative effects, and a significant positive effect upon the SA objective of providing a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand. This option is likely to reduce future under-occupation of homes thus there is a minor positive effect on energy efficiency and responding to the challenge of climate change	information on housing demand and need. Responses to consultation showed a diversity of opinion including whether more emphasis should be placed on family homes or on flats	information.
10.3 – What type of affordable homes are needed?	10b - In line with guideline proportion included in Strategic Housing Market Assessment	Of the limited number of SA objectives impacted this option shows no negative effects, and a significant positive effect upon the SA objective of providing a sustainable supply of housing including and appropriate mix of types and tenures to reflect demand. This option is likely to reduce future under-occupation of homes thus there is a minor positive effect on	10b - The SHMA and any bona fide update of it represent the key source of information on housing demand and need. Responses to consultation showed a diversity of opinion.	Alternative guideline proportions - No robust alternative source of information.

		energy efficiency and responding to the challenge of climate change		
10.4 – delivering affordable housing	<p>10c - Set 30% as a future target element of affordable homes in new housing developments</p> <p>10d - Do not set specific target through policy</p> <p>10e - Affordable housing to apply to all residential development (no threshold)</p> <p>10f - Maintain 15 dwelling threshold</p> <p>10g - Allow for provision of affordable housing off site or through a financial contribution</p> <p>10h - Affordable homes to be 70% social rent and 30%</p>	<p>The option (10c) of a 30% element policy target shows a number of minor positive effects. (essentially relating to supporting vulnerable people, reducing deprivation, supporting vibrant communities, and improving urban renaissance).</p> <p>Conversely the no policy option (10d) shows significant negative effects in such terms.</p> <p>While option 10e showed largely unknown effects, option 10f (maintaining the 15 dwelling threshold showed a number of minor positive effects similar to those for 10c. Evidently these relate to the possibility that an affordable</p>	<p>10c - Independent viability assessment shows this is an appropriate target; balancing viability with the pressing need for more affordable homes.</p> <p>10e - Independent assessment shows that negotiating an element/contribution for affordable housing on sites of any size would not undermine viability, thus potentially increasing yield to help address pressing need</p> <p>10g - In some instances it may only be feasible/viable to deliver affordable homes off site or by way of a financial contribution. Such instances may better serve to deliver housing strategy objectives</p> <p>10h -This is the proportion</p>	<p>10d - Absence of a target would significantly reduce affordable housing that may be delivered. A higher target would potentially threaten viability of residential development, and a lower target would reduce potential yield of much needed affordable homes.</p> <p>10f -Only negotiating for affordable homes on schemes of 15 or more units would reduce potential yield of much needed affordable homes.</p> <p>-Affordable housing to reflect alternative proportion of social rent and intermediate.</p> <p>The 70%/30% proportion is based on the conclusions of the SHMA, and unless any bona fide update suggests otherwise there is no robust information justifying an</p>

	<p>intermediate</p> <p>10i - Allow release of land adjoining built up parts of rural villages to deliver affordable homes</p> <p>10j - No specific policy</p>	<p>element may render schemes smaller than 15 units unviable.</p> <p>The option (10g) to allow for provision of affordable housing off site or through a contribution showed some minor negative impacts. These are associated with the possibility that affordable housing will be concentrated away from other developments potentially resulting in crime, deprivation and polarised communities.</p> <p>Option 10h showed a number of minor positive effects principally relating to supporting vulnerable people , reducing deprivation and creating vibrant balanced communities (and no negative effects)</p> <p>Allowing exceptional land release as per</p>	<p>recommended in the SHMA.</p> <p>10i -Recent rural parish surveys have shown local need exists for affordable housing in most of Thanet's rural villages. Such a policy would facilitate delivery in cases where it may not be feasible to do so within villages' built up areas.</p>	<p>alternative proportion.</p> <p>10j - The NPPF expects a responsive approach to local rural area circumstances and refers to such a policy mechanism. Absence of such a policy may preclude provision of affordable homes to meet local need, potentially threatening the sustainability of village communities.</p>
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		option 10i showed a number of minor negative effects including access to facilities, community well-being, and sustainable development pattern. These are associated with concerns that the policy might lead to people being located away from more densely populated and better served areas. However, the alternative (no policy) option 10j showed a number of significant negative effects (including similar considerations).		
10.5 -Approach to Houses in Multiple Occupation	10k - Retain criteria based policy 10l - Restrict HMO's in certain areas 10m - Identifying a particular concentration of HMO's which would be unacceptable in an area and restrict	All options are described as strategic in nature, leaving many unknowns including which areas may be selected and the thresholds for any targets imposed in respect of option 10m particularly, Options 10k & 10 l will both likely maintain	10k - This will provide a basis for continuing to ensure that proposals for HMO's do not cause harm to local amenity 10l - Continuing presumption against HMO's in west Cliftonville (as in existing DPD) will complement interventions	No policy or restrictions - Existing policy has provided a useful mechanism to judge proposals on the basis of individual and in combination impacts No restriction - In some locations a presumptive restriction is justified in order to support area regeneration

	<p>through policy</p>	<p>status quo with a potential to restrict HMO's which may have an impact on the supply of affordable and student housing.</p> <p>All options should consider proximity to key facilities including healthcare.</p> <p>Policies should ensure proper management, and in high density areas private car use should be discouraged</p> <p>Option 10m might result in HMO integration in certain areas where it has not yet been located and where positively managed potentially result in integration and more mixed communities.</p> <p>The SA refers to assessment at a later date once information</p>	<p>to regenerate the area.</p> <p>10m - Potential exists for HMO's to cumulatively increase in number and to a level that may undermine the local amenity enjoyed by established communities and erode the stock of modern family homes. Thus a criteria based policy needs augmentation with a threshold beyond which harm would be expected to arise. It is proposed that this be applied district wide in order to preclude displacement pressures.</p>	<p>programmes (as in the case of the area covered by Cliftonville development plan document).</p> <p>No restriction on numbers/concentration Concerns resulting from incremental increases in HMO's associated with student accommodation illustrate that it would be beneficial to augment the criteria based policy to indicate a number of HMO's in any area beyond which harm would be expected to arise.</p>
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		<p>becomes available.</p> <p>At this point the strategic options show similar effects with the only potentially minor negative effect in relation to the SA objective of reducing waste generation and disposal and the sustainable management of waste as HMO development may increase waste generation in certain area if density increases.</p>		
10.6 - Approach to accommodation for gypsies and travellers	10n - Criteria used to consider potential sites to include impact on surrounding uses and access to facilities (e.g. schools, jobs, healthcare)	<p>This option shows no negative effects and some minor positive effects.</p> <p>The policy although not representing a strategic approach to site selection allows the Council to respond to demand reducing the risk of over or under allocation of sites.</p> <p>Allocating sites on set</p>	<p>10n - Specific assessment shows no need to provide pitch accommodation to meet the needs of gypsies and travellers in Thanet District. However, it is important that should any application to provide such provision come forward, a policy exists to assess the suitability of the site.</p> <p>It is considered appropriate that the criteria outlined under this item should be</p>	<p>No policy or policy based on alternative criteria -</p> <p>In the event applications are received, absence of policy guidance may result in accommodation being provided on an inappropriate site, where the gypsy and traveller community are unable to sustainably access community facilities and potentially undermining</p>

		criteria would allow selection according to nearby facilities and public transport links. It is assumed that selection criteria would examine issues such as biodiversity, tourism and access and that sites potentially harmful to these be rejected.	included to safeguard the interests of the gypsy, traveller and settled community	peaceful co-existence with the settled community.
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The following policies and options are currently undergoing the Sustainability process:

Policy Name	Draft Policy Wording	Options
SP18 Type and size of dwellings (aspect encouraging higher proportion of houses than recommended in Strategic Housing Market Assessment)	This encourages housing developments to incorporate a higher proportion of houses (than flats) than recommended in the SHMA and indicates justification will be required for schemes containing a higher proportion of flats than recommended.	<p>Dwelling completions in the district have in the last few years included a proportion of flats substantially higher than recommended in the SHMA. This aspect of the policy seeks to redress the balance.</p> <p>Alternative option would be to not incorporate this aspect. However, this would likely significantly extend the time period within which the overall stock may come to reflect the balance recommended in the SHMA.</p>

H06 New agricultural dwellings	This policy restricts proposals for new agricultural dwellings to cases where there is a genuine requirement , and subject to consideration of design access and location, and to be restricted to occupation for such purpose.	The policy is considered to reflect the NPPF approach to restricting isolated homes in the countryside unless special circumstances exist. The policy aims to ensure that any such development genuinely meets such circumstances. Alternative option would be no policy.
H07 Care and Supported Housing	This policy aims to support provision of good quality suitable accommodation for people needing care and support and that C2 uses are appropriately located.	The policy is considered important to facilitate provision of such housing in line with evidence of need. An option would be no policy. However, this could imply lack of support for such proposals.
H08 Accessible homes	This policy identifies the level of Lifetime Homes and Wheelchair Design housing that may be required as part of the housing mix.	There is evidence of need for such accommodation, and the policy aims to facilitate its provision in line with that. Alternative option of no policy may result in no such accommodation being provided, contrary to the requirements of the NPPG and evidence of need.
H11 Residential Use of Empty Property	This policy supports proposals to bring empty property within built confines into residential use subject to compatibility with nearby uses and other policies.	The NPPF requires us to identify and bring back into residential use empty housing and buildings in line with local strategies. Thanet has a large stock of empty and under-used property much of which is being, and could be usefully

		<p>be, brought into residential use.</p> <p>Alternative option of no policy could discourage proposals or fail to signal that such proposals are generally to be encouraged.</p>
H12 Retention of existing housing stock	<p>Policy restricting loss of existing housing unless proposal relates to community facilities , tourism related uses, otherwise complying with area based housing objectives and providing there is no conflict with certain other policies.</p>	<p>Alternative options</p> <ol style="list-style-type: none"> 1 Policy as summarised 2 policy excluding exceptions 3 policy including additional exceptions 4 no policy <p>Preferred option policy as summarised is considered appropriate to support the objective of increasing the overall housing stock, and with sufficient specific exceptions to support the Plan's objectives.</p>

Environment & Quality of Life

Issues and Options Issue 11

Issues and Options Issue 11 - How do we maintain a physical separation of open countryside between Thanets Towns and Villages?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP20 - Protecting the Countryside

Policy SP21 - Green Wedges

Non-Strategic

None

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
11 – How do we maintain a physical separation of open countryside between Thanets towns and villages?	11a – Maintain protection of the open character of the areas between Thanets main towns currently identified as Green Wedges 11b – Maintain	Maintaining protection of the green wedges could restrict potential housing supply, but could also push development towards pdl. No policy protection could result in development away from built up areas with better	11a –The green wedges have historically been valued and protected and relevant policies have been supported at appeals. The Natural Environment Topic Paper explains their importance in providing space, openness and	11c – Without a policy there would be no additional protection for the green wedges and the countryside which would result in inappropriate developments and urban sprawl, and detract from

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
	<p>protection of the rural and open character of the areas between Thanet's villages</p> <p>11c – Afford no policy protection to the countryside and green wedges</p> <p>11d – Encourage alternative uses in the Green Wedges which may include leisure, provision of open space, creation of new wildlife habitats</p>	<p>transport links, thus encouraging private car use. It could also be detrimental to the tourism sector. Removing protection could have an indirect effect on listed buildings by encouraging development in new area out of towns. Removing protection could result in damage to open spaces and wildlife habitats.</p> <p>Access to healthcare or educational facilities, effects on crime and on vulnerable people will not be affected. Encouraging leisure and tourism uses might support employment and positive effects on the GVA.</p>	<p>separation and provides historic detail and examples of successful appeals. Maintaining and protecting the open areas between the Thanet towns is still considered essential as they are vulnerable to development pressures and to prevent the coalescence of the main Thanet towns. This option was strongly supported in the public consultation</p> <p>11b – Maintaining protection of the rural and open areas between the villages is still considered essential to protect the countryside from sporadic forms of development. This option was strongly supported in the public consultation</p> <p>11d – Encouraging alternative uses such as leisure, open space and the creation of new wildlife habitats is considered</p>	<p>the contrast between the towns and villages and historic landscapes that are unique to the area.</p>

Issue	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
			appropriate as some green wedge areas are currently inaccessible and have potential for enhancements	

Issues and Options Issue 12

Issues and Options Issue 12 - How do we ensure that new development respects Thanet's important and valued views and landscapes?

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP22 - Protecting Thanet's important views and landscapes

Non-Strategic

None

Issue	Options in interim SA	Sustainability appraisal	Preferred Option and Justification	Why other options have been rejected
12 – How do we ensure that new development respects Thanet's important and valued views and landscapes?	12a – Retain policy protection for identified Landscape character areas 12b – No specific policy	Unlikely to have significant effects in most circumstances. Removal of protection policy could result in changes to the landscape which may negatively affect tourism.	12a – The NPPF states that valued landscapes should be protected and enhanced. Thanet has distinct and historic landscapes – the Natural Environment Topic Paper details previous studies that have identified these landscapes. It is important therefore that the defined landscape areas should continue to be protected by planning	12b – A landscape protection policy gives weight to the importance and significance of Thanet's landscapes and enables their continued protection in determining planning applications.

		policy.	
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Issues and Options Issue 13

Issues and Options Issue 13 - How do we protect, maintain and enhance the District's Green Infrastructure to better support wildlife and human health

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP23 - Green Infrastructure

Policy SP24 - Biodiversity Enhancements

Policy SP25 - Protection of the European Sites

Policy SP26 - Protection of Open Space

Policy SP27 - Provision of accessible natural and semi natural open space

Non-Strategic

Policy GI01 - Locally Designated Wildlife Sites

Policy GI03 - Protected Species and other significant species

Policy GI04 - Requirements for new open space

Policy GI06 - Landscaping and Green Infrastructure in New Developments

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
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<p>13 – How do we protect, maintain and enhance the District’s Green Infrastructure to better support wildlife and human health</p>	<p>13a – Policy support to protect and enhance existing areas of public open space</p> <p>13b – No specific policy protecting open spaces</p> <p>13c – Policy requirement for new development to provide effective green infrastructure</p> <p>13d – Policy requirement for new development to provide a net gain in biodiversity</p> <p>13e – Policy requirement for new development to provide new accessible open space</p> <p>13f – Policy requirement for mitigation against any loss of farmland bird habitat</p> <p>13g – Policy support for enhancement of green wedges</p>	<p>Options unlikely to affect public transport, access to key facilities, reuse of pdl or sustainability in construction or operation.</p> <p>Requirement for new development to contribute to GI will have neutral effect on housing supply with a risk that the viability of smaller developments may be affected. 13b would have a detrimental effect on improving sense of place. Policies supporting GI and open spaces can have a positive effect on air quality.</p>	<p>13a – The NPPF states that existing open space should not be built on unless certain criteria are met. There is a shortage of open spaces in Thanet so this option is necessary to avoid any loss of existing open spaces</p> <p>The NPPF requires local plans to plan positively for the creation, protection and management of networks of biodiversity and green infrastructure. 13c and 13d are considered important to promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species.</p> <p>13e – The Natural Environment topic paper sets out how open space requirements have been calculated based on the Open Space strategy.</p>	<p>13b – Thanet is already deficient in open space provision, therefore without a specific policy to protect existing open spaces, they would probably be lost. Any further reduction in open space provision could have a detrimental effect to health, and on the economy as open spaces provide health benefits as well as an attractive environment where people want to live and work.</p>
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			<p>This option is necessary to ensure sufficient open space is provided to serve the expected population increase</p> <p>13f – Farmland bird population has been declining so important to ensure remaining populations are protected and encouraged to increase</p> <p>13g – Potential for environmental and recreational enhancements to the green wedges and also the BOAs.</p>	
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The following policies and options are currently undergoing the Sustainability Appraisal process:

Policy Name	Draft Policy Wording	Options
Protection of the European Sites, Sites of Special Scientific Interest and National Nature Reserve	Development that would have a detrimental impact on the European Sites, Sites of Special Scientific Interest or National Nature Reserve will not be permitted. If a development proposal	Option 1 – Inclusion of policy to ensure mitigation of increased recreational pressure at european sites

	<p>cannot demonstrate that the development will not have a significant effect on the European sites, an Appropriate Assessment must be carried out in line with the Habitats Directive.</p> <p>Proposals for residential development must include measures to mitigate against the effects of potential increased recreational pressure on protected sites.</p> <p>Proposals for major residential developments must include provision of open space suitable for dog walking and general recreation, in accordance with policies *****.</p> <p>In developing these measures, regard must be had to the SPA Mitigation Strategy which requires a financial contribution towards wardening, and applicants must demonstrate clearly how they are meeting the strategy and how they will ensure that development does not increase recreational pressure on designated sites.</p>	<p>Option 2 – No specific policy</p>
<p>Locally Designated Wildlife Sites</p>	<p>Development which would have a detrimental impact on locally designated wildlife sites will not be permitted. Exceptionally, where a strategic need for a proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere, an equivalent area of habitat will be created elsewhere at a suitable location well related to other existing habitats.</p>	<p>Option 1 – Continue to protect local wildlife site with specific policy</p> <p>Option 2 – No specific policy</p>

Regionally Important Geological Sites	At RIGS sites, development which would result in the loss or obstruction of geological features of importance will not be permitted.	Option 1 – Continue to protect RIGs sites with specific policy Option 2 – No specific policy
Protected Species and other significant species	On sites where protected species or farmland birds may be present, the Council will require a Protected Species survey to be carried out alongside any development proposals. Any mitigation necessary should be carried out in line with Natural England's Standing Advice.	Option 1 – Continue policy support for the protection of species Option 2 – No specific policy
Jackey Bakers	Jackey Bakers sports ground will be promoted as the long-term primary sports venue for Thanet. Where fully justified, the council will permit ancillary development to subsidise the sports use.	Option 1 – continued policy support Option 2 – no specific policy
Designing Landscape and the Public Realm	External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that: 1) the design relates to the character and intended function of the spaces and surrounding buildings, 2) existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are	Policy now combined with General design policy

	<p>retained and protected</p> <p>3) microclimate is factored into design proposals and that public spaces receive adequate sunlight,</p> <p>4) materials are of a high quality and respond to the context to help create local distinctiveness,</p> <p>5) an integrated approach is taken to surface water management as part of the overall design,</p> <p>6) a coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art,</p> <p>7) trees and other planting is incorporated, appropriate to both the scale of buildings and the space available,</p> <p>8) species are selected to enhance biodiversity through the use of native planting and/or species capable of adapting to our changing climate, and</p> <p>9) the design considers the needs of all users and adopts the principles of inclusive design.</p>	
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Issues and Options Issue 14

Issues and Options Issue 14 - How can we adapt to the effects of, and mitigate against the effects of climate change

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

SP30 - Climate Change

Non-Strategic

Policy CC01 - Fluvial and Tidal Flooding

Policy CC02 - Surface Water Management and Water Quality

Policy CC03 - Coastal Development

Policy CC04 - Sustainable Design

Policy CC05 - Renewable Energy Installations

Policy CC06 - District Heating

Policy CC07 - Solar Parks

Policy CC08 - Richborough

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
How can we adapt	14a – Requirement for	If options deemed	The NPPF requires local	14a – Water efficiency

<p>to the effects of Climate change?</p>	<p>new development to include water efficiency measures</p> <p>14b – Requirement for conversion of buildings to include retrofitting to adapt to climate change</p> <p>14c – Restriction of development along the coast where it may be affected by coastal change</p> <p>14d – Requirements for any development proposed in flood risk areas to comply with the requirements in the NPPF</p> <p>14e – Requirements for the use of SUDs in new developments</p>	<p>expensive could affect the viability of smaller housing schemes, although could also affect the saleable value of a house that is climate change resilient compared to that which is not. Locating new developments away from flood risk contributes to a sustainable pattern of development.</p> <p>Retrofitting could have positive economic effects, however any works to historic/cultural assets will need to be sensitive to the design and the building fabric.</p>	<p>plans to include policies that will deliver climate change mitigation and adaptation.</p> <p>14c – It is considered appropriate to identify any areas vulnerable to coastal erosion and include a relevant planning policy restricting development in those areas.</p> <p>14d – It is considered necessary to include a policy regarding development in flood risk areas</p> <p>14e – A requirement for the use of SUDS in new development is considered appropriate, however it should set out what types of SUDS would be appropriate in which locations to ensure they do not contribute to pollution of groundwater.</p>	<p>measures in new development are considered appropriate as Thanet is a water stressed area. The Viability Assessment found that water CSH Level 3 with level 5 for water is acceptable. However it is considered more appropriate to include this in text only rather than policy at this stage as the government is reviewing the CSH standard.</p> <p>14b - It may not always be practical or appropriate to retrofit to all buildings so this option would be impractical/unreasonable</p>
<p>How can we mitigate against the effects of Climate Change?</p>	<p>14f – Requirement for new development to meet a specific Code for Sustainable Homes</p>	<p>Options f,g,h and j could affect the viability of housing schemes. Measures for deterring the use of</p>	<p>14g – Option complies with NPPF requirements. Considered appropriate to include policy supporting proposals which</p>	<p>14f – this option is considered appropriate until such a time that it is replaced by a new government national standard, therefore</p>

	<p>level</p> <p>14g – Requirement for new development to incorporate design principles including landscaping and layout which minimise use of resources</p> <p>14h – Requirements for new development to obtain an element of its energy from renewable or low carbon energy resources</p> <p>14i – Support for district heating systems in suitable and viable locations</p> <p>14j – Requirement for new developments to incorporate measures to reduce use of the private car</p> <p>14k – Support for development of solar farms subject to criteria</p>	<p>private cars will , if successful, affect the public transport network and could have a positive impact on air quality.</p> <p>Option I might encourage housebuilding in the vicinity. Support for development of renewables may bring about some employment generation and may also result in regeneration of derelict land. There should be a neutral effect with options j-m, assuming locations are chosen with minimal landscape impact. Which makes it difficult to define suitable/appropriate sites.</p>	<p>achieve sustainable design and construction</p> <p>14h – clause considered appropriate for inclusion in a sustainable design policy</p> <p>14i – Meets requirements in the NPPF</p> <p>14k – with appropriate clauses relating to visual and environmental impact</p> <p>14l – complies with the NPPF</p> <p>14m – Part of Richborough is already being developed as an energy park so a local plan allocation would support any further applications</p>	<p>appropriate as informative text rather than policy</p> <p>14j – this is an issue that is addressed fully in other parts of the plan</p>
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	<p>14l – Support for other forms of renewable energy developments in appropriate locations</p> <p>14m – Allocation of specific sites which would be suitable for large scale renewable energy development</p>			
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Issues and Options Issue 15

Issues and Options Issue 15 - Maintain a safe and healthy environment

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

None

Non-Strategic

Policy SE01 - Potentially Polluting Development

Policy SE02 - Landfill Sites and Unstable Land

Policy SE03 - Contaminated Land

Policy SE04 - Groundwater Protection Zones

Policy SE05 - Local Air Quality Monitoring

Policy SE06 - Noise Pollution

Policy SE10 - Light Pollution

Issue – 15 Maintain a safe and healthy environment	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
15 –Control Polluting Development	15a – Policy to control	15a is more likely to result in neutral and	15a – Discussions with Environmental Health	15b – Without a policy it would be more difficult to

	polluting development 15b – No specific policy	beneficial effects than 15b.	concluded that a policy is necessary as the potential release of pollutants as a result of development is a material consideration in planning decisions. Meets requirements of the NPPF.	incorporate pollution control in the planning process
Development on contaminated land	15c – Policy to control and mitigate development on contaminated land 15d – No specific policy	15c could have indirect health benefits and without a policy there would be a greater risk to health. Both options could deter development on pdl if a developer can build on cheaper, cleaner greenfield.	15c - Discussions with Environmental Health concluded that a policy is necessary to ensure site assessments and any necessary remedial measures are carried out prior to development Meets requirements of the NPPF.	15d – Without a policy it would be more difficult to incorporate the remediation of a potential development site in the planning process
Development on unstable and derelict land	15e – Policy to control development on unstable and derelict land 15f – No specific policy	These options only likely to effect the development of pdl. 15e could help make the development of pdl more viable and less risky for developers and give confidence that potential instability issues have been considered.	15e – Discussions with Environmental Health concluded that a policy is necessary as there are areas where land stability is likely to be an issue. Meets requirements of the NPPF & reduces risk to the public.	15f – Without a policy it would be more difficult to incorporate land stability issues in the planning process.
Air quality	15g – Policy support for improving air quality 15h – No specific policy	15g is more likely to result in beneficial effects as it allows the control of development in AQMA so will improve air quality and indirectly	15g – Discussions with Environmental Health concluded that a local plan policy will help in implementing the Air Quality Action Plan to address the	15h– Without a policy the necessary links between planning, new developments and the Air Quality Action Plan would not be apparent and

		contribute towards improving the health of residents within the AQMA.	Urban AQMA. Because of the peninsular nature of the district, any significant development will result in increased traffic in areas which already suffer from poor air quality. Meets requirements of the NPPF.	Thanets air quality would deteriorate.
Noise	15i – Policy to control and mitigate against unacceptable noise 15j – No specific policy	15i could have indirect positive effects by reducing the stress and adverse effects noise can have on quality of life.	15i – Noise is a material consideration in determining planning applications and the National Planning Practice Guidance states the issues that should be considered. Relevant planning policy can support this. Meets requirements of the NPPF	15j – Without a policy there would be no levels against which noise must be assessed
Light pollution	15k – Policy support for controlling light pollution 15l – No specific policy	15k could have positive effects on how satisfied people are with where they live. It could also have visual and landscape impact benefits and help reduce light pollution effects on protected species.	15k – Light pollution is a statutory nuisance and could impact significantly on Thanets unique open landscapes therefore a policy is necessary. Meets requirements of the NPPF	15l – Without a policy there would be no standards against which lighting levels must be assessed.
Groundwater	15m – Policy restricting development that would detrimentally impact groundwater	15m could help protect ground water resources and ground water protection zones, although ground water	15m – Groundwater from underground chalk rock is used to supply water for drinking, agriculture, horticulture and industry.	15n – No specific policy could result in development being permitted that pollutes the groundwater. Once the

	15n – No specific policy	quality is protected by other legislation.	Policy necessary as groundwater is extremely vulnerable to contamination as substances are able to pass rapidly through the thin soils and natural fissures. Part of Thanet is designated by the Environment Agency as a Groundwater Protection Zone. Policy should refer to SUDS as some methods would affect groundwater.	chalk and groundwater is contaminated it can take decades to clean up.
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The following policies are currently undergoing the Sustainability Appraisal process:

Policy Name	Draft Policy Wording	Options
Aircraft noise	<p>Applications for noise sensitive development or redevelopment on sites likely to be affected by aircraft noise will be determined in relation to the latest accepted prediction of existing and foreseeable ground noise measurement of aircraft noise.</p> <p>Applications for residential development will be determined in accordance with the</p>	<p>Option 1 – Retain policy regulating development subject to aircraft noise</p> <p>Option 2 – No specific policy</p>

following noise exposure categories.		
Nec	Predicted aircraft noise levels (dbl aeq.0700-23.00)	
A	<57	Noise will not be a determining factor
B	57-63	Noise will be taken into account in determining applications, and where appropriate, conditions will be imposed to ensure an adequate level of protection against noise (policy ep8 refers).
C	63-72	Planning permission will not be granted except where the site lies within the confines of existing substantially built-up area. Where residential development is exceptionally granted, conditions will be imposed to ensure an adequate level of

			protection against noise (policy ep8 refers).	
	D	>72	Residential development will not be permitted.	
	<p>Applications for non-residential development including schools, hospitals and other uses considered sensitive to noise will not be permitted in areas expected to be subject to aircraft noise levels exceeding 60 db(a) unless the applicant is able to demonstrate that no alternative site is available. Proposals will be expected to demonstrate adequate levels of sound insulation where appropriate in relation to the particular use.</p>			
Aircraft noise and residential development	<p>When planning consent is granted for residential development on any land expected to be subject to a level of aircraft noise of above 57db(a)**, such consent will be subject to provision of a specified level of insulation to achieve a minimum level of sound attenuation in accordance with the following criteria:</p>			<p>Option 1 – Retain policy regulating residential development subject to aircraft noise</p> <p>Option 2 – No specific policy</p>
	NEC	Predicted Aircraft Minimum		

		Noise Levels Attenuation required (dB(A) (frequency range 100-3150 Hz)	
	A	<57	No attenuation measures required
	B	57-63	20dB
	C	63-72	30dB
	** LAeq 57dB 07.00-23.00		
Noise Action Plan Important Areas	Proposals for residential development within identified Important Areas in the Noise Action Plan must incorporate mitigation measures against the impact of noise on residential amenity		Option 1 – Include policy to mitigate against noise identified in Important Areas Option 2 – No specific policy

Issues and Options Issue 16

Issues and Options Issue 16 - Provide High Quality Homes and Neighbourhoods

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP28 - Quality Development

Non-Strategic

QD01 - General Design Principles

QD02 - Living Conditions

GI04 - Amenity Green Space and Equipped Play Areas

GI06 - Landscaping and Green Infrastructure in New Developments

Policy CC02 - Surface Water Management and Water Quality

Issue 16 – Provide high quality homes and neighbourhoods	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
Amenity value and character	16a – Consideration of impact of development on residential amenity value 16b – Consideration of impact of new development	All 3 options have the potential for a number of positive effects, however the most significant of the options is the	16a, 16b and 16c – High quality design and a good standard of amenity can help support the economic strategy and contribute towards a	

	<p>on the character and appearance of surrounding area</p> <p>16c – Consideration of impact of new development on the compatibility with and impact on neighbouring buildings</p>	<p>requirement for development to take into account its surroundings, residential amenity and neighbouring buildings and the positive effect this can have on landscape and townscape. Specific policy criteria and mechanism for achieving these outcomes will need further development and assessment in subsequent stages of the local plan.</p>	<p>higher standard of health and wellbeing. This is particularly important in Thanet where some areas are deprived and the design and quality of developments have not been to a very high standard.</p> <p>These options comply with the NPPF, and were supported in the consultation.</p>	
<p>Movement and access in new development</p>	<p>16d – Provision of pedestrian/cyclist/vehicle movement in new development</p> <p>16e – Provision of disabled access</p>	<p>16d will help support alternatives to private car use by ensuring that infrastructure and facilities are integrated into the design.</p> <p>16e will have a positive effect in improving access to new developments for vulnerable groups and will also help to make new developments</p>	<p>16d – It is important to provide for different transport modes both in terms of practicalities as people will still travel by car, and enabling safe and convenient cycling and walking routes which will contribute to reducing carbon emissions by providing an alternative means of transport as well as health benefits. Option supported but</p>	

		<p>somewhere people of all abilities are happy to live.</p>	<p>considered more appropriate to locate in other sections of the plan</p> <p>16e – Option supported but considered more appropriate to locate in other sections of the plan.</p>	
<p>Open space and green space</p>	<p>16f – Provision of open spaces and gaps in development</p> <p>16g – Provision of landscaping and planting, green infrastructure</p> <p>16h – Provision of wildlife habitats and corridors</p>	<p>16f and 16g have the potential to provide local health benefits by providing opportunities for people to exercise more and live healthier lifestyles. 16h is likely to have a significant positive effect on habitat creation and enhancing connectivity between isolated habitats</p>	<p>16f – The NPPF states that access to high quality open spaces can make an important contribution to the health and well being of communities. It states that assessments should identify deficits and needs for open space to determine what provision is required. Thanet is currently deficient in public open space provision so this option is appropriate, as well as to create pleasant living environments and support a healthy community</p> <p>16g – This option will help create high quality areas</p>	

			<p>where people will want to live as well as contribute to the GI network</p> <p>16h – This option will improve biodiversity and also quality of life for Thanets residents</p>	
<p>Crime prevention and contributing towards public art</p>	<p>16i – Measures to prevent crime and disorder</p> <p>16j – Integration of public art</p>	<p>16i is likely to have a positive effect all be it a minor one as it would only benefit new development. Both options would likely have a significant effect on sense of place and peoples general satisfaction</p>	<p>16i – The NPPF states that planning policies should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. This option was well supported in the public consultation with one comment suggesting that fear of crime can undermine other policies designed to improve the district. Reducing crime and the fear of crime could benefit Thanet economically and in terms of quality of life for Thanet’s residents.</p>	<p>16j – The incorporation of public art received little support in public consultation and is not considered necessary for the sustainable development of the district. The NPPG suggests that public art is not a priority in suggesting that planning obligations should not be sought for anything clearly not necessary to make a development acceptable in planning terms, giving public art as an example.</p>

<p>Other policy issues</p>	<p>16k – Provisions for clothes drying facilities and refuse disposal/dustbin storage</p> <p>16l – incorporation of sustainable drainage systems</p> <p>16m – Appropriate design and location of advertisements</p>	<p>16k could contribute towards reducing greenhouse gas emissions and energy consumption by providing alternatives to energy intensive tumble dryers.</p> <p>16l is likely to contribute towards reducing flood risk, climate change adaptation and indirectly contribute towards habitat creation with SUDs in the form of ponds or waterbodies.</p>	<p>16k – Ensuring sufficient space for clothes drying facilities contributes to health and wellbeing in the provision of a space away from the main living area, and, in making this provision, new developments are less likely to be unacceptably small. It is essential that adequate provision is made for waste storage, particularly in enabling recyclable and general waste to be segregated.</p> <p>16l – This option is considered appropriate as it contributes towards reducing surface water flooding, can provide new habitats and biodiversity, and can contribute to health and well being. However SUDs will be inappropriate in some areas due to potential contamination of the groundwater. This issue, and relevant policy, will be addressed under a</p>	
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			<p>separate policy.</p> <p>16m – This option is necessary to ensure advertisements do not compromise public safety, are not a public nuisance and do not detract from the important qualities of conservation areas.</p>	
<p>Areas of high townscape value</p>	<p>16n – Continued existing policy protection for AHTVs</p> <p>16o – Removal of policy protection</p> <p>16p – Identify areas that are of high townscape value and protect and enhance through policy</p>	<p>16n and 16p likely to have positive effects on townscape and indirectly on the sense of place, peoples satisfaction with where they live and cultural heritage features. 16o has the potential for adverse effects on the sense of identity of towns and could potentially harm the visitor economy and result in adverse, visual townscape and heritage effects.</p>	<p>16o – Although this option removes policy protection from the existing AHTVs, the Local Plan will include stronger design policies with an emphasis on the qualities identified in the existing AHTV areas. This will ensure those qualities are protected and enhanced in all areas of the district rather than only those with an AHTV designation. It is considered that stronger design policies should remedy the concerns raised regarding option 0 in the SA comments.</p>	<p>16n – There is insufficient evidence to justify the designation of the AHTVs and continue policy protection</p> <p>16p – There are many areas of the district that are of high townscape value, however the characteristics of the areas are different, so it would be difficult to establish a justifiable method and criteria for designating areas. However, it is intended to identify important character areas in the forthcoming Quality Development</p>

				SPD.
Housing density	<p>16q – Housing densities set in zones</p> <p>16r – Housing density decided by density of surroundings of application site</p> <p>16s – Continue density requirement H1 in TLP 2006</p>	<p>All options have the potential to have a positive effect on sense of place, townscape, heritage features and the sustainable use of land resources. By allowing different densities of development the options have indirect benefits for sustainable transport by increasing the numbers of people living close to town centres where public transport links can be accessed more easily.</p>	<p>16r – The NPPF states that local planning authorities should set their own approach to housing density to reflect local circumstances and that this should be guided by design policies. The Quality Development Topic Paper identifies different types of areas and suggested density units as recommended in the Kent Design Guide. However it was considered most appropriate for density to be fairly flexible and which reflects or is compatible with the density of the surroundings as many areas already have a variety of densities in a relatively small area and distinguishing density areas would not be clear cut.</p>	<p>16q – Some areas would be easier to zone than others, therefore this options was not considered the most appropriate.</p> <p>16s – This requirement was set based on national and regional targets – both of which no longer exist. Therefore it is considered more appropriate for density to be considered at a local level.</p>
Garden land development	<p>16t – Policy restriction on development on garden land</p>	<p>16t can contribute indirectly towards biodiversity by helping</p>		<p>16t – Restricting all garden development is not considered and</p>

	16u – No restriction	to retain gardens and their role as important areas of habitat within urban areas and towns.		<p>appropriate option as there will be instances where a proposed development on garden land would improve the area.</p> <p>16u – No restriction or criteria could make it difficult to provide justified reasons for refusal for inappropriate development that would not contribute to high quality developments and a pleasant environment.</p>
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The following policies and options are currently undergoing the Sustainability Appraisal process:

Policy Name	Draft Policy Wording	Options
Designing Landscape and the Public Realm	<p>External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that:</p> <p>1) the design relates to the character and</p>	Policy now combined with General design policy

	<p>intended function of the spaces and surrounding buildings,</p> <p>2) existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are retained and protected</p> <p>3) microclimate is factored into design proposals and that public spaces receive adequate sunlight,</p> <p>4) materials are of a high quality and respond to the context to help create local distinctiveness,</p> <p>5) an integrated approach is taken to surface water management as part of the overall design,</p> <p>6) a coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art,</p> <p>7) trees and other planting is incorporated, appropriate to both the scale of buildings and the space available,</p> <p>8) species are selected to enhance</p>	
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	<p>biodiversity through the use of native planting and/or species capable of adapting to our changing climate, and</p> <p>9) the design considers the needs of all users and adopts the principles of inclusive design.</p>	
Advertisements	<p>Applications for advertisements will be considered in relation to their effects upon amenity and public safety. Regard will be paid to the surrounding location, manner of illumination (if proposed), material composition, design and relationship to the land, building or structure to which they are to be affixed. Advertisements should not dominate but should be in balance with the character, townscape and architecture of the buildings on which they are situated.</p> <p>In and adjoining conservation areas the Council will require that the design and siting of advertisements does not detract from, and preferably makes a positive contribution to, the character and/or appearance of the area.</p>	<p>Option 1 – Retain policy controlling advertisements</p> <p>Option 2 - no specific policy</p>
Telecommunications Development	<p>Proposals for telecommunications development will be permitted provided that the following criteria are met.</p> <p>1) The siting and appearance of the</p>	<p>Option 1 – Include Telecommunications policy</p> <p>Option 2 – No specific policy</p>

	<p>proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character and appearance of the surrounding area.</p> <p>2) If on a building, apparatus and associated structures should be sited and designed to minimise impact to the external appearance of the host building.</p> <p>3) If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the Council.</p> <p>4) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications development, the Council will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.</p>	
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Issues and Options Issue 17

Issues and Options Issue 17 - Protecting and enhancing Thanet's heritage assets and their setting

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP29 - Heritage Assets

Non-Strategic

HE01 - Archaeology

HE02 - Conservation Areas

HE03 - Heritage Assets

HE04 - Historic Parks and Gardens

HE05 - The Historic Environment and Climate Change

Issue 17 – Protecting and enhancing Thanets heritage assets and their setting	Options in interim SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
Designated and locally listed heritage assets and their settings	17a – Support for preservation and enhancement of existing	All options have the same direct and indirect effects on the character and sense of place of	The NPPF states that local plans should set out a positive strategy for the conservation and	

	<p>conservation areas</p> <p>17b – Support for designation of new conservation areas</p> <p>17c – Support for protection and enhancement of listed buildings</p> <p>17d – Support for protection and enhancement of historic parks and gardens</p> <p>17e – Support for protection and enhancement of scheduled ancient monuments</p> <p>17f – Support for protection and enhancement of buildings of local interest and other heritage assets, through development of a local list</p>	<p>settlements, the economy and visitor economy.</p>	<p>enjoyment of the historic environment. Thanet has a rich heritage and can trace its origins to pre-historic activity. Thanet has approximately 2500 listed buildings, 21 conservation areas, 13 scheduled ancient monuments and a richness in archaeological remains. All of the options are considered important and necessary to protect and enhance these assets.</p>	
<p>Protecting assets and criteria based policies</p>	<p>17g – Support for identification and, where appropriate, protection of</p>	<p>Options 17g-k would have the same direct and indirect effect on the character and sense of</p>	<p>The NPPF and NPPG states that local plans should set out a positive strategy for the</p>	<p>17k – Sites will be identified through the forthcoming Heritage Strategy so not</p>

	<p>archaeological heritage</p> <p>17h – Support towards positive action in relation to Heritage Park</p> <p>17i – Criteria based policy for determining applications for buildings which are locally listed</p> <p>17j – Criteria based policy for dealing with renewable energy in the historic environment</p> <p>17k – Site specific policies for significant assets with development potential</p> <p>17l – No specific heritage policies</p>	<p>place of settlements, help support the economy and visitor economy and contribute to character of townscape. Effects of 17l uncertain as it is not clear to what extent the NPPF on its own would protect heritage assets.</p>	<p>conservation and enjoyment of the historic environment, and identify specific opportunities for the conservation and enhancement of heritage assets. Options 17g-j will help facilitate these opportunities.</p>	<p>appropriate for inclusion in planning policy.</p> <p>17l – Although the NPPF provides some policy protection to Heritage Assets, it is not considered sufficient for Thanet considering its rich history and high number of listed buildings</p>
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Issues and Options Issue 18

Issues and Options Issue 18 - How should we plan for community facilities

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Policy SP32 - Community and Utility Infrastructure

Non-Strategic

Policy CM01 - Provision of New Community Facilities

Policy CM02 - Retention of Community Facilities

Policy CM03 - New Primary School, Margate

Policy CM04 - Margate Cemetery Expansion

Policy CM05 - Minster Cemetery Expansion

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
18 – How should we plan for community facilities	<p>18a – Policy support for protecting existing community facilities</p> <p>18b – No specific policy for protecting existing</p>	18a and 18b contribute towards supporting existing facilities and promoting the development of new facilities. The effects of 18b are uncertain as it may or may not be governed by	18a – The NPPF states that planning policies should guard against the unnecessary loss of community facilities and other local services. The consultation raised	18b – There are development pressures to redevelop community facilities for more valuable uses. Without a policy, community facilities, and the space to

	<p>community facilities</p> <p>18c – Policy support for new community facilities to be developed</p> <p>18d – No specific policy for new community facilities to be developed</p>	<p>other factors such as population growth, housing numbers and the needs of the population. Option d would have adverse effects as it would not allow the capacity of facilities to be increased in the long term.</p>	<p>concern that unused, inadequate or poor quality facilities should not be retained. However a criteria based policy to safeguard facilities was considered appropriate as it may not be possible to provide facilities on an alternative site if one is lost.</p> <p>18c – The NPPF states that planning policies should plan positively for the provision and use of shared space, community facilities and other local services. It is considered necessary to include a policy in order to meet the requirements of the NPPF and to enhance the sustainability of the communities and residential environments.</p>	<p>accommodate them, could be permanently lost to communities.</p> <p>18d – Without a policy necessary community facilities may not be delivered</p>
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The following policies and options are currently undergoing the Sustainability Appraisal process:

Policy Name	Draft Policy Wording	Options
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<p>Healthy and Inclusive Communities</p>	<p>The Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities. Proposals will be supported that:</p> <ol style="list-style-type: none"> 1) Bring forward accessible and new and/or community services and facilities, including new health facilities. 2) Safeguard existing community services and facilities. 3) Safeguard or provide open space, sport and recreation and enabling access to nature. 4) Promote healthier options for transport including cycling and walking. 5) Improve or increase access to a healthy food supply such as allotments, markets and farm shops. 6) Create social interaction and safe environments through mixed uses and the design and layout of development. 7) Create a healthy environment that regulates local climate 	<p>Option 1 – Inclusion of policy to protect and improve the health of Thanets residents</p> <p>Option 2 – No specific policy</p>
<p>Community Infrastructure</p>	<p>Development will only be permitted when provision is made to ensure delivery of relevant and sufficient community and utility infrastructure. Where appropriate, development will be expected to contribute to the provision of new, improved, upgraded or replacement infrastructure and facilities.</p>	<p>Option 1 – Include strategic policy to ensure delivery of community and utility infrastructure</p> <p>Option 2 – No specific policy</p>
<p>Expansion of Primary and Secondary Schools</p>	<p>The Council will support the expansion of existing and development of new primary and</p>	<p>Option 1 – Include strategic policy to ensure support for the expansion of</p>

	secondary schools in Thanet to meet identified needs and will work with Kent County Council in identifying, allocating and safeguarding land as appropriate.	schools Option 2 – No specific policy
New Primary School, Margate	Land is allocated at the All Saints Avenue, Margate, as shown on Map **, for the development of a new Primary School.	Option 1 – Include allocation for new primary school Option 2 – Do not allocate specific site
Margate Cemetery Expansion	Land is allocated and safeguarded for the expansion of Margate Cemetery and ancillary uses.	Option 1 – include allocation of land for the expansion of the cemetery Option 2 – Do not allocate specific site
Minster Cemetery Expansion	Land should be provided for the expansion of Minster Cemetery and ancillary uses in reconciliation with the allocated housing site adjoining the existing Cemetery.	Option 1 – include allocation of land for the expansion of the cemetery Option 2 – Do not allocate specific site

Transport & Infrastructure

Issues and Options Issue 19

Issues and Options Issue 19 - Enabling an efficient and effective transport system

The policies in the Preferred Options Local Plan as a result of the Issues and Options considerations are as follows:

Strategic

Non-Strategic

Issue	Options in SA	Sustainability Appraisal	Preferred Option and Justification	Why other options have been rejected
Enabling an efficient and effective transport system		<p>How important are the following factors?</p> <ul style="list-style-type: none"> Reducing the need to travel (especially by car) to access the facilities we need day to day. Encourage more people to walk, cycle or use 	<p>Policy to aim to reduce need to travel and make use of sustainable modes (expected by NPPF)</p> <p>Wherever possible policy to direct development to locations where reliance on private cars is reduced and where transport</p>	Any other approach likely to conflict with NPPF and sustainable development principles.

		<p>public transport</p> <ul style="list-style-type: none"> • Making better use of High Speed 1 rail link. • Dealing with any “pinch points” in the transport network • Improving through-traffic flows at Westwood and facilitating convenient and safe movement within the area • The level and location of public car parking needed in the town centres • Addressing the deficiencies in the transport system to deal with existing problems or accommodate future growth. 	<p>network is/will be able to cope. (Expected by NPPF and responsive to fact that some network junctions have capacity limitations)</p> <p>Policy to clarify that development will be expected to contribute as appropriate to improvements to local highway network as identified in Transport Strategy.</p> <p>Policy to support implementation of a scheme to relieve potential traffic congestion issues at Westwood (To support continued function of the area as a major destination)</p> <p>Policy to safeguard car parking provision at coastal town centres and seek to rationalise level and disposition of provision at Westwood.</p> <p>(Sufficient car parking is</p>	
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			<p>important to the functions of the town centres).</p> <p>Need to avoid over-provision at Westwood.</p> <p>Policies to encourage developers and service providers to address existing and potential deficiencies. (compatible with government policy in NPPF.</p>	
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The following policies and options are currently undergoing the Sustainability process:

Policy Name	Draft Policy Wording	Options
SP34 Safe and Sustainable Travel	Policy expressing Council's commitment to working with partners to manage travel demand and sustainable modes, and requiring development applications to promote safe and sustainable travel.	<p>Policy considered consistent with NPPF and interim sustainability appraisal objectives.</p> <p>Alternative of no policy would undermine expression of commitment to promoting sustainable travel.</p>
SP35 Accessible location	This policy refers to expected location of development proposals generating a significant number of trips and supports clustering or co-location of services at locations accessible on foot and by public transport.	This policy aims to reduce the need to travel and promotes use of sustainable modes. This is consistent with the NPPF objective to balance the transport system in favour of sustainable transport modes and

		<p>choice about mode of travel.</p> <p>Alternative option of no policy could weaken the Plan's ability to direct development to locations that will assist this objective.</p>
SP36 Transport Infrastructure	This policy requires provision of relevant transport infrastructure	<p>Absence of such a policy may undermine the ability to assess, and require development to secure, the type and level of supporting transport infrastructure required.</p> <p>Alternative of no policy could place a significant and unsustainable burden on existing infrastructure and undermine sustainable development.</p>
SP37 Connectivity	This policy states that the Council will continue to lobby for investments to secure improved rail journey times for CTRL and domestic services between Ramsgate and Ashford	<p>Prospective improvements will improve the attractiveness of the district as a place in which to invest and from which to commute, in turn supporting a more mixed community structure, a wider employment base, more local spending and potential job creation. Alternative option of no policy could imply lack of support for these investments.</p>
SP38 Strategic Road Network	This policy expresses a commitment to work with neighbouring districts to assess the impact of planned growth and movement upon particular junctions on the strategic road network.	<p>This policy reflects the need for the Highways Agency to assess the impacts of local development on the Strategic Road Network in order to assess what investment may be needed to maintain appropriate</p>

		<p>capacity.</p> <p>Alternative option of not expressing and following such commitment could lead to uncertainty about deliverability of development in terms of transport infrastructure capacity.</p>
SP39 New Rail Station	<p>Policy supporting development (and safeguarding the proposed site) of a new railway station suitably located west of Ramsgate subject to criteria regarding vehicular access, suitable level of car parking, integration with wider public transport services, mitigation of noise impacts, compatibility with landscape character and location to minimise loss of best and most versatile agricultural land.</p>	<p>This project which is being led by the County Council is expected to generate social and economic benefits for, and beyond, the district. The policy expresses support for the project and safeguards the proposed site from alternative development.</p> <p>Alternative option of no policy could signify lack of support for the project and undermine feasibility of its delivery.</p>

Policy Name	Draft Policy Wording	Options
TP01 Transport Assessments and Travel Plans	<p>Policy setting requirement (where appropriate) for development proposals to provide Transport Assessments and Travel Plans.</p>	<p>Policy reflects NPPF and is considered helpful reference to clarify expectation.</p> <p>Alternative of no policy could erode</p>

		awareness of this requirement.
TPO2 Walking	Policy setting expectation that new development should be designed to facilitate safe and convenient pedestrian movement, and encouraging proposals to provide and enhance safe and convenient walking routes.	Policy considered appropriate as promoting sustainable travel modes consistent with NPPF. Alternative of no policy might undermine ability to effectively incorporate these considerations in dealing with development proposals.
TPO3 Cycling	Policy -expressing commitment to seeking earliest possible provision of a network of cycle routes, safeguarding existing/proposed routes, -setting expectation that new development considers cyclist safety - setting requirements for cycle parking and facilities	Policy considered appropriate as promoting sustainable travel modes consistent with NPPF. Alternative of no policy might undermine ability to effectively incorporate these considerations in dealing with development proposals.
TPO4 Public Transport	Policy setting expectation for new development to take account of the need to facilitate use of public transport and supporting proposals to provide certain facilities to facilitate such travel.	Policy considered appropriate as promoting sustainable travel modes consistent with NPPF. Alternative of no policy might undermine ability to effectively incorporate/support these considerations in dealing with development proposals.
TPO5 Coach parking	Policy safeguarding specific existing	Policy considered appropriate in order

	and potential sites for coach parking.	to safeguard and augment coach parking facilities to support Thanet's visitor economy. Alternative of no policy could result in existing and proposed coach parking areas being lost to alternative development.
TPO6 Car parking.	Policy providing guidance on the level of car parking expected in new developments, including exceptions/ and continued relaxation within defined town centre areas.	Policy considered consistent with and appropriate in light of NPPF. Continued relaxation in town centre areas considered appropriate in order that development in sustainable locations is not precluded due to lack of space for parking provision. Alternative of no policy would result in lack of certainty by developers as what level of parking may be appropriate in particular locations and circumstances.
TPO7 Town centre and public car parks	Policy safeguarding town centre car parking	Policy considered appropriate in order to retain a sufficient quantity of suitably located town centre car parking in support of their function and vitality consistent with the NPPF. Alternative of no policy could lead to proposals eroding sufficient and suitably located provision.

Policy Name	Draft Policy Wording	Options
TP08 Freight and Service Delivery	Policy stating new development proposals will be expected to demonstrate adequate off-street servicing.	<p>Policy considered appropriate to safeguard movement of goods and people and accommodate efficient delivery of goods in accordance with the NPPF.</p> <p>Alternative of no policy could result in conflict with safe and convenient movement in the vicinity.</p>
TP09 Car parking at Westwood	Policy retaining expectation for development proposals to demonstrate measures to encourage element of customers to arrive by non car modes of travel, a corresponding reduction in parking provision below general guidelines, and to consider proposals that may generate parking in light of compatibility with the Westwood Relief Scheme.	<p>Policy considered appropriate as Westwood area is characterised by a significant level of traffic movement, exacerbated by movement between different car parks in the vicinity around the intersection of two main roads.</p> <p>Alternative option of no policy could result in additional visits by private cars and increased movement between car parks undermining convenient and safe movement by other modes.</p>
TP10 Traffic management	Policy supporting development required to implement traffic management measures designed to realise best use of the highway network in terms of safety, traffic capacity and environmental conditions.	<p>Policy considered appropriate expression of support and consistent with the the NPPF reference to creating safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians. Alternative of no policy could imply lack of support.</p>