

Thanet District Council **Statement of Consultation October 2018**

(Regulation 22(c))

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Thanet Local Plan - Statement of Consultation – Regulation 22(c)

1 Introduction

1.1 This document explains how the Council has engaged with communities and stakeholders during the preparation of the Thanet Local Plan and complied with the statutory regulations, including the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations 17d and 22c) and the Council's own Statement of Community Involvement (SCI) (Review 2012).

1.2 The document sets out the context of consultations in the preparation of the local plan, the SCI and how its requirements have been met, and details of the consultations carried out at Regulations 18 and 19.

Context

1.3 Following the adoption of the Thanet Local Plan 2006, the Council began the preparation of a Core Strategy as part of the Local Development Framework under the Planning and Compulsory Purchase Act 2004. In April 2012 the Town and Country Planning Regulations came into force which reinstated the requirement for a single local plan, and the National Planning Policy Framework (NPPF) replaced the suite of Planning Policy Guidance Notes. The Core Strategy was aborted and work began on a new Local Plan conforming to the new NPPF.

1.4 The Core Strategy preparation involved some public consultations, including an Issues and Options conference in 2005, a Vision, Issues and Options Conference in 2008, and a Preferred Options Conference and consultation in 2010. Some of the work carried out in the preparation of the Core Strategy has contributed to the current draft Local Plan.

1.5 The preparation of the Thanet Local Plan to 2031 involved the following consultations:

- Thanet's New Local Plan – Options Consultation - 03 Jun– 14 Aug 2013 (Reg 18)
- Draft Thanet Local Plan to 2031 – Preferred Option Consultation – 08 Jan – 06 Mar 2015 (Reg 18)
- Proposed Revisions to Draft Local Plan (Preferred Options) – 19 Jan – 17 Mar 2017 (Reg 18)
- Draft Thanet Local Plan to 2031 – Pre-Submission Publication, Regulation 19 – 23 Aug – 03 Oct 2018 (Reg 19)

Statement of Community Involvement

1.6 The Statement of Community Involvement (Review 2012) was adopted by the Council on 12th July 2012. The SCI states that the council will use the following methods to inform people:

1. *'Online - we will put information on our website, and people can register on our online consultation system to received updates at <http://consult.thanet.gov.uk>*

Information is displayed on the Thanet District Council website planning policy page with links to the online consultation system. There are also links from the Councils homepage and consultation pages.

2. *Mail outs - we will write to or email anyone who has asked to be kept informed in writing (also satisfies Regulation 18(2))*

The Councils online consultation system (inovem) includes statutory consultees and other relevant bodies/organisations who have an interest in local planning policy. It also includes people who have asked to be added, those who have registered themselves and those who have taken part in previous consultations who wish to remain in the process. The consultation system will either generate a letter or email to those wishing to be kept informed, depending on their preferred method of contact.

3. *Local Press - we will advertise the publication of consultation documents in a free and paid local newspaper.'*

Adverts are placed in the Thanet Extra (free newspaper) and the Thanet Gazette (paid for newspaper).

1.7 The council has used all of these methods to inform people of public consultations for each stage in the process. The SCI also sets out other methods the council may use to involve people in the planning process. Each of the consultations included a combination of these methods and is detailed in the relevant sections for each of the consultations.

1.8 The Council has considered whether another review of the SCI is needed, however it was decided that the SCI is still fit for purpose and a review is not considered necessary at this stage

2 Consultation with Members and formal council procedures

2.1 A Local Plan Cabinet Advisory Group was established comprising five cross-party Members of the Council whose purpose is 'To consider the implications of draft strategies policies and proposals in the emerging Local Plan and to advise Cabinet of the views expressed by the Group'. The Group has been kept up to date with the general progress of the Local Plan, and has been involved in various aspects of the production of the Local Plan through informal Local Plan Working Group meetings. Members were provided with information relating to the Local Plan and its evidence base, and key issues have been discussed and debated.

2.2 Versions of the Local Plan Document have been reported to the following Council meetings:

Item Reported	Meeting	Summary from committee report
Issues and Options	Cabinet – 29th May 2013	This report relates to a proposed issues and options consultation for Thanet's new Local Plan. The report explains what the new Local Plan is, and the process for its production, as well as setting out the purpose of the proposed consultation. A summary of the proposed consultation document is provided, as well as the proposed methods of consultation. It is recommended that the consultation document be agreed for consultation to take place on the issues and options for Thanet's Local Plan
Preferred Options	Overview & Scrutiny – 27th November 2014	The report presents to the Overview and Scrutiny Panel the Draft Thanet Local Plan to 2031 Preferred Options Document that will be presented to Cabinet for their consideration on 11th December with the recommendation that it is progressed for public consultation. The report provides the Panel the opportunity to review how the Draft Thanet Local to 2031 Preferred Options document has been formulated in accordance with the government regulations and National Planning Policy Framework and an assessment of the options for the spatial and land-use policy considerations for the future growth, development and regeneration of the District. The Overview and Scrutiny Panel is also provided the opportunity to raise any issues on the proposed policies, proposals and landuse allocation as well as examining the procedures put in place for progressing the Local Plan, the time-table with the critical milestones and how the Council will consult with local communities. The report also includes the Project Plan to progress the Thanet Local Plan to 2031 for their information.
Preferred Options	Cabinet – 11th December 2014	The report sets out the Preferred Options for formulating the Draft Thanet Local Plan to 2031 which has been progressed in consultation with the Local Plan Cabinet Advisory Group. The report sets out the recommendation of the Local Plan Cabinet Advisory Group to approve the Draft Thanet Local Plan 2031 Preferred Options document for stakeholder and community consultation. The report also includes the Project Plan to progress the Thanet Local Plan to 2031 for their consideration, as Annex 4.

Preferred Options Revisions	Overview & Scrutiny – 21st November 2016	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure.</p> <p>It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process.</p> <p>The report also sets out the main issues raised during the Preferred Options consultation (January 2015); and provides recommended responses to those issues.</p> <p>The report addresses the updating of the evidence base for the Local Plan process; and indicates key changes that are being proposed for consultation as revisions to the Preferred Option Local Plan.</p> <p>On the basis of legal advice, the report proposes a focussed consultation on revisions to the Preferred Options Plan published in January 2015; with accompanying consultation relating to Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment; the draft Infrastructure Delivery Plan and Local Green Space.</p> <p>The Thanet Transport Strategy (jointly prepared by Kent County Council and Thanet District Council), which supports the draft Local Plan, will be the subject of a separate report and consultation, following a decision on the draft Local Plan.</p> <p>Recommendation(s):</p> <ol style="list-style-type: none"> 1. That the Overview and Scrutiny Panel recommends to Cabinet that the proposed revisions to the draft Local Plan, and the accompanying Sustainability Appraisal/Strategic Environmental Assessment/Habitat Regulations assessment reports, be agreed for consultation purposes for a period of 6 weeks; and 2. That Overview and Scrutiny Panel recommend to Cabinet that the appropriate amendments to the Local Development Scheme be agreed.
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Preferred Options Revisions	Cabinet – 8th December 2016	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure. It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process.</p> <p>The report also sets out the main issues raised during the Preferred Options consultation (January 2015); and provides recommended responses to those issues.</p> <p>The report addresses the updating of the evidence base for the Local Plan process; and indicates key changes that are being proposed for consultation as revisions to the Preferred Option Local Plan.</p> <p>On the basis of legal advice, the report proposes a focussed consultation on revisions to the Preferred Options Plan published in January 2015; with accompanying consultation relating to Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment; the draft Infrastructure Delivery Plan and Local Green Space.</p> <p>The Thanet Transport Strategy (jointly prepared by Kent County Council and Thanet District Council), which supports the draft Local Plan, will be the subject of a separate report and consultation, following a decision on the draft Local Plan.</p> <p>The report has been considered by Overview & Scrutiny Panel, and the recommendations of the Panel are set out at the end of section 2 of this report.</p> <p>Recommendations</p> <p>That the proposed revisions to the draft Local Plan, and the accompanying Sustainability Appraisal/Strategic Environmental Assessment/Habitat Regulations assessment reports, be agreed for consultation purposes for a period of 6 weeks; and</p> <p>2. That the appropriate amendments to the Local Development Scheme be agreed</p>
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Publication	<u>Cabinet – 25th October 2017</u>	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure.</p> <p>It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements and processes for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process.</p> <p>This report sets out the main issues raised during the Proposed Revisions consultation (January 2017); and provides recommended responses to those issues.</p> <p>The report also addresses the updating of the evidence base for the Local Plan process; and indicates the key changes that are being proposed for the formal Publication stage of the draft Local Plan.</p> <p>The report recommends that the Council publish a final pre-Submission draft Plan, the Sustainability Appraisal and draft Transport Strategy, alongside other supporting documentation for six weeks; and the Thanet Landscape Character Assessment as an intended Supplementary Planning Document (SPD).</p> <p>The report also recommends that following the Publication stage, the draft Local Plan be submitted to the Planning Inspectorate for Examination; along with the supporting evidence base, and the representations received during Publication.</p> <p>Recommendation(s): 1. That Cabinet agree the draft Local Plan, with the changes proposed in this report, the Sustainability Appraisal and draft Transport Strategy for Publication for a period of 6 weeks to allow comments to be made; 2. That Cabinet agree to publish the Thanet Landscape Character Assessment for comment, with the intention of adopting it as a Supplementary Planning Document (SPD); 3. That Cabinet recommend to Council that, following the Publication period, the draft Local Plan be submitted to the Planning Inspectorate for Examination; and 4. That Cabinet agree the proposed amendments to the Local Development Scheme.</p>
Publication	<u>Overview and Scrutiny Panel – 21 November 2017</u>	As above except recommendations are 'That Overview & Scrutiny Panel recommend to Cabinet....'
Publication	Cabinet – 14	This meeting was cancelled. The O&S motion above was put to the vote and declared LOST, however no

	December 2017	alternative recommendations were made to Cabinet.
Publication	Council – 18 January 2018	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure.</p> <p>It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements and processes for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process.</p> <p>This report sets out the main issues raised during the Proposed Revisions consultation (January 2017); and provides recommended responses to those issues.</p> <p>The report also addresses the updating of the evidence base for the Local Plan process; and indicates the key changes that are being proposed for the formal Publication stage of the draft Local Plan.</p> <p>The report recommends that Council agree, that following Publication stage, the draft Local Plan be submitted to the Planning Inspectorate for Examination; along with the supporting evidence base, and the representations received during Publication.</p> <p>Recommendation(s): That Council agree that, following the Publication period, the draft Local Plan be submitted to the Planning Inspectorate for Examination.</p> <p>COUNCIL VOTED AGAINST THIS RECOMMENDATION</p>
Publication	Extraordinary Cabinet – 2nd July 2018	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure. It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements and processes for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process. This report sets out the current position with the draft Local Plan; identifies new information to be considered in relation to the draft Plan; and seeks Members' views on the next steps to be taken with the draft Plan.</p>

Recommendation(s):

- (1) (a) Option 1 - That Cabinet recommend that Council agree to proceed with the draft Local Plan as recommended to Council on 18 January 2018 (which is the officer recommendation), or (b) Option 2 – That Cabinet recommend that Council agree to proceed with the draft Local Plan as recommended to Council on 18 January 2018, with the revised distribution of sites and other amendments set out in this report and in the Addendum at Annex 2;
- (2) That Cabinet recommend to Council to agree for inclusion in the draft Local Plan the main changes in Annex 4 of the Council report of 18 January 2018, as modified by any decision on Recommendation (1) above (set out in Annex 1);
- (3) That Cabinet recommend to Council to agree for inclusion in the draft Local Plan the other changes set out in this report regarding the identification of additional Local Green Spaces, and a proposed new policy relating to foster homes in the district (also set out in the Addendum at Annex 2);
- (4) That, subject to the other recommendations above, Cabinet recommend to Council that authority be delegated to officers to make such minor technical and factual amendments to the draft Plan as are necessary for clarity and consistency;
- (5) That Cabinet recommend to Council that the draft Local Plan (as amended), together with the associated evidence base, including the Sustainability Appraisal/Habitat Regulations Assessment, and the draft Transport Strategy, be published for comment (under Reg 19) for a period of six weeks, and then subsequently be submitted for Examination (under Reg 22);
- (6) That Cabinet recommend to Council that the Council request the Examination Inspector, under Section 20(7) of the Planning & Compulsory Purchase Act 2004) to recommend any modifications to the draft Local Plan, which they consider are required in order to resolve problems that would otherwise make the Plan unsound or not legally compliant; and

Decision:

- (7) That Cabinet agree that the Council's Local Development Scheme (LDS – the Council's Local Plan work programme) be amended to reflect the timetable set out in this report, and authorise officers to make such other minor changes to the LDS as are necessary to reflect the anticipated timetable for Local Plan preparation.

Publication	Extraordinary Executive, Policy & Community Safety Scrutiny Panel – 11 July 2018	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure. It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements and processes for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process. This report sets out the current position with the draft Local Plan; identifies new information to be considered in relation to the draft Plan; and seeks Members' views on the next steps to be taken with the draft Plan. The report also records the Cabinet consideration of the draft Local Plan position. The Panel are asked to consider whether to respond to the Cabinet's initial proposals which are as detailed below:</p> <p>Cabinet recommends:</p> <ul style="list-style-type: none"> (1) That Council agree to proceed with the draft Local Plan on the basis of Option (2) set out in this report; that is, as recommended to Council on 18 January 2018, with the revised distribution of sites and other amendments set out in this report and in the Addendum at Annex 2; (2) That Council agree for inclusion in the draft Local Plan the main changes in Annex 4 of the Council report of 18 January 2018, as modified by any decision on Recommendation (1) above (set out in Annex 1); (3) That Council agree for inclusion in the draft Local Plan the other changes set out in this report regarding the identification of additional Local Green Spaces, and a proposed new policy relating to foster homes in the district (also set out in the Addendum at Annex 2); (4) That, subject to the other recommendations above, Council delegate authority to officers to make such minor technical and factual amendments to the draft Plan as are necessary for clarity and consistency; (5) That Council agree that the draft Local Plan (as amended), together with the associated evidence base, including the Sustainability Appraisal/Habitat Regulations Assessment, and the draft Transport Strategy, be published for comment (under Reg 19) for a period of six weeks, and then subsequently be submitted for Examination (under Reg 22); and (6) That the Council request the Examination Inspector, under Section 20(7) of the Planning & Compulsory Purchase Act 2004) to recommend any modifications to the draft Local Plan, which they consider are required in order to resolve problems that would otherwise make the Plan unsound or not legally compliant.
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Publication	Extraordinary Cabinet – 19th July (afternoon) Extraordinary Council – 19 July 2018 (evening)	<p>The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure. It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements and processes for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process. This report sets out the current position with the draft Local Plan; identifies new information to be considered in relation to the draft Plan; and seeks Members' views on the next steps to be taken with the draft Plan.</p> <p>Recommendation(s): Cabinet Meeting 2pm on the 19 July 2018 The responses from the Extraordinary Executive, Policy & Community Safety Scrutiny Panel to be held on the 11 July will be reported to Cabinet for consideration at its meeting at 2pm on the 19 July 2018.</p> <p>Cabinet is then recommended to finalise its proposals for the Council to consider at 7pm on the 19 July 2018, having taken into account the comments from the Executive, Policy & Community Safety Scrutiny Panel. The recommendations to Council will show the Cabinet's response to those comments.</p> <p>Council meeting 7pm on the 19 July 2018 Council is recommended to consider the final proposals from Cabinet which will be agreed at the Extraordinary Cabinet meeting to be held at 2pm on the 19 July 2018, together with the Cabinet's response to any representations from the Extraordinary Executive, Policy & Community Safety Scrutiny Panel to be held on the 11 July 2018.</p>
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3 Duty to Cooperate

3.1 The Localism Act 2011 introduced a duty to cooperate in relation to planning for sustainable development. A local authority must co-operate with other local authorities and specific organisations in preparing development plan documents in relation to strategic matters. In doing so, local authorities must engage constructively, actively and on an ongoing basis.

3.2 The NPPF (paragraph 178) states that “Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans”.

3.3 Paragraph 181 in the NPPF further states that “Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development”.

3.4 The Council has a long history of cooperation with its neighbours in East Kent, and has continued to work with neighbouring Councils and other key organisations on key aspects of Local Plan work. A separate statement has been prepared to demonstrate how the Council has met the above requirements in relation to the development of the Local Plan.

4 Regulation 18 – Preparation of a Local Plan

The Council has carried out three public consultations as part of its plan preparation process:

- Thanets New Local Plan – Options Consultation - 03 Jun– 14 Aug 2013.

This consultation identified the issues relevant to Thanet and options to consider as a preferred approach for the local plan. It included information such as why each issue needed to be addressed, what evidence was available and key facts. The questions sought opinions and levels of agreement with the options available.

- Draft Thanet Local Plan to 2031 – Preferred Option Consultation – 08 Jan – 06 Mar 2015

Although the Preferred Options stage is no longer a formal stage in the plan making process, it was considered necessary due to the closure of Manston Airport, and also to meet the Environmental Assessment of Plans and Programmes Regulation 2004 in assessing options and alternatives (via the Sustainability Appraisal). This consultation presented a draft of the whole local plan and sought comments on each of the draft policies.

- Proposed Revisions to Draft Local Plan (Preferred Options) – 19 Jan – 17 Mar 2017

This was a focussed consultation brought about by new and updated evidence. The consultation was focussed on a number of key issues – housing numbers; new housing sites; the future of the former Airport; infrastructure provision (including the proposed “Inner Circuit”); and an invitation to propose sites as Local Green Space. Comments were sought only on the new or revised policies.

4.1 Each of the consultations was based on the Councils consultation portal (Inovem) and people were encouraged to use the online method to respond to the consultations. Inovem includes a database of stakeholders who have registered themselves, asked to be registered and who have responded to consultations by post or email. The database also includes General and Specific Consultation Bodies as outlined in Regulation 2. Information about public consultations is sent using the stakeholder database either by email or letter. Consultation letters are available in Appendix 1 – they were generated using the mailmerge facility in Inovem and either posted as hard copies or sent via email.

4.2 The following section sets out (for each consultation) which bodies and persons were invited to make representations, and how they were invited to make representations. A summary of the main issues raised is provided along with an explanation of how the representations have been taken into account.

Issues and Options Consultation – Regulation 18 – 4th June – 14th August 2013

Which bodies and persons were invited to make representations

340 letters and 455 emails were sent out on 4th June 2013 to inform people of the consultation. The consultation period was for 10 weeks as it fell across summer holidays. A reminder letter and email were sent out on 1st August. (See Appendix 1 for letters)

How those bodies and persons were invited to make representations

Methods of communication

Leaflets (Appendix 2)

Posters (Appendix 2)

Copies available in libraries – copies of document, poster and leaflets and flyers

Press adverts – media briefing 5th June, Kent Messenger advert 24th July, (Appendix 2)

Website (Appendix 2)

Twitter

Facebook

Mail out – 10 weeks, 2 week reminder (sent 31 July 2013)

Member email

Communications list mail

Thanet Community networks mail out

Random mail 1000 residents

Correspondence with landowners of SHLAA submission sites

Correspondence with landowners at Westwood Town Centre

Specific Consultation events

Press Conference

Stakeholder Conference – 21st June 2013

Staff Drop-in Session – 24th June 12.00-4.00

District Drop-in Sessions –

- *Tuesday 2nd July - Customs House, Harbour Parade, Ramsgate, 2pm-8pm*
- *Thursday 4th July - Thanet's Gateway Plus, Cecil Street, Margate, 2pm-8pm*
- *Tuesday 9th July - Queens Road Baptist Church, Broadstairs, 2pm-8pm*
- *Thursday 11th July - Minster Village Hall, Minster, 2pm-8pm*

Focus Group – 30th July- Invites sent to a random sample of residents

Parish and Town Council Workshops

Member briefing

Managers Forum

Thanet Travel Forum

Communication through meetings with stakeholders

TDC and KCC Strategic Housing Meeting

Planning Policy Forum Presentation

CPRE meeting

Thanet Regeneration Board

Thanet Business Forum

Thanet Business Networks

NE, KWT, EA

Highways Agency

Planning and Building Control User Group

Summary of main issues raised and how the representations have been taken into account

The questionnaire for this consultation included a combination of open questions and choices of opinion where the respondent could select their preferred response. Approximately 8700 opinions were expressed from about 120 individuals and organisations, including residents, businesses, interest groups, statutory consultees and landowners. Appendix 3 includes the main issues raised and how the Local Plan would take these into account. Appendix 3 also includes justifications for the preferred options following their assessment through the Sustainability Appraisal.

Preferred Options Consultation – 9th January – 6th March 2015

Which bodies and persons were invited to make representations

356 letters and 898 emails were sent to those registered on inovem to advise them of the public consultation and the various drop-in sessions (see Appendix 1 for letter).

A leaflet was prepared as a method of communication (Appendix 2)

How those bodies and persons were invited to make representations

- **Press Coverage**
 - Press release on the website
 - Press briefing took place on 8 January 2015.

- Coverage in the KM Thanet Extra – 14 January 2014 – Focus On Local Plan – including drop in session details
- 33,000 circulation
- Coverage on www.kentonline.co.uk – including drop in session details Average 637,396 visits a month
- Minimal coverage in the Thanet Gazette – Houses at Westgate/Minster 9,000 circulation
- **Press Advertising**
 - Half page advert in Thanet Gazette – 9 January 2015 – promoting consultation and Drop in sessions 9,000 circulation
 - Half Page advert in KM Thanet Extra – 16 January 2015 - promoting consultation and Drop in sessions 33,000 circulation
 - Digital space booked on Thanet pages of www.kentonline.co.uk 20,000 impressions per week
 - Includes MPU, Banners and Skyscrapers
- **Social Media**
 - Twitter
 - A tweet went out on 9 January 2015 to our 4,500 followers and was retweeted 7 times
 - Facebook
 - Two posts to Facebook to our 624 followers
 - Post 1 – 2 January 2015 – Drop in dates and times
 - Reached 490 people
 - Shared twice
 - Two comments
 - Post 2 – 9 January 2015 – Local Plan Launch (including drop in sessions)
 - Reached 651 people
 - Shared twice
 - Two likes and five comments
 - Facebook paid for advert promoting the Local Plan and drop in sessions.
 - Started on Friday 9 January
 - Ad seen by 11,436 people
 - 110 click throughs to the website
 - Eight likes and nine comments
- **Direct emails**
 - These were sent via the Planning database and includes all statutory groups and those who have previously responded to a consultation.
 - Emails were sent out to the Business Development Team's database of local businesses and business groups.
- **Online advertising**
 - Advertise on the Thanet pages of the KM website
 - A banner was added to the home page of the thanet.gov.uk website.
- **Sixth form schools and colleges**
 - Sixth form schools and colleges in the area contacted to engage with the schools, and to promote the local plan to interested students.

This resulted in students coming into the council for an information session and members of planning going out to the schools

Specific consultation events

- Drop in sessions (Appendix 2) – all were manned by staff from the strategic planning team and a member of the Communications team. Where possible, a laptop was connected to a projector to display a ‘rolling presentation’ which included slides setting out the main issues for people to look at. The sessions took place during the last week of January 2015 and the first week of February 2015 on the following dates:
 - 13th January - The Centre, Birchington, 1.00-7.00pm (157 visitors)
 - 21st January - Baptist Church, Broadstairs, 1.00-7.00pm (81 visitors)
 - 29th January - Customs House, Ramsgate, 1.00-7.00pm (116 visitors)
 - 31st January - Westwood Cross, 9.00am- 5.00pm (142 visitors)
 - 3rd February - Hartsdown Leisure Centre, Margate, 1.00-7.00pm (115 visitors)
 - 10th February - Thanet Gateway, Margate, 12-2.00 (22 visitors)
- Staff drop-in sessions
These were held on 17 December 2014, and 8 January 2015.
- Attendance at Parish Council meetings
- Members of the parish councils were invited to a meeting at TDC on Monday 1st December 2014. The meeting was attended by
 - Acol Parish council
 - Broadstairs Town Council
 - Birchington Parish Council
 - Cliffsend Parish Council
 - Margate Neighbourhood Forum
 - Minster Parish Council
 - Monkton Parish Council
 - St Nicholas Parish Council
- The Council attended the following public meetings at the request of Parish Councils and community groups:
 - Ramsgate Town Council (14th January)
 - Supporters of Manston Airport (15th January)
 - Westgate Residents Association (16th January)
 - Garlinge Residents Association (19th January)
 - Cliffsend Parish Council (22nd January)
 - Birchington Parish Council (13th February)
 - Minster Parish Council (25th February)
- 6th Form Conference

A conference was held for 6th formers on 5th February at the Council offices. Invitations were sent to pupils from St Lawrence and King Ethelbert schools who both attended.

Following comments made at the early drop-in sessions and public meetings, the Council produced a Frequently Asked Questions board (Appendix 2) that was displayed at drop-in sessions and made available as a leaflet, and a Step-by-Step Guide to using the online consultation system also available as a leaflet.

A large-print version of the local plan was supplied to the Adult Education Centre on their request (Appendix 2)

Summary of main issues raised and how the representations have been taken into account

About 1,800 sets of comments were received, with a total of some 40,000 individual points of response to the consultation questions. The Council also received three written petitions and an e-petition relating to the draft Local Plan. These were considered at the Council meeting on 16th July 2015. The key planning issues arising from the petitions were: objections to the proposed housing allocations at Birchington; objections to the proposed strategic housing allocation on land between Dent-de-Lion and Minster Road/land bordering Minster Road, Westgate-On-Sea (two petitions); and a request for a public meeting to discuss “the consultation process, allocation of green field land and the scale of anticipated housing growth for Thanet”.

The Council also received the results of a survey from the Thanet UKIP Group regarding the level of housing in the draft Plan. Approximately 2,200 respondents indicated that they were against the level of housing in the draft Local Plan.

The main issues arising from the consultation were housing numbers and sites; economic strategy and job creation; the future of Manston Airport; provision of infrastructure (social and physical); environmental protection; and retail provision and the role of Westwood. Concerns were also raised by a number of correspondents about the publication of supporting documents and whether the Council had fulfilled the “duty to cooperate”.

The main issues, the Councils responses and any resulting changes to the Local Plan can be found in Appendix 4.

Proposed Revisions to Draft Local Plan (Preferred Options) – 19 Jan – 17 Mar 2017

Which bodies and persons were invited to make representations

1510 letters and 1856 were sent to those registered on inovem to advise them of the public consultation and the various drop-in sessions (see Appendix 1 for letter).

How those bodies and persons were invited to make representations

Press Coverage

- Press release on the website
- Press briefing took place on 17 January 2017.
- Coverage in the KM Thanet Extra – 20 January 2017 – Focus On Local Plan – including drop in session details
 - 33,000 circulation
- Coverage on www.kentononline.co.uk – including drop in session details
 - Average 637,396 visits a month
- Coverage in Thanet Gazette and on Kent Live News on 20 January 2017
 - 9,000 circulation
- Coverage in the Kent on Sunday on 22 January 2017
- Coverage on BBC Radio Kent on 20 January 2017

Press Advertising

- Half page advert in Thanet Gazette – 20 January 2017 – promoting consultation and Drop in sessions 9,000 circulation
 - Half Page advert in KM Thanet Extra – 25 January 2017 and 8 February 2017 - promoting consultation and Drop in sessions 33,000 circulation

Social Media

- Twitter
 - Tweeted 16 times
 - Tweets have received 51 re-tweets and 24 likes
- Facebook
 - There have been five posts Reaching 4,352 people, the posts achieved six shares and 14 likes
- Facebook paid for advert – promoting the Local Plan and drop in sessions. Started on Friday 20 January
 - Ad seen by 23,435 people
 - 1,388 click throughs to the website
 - 79 Shares, 59 likes and 91 comments

Mail/Email distribution

- Emails and letters sent to Planning's list of those who have previously taken part in consultations - Approx 3,500 contacts

Poster/Leaflet Distribution

- Posters and Leaflets have been sent to:
 - Parish Councils
 - Libraries
 - Council Offices
 - Thanet Gateway

Website hits

The consultation webpage was visited 1,044 times by 885 people.

Specific consultation events

Drop in sessions (Appendix 2) – all were manned by staff from the strategic planning team and a member of the Communications team. A laptop was set up at each event with the online consultation open to help people make their comments online.

- Thanet Gateway 9am -12.00 – Saturday 28th January 2017 (48 visitors)
- Kent Innovation Centre 9am-12.00 – Friday 3rd February 2017 (21 visitors)
- Custom House 9am-12.00 – Monday 6th February 2017 (52 visitors)
- Custom House 13.00-16.30 – Tuesday 14th February 2017 (65 visitors)
- King Ethelbert's School 9am-12.00 – Wednesday 15th February 2017 (75 visitors)
- Kent Innovation Centre 13:00-17:00 – Friday 17th February 2017 (18 visitors)
- Holiday Inn, Minster 13:00-17:00 – Monday 20th February 2017 (54 visitors)
- Thanet Gateway, Margate 17:00-20.00 – Thursday 23rd February 2017 (16 visitors)
- A staff briefing session took place with an attendance of 12 people
- Member briefing sessions

Summary of main issues raised

About 900 sets of comments were received, with a total of some 1,500 individual comments.

The main issues arising from the consultation related to housing numbers and sites; the future of Manston Airport; the proposed new site for the Parkway Station and the provision of infrastructure (social and physical), including the proposed 'Inner Circuit'.

The main issues, Councils responses and any changes to the Local Plan can be found in Appendix 5.

5 Pre-Submission Publication, Regulation 19 – 23rd August – 4th October 2018

Which bodies and persons were invited to make representations

1598 letters and 2657 emails (both including the Statement of Representations Procedure) were sent to those registered on inovem to advise them of the public consultation and the various drop-in sessions (see Appendix 1 for letter).

How those bodies and persons were invited to make representations

Press coverage

- Press release on website
- Story in Isle of Thanet News (website - average 330,000 visits a month)
 - 16/09/2018
 - 08/09/2018
 - 01/09/2018
 - 22/08/2018
- Kent Online - Thanet Extra (35,500 circulation + website average 637,396 visits a month)
 - 23/08/2018

Press Advertising

- Six half page adverts in the Thanet Extra (35,500 circulation)
 - 29/8/2018
 - 5/9/2018
 - 12/9/2018
 - 19/9/2018
 - 26/9/2018
 - 3/10/2018

Digital Advertising

- Four weeks headline advert on the Isle of Thanet News pages (average 11,000 view a day)

Social Media

- Twitter
 - Tweeted 3 times
 - Tweets have received 8 re-tweets and 2 likes
- Facebook
 - There has been one post - the post achieved 22 shares and 4 likes
- Facebook paid for advert – promoting the Local Plan. Started on Friday Thursday 30 August
 - Ad seen by 26,680 people
 - 2,789 click throughs to the website
 - 79 Shares

Website hits

- 4,426 number of visits to the Local Plan page
 - 7th most popular page during the consultation period.

Summary of main issues raised

During the Publication period, the Council received a total of 1,540 representations from just over 500 respondents, a mix of local residents, statutory consultees, development agents and landowners. Of those, a total of 920 comments are classified as objections. Six representations were received after the consultation closed. One of these was accepted as it arrived in a plastic bag with an apology from Royal Mail and was dated the 2nd October.

The main issues raised during the Publication stage were in relation to:

- The proposed housing target for the draft Plan;
- The location, scale and impact of the proposed new housing/strategic sites;
- The deliverability of strategic sites;
- Issues relating to 5-year housing land supply; calculation of “windfalls” and the role of empty homes;
- Infrastructure and service provision to support new development - suitability, deliverability and viability (including the provision of the proposed “Inner Circuit”; education; health and other facilities);
- The economic strategy and its relationship to housing provision;
- The future use/development of Manston Airport, and the potential impact of an airport operation on local communities;
- Whether there is justification or viability for the proposed Parkway Station; and
- A number of new or previously submitted proposals for housing or employment uses.

A more detailed note of main issues is attached at Appendix 6.

APPENDIX 1 – CONSULTATION LETTERS

Dear

Notice under Regulation 18(1) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Thanet Local Plan Issues and Options Consultation: 4th June – 14th August 2013

I am writing to let you know that we are consulting on the issues and options for Thanet's new Local Plan.

The Local Plan will set out policies and proposals that will be used to guide decisions and investment on development and regeneration over the period to 2031. It will set out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the type of places and environments we want to create. The Local Plan will have far reaching implications for everyone with an interest in Thanet's future.

In 2009 we consulted on Preferred Options for Thanet's Core Strategy. Following changes to national planning legislation, a decision was taken to prepare a new Local Plan instead of continuing with the Core Strategy. We are consulting now on issues and options for this Plan.

The quickest and easiest way of responding is electronically, through our online consultation portal.

To comment this way, please go to **<https://consult.thanet.gov.uk>**

If you are not able to respond this way, you can download the consultation document and questionnaire from our consultation portal (website address above) or pick up a paper copy of the consultation document from the Thanet Gateway, Cecil Street, Margate, and at public libraries in the District. If you require a hard copy of the questionnaire please contact Strategic Planning on 01843 577591 or local.plans@thanet.gov.uk. Please send completed questionnaires to local.plans@thanet.gov.uk or Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XZ.

Please make sure we have your comments in writing by **14th August 2013**.

If you have any queries please contact the Strategic Planning team on 01843 577591 or email local.plans@thanet.gov.uk

Yours faithfully

Simon Thomas
Planning Manager

Dear

Thanet Local Plan Issues and Options Consultation: 4th June – 14th August 2013

The consultation on Thanet's new Local Plan closes in two weeks, so there is still time for you to comment. Many thanks to those of you who have already sent us your comments, or taken part in one of our consultation events.

The Local Plan will set out policies and proposals that will be used to guide decisions and investment on development and regeneration over the period to 2031. It will set out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the type of places and environments we want to create.

The Local Plan will have far reaching implications for everyone with an interest in Thanet's future.

The quickest and easiest way of responding is electronically, through our online consultation portal. To comment this way, please go to <https://consult.thanet.gov.uk>. If you are not able to respond this way, you can download the consultation document and questionnaire from our consultation portal (website address above) or pick up a paper copy of the consultation document from the Thanet Gateway, Cecil Street, Margate and at public libraries in the District. If you require a paper copy of the questionnaire please contact Strategic Planning on 01843 577591 or local.plans@thanet.gov.uk.

Please send completed questionnaires to local.plans@thanet.gov.uk or to Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent CT9 1XZ.

Please make sure we have your comments in writing by **14th August 2013**. If you have any queries please contact the Strategic Planning team on 01843 577591 or email local.plans@thanet.gov.uk

Yours faithfully

Simon Thomas, Planning Manager

Dear

Thanet Local Plan Preferred Options Consultation: 9th January – 6th March 2015

I am writing to let you know that we are consulting on the preferred options for Thanet's new Local Plan.

The Local Plan will set out policies and proposals that will be used to guide decisions and investment on development and regeneration over the period to 2031. It will set out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the type of places and environments we want to create. The Local Plan will have far reaching implications for everyone with an interest in Thanet's future.

In 2013 we consulted on Issues and Options for the new local plan. We have considered the issues raised in that consultation, and have now prepared a draft local plan based on the evidence available to us and the preferred options identified through the previous consultation.

The quickest and easiest way of responding to the consultation is electronically, through our online consultation portal. To comment this way, please go to <https://consult.thanet.gov.uk>

If you are not able to respond this way, you can download the consultation document and questionnaire from our consultation portal (website address above) or have a look at a paper copy of the consultation document at the Thanet Gateway, Cecil Street, Margate and at public libraries in the district. If you require a paper copy of the questionnaire please contact Strategic Planning on 01843 577591 or local.plans@thanet.gov.uk.

Please send completed questionnaires to local.plans@thanet.gov.uk or to Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent CT9 1XZ.

Please make sure we receive your comments in writing by **6th March 2015**.

The Council will be holding 'drop-in' sessions around Thanet where you can come and talk to planning officers about the draft local plan and the consultation:

13th January - The Centre, Birchington, 1.00-7.00pm

21st January - Baptist Church, Broadstairs, 1.00-7.00pm

29th January - Customs House, Ramsgate, 1.00-7.00pm

31st January – Westwood Cross, 9.00-5.00pm

3rd February - Hartsdown Leisure Centre, Margate, 1.00-7.00pm

10th February - Thanet Gateway, Margate, 12-2.00pm

If you have any queries please contact the Strategic Planning team on 01843 577591 or email local.plans@thanet.gov.uk

Yours faithfully

Ismail Mohammed

Wed 18 Jan 2017

Dear Sir/Madam

I am writing to let you know that we are consulting on proposed revisions to the Draft Local Plan (Preferred Options) between 20th January and 17th March 2017.

In this focussed consultation the Council are seeking views on the following main changes to the Local Plan Preferred Options 2015. These main changes are:

- The re-designation of the former Manston airport site for mixed use development
- The allocation of two additional housing sites at Manston Court Road/Haine Road and at Manston Road/Shottendane Road to meet the new objectively assessed housing need of 17,140 dwellings.
- An alteration to the location of the proposed Thanet Parkway Station
- Safeguarding of Strategic Routes
- Implementation Policy
- Suggestions for Local Greenspace Designations
- Call for evidence relating to National Standards for internal space in new development; accessible and adaptable accommodation; and water efficiency.

All comments submitted during the last plan consultation in 2015 have been considered but not all changes are being made at this stage. Due to the scale of change from the last plan we wanted to seek the views of the public on these main changes before submission to the Secretary of State. The other amendments will be available for comment during the pre-submission consultation later on this year. Therefore we are ONLY seeking views on the changes listed above.

The consultation is also accompanied by the Sustainability Appraisal report and comments are welcome on this. A separate comments form is available.

Other supporting documents that will be available for information during the consultation include the Strategic Housing Market Assessment (SHMA), Habitats Regulations Assessment, the Draft Infrastructure Delivery Plan, Airport Viability Study and Economic Growth Strategy.

The quickest and easiest way of responding is electronically, through our online consultation portal. To comment this way please go to consult.thanet.gov.uk

If you are not able to respond this way, you can download the consultation document and comments form from our consultation portal or pick up paper copies from the Thanet Gateway, Cecil Street, Margate, at public libraries in the District or from Pierremont Hall in Broadstairs or Customs House in Ramsgate. If you require a hard copy of the consultation document or the comments form please contact Strategic Planning on 01843 577591 or local.plans@thanet.gov.uk or Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent CT9 1XZ. Please note that comments that are not received via the consultation portal may not be immediately acknowledged.

Please make sure we have your comments by 5pm Friday 17th March 2017.

Yours faithfully

Adrian Verrall

22 August 2018

Dear Sir/Madam

I am writing to advise you that following the meeting of Full Council on 19 July 2018, the Council has published the Pre-Submission Publication Local Plan for public consideration. This is the Plan the Council intends to submit to Government for independent Examination by a Planning Inspector.

The meeting on 19 July 2018 agreed revisions to the local plan which have been included in the online version at www.consult.thanet.gov.uk. However, for paper copies of the plan, the draft local plan needs to be read in conjunction with those amendments as set out in the Local Plan Addendum (Publication Draft, July 2018).

In addition to the local plan and addendum, a number of other documents have also been produced for consideration – the Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). The Council is also consulting on the Transport Strategy and the Thanet Landscape Character Assessment both of which inform the local plan. The draft Transport Strategy is the outcome of joint-working with Kent County Council, and comments on the draft Transport Strategy will be shared with Kent County Council. Following consultation and consideration of comments received, it is intended to adopt the Landscape Character Assessment as a Supplementary Planning Document (SPD). This means that this will be one of the documents used to assess planning applications.

The draft Plan, Sustainability Appraisal, Habitat Regulations Assessment, Landscape Character Assessment and Transport Strategy are published for a period of six weeks, from **Thursday 23rd August to 5pm Thursday 4th October 2018**. The publication documents may be viewed on the Council's web-site at www.consult.thanet.gov.uk or during normal opening hours at the following deposit points and libraries:

- Thanet Gateway Plus and Library Cecil Street Margate, CT9 1RE
- Pierremont Hall, Pierremont Park, Broadstairs CT10 1JX
- The Custom House, Harbour Parade, Ramsgate CT11 8LP
- Birchington Library - Alpha Road, Birchington, Kent, CT7 9EG
- Broadstairs Library – The Broadway, Broadstairs, Kent CT10 2BS
- Cliftonville Library - Queen Elizabeth Avenue, Margate, Kent, CT9 3JX
- Minster Library - 4A Monkton Road, Minster, Ramsgate, Kent, CT12 4EA
- Newington Library – Marlowe Academy, Marlowe Way, Ramsgate, Kent CT12 6NB
- Ramsgate Library - Guildford Lawn, Ramsgate, Kent, CT11 9AY
- Westgate library – Minster Road, Westgate-on-Sea CT8 8BP

Comments can be made online, via the website www.consult.thanet.gov.uk. However, should you wish to submit comments in writing, the representation form, and guidance on how to make comments, can be downloaded from the Council's website www.consult.thanet.gov.uk and either emailed to local.plans@thanet.gov.uk or send by post to Strategic Planning Team, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XZ.

If you wish to submit supporting studies with your comments or if your submissions are more than 50 pages, please send 3 paper copies of each submission.

The use of the representation form is strongly recommended as this will ensure that comments are related to matters relevant to the subsequent examination by a Planning Inspector. All responses will be publicly available and cannot be treated as confidential.

All comments should be returned by **5pm Thursday 4th October 2018**, representations received after this date **cannot** be accepted as only representations received by the closing date will be considered by the Inspector. If you wish to appear at the Examination, you will need to make comments at this stage. Only comments made at this stage will be forwarded to the Planning Inspector for consideration as part of the Examination.

If you wish to be notified of future stages of the Local Plan 2031 or the Thanet Landscape Character Assessment please specify in your submission. If you register your details at www.consult.thanet.gov.uk you will automatically be notified of all future Local Plan documents by email.

Privacy statement: Your contact details will only be used for Local Plan consultations and to inform you about the stages of this Local Plan process; and for the purposes of the Local Plan Examination.

Yours faithfully,

Adrian Verrall

Strategic Planning Manager

DRAFT THANET LOCAL PLAN 2031
PRE-SUBMISSION PUBLICATION (REGULATION 19) 23rd AUGUST 2018
STATEMENT OF REPRESENTATIONS PROCEDURE

This Statement has been prepared by Thanet District Council under:
Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and as amended by Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017; and
Regulation 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012, Representations on Supplementary Planning Documents.

Subject matter:	<p>Thanet District Council is now publishing the pre-submission draft Local Plan 2031 and accompanying Sustainability Appraisal and Habitat Regulations Assessment. It is known as Regulation 19, and it is the final opportunity to make representations on the draft plan before it is submitted to a Planning Inspector for consideration (through an Examination in Public).</p> <p>The online version incorporates the Addendum changes agreed by Full Council on 19 July 2018.</p> <p>The draft Plan is also available in paper form in two documents</p> <ul style="list-style-type: none"> • Draft Local Plan to 2031 – July 2018 Pre-Submission Publication Version Regulation 19 • Local Plan Addendum (Publication Draft, July 2018) <p>The Local Plan sets out the level and location of new development for the District for the period up to 2031. It also includes policies that would be used to determine planning applications, should the plan be approved.</p> <p>At the same time the Council is seeking views on</p> <ul style="list-style-type: none"> • Thanet Landscape Character Assessment <p>Following consultation and consideration of comments received, it is intended to adopt the Landscape Character Assessment as a Supplementary Planning Document (SPD). This means that this will be one of the documents used to assess planning applications.</p> <p>The Council is also seeking views on the draft Transport Strategy. The draft Transport Strategy is the outcome of joint-working with Kent County Council, and comments on the draft Transport Strategy will be shared with Kent County Council</p>
Representation period:	<p>The period for representations begins on</p> <p>Thursday 23rd August to 5pm Thursday 4th October 2018.</p> <p>Comments received outside the publication period cannot be accepted.</p>
Documents can be	<p>The Council's consultation web-site at www.consult.thanet.gov.uk</p>

<p>viewed at:</p>	<p>Or during normal opening hours at the following deposit points and libraries</p> <ul style="list-style-type: none"> • Thanet Gateway Plus and library Cecil Street Margate, CT9 1RE • Pierremont Hall, Pierremont Park, Broadstairs CT10 1JX • The Custom House, Harbour Parade, Ramsgate CT11 8LP • Birchington Library - Alpha Road, Birchington, Kent, CT7 9EG • Broadstairs Library – The Broadway, Broadstairs, kent CT10 2BS • Cliftonville Library - Queen Elizabeth Avenue, Margate, Kent, CT9 3JX • Minster library - 4A Monkton Road, Minster, Ramsgate, Kent, CT12 4EA • Newington Library – Marlowe Academy, Marlowe Way, Ramsgate, Kent CT12 6NB • Ramsgate Library - Guildford Lawn, Ramsgate, Kent, CT11 9AY • Westgate library – Minster Road, Westgate-on-Sea CT8 8BP
<p>Representations to be sent to:</p>	<p>The Council is encouraging comments to be made online, via the website www.consult.thanet.gov.uk</p> <p>However, should you wish to submit comments in writing please download the Representations Form at www.consult.thanet.gov.uk</p> <p>or email to local.plans@thanet.gov.uk or call 01843 577591 to request a representation form.</p> <p>Representation forms should be returned by 5pm Thursday 4th October 2018.</p> <p>By email to local.plans@thanet.gov.uk</p> <p>By post to Strategic Planning Team, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XZ</p>
<p>Notification Requests:</p>	<p>If you wish to be notified of future stages of the Local Plan 2031 or the Thanet Landscape Character Assessment please specify in your submission. If you register your details at www.consult.thanet.gov.uk you will automatically be notified of all future Local Plan documents by email.</p> <p>Privacy statement: Your contact details will only be used for Local Plan consultations and to inform you about the stages of this Local Plan process; and for the purposes of the Local Plan Examination.</p>

CONSULTATION STATEMENT APPENDIX 2 – PUBLIC CONSULTATION MATERIALS

Issues and Options Consultation – 4th June – 14th August 2013

Consultation Leaflet:



LOCAL PLAN
THANET EDITION

Your guide to the
Local Plan consultation



The completed Local Plan sets out how the district will be developed between now and 2031.



Your Local Plan guide

Thanet District Council is preparing a new Local Plan for Thanet. It will help make sure that the district is developed in the right way. The plan will set out how and where:

- homes, jobs, community facilities, shops and infrastructure will be delivered;
- the types of places and environment we want to create;
- land to be protected from development, such as open spaces.

The new Local Plan will cover the district right up to 2031. All planning authorities are required to produce a Local Plan.

Consultation, consultation, consultation

The council will carry out three public consultations before the Local Plan is adopted in 2015.



After all three consultations, the final Local Plan will be submitted to the Secretary of State for approval.

Key issues

If you are interested in any of these issues, then you need to be looking at the Local Plan.

THE ECONOMY	THE ECONOMY	THE ECONOMY	THE ECONOMY
Issue 1 What level of employment growth should be planned for?	Issue 2 How much employment land is needed & where?	Issue 3 How can we promote infrastructure growth?	Issue 4 How should Thanet's coastal profile be developed?
Issue 5 How many homes do we need to provide?	Issue 6 Where should new homes be provided?	Issue 7 How do we maintain a physical separation between Thanet's town & village?	Issue 8 How do we maintain a physical separation between Thanet's town & village?
Issue 9 Which policies do we need to ensure a safe and healthy environment?	Issue 10 How can we provide high quality homes, development & neighbourhoods?	Issue 11 What can we do to ensure a high quality environment?	Issue 12 How do we maintain a physical separation between Thanet's town & village?
Issue 13 How can we provide high quality homes, development & neighbourhoods?	Issue 14 How do we maintain a physical separation between Thanet's town & village?	Issue 15 How do we maintain a physical separation between Thanet's town & village?	Issue 16 How do we maintain a physical separation between Thanet's town & village?





Find out more about the Local Plan & take part in the consultations at:
www.thanet.gov.uk/localplan




Help taking part

The Local Plan is very detailed...

This is because the council must consider and examine very detailed evidence. This includes issues about the economy, the need for housing and the built and natural environment to name a few.

The council wants the public to see everything relevant to the process so that you can make informed comments.

This is why the information provided as part of this consultation is very detailed.



Need help understanding the local Local Plan? Call in to one of our drop-in sessions to speak to a member of the planning team. Details are at the back of this leaflet.



But once completed, the Local Plan helps answer many of these issues...

MORE HOUSING

WHAT ABOUT THE FUTURE OF OUR TOWN CENTRES?

IMPROVE THE TRANSPORT NETWORK

MORE JOBS

PRESERVE THE GREEN ENVIRONMENT

It's important that you make time to take part in the three consultations.



LOCAL PLAN THANET EDITION

Need more help or advice?

If you are unsure about any of the information provided, or would like to speak with a member of the planning team about the Local Plan:

Call in to one of our drop-in sessions:

- 25th June - Westwood Cross, 2pm-7.30pm
- 2nd July - Custom House, Harbour Parade, Ramsgate, 2pm-8pm
- 4th July - Thanet Gateway Plus, Margate, 2pm-8pm
- 9th July - Queens Road Baptist Church (Stone Day Room) Broadstairs, 2pm-8pm
- 11 July - Minster Village Hall, Minster, 2pm-8pm

E-mail us
localplans@thanet.gov.uk

Call us
01843 577591

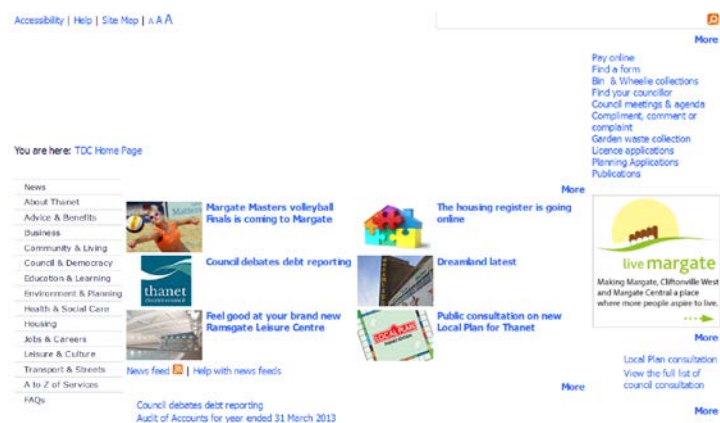
Find out more about the Local Plan & take part in the consultations at:
www.thanet.gov.uk/localplan




Poster printed in Thanet Gazette 24th July 2013:



Link to consultation from TDC Homepage:



Advert in Thanet Gazette – 9 January 2015

Leaflet:

THE LOCAL PLAN

What's the right route for Thanet?

What is the new Local Plan?

The plan will set out policies and proposals that will guide decisions and investment on growth, development and regeneration over the period to 2031. It will set out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the type of places and environments we want to create. It will also identify land to be protected from development, such as open space. The plan will form the local statutory planning framework for determining planning applications.

What does the plan say?

- We have a flexible strategy in order to provide for 5,000 additional jobs across all sectors of the economy including tourism, leisure and the green economy.
- The airport and surrounding area is proposed as an opportunity area for which the council will prepare an Area Action Plan to guide its future development.
- The housing provision over the plan period is 12,000 additional homes.
- Development will be focused in accessible areas with existing infrastructure and services, either within or on the edge of existing urban areas.
- Greenfield housing allocations are proposed at Westwood, Birchington, Westgate-on-Sea and Manston Green.
- Important countryside, open spaces, heritage and the built and natural environment will be protected for their character and contribution to sense of place.
- The green wedges that separate Thanet's towns will be protected.
- A new parkway station is promoted for under economic benefit to the district.

Map Diagram

How to respond to this consultation

The consultation closes at MIDNIGHT on Friday 6 March 2015. Please ensure you have submitted your comments to us by this time.

The quickest and easiest way for you to respond is through our online consultation portal. You will need to register to comment. If you have already registered during a previous consultation simply enter your username and password.

To comment this way go to <https://consult.thanet.gov.uk>

You can also download the draft plan or you can view a paper copy of the consultation document at Thanet's Gateway Plus, Cecil Street, Margate, and at public libraries in the district.

If you are not able to respond through the consultation portal, you can download the questionnaire and send it to us.

If you require a paper copy of the questionnaire please contact Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XX.

Please send completed questionnaires to local.plans@thanet.gov.uk or Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XX.

Please be advised that comments submitted to us will be made public along with your name and the name of the organisation you are representing (if relevant). Your address and any other personal details you provide to us will remain confidential.

What happens next?

The process for adopting a Local Plan is set out below. Following on from last year's 'views and opinions' consultation we are seeking views on whether our preferred approach is correct.

START

Review and options consultation

Following evidence gathering the council held an issues and options consultation in 2013. The draft with strategic issues including overall levels of development and the broad strategy for the future of development.

At this stage we did not identify a preferred strategy or select a particular option.

What happened next?

We considered all of the representations received. Comments were used to inform decisions as to the most appropriate strategy and decide on preferred options. We considered all the allocation. A draft Local Plan was then produced for consultation.

YOU ARE HERE

This consultation

We are consulting on our preferred strategy. The draft proposes site allocations and detailed policies. We are seeking views on whether our preferred approach is correct.

What happens next?

Based on comments received the next version of the plan will be written and submitted to the Secretary of State. A further 'pre-submission' consultation will be held at this stage.

The plan will go through an examination where an inspector will consider whether the plan has been properly prepared, and that its policies are justified, effective, pass the legal tests and conform with national policy.

Adoption of the plan

Following the examination the inspector may recommend changes to the plan, at this stage a further consultation will be carried out.

The council will then adopt the Thanet Local Plan which will form part of the development plan for Thanet to 2031.

FINISH

The next stage of the process is to consider comments received on the draft plan and prepare a version of the plan to submit to the Secretary of State for adoption. So this is your chance to have your say.

How can I get help?

The Strategic Planning team is here to help you understand the plan and facilitate the consultation.

Additional information can be found on the Local Plan pages of the council's website and the team will be available to talk to you by telephone and email.

We are also holding a number of consultation events throughout January and February where you can meet the team and ask questions.

Thursday 13 January – 1pm to 7pm
The Centre, Birchington

Wednesday 21 January – 1pm to 7pm
Broadstairs Baptist Church, Broadstairs

Thursday 29 January – 1pm to 7pm
Custom House, Ramsgate

Saturday 31 January – 9am to 5pm
Westwood Cross

Tuesday 3 February – 1pm to 4pm
Hartcliffe Leisure Centre, Margate

Monday 10 February – 10pm to 2pm
The Gateway, Margate

01843 577501

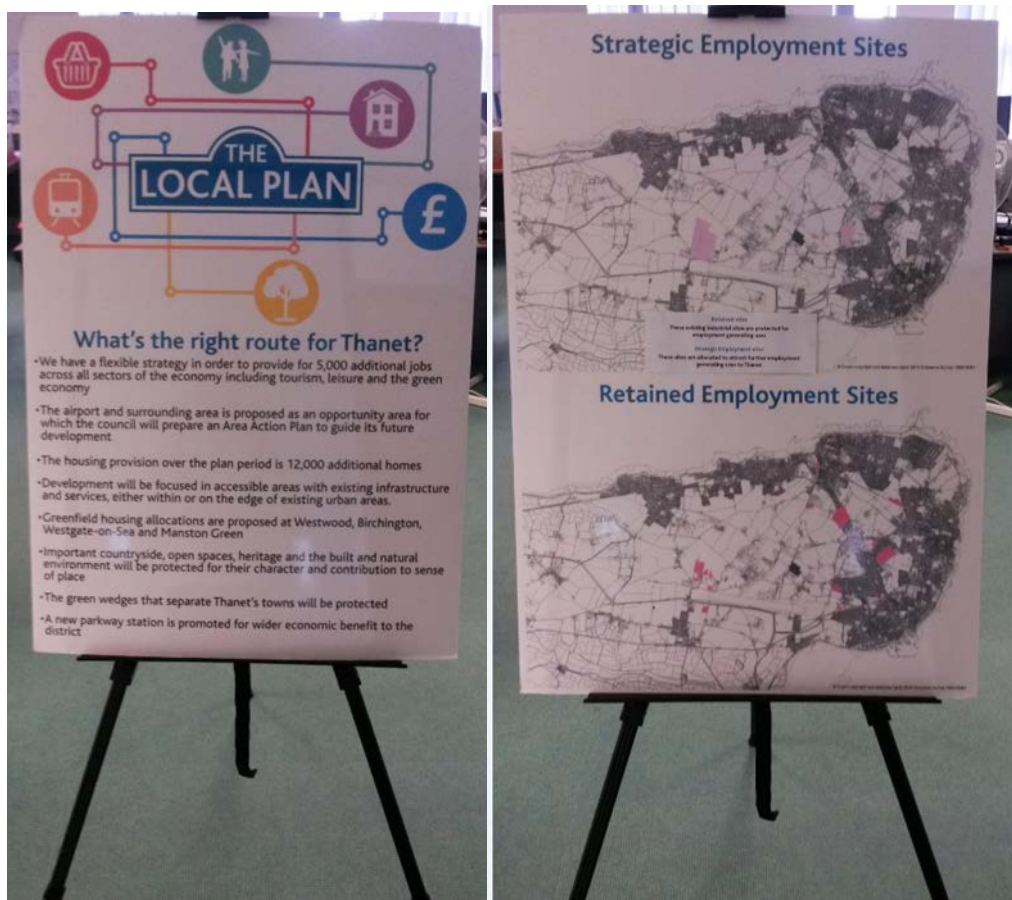
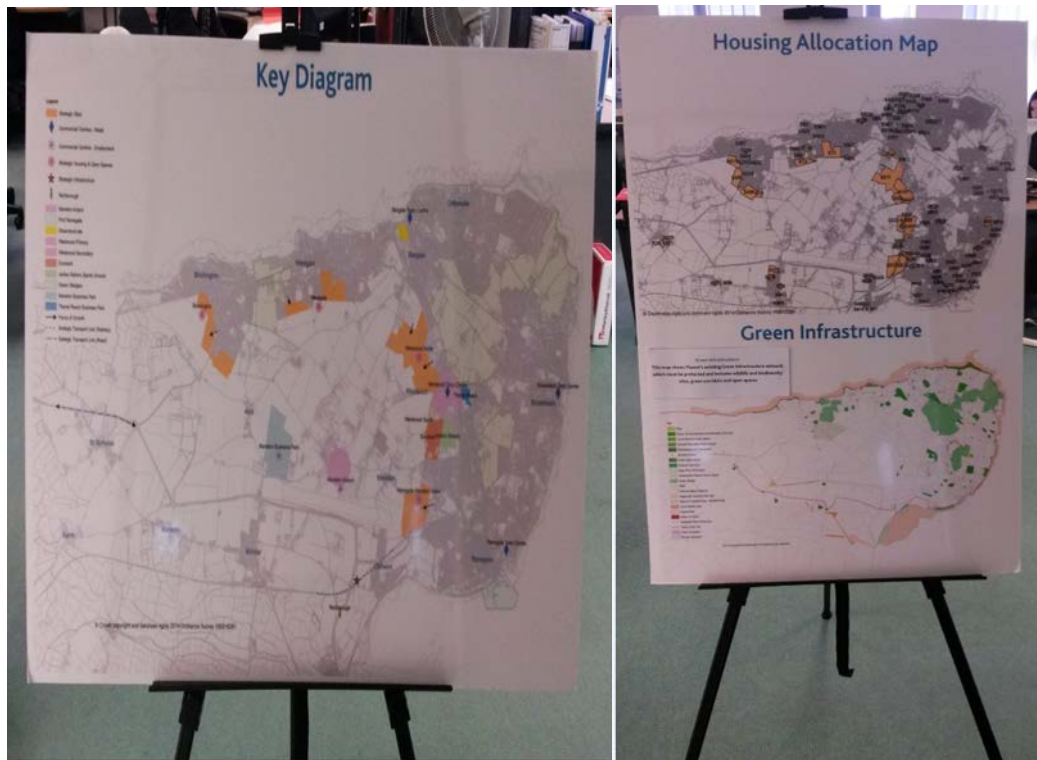
local.plans@thanet.gov.uk

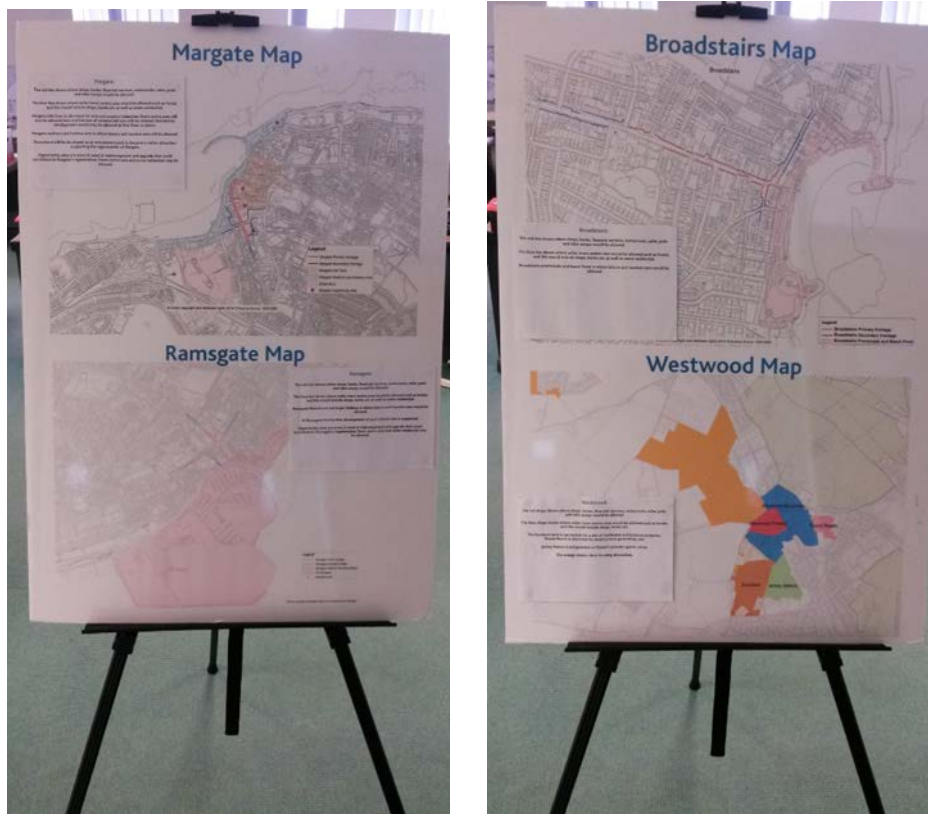
Drop-In sessions & Boards

Westwood drop-in:



These boards were displayed at each of the sessions:





FAQ Board:

THE LOCAL PLAN

Frequently asked questions

Housing

What will happen if we don't plan for more houses/why can't we just say no?

If the Council does not allocate land for houses, developers could apply for planning permission to build houses anywhere and it would be difficult for the Council to refuse these applications.

Who will be living in the houses once they are built? Concern that they will be filled by pensioners from London Borough.

In this Local Plan, the Council is not planning to meet the housing needs of other areas. However, it is not possible to be precise about how many residents of the new market housing will be Thanet residents. In terms of affordable housing, the Council has a policy of requiring new developments to provide 20% affordable housing. The Council is able to nominate people for the affordable housing from its own housing register. In 2013, the Council closed its housing register to people outside Thanet. The nominations are based on the Council's policy of prioritising people with a local connection of 3 years or more.

Why is the Council allocating areas of precious, prime agricultural land for housing development that should be used for growing food?

In developing the Local Plan we have tried to allocate as much housing on brown field or developed land as possible. However this still leaves a shortfall in the amount of houses required, which means we have had to look at allocating greenfield or undeveloped land for possible housing developments.

It is anticipated that about 40% of the planned homes in the draft Plan would be on brownfield sites.

What is the council doing to stop Thanet being turned into a large housing estate?

The Local Plan allows us to control where and how many houses are built in Thanet. Without the Local Plan it would be harder for us to prevent development in non-allocated areas.

The Local Plan aims to safeguard the individual identity and essential character of individual towns and villages.

We bought a house recently why didn't the search pick the housing allocation up?

Because the Local Plan is still only a draft, the sites which we propose for allocation will not yet show up on your search.

The proposed sites will ruin the village and its identity as it will become a town.

The Local Plan includes further information about how we have decided on the development in rural areas. Please see paragraphs 11.11-11.15 of the draft Plan.

What are the plans to improve infrastructure for the proposed housing sites at Dorton, Dorton, Scherrie, roads etc.

The Council is working with the agencies responsible for delivering medical services, schools and transport infrastructure on an ongoing basis. It is preparing an infrastructure delivery plan to identify what supporting community facilities, utility and transport infrastructure will be needed to support the plan.

The current draft plan reflects information provided by these agencies to date, and will inform more detailed consideration of their business plans

Unemployment is high in Thanet, we need industry not houses, how will this be addressed?

Government's National Planning Policy Framework requires us to objectively assess future housing requirements and meet them. The level of provision in the Draft Plan has been informed by a range of forecasts taking into account past trends and potential employment growth.

The Plan also contains measures to attract and accommodate employment growth.

It is also important to note that a significant part of the future housing requirement relates to the needs of the District's existing population such as young people who will come to need a home of their own.

Why can't all the empty properties be used for new housing instead of finding new sites?

The Council works vigorously to bring empty property back into use. However, empty properties that are being used for residential are already counted as part of the existing housing stock (they may be second homes/holiday homes etc) so cannot be counted as part of the 'new' housing supply.

The draft Plan assumes that some of the total housing to be provided will come from sites that cannot currently be identified ('windfall' sites) an element of which may be from re-use of empty property.

What criteria are applied in identifying/assessing potential housing sites?

A range of criteria are applied and these are identified in our Strategic Housing Land Availability Assessment and Strategy for Planned Location of Housing. These include, for example, potential for flooding, archaeological, transport considerations.

Are you using the most recent population data to calculate the housing numbers?

Yes – and we update these figures on a regular basis.

THE LOCAL PLAN

Frequently asked questions

General

Why do we need a Local Plan?

Recent changes to the national planning system mean that local authorities are now responsible for deciding the levels of development needed for their district. The plan shapes how Thanet will develop over the next 20 years and sets out how much development is needed to support the future population and economy. The Local Plan will give Thanet District Council greater control over where and what type of new developments can take place.

The plan must be based on evidence from a number of studies covering a wide range of subjects and take account of national policy.

When will we know more detail on layout of the development?

The Local Plan allocates land for potential development. The detail of what will be built will come at the planning application stage when a developer proposes a scheme. Their proposals will need to include the requirements of the relevant policy in the local plan. The Council will consult with residents and other stakeholders on the planning application before it is decided.

What communication has there been about this consultation?

The following has been/ is being carried out to publicise the consultation:

- Press releases and press briefings
- Three half page adverts in the Thanet Gazette (circulation approx. 9,000)
- Six adverts in the KM Extra (circulation approx. 30,000)
- Digital adverts on the www.thanetonline.co.uk Thanet pages (approx. 14,000 monthly visitors)
- Use of Twitter and Facebook posts to promote the consultation and drop in sessions
- Facebook 4,500 followers
- Facebook advertising – currently displayed to approx. 12,000 people
- Email sent to 12 business networks who will forward to their members and contacts
- Emails and letters sent to people registered on our consultation database
- Approx. 1,000 contacts
- Posters, questionnaires and Leaflets have been sent to:
 - Parish Councils
 - Libraries
 - Council Offices
 - Thanet Gateway
- Parish Councils and other organisation/group briefing sessions
- Working with Sixth Form schools/colleges to help promote the plan to their students
- Public briefing sessions

Do we have to answer every part of the questionnaire?

No. Only you only need to answer the questions relating to subjects you are interested in. Paper questionnaires are available on request and can be handed in at the Gateway or at local libraries to save on postage. Where can I find the Council's supporting evidence?

Our evidence base to date can be found on the Council's website at www.thanet.gov.uk/localplan by clicking the square marked 'Evidence Base' on the left hand side. As this is an informal consultation some of our evidence base is still being prepared.

THE LOCAL PLAN

Frequently asked questions

Economy

Why are there 12,000 houses and only 3,000 jobs? There is already high unemployment here – isn't this make it worse?

The level of housing proposed is 12,000 new homes over the 20 year period to 2031. This figure takes account of both the homes needed to accommodate changes in the existing population together with some in migration including homes for the additional labour force associated with the target of 5,000 additional jobs.

Where are these jobs coming from?

Expertise carried out employment forecasting for the Council. The report showed that there is already strong growth in the tourism and green sectors of the economy and this is likely to continue. Thanet is also strong in retail and public administration professions.

Why are you focussing retail development at Westwood?

Thanet's town centres all perform different and complementary functions and retail development is supported at all of them.

The Local Plan does not propose to expand Westwood beyond its existing boundaries.

Where is the new A167 road going to go that extends from Minster Road and the A287?

The draft Plan is not prescriptive about the specific location or alignment of a new road link.

This would be a matter to be considered when any planning application is received.

When is this likely to happen if approved?

Planning for this, with ECC, is still taking place and will be included in the Infrastructure Delivery Plan.

Boats are already at capacity. 12,000 households will add to the problem. What plans are there to deal with this?

We are working with ECC Highways. Detailed schemes will be drawn up at the planning applications stage and advice will be sought by ECC as the Highways authority.

thanet.gov.uk/localplan
 01843 577591
local.plans@thanet.gov.uk

THE LOCAL PLAN

Frequently asked questions

Transport

Where is the new A167 road going to go that extends from Minster Road and the A287?

The draft Plan is not prescriptive about the specific location or alignment of a new road link.

This would be a matter to be considered when any planning application is received.

When is this likely to happen if approved?

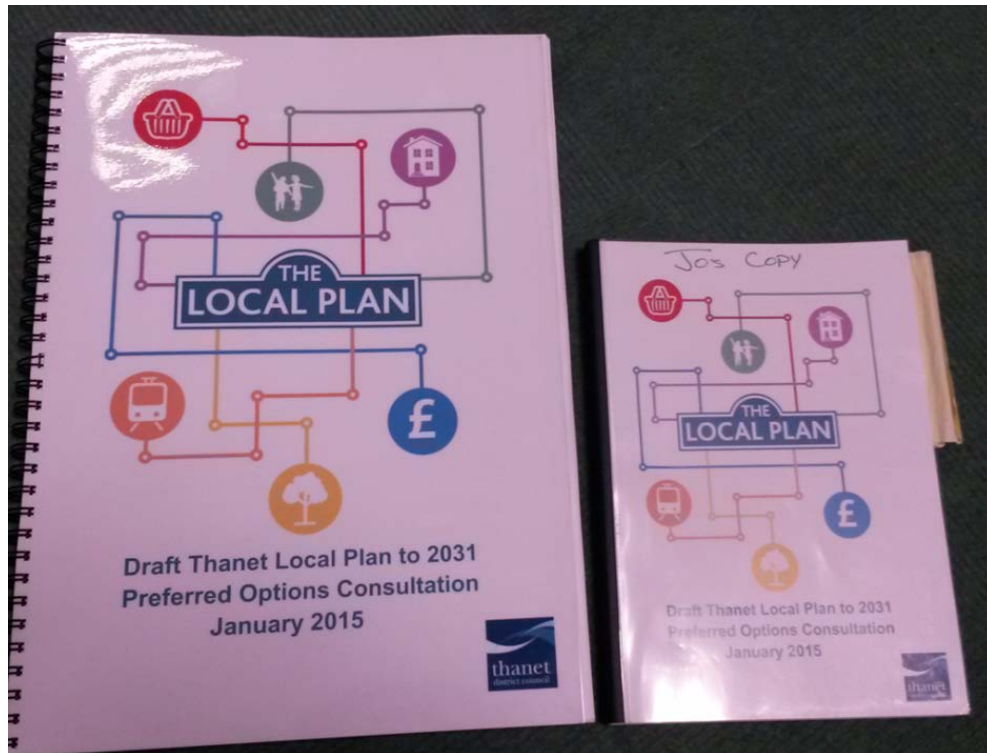
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Large print version of the Local Plan:



Preferred Options Revisions Consultation – 19th January - 17th March 2017

Consultation Leaflet

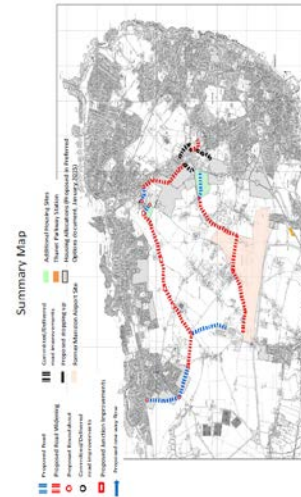


What is the new Local Plan?

The plan will set out policies and proposals that will guide decisions and investment on growth, development and regeneration over the period to 2031. It will set out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the type of places and environments we want to create. It will also identify land to be protected from development, such as open space. The plan will form the local statutory planning framework for determining planning applications.

What do the proposed revisions say?

- These revisions only relate to specific parts of the draft plan. There will be an opportunity to comment on the whole draft plan before it is submitted for examination later this year.
- The housing provision over the plan period is 17,140 homes – about 7,800 either already built, with planning permission, empty homes or “windfalls” – the draft Plan only needs to find 9,300 additional homes.
- The airport site is proposed as a site for mixed-use development – housing, employment and leisure, together with new local facilities and infrastructure.
- Other new housing allocations are proposed at Westwood (with mixed leisure uses) and Shortlandside.
- Identification of key road schemes to be provided to create a new “Inner Circuit” to relieve pressure on the existing road network.
- To invite proposals for sites to be considered as Local Green Space within the Local Plan.
- Amended location for the proposed Thanet Parkway station.
- Proposals for adopting new national technical standards in relation to water efficiency, internal space standards and accessible and adaptable accommodation.



How to respond to this consultation

The consultation closes at 5pm on Friday 17 March 2017. Please ensure you have submitted your comments to us by this time.

As well as the draft Local Plan, you can also comment on the Sustainability Appraisal of the Plan, or put forward areas for consideration as Local Green Space.

The quickest and easiest way for you to respond is through our online consultation portal. You will need to register to comment. If you have already registered during a previous consultation simply enter your username and password.

To comment this way go to <https://consult.thanet.gov.uk>

You can also download the draft plan or you can view a paper copy of the consultation document at Thanet's Gateway Plus, Cecil Street, Margate, and at public libraries in the district.

If you are not able to respond through the consultation portal, you can download the comments form and send it to us.

If you require a paper copy of the comments form please contact Strategic Planning on 01843 577591 or local.plans@thanet.gov.uk

Please send completed comment forms to local.plans@thanet.gov.uk or Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XZ.

Please be advised that comments submitted to us will be made public along with your name and the name of the organisation you are representing (if relevant). Your address and any other personal details you provide to us will remain confidential.

What happens next?

The process for adopting a Local Plan is set out below. Following on from the 2015 preferred options consultation in 2015 we are now asking you to let us know your views on the revisions we have made.

2015 consultation

YOU ARE HERE

FINISH

Preferred Options consultation
Public consultation of draft plan based upon our preferred strategy.
Proposed site allocations for development and detailed policies.

What happens next?
We considered all of the representations received as part of this consultation. Further work was carried out on the Strategic Housing Market Assessment. The council sought an indemnity partner for the CPO of the airport. A report was commissioned on airport viability to establish a way forward for the Local Plan.

This consultation - Proposed Revisions to the Draft Local Plan
Focused consultation on new site allocations to meet the housing need including a mixed use policy for the former airport site.
Consultation also includes infrastructure matters, the Sustainability Appraisal and Local Green Space.

What happens next?
Draft the final Plan for submission.
Pre-submission consultation.
Submission to Secretary of State.
Examination - Where an inspector will consider whether the plan has been positively prepared, and that its policies are justified, effective, pass the legal tests and are in conformity with government guidance.
Adoption of the Plan
Following the examination the inspector may recommend changes to the plan. At this stage a further consultation will be carried out.
The council will then adopt the Thanet Local Plan which will become the statutory plan for Thanet to 2031.

Further information

The Strategic Planning Team is here to help you understand the plan and facilitate the consultation. Additional information can be found on the Local Plan pages of the council's website and the team will be available to talk to you by telephone and email.

We are also holding a number of public engagement sessions throughout January and February where you can meet the team and ask questions.

The sessions will be taking place on:

Date	Time	Location
Saturday 28 January	9am to 12pm	The Thanet Gateway Cecil Street Margate, CT9 1BE
Friday 3 February	9am to 12pm	The Kent Innovation Centre Thanet Reach Business Park, Millennium Way, Broadstairs, CT10 2QQ
Monday 6 February	9am to 12pm & Tuesday 14 February: 1pm to 4.30pm	Custom House, Harbour Parade, Ramsgate, CT11 8LP
Wednesday 15 February	9am to 12pm	King Ethelbert's School Canterbury Rd, Birchington, CT7 9BL
Friday 17 February	1pm to 5pm	The Kent Innovation Centre
Thursday 23 February	5pm to 8pm	The Thanet Gateway

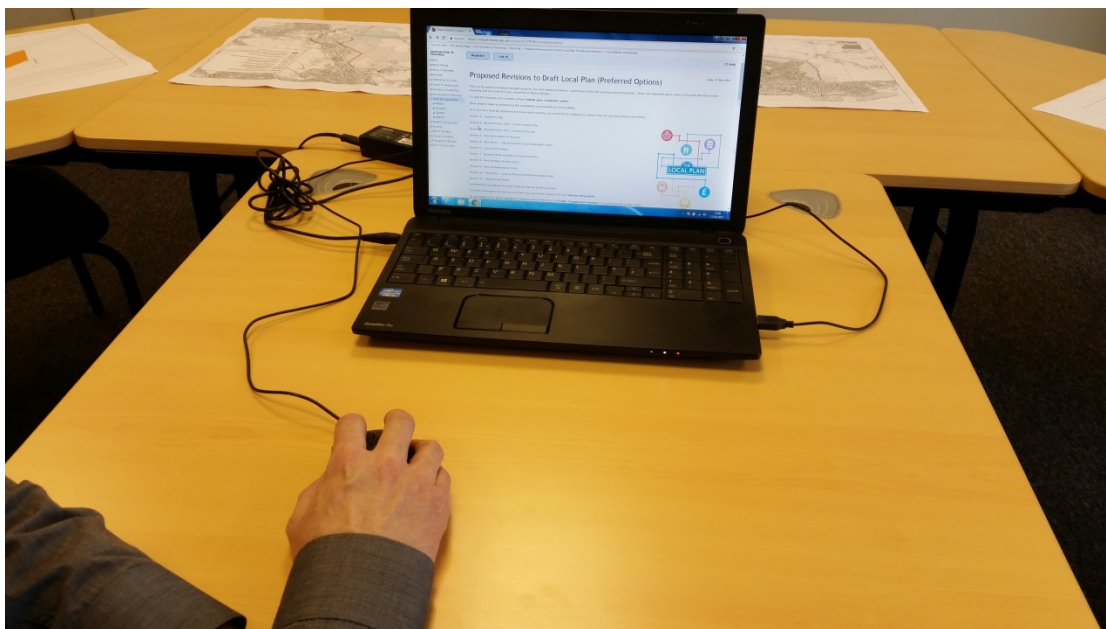
local.plans@thanet.gov.uk 01843 577591 consult.thanet.gov.uk

Drop-in Sessions and Boards

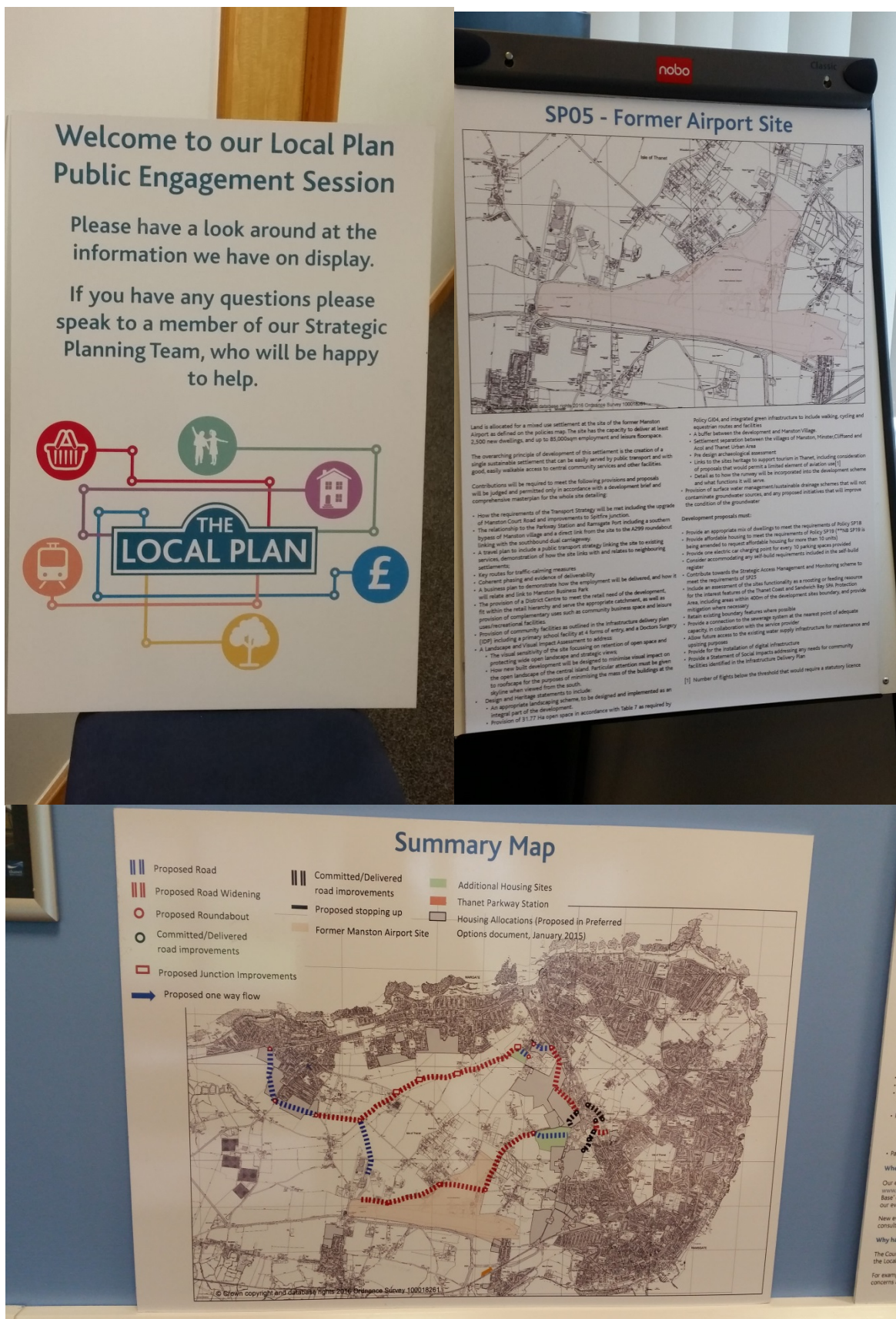
Kent Innovation Centre



Laptop set up with online consultation to help visitors comment online



These boards were displayed at each of the sessions:



Strategic Policy - Land at Manston Court Road/Haine Road



Land is allocated for a mixed use development, comprising up to 700 new dwellings at a maximum density of 30 dwellings per hectare net, and leisure use. This allocation adjoins other sites allocated for residential development (strategic sites S141, S511, S553 & S447 and other housing sites S535 & S549). Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site integrating with development at the adjoining sites. The Masterplan shall incorporate:

1. Contributions to highway improvements identified in the Transport Strategy
2. A minimum of 9 ha of open space in accordance with the standards set out in Table 7

Phasing of development will be in accordance with the amendments to Appendix B.

Masterplanning shall:

- Provide an appropriate mix of dwellings to meet the requirements of Policy SP18
- Provide affordable housing to meet the requirements

of Policy SP19 (**NB SP19 is being amended to request affordable housing for more than 10 units)

- Provide one electric car charging point for every 10 parking spaces provided
- Consider accommodating any self-build requirements included in the self-build register
- Contribute towards the Strategic Access Management and Monitoring scheme to meet the requirements of SP25
- Include an assessment of the sites functionality as a roosting or feeding resource for the interest features of the Thanet Coast and Sandwich Bay Special Protection Area, including areas within 400m of the development sites boundary, and provide mitigation where necessary
- Retain existing boundary features where possible
- Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider
- Allow future access to the existing water supply infrastructure for maintenance and upzipping purposes
- Provide for the installation of digital infrastructure
- Provide a Statement of Social Impacts addressing any needs for community facilities identified in the Infrastructure Delivery Plan

HO2 Additional Site - Land at Manston Road/Shottendane Road, Margate



Land is allocated for up to 250 dwellings at a maximum density of 35 dwellings per hectare net at Manston Road/Shottendane Road. Phasing of development will be in accordance with the amendments to Appendix B. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site. The masterplan should be informed by a transport assessment and travel plan including an assessment of impact on the local road network and demonstrating measures to promote multi-modal access. Development will incorporate and provide for highways improvements identified in the Thanet Transport Strategy.

Master planning will:

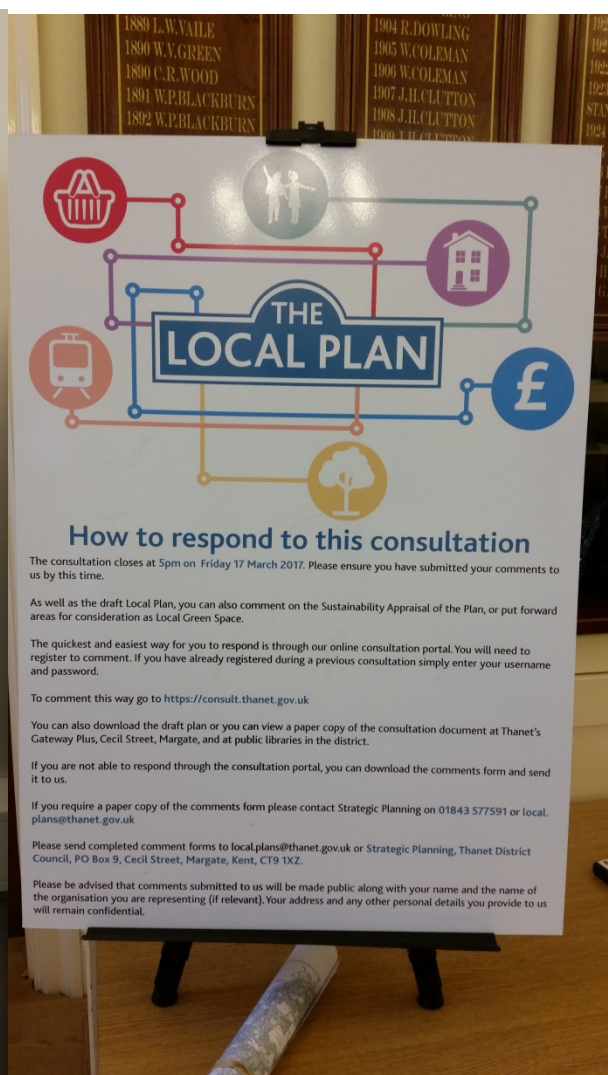
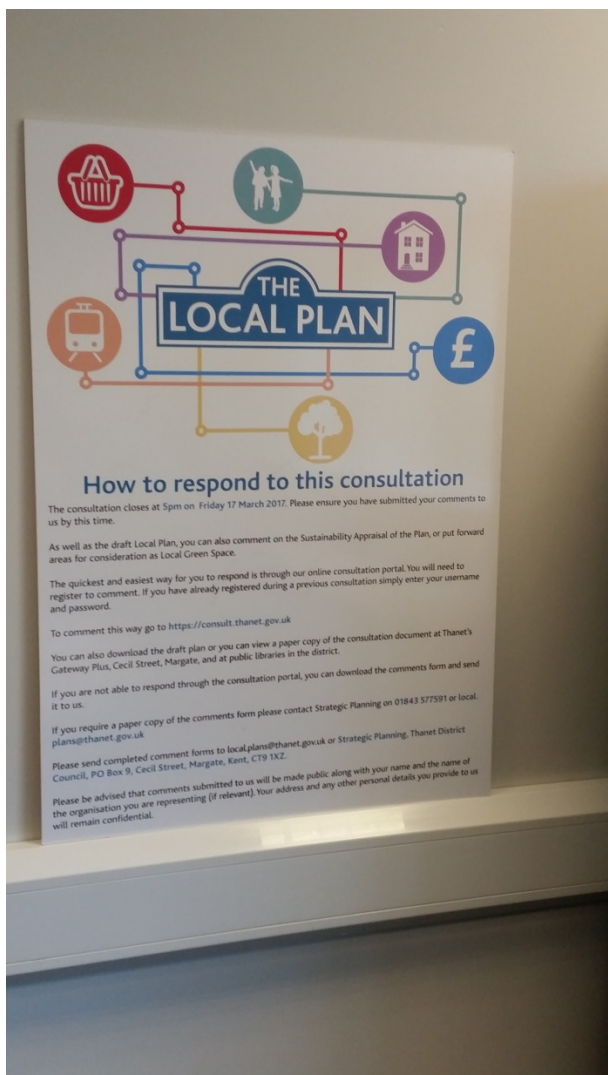
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- Provide affordable housing to meet the requirements of Policy SP19 (**NB SP19 is being amended to request affordable housing for more than 10 units)
- Provide one electric car charging point for every 10 parking spaces provided
- Consider accommodating any self-build requirements included in the self-build register

• Contribute towards the Strategic Access Management and Monitoring scheme to meet the requirements of SP25

- Include an assessment of the sites functionality as a roosting or feeding resource for the interest features of the Thanet Coast and Sandwich Bay Special Protection Area, including areas within 400m of the development sites boundary, and provide mitigation where necessary
- Retain existing boundary features where possible
- Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider
- Allow future access to the existing water supply infrastructure for maintenance and upzipping purposes
- Provide for the installation of digital infrastructure
- Provide a Statement of Social Impacts addressing any needs identified in the Infrastructure Delivery Plan.
- Disposition of development and landscaping will be expected to enable a soft edge between the site and the open countryside

Thanet Parkway





THE LOCAL PLAN

Frequently asked questions



Former Manston Airport Site

Why is the council proposing a change of use for the former airport site?

The council must set out planning policies within its Local Plan that are based on evidence.

Within the current Local Plan the Manston Airport site is designated for 'aviation use only'.

To continue with this designation in its new Local Plan, the council would have to provide evidence to the independent planning inspector appointed by the Secretary of State for Communities and Local Government, that a future airport could be viable.

The council commissioned Axa (an aviation management consultancy) to produce a report on the financial feasibility of operating Manston Airport as a standalone entity.

The report concluded that the reopening of an airport would be unviable.

What does this mean?

It means that the council does not have sufficient evidence to continue to designate the site for aviation use only within its Local Plan.

The proposed revisions to the Local Plan indicate that the Manston Airport site is designated for mixed-use development.

Where can I find more information on the former Manston Airport site?

More information can be found at thant.gov.uk



Transport

Where is the new link road going to go that extends from Minors Road and the A28?

The draft Plan is not prescriptive about the specific location or alignment of a new road link, but it does show a general line for the new roads, under the New Strategic Routes Policy.

This would be a matter to be considered when any planning application is received.

When is this likely to happen if approved?

Planning for this is still taking place and is included in the Infrastructure Delivery Plan.

Roads are already at capacity. 17,000 households will add to the problem. What plans are there to deal with this?

We are working with KCC Highways to prepare a Transport Strategy, which is likely to be published later in the year. A key element of the Strategy is the Inner Circuit, which seeks to relieve pressure on the existing road network. This is a proposal in the Proposed Revision consultation. Detailed schemes will be drawn up at the planning applications stage and advice will be sought from KCC as the highways authority.



Environment

Thant is already a water stressed area – will there be enough water for all of these new houses?

The council has been working with Southern Water to make sure that they provide water and sewage facilities for the predicted growth included in the draft Local Plan. We will continue to work with them throughout the process, and our draft Local Plan has informed their business plan so they can ensure our growth needs are met.

The council is also proposing (through these revisions) to implement higher water efficiency requirements in new development.

Why are there 17,000 houses but only 5,000 proposed jobs? There is high unemployment here – won't this make it worse?

The level of housing proposed is 17,000 new homes over the 20 year period to 2031. Housing numbers are not determined by jobs numbers alone, and so there is not a direct relationship between homes and jobs. This figure takes account of both the homes needed to accommodate changes in the existing population together with some in migration including homes for the additional labour force associated with the target of 5,000 additional jobs.

Homes are required to reflect new households forming as younger people leave the family home (where some will already have jobs), people retiring to the area and people moving into the area (some of whom already have jobs).

Where are these jobs coming from?

Experiences carried out employment forecasting for the council. The report showed that there is already strong growth in the tourism and green sectors of the economy and this is likely to continue. There is also strong cultural, retail and public administration professions.

Most of these jobs are likely to arise in smaller numbers across a large number of companies, rather than a lot of jobs in a small number of companies. The council has recently adopted a new Economic Growth Strategy which will support this.

Why are you focussing retail development at Westwood?

Thant's town centres all perform different and complementary functions and retail development is supported at all of them.

The Local Plan does not propose to expand Westwood beyond its existing boundaries.

THE LOCAL PLAN

Frequently asked questions General

Why do we need a Local Plan?

The plan shows how Thant will develop over the next 20 years and sets out how much development is needed to support the future population and economy. The Local Plan will give Thant District Council greater control over where and what type of new developments can take place.

The plan must be based on evidence from a number of studies covering a wide range of subjects and take account of national policy.

When will we know more detail on layout of the developments?

The Local Plan allocates land for potential development. The detail of what will be built will come at the planning application stage when a developer proposes a scheme. Their proposals will need to include the requirements of the relevant policy in the Local Plan. The council will consult with residents and other stakeholders on the planning application before it is decided.

What communication has there been about this consultation?

The following is being carried out to publicise the consultation:

- Seven public engagement sessions
- Press releases and press briefings
- Adverts in the Thant Gazette (circulation approx. 9,000) and in the KM Extra (circulation approx. 30,000)
- Twitter and Facebook posts to promote the consultation and public consultation sessions
 - Thant District Council Twitter – 6,331 followers
 - Thant District Council Facebook – 1,849 followers
- Facebook advertising
- Email to business networks
- Emails and letters to people registered on our planning consultation database
 - Approx. 1,300 contacts
- Posters and leaflets have been sent to:
 - Parish Councils
 - Libraries
 - Council Offices
 - Thant Gateway
- Parish Council and other organisation/group briefing session

Where can I find the council's supporting evidence?

Our evidence base to date can be found on the council's website at www.thant.gov.uk/localplan by clicking the square marked 'Evidence Base on the left hand side. (As this is an informal consultation some of our evidence base is still being prepared.)

New evidence supporting this consultation can be found on the Council's consultation portal.

Why haven't you taken my previous comments into account?

The Council does try to take people's concerns into account in preparing the Local Plan.

For example, at the last stage of consultation, people raised a lot of concerns about the provision of infrastructure – education, health,

utilities, transport, etc. Although the council is not directly responsible for a lot of these matters, it has been working actively with the various service providers to try to ensure that the necessary services are provided alongside new development.

However, like all planning authorities, the council is to some extent limited in terms of the changes it can make to its Plan. This is because it must follow national government guidance in order to ensure that the Local Plan is accepted through the Independent Examination process. An independent inspector looks at the Plan to make sure it is "sound", which means:

- **Positively prepared** – seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives
- **Effective** – the plan should be deliverable and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should be consistent with the policies in the National Planning Policy Framework and the Planning Practice Guidance

So, for example, the overall housing numbers that the council needs to find are determined by a specific formula in national guidance, and it is expected that councils will prepare Plans that meet those housing requirements. This means that objections relating to housing numbers have to be considered in this context. It is not open to the council to simply ignore those housing numbers.

What does this consultation cover?

This consultation is only focusing on the changes which have been made since the 2015 Preferred Options consultations. These include:

- The housing provision over the plan period is 17,140 homes – about 7,800 either already built, with planning permission, empty homes or "windfalls" – the draft Plan only needs to find 9,300 additional homes.
- The airport site is proposed as a site for mixed-use development – housing, employment and leisure together with new local facilities and infrastructure.
- Other new housing allocations are proposed at Westwood (with mixed leisure uses) and Shottenden.
- Identification of key road schemes to be provided to create a new "Inner Circuit" to relieve pressure on the existing road network.
- To invite proposals for sites to be considered as Local Green Space within the Local Plan.
- Amended location for the proposed Thant Parkway station
- Proposals for adopting new national technical standards in relation to water efficiency, internal space standards and accessible and adaptable accommodation.

Frequently asked questions



Housing



What will happen if we don't plan for more houses? Why can't we just say no?

If the council does not allocate land for houses, developers could apply for planning permission to build houses anywhere and it would be difficult for the council to refuse these applications

How are housing numbers determined?

There is a methodology set out in Government guidance, which councils have to follow to calculate their "objectively assessed need" for housing. This takes into account likely population change, any additional requirement arising from economic requirements, household size and other factors. Population projections are undertaken by the Office for National Statistics (ONS) and household projections by the Department for Communities & Local Government (DCLG), and these form the basis for calculating the housing requirement.

Why have housing numbers gone up to 17,140?

In 2016, a new set of household projections were published by the government, which meant that the Council had to recalculate its housing requirement based on the new figures.

What about Brexit? Won't that reduce housing requirements?

At this point, it is impossible to say what the impact of Brexit will be on housing numbers, as there are many factors to be considered. Once the Brexit process is finalised, we will be clearer about how housing figures might be affected. This would need to be addressed in a future review of the Local Plan.

Who will be living in the houses once they are built? Could they be filled by people from outside the area?

In this Local Plan, the council is not planning to meet the housing needs of other areas. However, it is not possible to be precise about how many residents of the new housing market will be Thanet residents. In terms of affordable housing, the council has a policy of requiring new development to provide 30% affordable housing. The council is able to nominate people for the affordable housing from its own housing register. In 2013, the council closed its housing register to people outside Thanet. The nominations are based on the council's policy of prioritising people with a local connection of three years or more.

Is the council allocating areas of precious, prime agricultural land for housing development that should be used for growing food?

In developing the Local Plan we have tried to allocate as much housing on brownfield or developed land as possible.

However this still leaves a shortfall in the amount of houses required, which means we have had to also look at allocating greenfield or undeveloped land for possible housing developments.

It is anticipated that about 40% of the planned homes in the draft Plan would be on brownfield land.

Unemployment is high in Thanet, we need industry not houses, how will this be addressed?

Government's National Planning Policy Framework requires us to objectively assess future housing requirements and meet them. The level of provision in the Draft Plan has been informed by a range of forecasts taking into account past trends and potential employment growth.

The Plan also contains measures to accommodate employment growth. The council has recently adopted a new Economic Growth Strategy which will support this.

A significant part of the future housing requirement relates to the needs of the District's existing population such as young people who will come to need a home of their own.

What is the council doing to stop Thanet being turned into a large housing estate?

The Local Plan allows us to control where and how many houses are built in Thanet. Without the Local Plan it would be harder for us to prevent development in non-allocated areas.

The Local Plan aims to safeguard the individual identity and essential separation of individual towns and villages.

How will the council ensure that the new developments in rural areas do not result in existing villages losing their identity?

The Local Plan includes further information about how we have decided on the development in rural areas. Please see paragraphs 11.11-11.15 of the draft Plan.

What is the criteria used to identify/assess potential housing sites?

A range of criteria is applied and these are identified in our Strategic Housing Land Availability Assessment and Strategy for Planned Location of Housing. These include, for example, potential for flooding, archaeology, transport considerations.

What are the plans to improve infrastructure for the proposed housing sites: Doctors, Dentists, Schools, roads etc.

The council is working with the agencies responsible for delivering medical services, schools and transport infrastructure on an ongoing basis.

The Council has published a working draft Infrastructure Delivery Plan (IDP) as a background document to this consultation.

The draft IDP covers a range of infrastructure (including transport; education health and utilities), but a lot of work with key stakeholders and service providers is still ongoing to try to ensure that infrastructure is provided alongside new development.

We bought a house recently why didn't the search pick the housing allocation up?

The Local Plan is still only a draft so the sites which we propose for allocation will not yet show up on your search.

Why can't all the empty properties be used for new housing instead of finding new sites?

This is based on the position that such housing is returned to the market, almost as if it were new housing stock. It is believed that the Local Plan can include in the housing land supply 540 units for the Plan period arising from empty properties being brought back into use.

The council works vigorously to bring empty property back into use, and has an active Empty Homes programme. The council can count some empty homes as part of the housing supply, if:

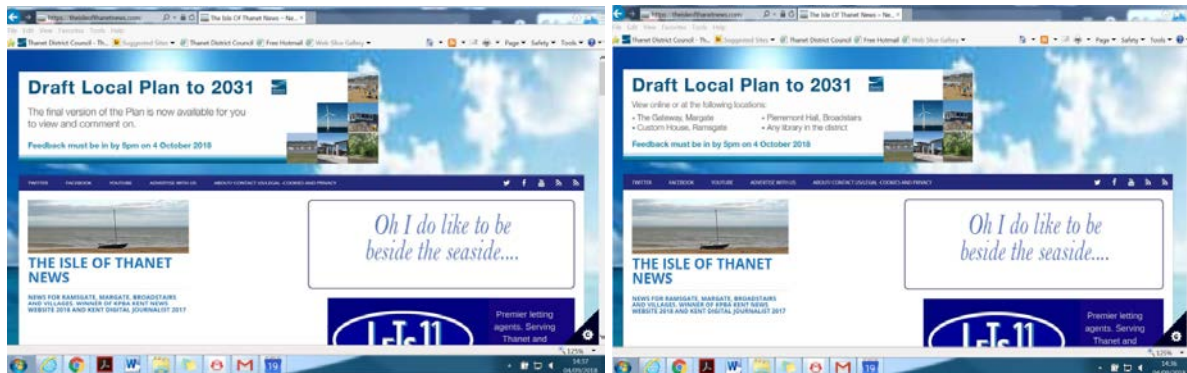
1. The properties in question have been empty for a period of four years or more

This is based on the position that over that period it can be argued that those properties have been vacant and unused for such a long period that they are no longer available in the housing market and therefore not part of the active housing stock; and

2. The council has an active and robust programme for bringing those properties back into use.

Pre-Submission Publication, Regulation 19 – 23rd August – 4th October 2018

Isle of Thanet News (online) – rolling screens – shots taken 4th September 2018



Press Adverts:



Help to kick off your own business

There's a new business start-up scheme in Kent, aimed at helping people to kick off their own business. A free-to-use online tool is available to help people to start their own business. It's called the Kent Business Start-up Scheme.

It is part of the Kent Business Start-up Scheme, which is a free-to-use online tool. It is aimed at helping people to start their own business. It is called the Kent Business Start-up Scheme.

The Kent Business Start-up Scheme is a free-to-use online tool. It is aimed at helping people to start their own business. It is called the Kent Business Start-up Scheme.

Isle political map could face change

By Katie Davis
 katie.davis@kentonline.co.uk

There's a possibility that the political map of the Isle of Thanet could be changed in a boundary review. South Thanet and North Thanet could be merged and replaced with East Thanet and South Thanet.

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How the political map in Kent could change

There's a possibility that the political map of the Isle of Thanet could be changed in a boundary review. South Thanet and North Thanet could be merged and replaced with East Thanet and South Thanet.



Craig Mackenzie and Sir Roger Gale

Draft Local Plan to 2031

The final version of the Plan is now available for you to view and comment. You can access the document and provide your comment online at thanet.gov.uk/localplan from Thursday 23 August until 5pm on 4 October 2018. You will also find copies of the plan in any of the following locations:

- The Gateway, Margate
- Custom House, Ramsgate
- Pleasant Hall, Broadstairs
- Any library in the district

What is the pre-submission stage?

- The Local Plan has now been approved by the council.
- Any feedback you give will be sent to the Planning Inspector, who could invite you to speak at the public examination.
- Previous feedback you may have already submitted is not carried over. If you want the Planning Inspector to see your comments, you must provide them at this stage.
- Your comments must be based on evidence.

Feedback must be in by 5pm on 4 October 2018



Appendix 3 – Headlines and actions from Issues and Options Consultation

1 – What level of growth should be planned for up to 2031?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was no overall clear consensus but the higher economic growth scenario was the most frequently selected answer	Tourism and the green economy alone will not deliver the growth. We need a wide economic base including manufacturing	Agree. It is a requirement of the NPPF to identify and plan for new and emerging sectors of the economy and evidence shows that tourism and the green sector fall in to this category. Thanet has traditionally been strong in the public sector administration, education and health as well as retail and growth within these sectors will also form part of the plan's economic strategy. 8% of Thanet's employees work in manufacturing equating to over 3000 jobs and so it is important to protect and support those businesses and maintain an adequate supply and choice of employment land.	Allocate and provide the policy framework to support all economic growth anticipated within the plan period. Protect and safeguard existing employment uses and apply a flexible policy approach in order to accommodate employment generating growth that has not been anticipated.
	The airport has not delivered growth in the past	Agree, there is continuing uncertainty at the airport. Some growth is anticipated over the plan period but the strategy for economic growth should not rely on this.	Positively plan for growth at the airport by safeguarding land for airport related use.
	Economic growth should not be at the expense of the natural environment	Agree, Thanet has a rich bio diverse environment. A quality attractive environment is key to economic growth and it is a strategic priority to safeguard this.	The plan as a whole will make provision for protecting the environment and seeks to strike a balance between economic growth and protecting the

			<p>environment by having policies that protect local, national and international nature conservation designations and protecting the open countryside.</p> <p>In addition, all draft policies will be subject to Habitats Regulations screening to ensure there is no likely significant impact on nature conservation designations.</p>
	Transport infrastructure is vital due to the peripheral geography of the district	Agree, good transport connections are vital for economic growth. This includes both connectivity within the district and transport links to further afield.	Provide pro active support in the Transport sections of the plan for transport and improvements to connectivity including new rail infrastructure and ensuring sufficient capacity on the strategic road network
	Discovery Park will have an effect on employment growth in Thanet	Agree, this may have an effect on the level of employment land take up in Thanet. However, having an enterprise zone so close to the District boundary could have a positive effect on business start ups and enterprise and expanding businesses may be interested in Thanet's nearby employment land.	Acknowledge Discovery Park's role in the employment land allocation strategy and ensure there is sufficient land and flexible policies to take advantage of knock on effects.
	The airport may compromise investment in the tourism and green economy	There is no evidence to suggest this. Tourism and the green economy are currently strong and their continued growth is supported by the Council and is a	Support the tourism and green economies by being flexible and not just supporting tourism uses in town centres and allocating adequate land to support the

		strategic objective of the plan.	green economy. Airport policies will also contain criteria to protect the environment.
	Quality of jobs need to improve to bring up wage levels. Need to improve skills and training	Agree and consider that improving education and skills is a key part of the economic strategy in order to attract and provide for a range of good quality employers.	Support the expansion and upgrade of education and skills facilities including new and expanding schools and give support for the University.
	Thanet is a retirement area but this creates jobs for others	Agree. The health and social care sectors of the economy are currently strong and the Council is supportive of further job growth in these areas.	Local Plan to acknowledge this in the economic strategy
Most people agreed or strongly agreed that there should be additional employment growth at the airport although a fair amount disagreed	Airport is unviable and in a peripheral location. A wait and see approach is advised.	Partially agree. The economic growth strategy of the Local Plan should not rely on the airport given the uncertainty over its future, however, as some growth is feasible over the plan period according to The Economic and Employment Assessment 2012 then it should be planned for in order to meet the requirements of the National Planning Policy Framework.	An element of growth at the airport should be planned between low growth and high growth. A review of the plan should be triggered if the airport grows substantially.
	Infrastructure needs to be improved including road infrastructure	Agree that supporting infrastructure is important to the economic growth strategy in the Local Plan	Support development of a new station that serves commuters and the airport, continue policy support for the airport subject to criteria and ensure sufficient capacity on the strategic road

			network. Provide support for improved communications infrastructure. These projects will be considered through the infrastructure delivery plan.
	Impact on wildlife such as farmland birds	Agree that this is an important consideration	Local Plan will state that any development at the airport should not be detrimental to wildlife and particularly the European designated sites and that any effects will be adequately mitigated.
	Noise and night flights	Agree that this is an important consideration	A section 106 agreement with the airport dealing with this issue is in place and will be replaced if necessary.
	Manston airport is an underutilised resource	Agree. Predicting how the airport will develop is difficult but as it is a significant piece of infrastructure with potential, an element of growth should be planned for in the Local Plan timeframe.	An element of growth will be planned for at the airport over the airport above the low growth scenario.
	Airport growth would be a stimulus to the local economy with positive knock on effects for other business	Agree, that there is potential for growth and knock on benefits within the Local Plan timeframe.	An element of growth will be planned for at the airport over the airport above the low growth scenario.
	Climate change issues may lead to less air travel in the future	There is no evidence to suggest this. There is demand for increased capacity at the main UK airports	
The majority of people opted for the airport low growth option	Based on past performance at the airport a cautious approach	Agree, the future of Manston airport is uncertain and therefore	An element of growth should be planned for over the plan period

which plans to deliver 240 jobs over the plan period. The remaining responses were evenly spread between high growth and no growth	should be taken	predicting growth is difficult.	but high growth is not assumed
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2 – How much employment land is needed and where?			
Headline views	Issues Raised	Council Response	Action in Local Plan
Most either agreed or had a neutral opinion about whether we should provide the amount of employment land that evidence suggests.	Allocations should reflect the evidence that only 30% of future employment growth is expected to be within the B use classes	Agree. Adequate allocations should reflect the Council's aspiration for high economic growth. As much of the growth is in sectors outside the traditional industrial a flexible approach is needed.	Employment land allocation strategy will be flexible and accommodate growth that is not necessarily from the industrial sectors. Town centres secondary frontages will also accommodate a wide range of employment uses
There was no consensus on whether we should include an additional amount of employment land as a buffer	We should use the employment land we currently have allocated before we allocate any more and that there is little demand for more floorspace within the plan period	Agree, the NPPF states that the long term protection of employment land should be avoided where there is no reasonable prospect of the land being used for that purpose. Therefore a review of existing employment land has been carried out.	Sites should be selected from our current supply and no further employment land should be allocated
When asked if we should consider using some existing allocated land for alternative purposes most people either agreed or had a neutral opinion.		Agree, the NPPF states we need to provide for all types of employment and evidence suggests that 70% of growth to the end of the plan period will be in the non B use classes	Some employment land should be allocated for flexible uses given the evidence that suggests only 30% of employment growth will be in the B use classes
No clear consensus was recorded when considering whether we should maintain the existing supply of allocated employment land	There were concerns regarding over development and increased road use if we allocate more employment land	Agree. Evidence suggest that our existing employment land supply can accommodate employment growth to 2031	Sites will be selected from our current supply and no further employment land should be allocated for employment use
	We should consider other	Agree. Evidence suggests 70% of	Support home working through a

	employment generating uses such as home working, arts, leisure, tourism and education uses	employment growth will be in the non B use classes	policy. Support arts leisure and tourism uses in town centres, on specific sites and through criteria based policy. Support education development in the plan
When asked whether we should provide a variety of sites in a range of locations across the District most people agreed. Most people disagreed with the statement that suggested we should provide all employment land in a single location or cluster.	It should be recognised that some employment land will need to be located outside the built settlements	Agree, evidence suggests that we require a range of employment sites in different locations and indeed some uses are incompatible in the built confines. In addition the NPPF requires us to support the rural economy and therefore some employment land will need to be allocated in appropriate locations outside the built settlements.	Employment sites will be allocated in a variety of locations with different functions responding to need arising over the plan period and in accordance with the employment land allocation strategy.
	Sites should be provided within the town centres and villages.	Agree, evidence suggests that we require a range of employment sites.	Employment sites will be allocated in a variety of locations with different functions from the existing supply. There will be policies to facilitate economic development in the rural area. Town centre policies will also facilitate economic development. Some additional sites were submitted – see Employment land review Update appendices
Most people agreed when asked if Thanet's need for employment land can be accommodated by a selection of sites from the existing supply	The current oversupply of employment land could be used for housing land, green open space or reverted back to farmland	Agree. An assessment has been made of the existing employment land supply based on current evidence and those considered surplus to requirements may be	Land that does not positively contribute to the employment land allocation strategy is being released and considered for alternative uses.

		released for alternative uses.	
Most people agreed we should be flexible and allow other employment creating development on our business parks.	Local economies are likely to change over the next 15 years so we need to be flexible and reactive. Uses that are allowed on employment sites should be relaxed to help local businesses	Agree, the NPPF says we should plan for all types of employment growth over the plan period.	Some employment land will be allocated for flexible uses given the evidence that suggests only 30% of employment growth will be in the B use classes
The majority of people agreed that we should protect the existing developed employment sites which are currently protected in the Thanet Local Plan 2006	Protecting employment sites is important to sustain high employment growth and so that Greenfield land is not required.	Agree, it is important to safeguard existing employment stock and protect land that contributes positively to the economic strategy, for future employment use based on up to date assessments of need.	A generous amount of employment land will be retained to accommodate need in the plan period based on evidence and building in an element of contingency. Given the amount of land available compared to the employment need there is no need to protect all sites and some that do not contribute positively to the employment strategy should be considered for other uses.
	Given new change of use flexibilities for B1 uses de-allocating sites could leave them open for inappropriate development	Protecting sites will not stop this permitted development occurring. Therefore, adequate land should be provided to accommodate losses to other uses and to facilitate flexible uses on some of our employment sites.	An adequate amount of employment land will be retained/protected and allocated to allow for a wide range of uses and to allow for an element of contingency.

3 – How can we promote our Economic Infrastructure Assets?			
Headline views	Issues Raised	Council Response	Action in Local Plan
Most people agreed that we should continue to support the development, expansion and diversification of the airport subject to environmental criteria. As well as protecting particular land for airport related development	This would make Thanet a hub rather than a peripheral area and would benefit the whole economy	Agree, although the future of the airport is uncertain there could be potential for some growth.	A positive policy generally supporting the continued use and development at the airport will be included in the plan.
	If we don't exploit the potential then we are missing an opportunity as it is an underutilised resources and a convenient alternative to the London airports	Agree, that the airport has some potential although its future is uncertain.	A positive policy generally supporting development at the airport will be included in the plan.
	Projections in the airport masterplan have been overambitious and the airport has not been successful at attracting growth in the past.	Agree, the Council is not basing its economic growth strategy on the airport masterplan as growth predictions have not been realised.	The Local Plan is cautiously planning for an element of growth around the airport but not the high growth scenario. High growth at the airport would trigger a review of the plan
	The airport is not viable due to its limited catchment	No evidence has been submitted to suggest this	
	Concerns over the effects of noise and disturbance particularly night flights	Agree this is an important consideration	There is a section 106 agreement with the airport concerning night flights.
	Concerns over air pollution, groundwater quality and wildlife impacts of airport expansion	Agree this is an important consideration and intensification of airport uses could have a negative effect on air and	Local Plan will state that any development at the airport should not be detrimental to wildlife and particularly the European

		groundwater quality and Thanet's nature conservation	designated sites and that any negative effects should be sufficiently mitigated against. The plan will also contain an environment and quality of life section with policies to protect wildlife and deal with pollution issues.
	Designations should be relaxed to allow for other employment generating uses.	Disagree, the Council generally supports an airport and other employment generating uses in the central island area.	Positive policies supporting such uses will be included in the plan compatible with the airport.
There was no clear consensus when asked whether we should provide a new station designed to serve commuters and/or the airport. Generally people agreed that we should increase the use of existing stations, including providing increased capacity at Ramsgate Station.	A parkway station would make Manston airport more viable	Agree, decreasing journey times to and from Thanet and generally improving the area's rail infrastructure would be of benefit to the whole economy.	General support will be given through the Local Plan for a new railway station decreasing journey times, improving Thanet's rail infrastructure and increasing the potential catchment of the airport.
	The parkway station would be expensive and would be of detriment to other existing stations in Thanet.	Commitment to the funding for Parkway station will be determined outside the Local Plan process. There is still a need for existing stations and it must be ensured that the parkway is complementary to existing stations	Include transport policies supporting public transport and connectivity
	Concern that it will draw people away from town centres and a	There is no evidence to suggest this. The Council is supportive of	Generous primary and secondary frontages along with seafront

	shuttle bus for this was suggested	the vitality and viability of the town centres and linkages between them.	areas of tourism and leisure will be allocated to support vitality and viability of the town centres and attract people to these hubs. In addition the plan supports connectivity by public transport as well as promoting walking and cycling. Include transport policies supporting public transport and connectivity
	The parkway is not needed until the airport is successful otherwise it may become a car park	Given the uncertainty over the future of the airport it is important not to base the plan's economic strategy on its growth. Evidence suggests that the station is needed to address current capacity issues on the rail network. A new station would have wider benefits for Thanet's economy and not just growth at the airport.	
	Concern about the effects of land take with a parkway station and the environmental impacts of this in a countryside location	A balance needs to be struck between the economic and social benefits of the station and its impact on the immediate environment.	Add criteria to protect landscape character and best and most versatile agricultural land.
	Better links are needed between stations and between the stations and the town centres	The Council is supportive of the vitality and viability of the town centres and linkages between them.	Generous primary and secondary frontages along with seafront areas of tourism and leisure will be allocated to support vitality and viability of the town centres and

			attract people to these hubs. In addition the plan should support public transport and connectivity as well as promoting walking and cycling
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4 – How should Thanet’s town centre’s develop?			
Headline views	Issues Raised	Council Response	Action in Local Plan
Most agreed that the coastal towns should adopt a stronger role in providing convenience shopping as this is beneficial for communities and reduces the need to travel	Concern that convenience at the coastal town centres should not be in the form of large supermarkets and that they should be at the appropriate scale	People should not have to travel far to access everyday convenience needs	Adequate space in the town centres will be provided to accommodate convenience shops and provide opportunities to better balance convenience provision across the District
	Large supermarkets should be “within” the town centres to increase footfall in the towns	Agree, it is important that we protect and enhance the vitality and viability of the town centres in accordance with the NPPF.	Convenience uses will be permitted both in the primary and secondary frontages of the town centres and elsewhere only in accordance with the sequential test policy.
When asked if we should plan for a level of development at Westwood which would maintain its existing market share most people either agreed or had a neutral opinion		Agree, Westwood is a successful and thriving town centre serving the catchment of the whole of Thanet and it is a strategic priority of the Council to support this role. There is no justification for further growth other than to maintain its position in the retail hierarchy.	An element of development will need to occur if market share is to be maintained. This will be accommodated largely within existing town centre boundary.
No clear consensus for the option of planning for additional growth at Westwood to increase its market share	Concern about the effect on the coastal town centres of increasing the market share at Westwood	Agree, consultation with retailers suggests that there is no need to increase the market share and therefore development at Westwood will not affect the coastal town centres	Plan for a constant market share which will involve an element of development. Plan positively for development and urban renewal in the coastal town centres by designating existing vacant frontages in order to support their vitality and viability.
	Problems of traffic congestion	Agree, however there are	The plan will seek to ensure that

	may be exacerbated if there is more development at Westwood	mitigation measures in place to address this. Development in the vicinity of Westwood should contribute to a Westwood relief scheme. Future committed development at Westwood has contributed to improved traffic solutions and there is no need to plan for major additional growth.	development in the vicinity of Westwood should contribute to a Westwood relief scheme.
	Support for further expansion at Westwood	Agree, growth needs to happen in order to maintain the current retail hierarchy and Westwood's role in the wider sub region.	An element of development will need to occur if market share is to be maintained. This will be accommodated largely within existing town centre boundary
A range of views were recorded when asked what uses should be planned for in Westwood, Margate, Broadstairs and Ramsgate. Most thought there should be a range of facilities in all towns	Westwood Cross lacks financial and professional services such as banks	Agree. Adequate vacant floorspace exists at Westwood to accommodate such uses	Allocate town centre boundaries to accommodate wider town centre uses
	Cafes and restaurants should be encouraged in the coastal town centres along with financial and professional services to a lesser extent	Agree. Adequate vacant floorspace exists to accommodate such uses except in Broadstairs where some flexibility will be required.	Allocate town centre boundaries to accommodate wider town centre uses.
	The coastal town centres should contain a greater range of facilities to remain competitive and attract tourism	Agree, it is important for the town centres vitality to contain a wide range of uses. It is appropriate to maintain a retail core to the town centres with a much broader range of uses within the wider	Adequate primary and secondary frontages will be identified to accommodate a range of uses

		town centre.	
	No A2, A3, A4 or A5 facilities should be provided at Westwood	This is not realistic as the uses described are town centre uses as allowed by the National Planning Policy Framework. It is a strategic priority to consolidate the role and function of Westwood as Thanet's primary town centre and therefore a range of uses is needed to support the commercial and residential communities in the vicinity.	
	Some thought there was an adequate mix of uses in all town centres		
There was strong agreement that we should be flexible in our towns to enable leisure development	Leisure development could re-energise the town centres making them more viable, encourage tourism and increase footfall	Agree, leisure development is a town centre use and is important to Thanet's economy.	Adequate primary and secondary frontages will be identified to accommodate a range of uses
	Flexibility should not be afforded to gambling establishments	Amusement centres and betting shops are town centre uses and cannot be restricted under current legislation	
	The most appropriate locations for leisure development is the seafront areas and specific sites leaving the town centres for retail use	Agree that seafront areas and non town centre sites can be appropriate for leisure development in some cases. It is important to maintain a retail core in the town centres	Key sites should be identified for leisure development and the sequential test for town centre uses should look at edge of centres and business parks where development cannot be accommodated within town centres. The primary frontages should be restrict to retail use

			only.
In Margate and Ramsgate the existing vacant floorspace should be used to accommodate the need for town centre uses.		Agree, both Margate and Ramsgate have substantial town centre vacancies	The primary and secondary frontage designations will mostly cover the vacant frontages in order to direct town centre development to these areas.
There was general agreement that at Westwood the existing retail areas could be used to accommodate the need through redevelopment and reconfiguration		Agree, there are large areas of parking that could be redeveloped and there is the potential for mezzanine floorspace in some buildings. There are also significant existing commitments at Westwood.	An element of town centre retail development will need to occur if market share is to be maintained. This will be accommodated largely within existing town centre boundary
There was general disagreement or neutral opinions for the option of accommodating the need for Broadstairs on the edge of the town centre or at Westwood Cross due to insufficient space		Town centre need for Broadstairs has to be accommodated over the plan period. If it is located in an area outside Broadstairs town it may harm the vitality and viability of Broadstairs Town centre.	The primary and secondary frontages of Broadstairs will need to be sufficient to accommodate this need. The plan will also contain a policy that allows for development on the edge of the town centre of Broadstairs where it cannot be accommodated with the primary and secondary frontages.
	Existing facilities should be maximised before any new development is proposed	Agree, vacant frontages and allocations will be the first choice for town centre allocations where possible	Primary and secondary frontages will predominantly cover vacant areas of the town centres in order to focus town centre development in these areas.
Proposals for town centre uses outside of town centres will be subject to an impact test. Most respondents either agreed with or		The Council wishes to reflect the National Planning Policy Framework and guidance with regard to impact tests. Size	The Impact test policy wording will reflect the National Planning Policy Framework. It will also largely reflect the suggested

had neutral opinions on the size thresholds for the impact test		thresholds were suggested in the Town Centre Assessment 2012.	thresholds from Town Centre Assessment carried out by Nathaniel Lichfield and Partners in 2012.
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5 – How can we support the rural economy?			
Headline views	Issues Raised	Council Response	Action in Local Plan
Most people agreed that we should support farm diversification projects	There should be as much diversification as possible providing that rural identity is retained and that the focus is on making farms viable. Quex is a good example of a diverse employer	Agree, the National Planning Policy Framework supports farm diversification and particularly ways of supporting the rural economy.	Include a policy supporting farm diversification subject to certain criteria that protects rural identity. Include a policy supporting farm diversification projects at Quex in order to support the tourism industry.
Most people agreed that we should protect existing and support the development of new village shops and services	Some thought that village shops provide villages with a sense of community	Agree, the National Planning Policy Framework promotes the retention and development of local services and community facilities in rural areas	Include policies in the Local Plan that protect vital rural shops and services and provide for new ones.
Most people agreed that we should protect best and most versatile agricultural land	Protecting farmland is of great importance	Agree, the National Planning Policy Framework states that Local Plan strategies should protect best and most versatile land	Include a policy in the Local Plan that protects best and most versatile agricultural land. This
Most people agreed that we should support agricultural related development including farm retail units	Farm shops can bring vibrancy to rural areas	Agree, the National Planning Policy Framework requires LPA's to support the needs of the food production industry and the rural economy as a whole	Include policies that support agricultural related development and diversification of agricultural and other land based rural business (that in turn would support the development of farm retail units) in the Local Plan including criteria that protects the character of the rural area
Most people agree that we should support the conversion of existing rural buildings for		Agree, the NPPF states that we should support this, however there is also the need to protect	Include a policy in the Local Plan that supports conversion of rural buildings for economic

economic development purposes		the countryside.	development purposes subject to criteria that protects the character and appearance of the area
Most people agreed that we should support the need for agricultural related dwellings		Agree, the NPPF recognises that there may be exceptional circumstances where it is essential for a rural worker to live permanently at or near their place of work in the countryside. In addition new permitted development flexibilities will facilitate this	Include a policy for new agricultural dwellings including strict criteria to ensure it is justified.
There was no clear consensus about supporting new build development for economic purposes within the existing villages	Additional development in rural areas such as conversion from farm buildings to commercial and residential can make them more sustainable and should be encouraged.	New build development in the rural area for economic development is supported in the NPPF , but the Council is mindful that it must not be of a scale and form that is harmful to the character and function of the rural area	Include a policy in the Local Plan supporting new build development in the villages for economic development purposes subject to criteria that protects the character and function of the rural area. Outside the confines new build development may be unsustainable.
	Some thought that new build development should be supported but only where it is not harmful to the unique local character	Agree, see above	Include a policy in the Local Plan supporting new build development in the villages for economic development purposes subject to criteria that protects the character and function of the rural area
	The rural economy in Thanet should be protected and specifically targeted at strengthening rural communities	Agree that the rural economy is an important part of the overall economy	Include a suite of policies supporting the rural economy rather than protecting certain enterprise as this is not feasible

The availability of water was considered to be a barrier to the food production industry.		Agree, according to the Environment Agency Thanet is a water stressed area	The Local Plan will deal with this issue overall and require code level 5 for water (code for sustainable homes) in all new development.
The threat from development (particularly housing) was considered a barrier to the food production industry		Some greenfield land will have to be used to accommodate housing needs in the District however, sustainability criteria is used when selecting sites for housing development including consideration of best and most versatile agricultural land which protects top grade agricultural land.	The plan will contain a suite of policies to support the food production industry such as supporting farm diversification and agricultural related development and protecting best and most versatile agricultural land.
The prevalence of solar farms and anaerobic digesters were considered a barrier to the food production industry		No evidence has been submitted to suggest this, Solar farms are a temporary use and do not have a long term effect on the quality of agricultural land. Market forces should dictate whether land is needed for agricultural use. It is considered that these uses have positive effect on farm viability. Policies in the plan will address the issue of the loss of agricultural land.	Include a solar farm policy in the plan which states that they should be temporary, capable of removal and cause minimal disturbance to agricultural land.

6 – How can we support the visitor economy?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was no clear consensus when asked if we should support hotel developments in areas outside of town centres	Some thought that town centres were the most sustainable locations for hotels and that hotel development outside the town centres could lead to harmful development in the countryside	Agree that town centres are suitable locations for hotel development but other areas may also be appropriate. Most countryside locations would probably not be appropriate.	Include a criteria based policy for the location of new serviced tourist accommodation that requires development to be well related to existing built development and seeks to protect the landscape character and nature conservation value of areas outside of the built confines.
	we should not be placing unnecessary restrictions on hotel development	Agree that we should be more flexible with hotel development but it could be harmful to allow them everywhere without suitable criteria	Include a criteria based policy for the location of new serviced tourist accommodation.
	Seafront areas could be appropriate for hotel development	Agree that some seafront locations that are well related to the urban area may be appropriate.	Include a criteria based policy for the location of new serviced tourist accommodation.
When asked if we should continue to support touring and static caravans parks in rural locations most people either agreed or had a neutral opinion		Agree that touring and static caravans are an important part of the tourist accommodation mix in Thanet and should continue to be supported where appropriate.	Include a policy supporting new, upgraded and improved self catering tourist accommodation
When asked if we should continue to restrict touring and static caravan parks at the coast most people agreed	Some thought that caravan parks are detrimental to the landscape and should not be supported at all especially at the coast and particularly static caravan parks.	Agree that static caravans can cause visual intrusion and because of their permanency they are not appropriate in open coastal locations. There is a case	Include a policy that supports new, upgraded and improved self catering accommodation subject to appropriate siting, design, scale and access. Development

		for allowing static caravans to provide necessary accommodation to support the aim of increasing overnight staying visits to the District.	will be required to be extensively landscaped if necessary.
When asked whether we should continue to restrict the redevelopment of existing self-catered accommodation where necessary, to maintain a reasonable choice of tourist accommodation in Thanet most people agreed or had a neutral opinion		Agree, that all tourist accommodation in Thanet is vital to the industry and is an important way of increasing income from tourism. As such the loss of such facilities should be resisted	Include a policy that resists the loss of existing tourist accommodation with 10 or more bedrooms.
	There was general agreement that there should be a range of good quality accommodation available in order to support the visitor economy	Agree, a mix of accommodation is appropriate to boost the tourism economy	Include policies that support a range of tourist accommodation
There was strong agreement that we should continue to support new tourist facilities where this would extend or upgrade the range of tourist facilities, increase the attraction of tourists to the area or extend the season		Agree, the tourism economy is very important to Thanet and the aims of upgrading facilities, increasing the attraction of visitors and extending the season further improves this area of Thanet's economy	Include a strategic tourism policy that supports these aims
There was no consensus when asked whether we should identify particular sites outside town centres that would be suitable for tourism	There was a concern that tourist facilities may be in remote locations	Agree that tourist facilities are generally inappropriate in remote locations	Some key sites have been selected for tourism and leisure uses. These are all within town centres or related to town centres with the exception of Quex Estate which encourages tourism and

			leisure uses but will include criteria to protect the parkland setting of the Estate.
Most thought that we should only allow the loss of an existing tourist facility where it has been demonstrated that it is no longer viable. Some thought that we should protect all facilities and restrict their loss. And some thought that we should only protect identified sites that are of particular importance to Thanet's visitor economy	There was general concern about the loss of facilities but there was uncertainty over the definition of viable and the fact that this could be down to poor management	Agree. The loss of tourist facilities is a concern but it is difficult to resist the closure of an unviable business. Blanket protection could lead to vacant premises and dereliction. It is however, considered important to protect tourism accommodation in the District as evidence suggests we currently have a deficit and the encouragement of the staying visitor is of importance to Thanet's economy and in line with the Council's Economic and Regeneration strategy.	Include a policy that resists the loss of existing tourist accommodation with 10 or more bedrooms subject to viability criteria.
	Some thought that applications for the loss of a facility should be dealt with on a case by case basis.	Agree, this is a sensible approach for tourist facilities in general but it is considered that tourism accommodation is so important to our tourism economy that change of use should be resisted	Include a policy that resists the loss of existing tourist accommodation with 10 or more bedrooms subject to viability criteria.
There was strong agreement that we should continue to zone Thanet's beaches as "major holiday, "intermediate" and "undeveloped" depending on their character and level of facilities available.	Beaches are Thanet's greatest asset	Agree, Thanet's beaches are one of the major tourist attractions in Thanet and their character and diversity should be protected.	Include policies to protect the beaches and allow certain development according to their character following an audit of beach facilities.
There was general agreement	A few people mentioned that they	Agree, language schools are a	Include a policy on language

that we should continue to support language schools subject to their local impact.	can lead to anti social behaviour and confrontation with local youths	major source of income for Thanet but their potential impact needs to be carefully managed	school which contains criteria related to impact
	The positive benefit on the local economy from Language Schools was generally welcomed.		
There was also general agreement that we should continue to only support amusement arcades in certain seafront locations in Margate and Ramsgate		Agree, amusement arcades are not appropriate in all areas due to their open fronted and noisy nature	Define areas within the coastal town centres that can accommodate amusement arcades
There was some disagreement with the suggestion that we should continue to allow amusement centres in the town centres	Many thought that town centres were inappropriate locations for gaming	Amusement centres are considered a town centre use according to the NPPF and as such should be allowed in the town centres	Include amusement centres as acceptable uses within the secondary frontage areas and do not allow them within primary shopping frontages
	Amusement uses contribute to the tourist economy.	Agree, amusement uses are part of a mix of tourist uses in the area and are considered attractive to some people.	Include amusement centres as acceptable uses within the secondary frontage areas and do not allow them within primary shopping frontages
	Amusement uses are outdated and have negative associations		Include amusement centres as acceptable uses within the secondary frontage areas and do not allow them within primary shopping frontages

Issue 7 – How we support communications infrastructure and home working			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was strong agreement that we should support home working subject to local impacts and expect all new development to be provided with the infrastructure to support high speed broadband and other communications	This is increasingly an expectation for business	Agree, home working already contributes to Thanet's economy and therefore should be supported.	Include a policy that supports home working subject to local impacts
	Effective communications infrastructure can mitigate against Thanet's relative distance from business markets.	Agree. Advance high quality communications infrastructure is essential for sustainable economic growth.	Include a policy requiring new development to deliver adequate communications infrastructure.
	Contact should be made with internet service providers to ensure that speed of services is further improved.	Kent County Council are working on improving broadband and communications infrastructure across Kent.	

8 : How many homes do we need to provide?			
Headline views	Issues Raised	Council Response	Action in Local Plan
<p>Consensus about the importance of factors to inform housing numbers was variable and included that housing numbers should be strategy (not trend) led.</p> <p>Capacity of infrastructure and services attracted complete consensus.</p> <p>Strong consensus regarding</p>	Housing numbers should be strategy not trend led	Agree that the strategy (including economic growth aspiration) should inform and be supported by the level of housing provided for. However, government advises that its household projections represent a starting point in objectively assessing the level of need to be provided for. Unless there is compelling and specific evidence to show that	Take account both of strategy and household projections in assessing appropriate level of housing to provide for.

<p>impact on traffic and travel, on amenity/ character of existing neighbourhoods and on the environment.</p> <p>There was some consensus regarding providing homes to support economic growth including people who live in but may work outside the district and to meet need for more affordable homes and the capacity of the market to deliver.</p>		projections would overstate future need providing below such levels would likely lead to the Local Plan being found unsound.	
	Account should be taken of the factors below:		As below
	-capacity of infrastructure and services	Agree. Fundamental to deliverable Local Plan.	Establish level of housing provision and phasing of land release taking account of infrastructure requirements identified in Infrastructure Delivery Plan and in light of development viability assessment
	- traffic and travel,	Agree. Fundamental to strategic objective of delivering transport infrastructure required to support existing communities and new development.	Establish level of housing provision and site locations taking account of Transport Strategy founded on sustainable transport principles
	-the amenity and character of existing neighbourhoods and protecting the environment.	Agree. Fundamental to the strategic objective of protecting and enhancing the environment.	Level of housing provision and suitable locations to be informed by the Strategic Housing Land Availability Assessment, Sustainability Appraisal and a Habitat Regulations Assessment.
	the need for more affordable housing	Agree. Fundamental to strategic objective of providing homes accessible to and suited to the needs of a settled and balanced community.	Aim to provide for the level of housing need indicated in latest evidence, but balanced with need to ensure housing provision overall is viable and deliverable.

	the capacity of the market to deliver	Agree. Capacity of the market will impact deliverability of Local Plan.	Housing numbers will be informed by assessment of viability and of the capacity of the market to deliver various quantities in consultation with development industry representatives.
	providing homes to support economic growth	Agree. Fundamental to objective of meeting housing needs and demands to support economic growth.	Housing provisions (and types of homes) to be considered taking account of a range of economic growth forecast scenarios.
	The needs of people who live in but may work outside Thanet	Agree. Such homes will contribute to the objective of meeting the needs and demands of a balanced and mixed community.	Housing provisions (and types of homes) to be considered taking account of this factor
	- the need to avoid attracting additional benefit-dependent incomers or mopping up unmet requirements of other districts (e.g. through over-provision against realisable employment growth)	Agree. Fundamental to objective of providing homes for a settled and balanced community. However, difficult to evidence link between this risk and simple housing numbers. Precautionary approach might hinder economic growth aspirations or result in risk of un sound plan.	Clarify the economic aspirations behind housing numbers, and place emphasis on delivering the type of homes associated with meeting local need and economic aspirations.

8 : How many homes do we need to provide?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was no clear consensus regarding the most appropriate	Setting housing provisions below those implied by the economic	Government is looking generally to boost the supply of housing	In establishing the level of housing provision to be made,

<p>economic or demographic scenario to apply as a starting point in forecasting housing numbers.</p>	<p>higher growth or trends based projections could be inconsistent with the Council's and Government's economic growth aspirations and might be less than objectively based (for example because migration cannot be discounted).</p> <p>Setting housing provisions above levels implied by the baseline or lower economic scenarios might be overambitious in view of lack of evidence of an economic upturn and could attract further benefit dependent people into the district if level of economic growth aspired to is not realised.</p> <p>Should the approach be ambitious or "wait and see"?</p>	<p>and requires Local Plans to meet full, objectively assessed needs (taking account of migration and demographic change).</p> <p>The key risk associated with providing for the higher level housing options is that economic performance over the plan period falls below aspirations. Although difficult to prove this could result in importation of further benefit dependent incomers, and poorer quality homes.</p> <p>However it is considered that the greater risk is that if provisions are based on the economic baseline or lower growth scenarios the Plan may be contrary to the NPPF, found "unsound" at examination and/or serve to undermine economic growth potential.</p>	<p>apply the housing forecasts associated with the economic growth and migration trends scenarios as a starting point.</p>
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8 : How many homes do we need to provide?			
Headline views	Issues Raised	Council Response	Action in Local Plan
	The need to make use as priority of the substantial supply of derelict and empty property to provide new homes.	Agree. Re use of vacant and derelict property may contribute to objectives of regenerating coastal town centres, protecting/enhancing townscape heritage and improving areas of poor quality housing and empty property. The aspiration to successively reduce the amount of vacant property has been built into the forecasting model which will inform the total level of additional homes to provide for. However, refurbishment of existing housing stock may not contribute to overall housing requirement. Use/re-use of such property should provide quality accommodation in line with social and economic regeneration objectives.	State general support for refurbishment/reconfiguration of the existing stock of empty/underused property to provide quality accommodation supporting area renewal and increasing the supply of family or other homes suited to social and economic regeneration objectives.
	What should be done regarding the impacts on areas designated for their national and international habitat significance of additional recreation pressures associated with more homes?	Agree this impact needs to be addressed and mitigated as appropriate	Level of housing provision and location of housing sites and appropriate mitigation to be tested and informed through Sustainability Appraisal (incorporating Strategic Environmental Assessment) and through Habitat Regulations Assessment. It is proposed to

			include a specific policy to protect European sites and sites of Special Scientific Interest and national nature reserve from harmful development including through appropriate mitigation in line with a strategy to be incorporated in a supplementary planning document
	Whether more affordable homes are needed if Thanet already has a supply of cheap housing	House prices in Thanet are generally cheaper than elsewhere in Kent. However, incomes are also generally lower, meaning that some local people are still unlikely to be able to meet their housing needs through the private market. The level of need for affordable housing will be assessed by reviewing the information contained in the Strategic Market Housing Assessment.	Aim to provide for the level of housing need indicated in latest evidence, but balanced with need to ensure housing provision overall is viable and deliverable.

9:Where should our new homes be provided?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was strong consensus that the approach should be to maximise or focus development within the existing built up areas of the towns and villages.	In assessing and allocating housing sites in the urban area, what safeguarding criteria should be applied?	As generally sustainable locations the existing built up areas represent a logical location for new development and present opportunities to re-use previously developed land. However criteria	In identifying future housing sites, focus on opportunities within existing built up areas of the towns and villages. Scale and location of housing

<p>Within this a slightly higher proportion favoured the “focus approach” signifying restrictive criteria be applied (for example to safeguard gardens, family homes and/or sites that are not previously developed).</p> <p>A relatively small percentage supported the alternative approach of focusing on greenfield sites and aiming to restrict housing sites in built up areas to those important for regeneration.</p>		<p>are needed to ensure that quality homes of the required type are achieved without compromising the quality of life of existing and new residents.</p>	<p>allocations to be established in light of their potential impact on a range of environmental factors informed by Strategic Housing Land Availability Assessment and Sustainability Appraisal.,</p> <p>Criteria based policies (for example safeguarding important open space and compatibility with townscape) to be applied to inform consideration of planning applications.</p> <p>Site allocations to reflect viability assessment.</p>
	<p>Infrastructure Implications (including transport links and schools)</p>	<p>Agree - Supporting infrastructure is critical to delivering housing required over the plan period. Alongside consultation with the infrastructure delivery agencies and organisations, the Council is preparing an infrastructure delivery Plan and Transport Strategy to identify and cost the infrastructure requirements</p>	<p>Site allocations to be established in light of need for timely provision of the social, community and transport infrastructure needed to support them.</p>

	<p>Need to safeguarding the function of the Green Wedges</p>	<p>Agree the important local function of the Green Wedges should continue. However, they are vulnerable to development pressures being in otherwise generally sustainable locations adjoining the urban area. Focusing on the housing capacity of the existing built up areas will serve to reduce pressure to consider allocating sites in the Green Wedge.</p>	<p>Aim to accommodate housing provisions on sustainable sites without compromising the function of the Green Wedges.</p> <p>Retain policy strongly protecting the Green Wedges from development harmful to their established function.</p>
	<p>How much emphasis/ priority should be placed on the potential of vacant/derelict land (including employment land) and property. Should there be an element of housing in the retail areas of the coastal towns?</p>	<p>Making positive use of such opportunities can assist social economic and environmental regeneration including town centres and optimise use of previously developed land.</p> <p>However, the degree of emphasis on such opportunities will need to be balanced with a versatile land portfolio to accommodate a variety of types of housing in line with strategic objectives.</p>	<p>Policy to provide general support for re-use of empty underused or vacant sites and premises to provide future homes of appropriate type (reflecting plan's strategic objectives).</p> <p>In town centres permit residential use in locations compatible with maintaining their commercial function and core retail area.</p> <p>Specific policy support for new build/conversion/refurbishment proposals associated with Intervention programmes supporting area renewal.</p>

	Need to protect finite countryside and quality grade agricultural land	Agree. This is important to the objective of protecting and enhancing Thanet's environment. However, anticipate some greenfield land will be needed to deliver overall housing provisions in line with strategic objectives. In identifying housing sites priority should be given to the urban areas in order to help reduce the greenfield land requirement. Alongside this however the need to protect the countryside has to be balanced with meeting total housing requirements.	Site allocations to be informed by considering their individual impacts on a range of factors including landscape and agricultural value.
	Need to protect green/open space for community benefit.	Agree. These assets are highly important for human health and wildlife.	Quantity and location of homes to take account of the need to safeguard existing green infrastructure including open space Policy signifying that where feasible development schemes on allocated or other sites will be expected to serve to augment, accessible provision.
	Should approach be a mix of urban regeneration, urban extensions and village extensions, should it be informed by individual sites' location,	Agree, the attributes of individual sites are important for achieving a deliverable plan reflecting a balanced settlement hierarchy. However, as a general principal	Assessment of the suitability of potential housing sites to include consideration of their sustainability, ability to deliver quality homes of the type

	characteristics, and sustainability, their ability to provide deliverable quality homes and by the settlement hierarchy?	the approach should be first to look to the urban areas for deliverable site options taking account of their individual attributes and sustainability.	required, and their distribution in light of a balanced settlement hierarchy.
	Need to avoid cramming people in at high density	Agree. This is consistent with the option to “focus” as opposed to “maximise” housing in the built up areas.	<p>Site allocations to be considered in relation to capacity of community, utility and transport infrastructure.</p> <p>Policies to require relevant infrastructure to be available in time to serve future housing development.</p> <p>Include policy expectations regarding design, living conditions and density considerations.</p>
	How much priority should be given to previously developed land?	<p>In line with the NPPF the preferred approach is to make effective use of previously developed land provided it is not of high environmental value.</p> <p>This is consistent with the preferred approach of “focusing” on, as opposed to “maximising” use of, sites in the built up areas (which signifies that criteria will be applied to safeguard sites having</p>	<p>Housing allocations to be considered in relation to the need to protect/enhance factors of environmental value such as important open space, heritage and townscape.</p> <p>Criteria based policies to signify that similar considerations will be applied in deciding planning applications.</p>

		high environmental value irrespective of whether they are previously developed or otherwise).	
	Villages may need some housing within or adjoining them to help them thrive/avoid stagnation/degeneration.	Agree. Some new homes at the rural settlements would serve to increase locational choices and meet need for affordable homes associated with those settlements. However this should be at a scale compatible with their character and sustainability in terms of accessibility of services and other infrastructure	Plan to include provision for an element of rural village housing at a scale compatible with the individual form and character of the individual settlements, and having regard to sustainability in terms of accessibility of services.
9:Where should our new homes be provided?			
Headline views	Issues Raised	Council Response	Action in Local Plan
<p>In relation to the location of any greenfield housing land required, more than half of respondents supported that this be by way of dispersed sites.</p> <p>A slightly smaller number supported provision at a small number of locations.</p> <p>A small percentage supported such provision by way of a single</p>	<p>Main concerns raised in advocating particular options were:</p> <ul style="list-style-type: none"> -environmental impact -visual impact -community cohesion -capacity of infrastructure and 	<p>Agree with the importance of the main factors mentioned in representors' concerns, and that most appropriate approach would be to allocate a number of sites as opposed to a single site. The majority of the concerns mentioned were mentioned in the context of not supporting a single site allocation.</p> <p>However, the number and size of</p>	<p>Greenfield land component to be by way of a number of sites.</p> <p>The number, location and size of specific allocations to be informed by considering identified site opportunities and their sustainability credentials, their ability to provide for supporting infrastructure and deliver elements of affordable housing alongside the other key concerns</p>

location.	<p>access to community facilities.</p> <p>-the need to avoid jeopardising a deliverable land supply</p> <p>-ability to deliver quality homes</p> <p>-need for some village housing</p> <p>-need to safeguard Green Wedges and prevent coalescence</p>	<p>site opportunities will need to be considered in relation to the potentially deliverable site options identified and their sustainability.</p>	referred to in responses.
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9:Where should our new homes be provided?			
Headline views	Issues Raised	Council Response	Action in Local Plan
<p>The majority of responses supported locating greenfield land requirements adjoining the Urban Area. A number supported locations adjoining the villages. A smaller number supported freestanding countryside sites and a lower number supported a new settlement.</p>	<p>Responses reveal the following as key issues</p> <p>Accessibility and viability of services and infrastructure</p> <p>Environmental impact</p> <p>Safeguarding the Green Wedge, prevent urban sprawl, protect remaining green space between villages and countryside.</p> <p>Natural/organic growth not large estates</p>	<p>Agree that greenfield housing element should be focused adjoining the built up areas of the Thanet towns and with housing of appropriate scale adjoining the built up areas of sustainable villages.</p> <p>Agree with significance of the issues raised . However, these need to be considered alongside the scale and location of viable site opportunities identified.</p>	<p>Greenfield housing allocations to be at sustainable locations adjoining the urban area.</p> <p>Individual allocations to be considered in light of factors raised in responses and balanced against other sustainability criteria and plan objectives.</p> <p>Balance of any housing provision attributed to rural settlements and not deliverable within their confines to be by way of allocation adjoining their built up confines.</p>

	<p>Scale and deliverability</p> <p>Integration with existing communities.</p> <p>Need good Transport connections</p> <p>Westwood to be the only new town.</p>		
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9:Where should our new homes be provided?

Headline views	Issues Raised	Council Response	Action in Local Plan
Further comments about where new home should be provided were wide ranging.	Degree of priority to use of empty /derelict property including surplus business parks) and brownfield sites (before greenfield)	Agree priority should be attributed but this needs to be balanced with the need to ensure a viable portfolio of deliverable housing sites capable of accommodating the type and quantity of homes required to meet the Plan's objectives.	Policies and allocations to support use of previously developed sites and empty/derelict property to provide housing. However, such allocations to be subject to criteria associated with the urban "focus" approach and be part of balanced wider portfolio of sustainable sites enabling timely delivery of the type of homes and infrastructure required to deliver plan objectives.
	Protect/enhance recreational and natural green space and biodiversity to reduce pressures on coastal European sites. If possible provide new links between existing and open	Agree these issues reflect strategic objectives and should be addressed in delivering a sustainable Plan	Quantity and location of homes to take account of the need to safeguard and where possible enhance existing green space/ infrastructure and biodiversity. (Informed by SHLAA, Strategy for

	<p>spaces.</p> <p>Take account of need to preserve/restore/and re-create priority habitats, ecology network and recovery of species populations.</p> <p>Need to assess and address potential loss of significant farmland bird habitat and SPA & SSSI foraging and roosting habitat</p> <p>Need to assess value of development sites for SPA and SSSI bird species</p> <p>Recreation pressures associated with high housing numbers cause concern regarding SPA species and need mitigation</p> <p>Strike balance between quality of life and protecting designated sites and farmland bird populations.</p> <p>A strategic Sustainable Access Management and Monitoring Strategy for the coastal and Natura Network.</p>		<p>Planned Location of Housing, SA and HRA)</p> <p>Policies to be included to apply similar considerations in deciding planning applications.</p> <p>Include a policy requirement, where appropriate, for housing applications to be informed by a wintering and breeding bird survey to assess impact on bird populations and address how any impacts can be minimised/compensated.</p> <p>Include a policy requirement that development should provide appropriate mitigation to protect designated nature conservation sites in relation to recreational pressure.</p>
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	Protect the natural beauty of the Wantsum Channel and Lower Stour wetland	Agree. Fundamental to objectives of protection of Thanet's environment, and the scenic value of the coast and countryside.	Site allocations to be informed by sustainability criteria including landscape impact. Include policy to ensure development protects and enhance Thanet's historic landscapes..
	Need to minimise effect of housing and infrastructure growth (in Thanet and Dover districts) on local habitats and natural sites	Agree this is fundamental to the objective of maintaining and enhancing the biodiversity and natural environment .	Site allocations to be informed by sustainability criteria factors including habitat and subsequently by SA & HRA.
	Take account of NOx emissions on the urban population and habitat.	Agree this is a significant factor for the objective of promoting physical well-being and protecting, maintaining biodiversity.	Allocation of sites to be based on criteria including their ability to reduce need to travel by cars and be informed by Transport Strategy SA, and HRA
	Need for and scale of any new village homes (including in relation to capacity of services). (Comments include reference to rural extensions to Birchington)	Agree. Some new homes at the rural settlements would serve to increase locational choices and meet need for affordable homes associated with those settlements However, this should be at a scale compatible with their character and sustainability in terms of accessibility of services and other infrastructure.	Plan to include provision for an element of rural village housing at a scale compatible with their individual form and character, and reflecting and enabling accessible, sufficient and viable services.

	Consider merits of allocating sites mentioned in responses	Agree it is important to consider the relative suitability of all potential sites in meeting planned housing provisions.	Site allocations identified and allocated following assessment of relative sustainability criteria, and of ability to deliver the types of homes needed to deliver plan's objectives.
	Take account of relevance of historic environment (factors such as scheduled ancient monuments and registered parks and garden)	Agree. This is important for the objective of preserving and enhancing the built historic environment, and ancient monuments and their settings	Site allocations to be informed by impact on historic heritage including criteria applied in Strategic Housing Land Availability Assessment
	Should anymore homes be allowed near Westwood?	Sites covered in Strategic Housing Land Availability assessments include land in the vicinity.	Site allocations to be informed by a range of criteria including availability of deliverable sites, community and transport infrastructure .
	Should housing land be released only at such time as employment increases?	Accept desirability of gearing provision of new homes in line with predicted job growth. However, policies also need to address the community requirements irrespective of economic status. Cannot envisage plan would be found "sound" if housing land was released only when new jobs are realised.	Policy to phase release of allocated housing land to prevent premature release and as far as reasonably possible gear it alongside predicted job growth.
	Port and Airport meet a housing need.	Disagree. These are regarded as infrastructure assets for the economic strategy.	No housing allocation at Port and Airport.

	Consider accessibility of locations in light of existing and proposed main walking and cycling routes	Agree this is a significant aspect of sustainability	Site allocations to be identified on the basis of sustainability assessment including proximity of or potential to create routes supporting sustainable travel.
	Development may require increases in capacity of sewerage system and water mains.	Agree that infrastructure capacity is significant for achieving a deliverable and sustainable plan.	Level of housing provision and site allocations to be considered in light of infrastructure capacity as informed through liaison with service providers. Policy permitting development only at such time as it is demonstrated that sufficient infrastructure capacity will be available.

What type of new homes do we need to provide? (10.1)			
Headline views	Issues Raised	Council Response	Action in Local Plan
<p>The importance attributed to specific factors to inform the type of homes needed (i.e. who we want to house) was variable. This is illustrated below in descending order of % supporting/strongly supporting</p> <p>Impact of particular types of homes on character of existing neighbourhoods</p>	Protecting the character of the area, neighbourhoods and communities	Agree. Accords with strategic objectives	Policy influencing type of homes to be sensitive to character of neighbourhood and need to promote balanced community structure.
	the need to build attractive, quality, well designed homes in attractive environments	Agree. Accords with strategic objectives	Include high quality inclusive design and need for development to conserve/enhance local character of the area as expectations in policy.
	the need to attract professional	Agree. Strategic objectives of	Policy influencing type and

Needs & aspirations of the existing community	people but not economically dependent incomers	improving earning power, employability and attracting skilled people mean high emphasis is needed on attracting incomers who are economically independent.	location of homes to accommodate a degree of locational choice (including some village homes) and promote homes suitable to and affordable by young aspiring households.
Achieving balanced/mixed communities			
Need for more affordable homes	Need more quality homes including family homes	Agree. It is a strategic objective that everyone has access to quality homes. Evidence indicates more family homes are needed.	Policy influencing type of homes to place emphasis on safeguarding and promoting more family homes. Include high quality inclusive design and need for development to conserve/enhance local character of the area as expectations in policy.
Need and demand from people moving in to Thanet to work			
Need and demand from all people moving in to Thanet	Whether affordable homes are needed in light of supply of cheap housing. Whether affordable homes should be targeted at local people. The need to keep affordable housing element thresholds at a level that won't disincentivise development.	While housing in Thanet is comparatively inexpensive, evidence shows that outstanding unmet need for affordable homes remains substantial.	Policy to optimise the quantity of affordable housing that can be delivered as part of new housing development schemes having regard to the level of need for affordable homes and development viability.
	the need to provide specialised and good quality housing for older people (including need for extra/end of life care, and homes suitable to facilitate movement including downsizing to get the market moving and the need to balance needs of elderly people	Agree in light of forecast ageing population and shortage of larger homes.	Policy supporting provision of specialised housing needed by older people and other groups in light of evidence of need and locational considerations.

	with a balanced community structure).		
	Whether newcomers will place unsustainable pressure on infrastructure	Agree – ability to deliver sufficient supporting infrastructure will be an important consideration in finalising level (and location) of development to provide for.	Establish the level, location and type of housing in light of the requirement to deliver sufficient supporting infrastructure.
	The need to focus on using empty homes (including to use them as family homes/affordable homes)	Agree. Re use of vacant and derelict property may contribute to objectives of regenerating coastal town centres, protecting/ enhancing townscape heritage and improving areas of poor quality housing and empty property. However, refurbishment of existing housing stock may not contribute to overall housing requirement. Use/re-use of such property should provide quality accommodation in line with social and economic regeneration objectives	State general support for refurbishment/ reconfiguration of the existing stock of empty/ underused property to provide quality accommodation supporting area renewal and increasing the supply of family or other homes suited to social and economic regeneration objectives.

What type of new homes do we need to provide? (10.2)			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was a diversity of opinion regarding the guideline	Whether there is a (market) need for more family homes and fewer	The Strategic housing market assessment suggests that this is	Policy regulating types of homes to be informed by balances

proportions for market housing included in consultation.	1 bedroom flats	the case and this is reflected in the benchmark scenario presented in consultation.	recommended in SHMA (subject to any refresh to ensure robustness).
	What mix of market homes would best help achieve social cohesion?	Consultation reveals that this is seen as a complex issue. At district level the SHMA suggests a specific mix to help address requirements for both market and affordable homes.	As above with mix applicable on specific sites to be informed in light of area specific housing objectives (to be set out in the Plan) and site specific circumstances. .
	Should more (market) flats be encouraged as making more efficient use of land?	The SHMA suggests that there is an oversupply of small and flatted accommodation and that the future mix should aim to increase the supply of larger and family homes. Nonetheless it is expected that some flatted accommodation will be required. In such cases flatted accommodation may make efficient use of land, but this should not be at the expense of providing quality accommodation, nor a determining factor implying that the rebalancing suggested in the SHMA should be reversed.	Policy regulating types of homes to be informed by balances recommended in SHMA (subject to any refresh to ensure robustness). Where flats are appropriate any advantage in making efficient use of land should not be at the expense of providing quality accommodation.

What type of new homes do we need to provide? (10.3)			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was a diversity of opinion	Should the proportion of 1	Aware of concerns about	Policy regulating types of homes

regarding the guideline proportions for affordable housing included in consultation.	bed/smaller flats be reduced, with possible corresponding increase in 2 bed flats/ 2/3 bed houses?	attracting more economically dependent small households. However, SHMA and any subsequent refreshed assessment of housing need is/will be informed by assessment of economic aspirations.	to be informed by balances recommended in SHMA (subject to any refresh to ensure robustness).
	Need for affordable homes greater than 3 beds queried.	Policy should be driven by objective of meeting need rather than aiming to influence size of households.	Policy regulating types of homes to be informed by balances recommended in SHMA (subject to any refresh to ensure robustness).
	What mix of homes would best help achieve social cohesion?	Consultation reveals that this is seen as a complex issue. At district level the SHMA suggests a specific mix to help address requirements for both market and affordable homes.	Broad mix to be informed by SHMA, but Plan to include area specific housing objectives to inform how sites may deliver appropriate mix within particular areas of the District.
	Should more (market) flats be encouraged as making more efficient use of land?	The SHMA suggests that there is an oversupply of small and flatted accommodation and that the future mix should aim to increase the supply of larger and family homes. Nonetheless it is expected that some flatted accommodation will be required. In such cases flatted accommodation may make efficient use of land, but this should not be at the expense of	Policy regulating types of homes to be informed by balances recommended in SHMA (subject to any refresh to ensure robustness). Where flats are appropriate any advantage in making efficient use of land should not be at the expense of providing quality accommodation.

		providing quality accommodation, nor a determining factor implying that the rebalancing suggested in the SHMA should be reversed.	
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What type of new homes do we need to provide? (10.4)			
Headline views	Issues Raised	Council Response	Action in Local Plan
Just over half of responses agreed that future housing development should include 30% as affordable housing. A small number were neutral on the issue.	What percentage of affordable housing should policy seek to negotiate?	Unmet need for affordable housing is substantial. Economic viability assessment suggests that 30% would be a viable target.	Policy for negotiating affordable homes to be based on 30% element unless bona fide information on need and viability suggest that an alternative percentage would be appropriate.
A slightly higher percentage of those with a view thought all new housing developments should be expected to provide affordable housing irrespective of the total number of dwellings proposed.	Should negotiation of an element of affordable housing apply to all housing sites or only to sites above a certain size?	Economic viability assessment suggests that policy could aim to apply negotiations on sites of any size (subject to off-site/financial contribution in lieu where appropriate). In view of the high level of unmet need it is appropriate to seek negotiations on sites of all sizes.	Policy for negotiating affordable housing to be applied to housing sites of any size.
Of those having a view more than double the number of responses agreed (than disagreed) that that affordable housing could in some cases be provided off-site or through a financial contribution.	In some cases should affordable housing be provided off-site or through a financial contribution?	Off-site provision or a financial contribution may serve to deliver affordable homes to help address the high level of outstanding need. The NPPF recognises that this approach can be applied where justified	Policy negotiating affordable homes to indicate that where justified, provision may be by way of off-site contribution or financial contribution in lieu of on-site provision.
A significant proportion of	What proportion of affordable	The 2009 SHMA recommends a	Policy for affordable housing to

responses were neutral as to whether the provision of affordable housing should be on the basis of 70% social rent and 30% intermediate. Of those having a view slightly more agreed than disagreed	homes should be for social rent and for intermediate?	target split that of 30% affordable homes be intermediate housing and 70% affordable rent. Subsequent evidence suggests this appears to remain a balanced approach.	indicate that the Council will apply a target to affordable homes that 30% should be intermediate housing and 70% social rented.
The proportion of responses agreeing that it is appropriate to continue to allow release of land adjoining the built up parts of our rural villages where this would deliver affordable housing to meet the needs of the village was greater than those disagreeing.	Should policy continue to allow "exception sites" to deliver affordable housing to meet the needs of villages?	The NPPF acknowledges rural exception sites as a mechanism for securing affordable housing to meet local need. Recent surveys indicate presence of unmet local need for affordable housing in most of Thanet's villages. It is therefore considered appropriate to retain a policy allowing exceptional release for cases where need cannot be met on sites which would not otherwise conflict with policy.	Rural exceptions site policy to be included..
The need to ensure that affordable housing policy requirements are flexible/applied on a case by case basis and do not jeopardise viability of development was raised by a number of respondents.	Ensuring that policy is applied flexibly so as to not jeopardise viability taking account other development costs such as infrastructure	Agree. Policy needs to be applied flexibly on a case by case basis to optimise affordable housing yield without undermining wider housing delivery.	Wording of policy to signify that expected affordable elements will be through negotiations taking account of site specific considerations.

What type of new homes do we need to provide? (10.5)

Headline views	Issues Raised	Council Response	Action in Local Plan
Responses are characterised by concerns that Houses in Multiple Occupation (HMO's) especially where clustered can be a cause of social problems and disturbance for local communities, can change the character of neighbourhoods and affect perception of the district	As below	As below	As below
A higher percentage of responses agreed with continuing the approach of allowing HMO's subject to consideration of their effects on the local character and living environment of an area than disagreed.	Should we retain/amend augment existing policy concerning proposals to establish/regularise HMO's?	<p>While HMO's particularly where clustered can cause local problems, they can, if provided at decent standards and well managed, provide a useful source of inexpensive accommodation.</p> <p>Alongside the current policy imposing a general presumption against further HMO's in the Cliftonville DPD, the existing criteria based general HMO policy has usefully served to judge and determine applications to establish/ regulate HMO's so that they are not harmful to amenity.</p>	<p>Retain district wide criteria based policy addressing proposals to provide/ regularise HMO's.</p> <p>Policy regarding HMO's in area covered by Cliftonville Development Plan Document to remain unchanged.</p>
The highest proportion of responses agreed that a restriction should be applied to HMO's in certain areas. However, a significant proportion	Are there particular areas where HMO's should be restricted?	Through consultation and other channels concerns have been expressed about the number of family homes changing to HMO's for student occupation in the	Augment district wide criteria based policy to state a level of concentration/clustering which, if exceeded, would be considered likely to be harmful in terms of

<p>were neutral on the issue and a small proportion disagreed.</p>		<p>vicinity of Broadstairs University campus.</p> <p>While concerns about concentration and clustering have been identified as a result of student HMO accommodation in the vicinity of the campus, it is considered appropriate to augment the policy to apply on a district wide basis for consistency and to pre-empt any issue of displacement</p> <p>The evidence base prepared for the adopted Cliftonville DPD showed that this area warranted a restriction on HMO's.</p>	<p>those criteria.</p> <p>Policy regarding HMO's in area covered by Cliftonville Development Plan Document to remain unchanged.</p>
<p>The highest proportion of responses agreed that the number of HMO's should be restricted beyond a specific level. However, a significant proportion were neutral on the issue and a small proportion disagreed.</p>	<p>Should quantitative restrictions be applied to HMO's and if so at what level and geographical area?</p>	<p>Investigation of this issue suggests that it would be helpful to augment the existing criteria based policy by indicating a level of concentration/clustering which, if exceeded, would be regarded as harmful and contrary to policy for that reason.</p>	<p>Apply restriction on the number of HMO's (expressed as maximum percentage of properties) within a specific radius. As noted above it is proposed to apply this district wide but retaining the more restrictive approach applied in the Cliftonville DPD.</p>

What type of new homes do we need to provide? (10.6)			
Headline views	Issues Raised	Council Response	Action in Local Plan

<p>Considerable agreement that impact on surrounding uses, and access to certain facilities are important factors for considering the location of any accommodation site requirements for gypsies and travellers.</p> <p>Responses indicate concern that providing such accommodation may serve to add to problems arising from existing level of social need including increasing burden on already overstretched social infrastructure.</p>	<p>Need to ensure these factors are taken into account in considering location of such sites.</p>	<p>In light of the conclusions of the Gypsy & Traveller Accommodation Assessment it is not considered necessary for the Local Plan to identify sites for such accommodation. In any event however, it will need to set out criteria to inform assessment of any planning applications that may come forward.</p>	<p>Criteria based policy (including impact on surrounding uses, and access to local facilities and services) to apply to any relevant proposals.</p>
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What type of new homes do we need to provide? (10.7)			
Headline views	Issues Raised	Council Response	Action in Local Plan
<p>In relation to other housing requirements relating to particular groups, responses frequently mentioned the need for homes for older people including specific types of accommodation (such as sheltered) and the potential for such provision to facilitate downsizing</p>	<p>Agree all issues are important including objective of facilitating independent living as far as possible.</p>	<p>Agree. The proportion of older people is forecast to increase, and the Plan will need to support provision of accommodation suitable to meet needs arising.</p> <p>Recognise the importance of addressing demand for student accommodation. There are currently no known proposals to</p>	<p>Include a policy to facilitate provision of types of housing such as sheltered/adaptable/extra care reflecting information drawing on evidence of need from the Strategic Housing Market Assessment, Housing Strategy, adult social services accommodation strategy and other research in respect of</p>

<p>Also mentioned were</p> <p>Need for student housing in bespoke and affordable accommodation.</p> <p>Homes for disabled people</p> <p>Service families</p> <p>Children leaving care</p> <p>People wishing to build their own homes.</p>		<p>provide bespoke accommodation, but use is made of private accommodation often on a multiple occupancy basis. Such use can serve a valuable function in this respect but clustering of HMO's can impact on local communities.</p> <p>Not aware of specific requirements that need to be anticipated and addressed in a specific policy for service families, children leaving care or people wishing to build their own homes.</p>	<p>specific needs.</p> <p>As indicated in respect of issue 10.6 Include policy to regulate HMO's.</p> <p>Policy to support housing to meet needs of particular groups including disabled people.</p>
	<p>More start up and accommodation for people on low incomes.</p>	<p>Agree such provision is required to support retention of young people and meet local need for affordable homes.</p>	<p>Policy to state expectation of a range of sizes and affordability of new homes reflecting evidence in Strategic Housing Market Assessment.</p>

Any further comments in relation to the type of homes we need to provide? (10.8)			
Headline views	Issues Raised	Council Response	Action in Local Plan
Comments included suggestions of the need for the following	As below	As below	As below
well-designed homes in keeping with area and with good space standards.		Agree	Include policy expectation regarding high quality and inclusive design and featuring

			appropriate criteria relating to living conditions.
More family and executive housing		Agree	Policy to state expectation of a range of new housing types and locations (including types and locations suited to this section of market) in line with findings of Strategic Housing Market Assessment. Policy to support retention of existing dwellings suited to requirements of modern family occupation.
Environmentally sustainable homes		Agree	Include policy promoting sustainable design (including energy efficiency and sustainable use of resources).
Fewer 1 bedroom flats		Agree. SHMA indicates the stock is already over represented by such accommodation and makes recommendations to address this	Include policy guiding mix of new homes to be provided reflecting SHMA recommendations.
A reduction in some types of residential care and provision of extra care housing		Agree. This appears consistent with the conclusions of the County Council's emerging accommodation strategy to help deliver choice and access to high quality accommodation to vulnerable adults eligible for care and support.	Include policy supporting provision of care and supported housing in line with evidence of need.

11 - Maintaining physical separation between Thanet's towns and villages

Headline views	Issues Raised	Council Response	Action in Local Plan
There was consensus in support of maintaining a physical separation between Thanet's towns and villages	Provide clear separate identities between the towns, provide wildlife habitats and contribute to well being	Agree	Include new local plan policy to protect the Green Wedges
	Concern that alternative/ multifunctional use of the green wedges could have a detrimental impact on birds, and could end up urbanising the area by attracting too many people to them	Agree	Include criteria in local plan policy to ensure any proposals for recreational uses of the green wedges are appropriate and will not conflict with the aims of the green wedges.
	Some land may need to be released for development	Sites will be allocated for housing in order to meet the identified need. These will include some greenfield sites, however draft allocations suggest that there is sufficient land available without allocating sites within the green wedges.	No action
	Merging development sites including natural and amenity space could form a larger block of amenity space (could be a country park).	Agree that this could be a way of creating new open space. To be considered when deciding housing allocation sites	No action
	Land use should be based on character and history of the landscape	Agree. Appropriate policies will be included in the plan.	No action in this section – landscape policy to be included elsewhere.

12 – How can we respect Thanet's important views and landscapes?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was consensus in support of the continued protection of	Strong support was given in terms of their heritage value,	Agree	Include new local plan policy to protect Thanet's landscapes

Thanet's landscapes	biodiversity value, contribution to the uniqueness of the district and making the district attractive for residents, businesses and tourists		
	Thanet's landscapes should be promoted as a tourist feature	Agree	Include in text in relevant sections of the plan
	To minimise the effect on open landscapes, development should be located in close proximity to the urban areas, on brownfield sites and the reuse of vacant buildings	These issues are considered in more detail in the section relating to the location of housing and the strategy for the planned location of homes.	No action in this section of the plan
	Concern about the impact of wind farms and solar farms on the landscape	Evidence suggests that there are few areas in Thanet that would be suitable for wind farms. The climate change section will include a policy relating to solar parks and will address landscape impact.	No action in this section of the plan
	Essential utility development should be allowed if the benefit outweighs the harm and no alternative sites are available	There may be instances where a development proposal has benefits or a necessity that outweighs the landscape impact	Include criteria in local plan policy
	Independent design panel should advise on the design quality and location of all major development proposals	Agree that independent design review is desirable. This will be addressed in the quality development section.	No action in this section of the plan

13 - How can we protect, maintain and enhance Thanet's green infrastructure?			
Headline views	Issues Raised	Council Response	Action in Local Plan
Consensus in support of	Other potential areas of green	<ul style="list-style-type: none"> Cliff tops – development 	Include policy protection for

protecting and enhancing existing areas of open space	<p>space identified as:</p> <ul style="list-style-type: none"> • Cliff tops • Old putting green, Westgate • Open area between Shottendane Lane and Hartsdown Road should be wooded • Dane Park extension – transport depot • Land at top of Effingham Street • Culmers land allotments • Taddys allotments • Kittys Green • Former Hoverport site • Land rear of former power station • Weatherlees Hill – in between garage and stream • Wildlife corridor next to Pfizers social club 	<p>unlikely due to proximity to European sites and other policy protection eg landscape, coastal erosion</p> <ul style="list-style-type: none"> • Old putting Green – already protected as open space which will be carried forward into the new local plan • Open area between Shottendane Lane and Hartsdown Road should be wooded – land is privately owned so Council cannot impose this • Dane Park extension into transport depot –site surrounding depot already protected open space which will be carried forward • Land at top of Effingham Street – plan needed to confirm location • Culmers land allotments - allotments considered as part of Green Infrastructure network • Taddys allotments - allotments considered as part of Green 	existing, and new areas of open space and existing green infrastructure as set out in the Natural Environment Topic Paper
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		<p>Infrastructure network</p> <ul style="list-style-type: none"> • Kittys Green – plan needed to confirm location • Former Hoverport site - allocate as natural open space? • Land rear of former power station- plan needed to confirm location • Weatherlees Hill – plan needed to confirm location • Wildlife corridor next to Pfizers social club – falls within Dover District 	
The options for providing new green infrastructure in new developments were strongly supported	Enhancement of the green wedges gained the most support, whilst mitigation against farmland birds gained the least support. Stepping stones of natural habitat should be provided in urban areas	None of the options in this question received any degree of disagreement. No comments were made with regards to the suitability of any of the individual options. All options therefore could be included in a criteria based policy	Include criteria based policy for new green infrastructure in new developments
	The integration of SUDS should be included as a method of introducing new GI in new developments	Agree. SUDs are addressed climate change section.	Policy relating to SUDS to be included in Climate Change section
Some support was given to the options for achieving a net gain in biodiversity	Planting of hedgerows gained the most support, provision of green roofs gained the least support.	Upon consideration, these options would be difficult to incorporate and deliver through planning policy. However, they will be included in the Topic Paper as possible methods of creating new	Include as general GI criteria requirement for new development to create new wildlife and biodiversity habitats and enhancements of Biodiversity Opportunity Areas.

		wildlife and biodiversity habitats	
	No mention of proposed Marine Conservation Zone	Noted. MCZ is mentioned in the Natural Environment Topic Paper, however it would be appropriate to make reference to it in the supporting text of the plan.	Refer to proposed Marine Conservation Zone in Local Plan text.
	Should contain policies relating to the protection of priority habitats and species	Agree. It is considered important to include the protection of priority habitats and species.	Include policy to protect priority habitats and species
	People need to be educated and informed, information sharing and greater general awareness about the relationship between dogs/dog walkers and birds and wildlife habitats	Agree. Signage and wardening are mitigation measures intended to be included in the Mitigation Strategy that will accompany the local plan.	Refer to Mitigation Strategy in relevant Local Plan policy

14 - Adapting to, and mitigating against, the effects of climate change			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was agreement for all of the options for adapting to the effects of climate change	There was no clear consensus regarding the conversion of old buildings to include retrofitting measures. Concerns were raised regarding viability, difficulties in converting some properties due to the nature of their construction and any negative impact on the structure or setting of retrofitting to a historic building.	Agree that it may not always be practical or appropriate to retrofit to all buildings. However there is scope for the inclusion of works to Heritage Assets to address climate change through local plan policy	Include policy in Heritage section relating to works to a heritage asset to address climate change
	There was no clear consensus for applying a local policy in relation to flood risk to expand on the	Agree that too many policies could be onerous. As well as development in flood risk areas,	Strategic policy relating to development in flood risk areas. Include flooding in policies

	requirements of the NPPF. Comments were made that additional policies may disadvantage existing home owners and restrict further development, and that development within flood risk areas would be in the wrong place anyway.	issues such as surface water flooding will also need to be considered.	relating to site allocations where relevant.
	There was consensus in support of the use of SUDS, however concern was raised as to their impact on archaeological remains where, for example, improving an areas drainage can change the moisture level in the local environment.	Noted point about archaeological remains. There is also an issue relating to groundwater with SUDs so a criteria based policy will be needed.	Include policy supporting the use of SUDs. Ensure issue of potential Groundwater contamination is addressed
	Should also consider desalination plants, solar/tidal power, active travel, landscaping	Agree.	Strategic policy to support applications for renewable energy developments
There was agreement for all of the options in relation to mitigating against the effects of climate change	There was no clear consensus regarding district heating systems, with concern expressed that they have to run all the time whereas local sources only run when they need to	Noted. An Energy Statement submitted with a planning application would provide the opportunity for the suitability of district heating schemes to be discussed.	Include policy relating to District Heating in the Climate Change section.
	There was no clear consensus for requiring new developments to incorporate measures to reduce the use of the private car, with a diversity of opinion. A suggestion was made that cycling and	Agree	Include policies to facilitate, enable and encourage cycling and walking – potentially in climate change, design and transport sections

	walking facilities should be planned for in the initial stages of new developments to encourage them as normal methods of transport rather than recreational pastimes.		
	<p>There was no clear consensus relating to solar farms. The following suggestions were made to avoid their development on Grade 1 agricultural land:</p> <ul style="list-style-type: none"> • Locate them on factory roofs • Locate them over car parks – will also provide shade for cars • Locate them on the green wedges <p>Concern was also raised about their impact on the landscape.</p>	The location of solar farms is dependent on the proximity of a connection to the National Grid. However there should be a relevant local plan policy against which any proposals for solar farms should be assessed.	Include policy with criteria relating to landscape issues and impact on agricultural land
	There was no clear consensus for encouraging other forms of renewable energy developments. Concerns were raised over loss of agricultural land, detriment to wildlife and negative visual impacts	Agree that these are considerations that need to be taken into account	Include policy supporting the development of renewable energy developments subject to any visual or environmental impact
	There was support for allocating Richborough for renewable energy technologies as it is a brownfield site with existing	Agree.	Allocate land at Richborough for renewable energy technologies

	connections to the national grid.		
	Anaerobic digesters, combined heat and power systems and tidal power may be appropriate. Could the tunnel networks be developed for ground source heating?	Agree that these are all good ideas. The policy for the development of renewable energy developments will be supportive of any such proposals submitted.	Include policy supporting the development of renewable energy developments
	Old hoverport site could be used for a renewable project – maybe a solar farm	Former hoverport site is not located close to a connection to the national grid which is necessary for the development of a solar park. The site has been proposed as open space.	No action
	Bird sensitivity maps should be used for defining areas for renewable energy and in planning control	The bird sensitivity maps appear to refer to sites for onshore windfarms. Windfarms have been identified in evidence as the least suitable form of renewable energy for Thanet, however, should a proposal be received, the sensitivity maps will be referred to.	No action

15 – To what extent do you agree or disagree that we should have policies in place to address the following issues?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was consensus in support of all of the policy options relating to the environment	Comments generally raised concerns that support the need for policies relating to these issues.	Discussions with the Environmental Health team also supported the need for environmental policies	Include policies relating to: Pollution Contaminated Land Unstable and Derelict Land Air Quality Noise Light pollution Groundwater Quality

	Concerns were raised regarding air pollution caused by Manston Airport, and air quality in general	Agree that these are important points. Thanet has an Urban Air Quality Management Area and associated action plan.	Air quality policy to require submission of an air quality assessment for proposals likely to cause detriment to Thanet's air quality.
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16 – Providing high quality homes, development and neighbourhoods			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was consensus for support for most of the options for providing high quality homes, developments and neighbourhoods	There was a difference of opinion regarding the integration of public art. It was supported in contributing to the character and identity of a place or development, but concern was raised about the potential for vandalism which would then have a negative effect, and that it was a lower priority than factors such as good design and green spaces.	All of the options that were consulted on were issues the Council considered important in terms of design. None of the options received significant objections in the consultation, therefore all will be included in design policies within the local plan. However it is not considered necessary to make specific policy reference to public art as this is considered to be more site specific and can be included in development proposals without specific policy reference.	Inclusion of a number of Design policies in the new Local Plan
There was consensus in support of protecting areas that are of High Townscape Value	Reasons included attracting inward migration of higher income households. However concern was raised that with planning controls existing for listed buildings and conservation areas further designations would make more hurdles to jump. Low townscape value designations	The existing AHTVs that were designated in the last local plan have been used to justify planning applications, and the corresponding policy had been successful in appeals. However, there is little evidence to support the designation of these areas, and there are other areas with	Include a policy that will be applicable to the whole district that echoes the sentiments of the current AHTV designations to enable high quality and sensitive developments throughout the district, not just in specified areas.

	were suggested as suitable areas for redevelopment and regeneration.	attractive characteristics that could warrant such a designation. There are no set criteria for the designation of existing AHTVs or designating new ones – the justifications for the existing AHTVs are characteristics that should be enhanced throughout the district. It is considered that a more detailed character analysis of parts of the district be carried out and more detailed design policies for those areas be included in the Quality Development SPD.	
There was no clear consensus as to how the density of new housing development should be set.	Comments were mixed, but related to suggestions of areas where a certain density might be appropriate, rather than specifying a density level to be applied district wide. The option to ensure that new developments reflect the density of the surrounding area was the most strongly supported.	It is considered more appropriate for density to be considered at the planning application stage so that it is relevant and appropriate for the site and its surroundings rather than being set through planning policy.	Include in policy that density should relate to surroundings of the site/location of the development
	Paving over front gardens lowers the environmental quality of the neighbourhood, and encourages cars travelling at higher speeds on clear roads, use space standards to ensure no unpleasantly small homes	Noted. These issues are more appropriate for inclusion in the Quality Development SPD.	No action

	Independent Design panel should advise on the design quality and location of all major proposals	Agree that independent assessment by the Design Panel would be beneficial in some cases, however this would need to be assessed depending on the site and location.	Policy recommendation for independent review by Design Panel for proposals of national or public significance
	Should refer to Sport Englands Active Design, Design for Crime Prevention and Commissioners Police and Crime Plan	Noted. There are many relevant documents produced by other organisations that support the local plan and its policies. However the Council cannot be certain that these documents will remain throughout the plan period, so reference to them within the plan is not considered appropriate as the plan would become out of date if the documents are withdrawn or superseded. However it is considered appropriate to refer to them in the relevant Topic Papers that support the plan.	No action. Refer to documents in relevant topic papers.

17 – How can we protect and enhance Thanet's heritage assets?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was consensus in support of most of the options for protecting Thanet's heritage assets and their settings			
	There was no clear consensus regarding the designation of new conservation areas – concerns	The Council considers conservation to be important, given the districts rich and diverse	Plan to include a strategic policy to facilitate the review of conservation areas and the

	were raised regarding enforcement if inappropriate development in conservation areas.	history. New conservation areas should be designated where there is sufficient evidence and community support.	designation of new ones, and also agreeing Article 4 Directions where appropriate.
	There was consensus in support of a local list. A comment was made that resources need to be in place to enable a proactive improvement.	Agree	Plan to include in Strategic Policy the recognition of local heritage assets through a local list
	There was consensus in support of a policy relating to renewable energy and the historic environment, and also for site specific policies for significant heritage assets with development potential	It is important that Heritage Assets can contribute towards reducing the impacts of climate change, therefore a policy setting out how this can be achieved is considered appropriate.	Plan to include policy to enhance the environmental performance of heritage assets
	Essential utility development should be permitted if the development outweighs the harm	Paragraph 133 of the National Planning Policy Framework sets out criteria which must be applied if a proposed development necessary to achieve substantial public benefits would cause detriment to a heritage asset	No action
	St Lawrence should be protected and established as a Heritage Area	A Heritage Strategy for Thanet is being prepared which will include the identification of specific areas/sites with heritage value.	No action.
	There are conflicts between buildings of historical importance and adapting buildings for people with mobility problems	It is considered important for buildings of historic significance to be flexible in their use, and brought back into use. Adapting them for accessibility will be	Support for new uses for historic buildings and bringing them back into use in strategic policy in the plan.

		incorporated where necessary and appropriate and where possible to do so without compromising the integrity of the building.	
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18 – How should we plan for community facilities?			
Headline views	Issues Raised	Council Response	Action in Local Plan
There was support for all of the options for ensuring there are sufficient and appropriate community facilities.	Concern that unused, inadequate or poor standard facilities should not be retained.	Agree. It would be detrimental to a community to insist on the retention of poor, inadequate facilities. However it is also important to safeguard them to prevent their redevelopment leaving a community lacking in facilities.	Include criteria based policy for the retention of community facilities.
	S106 agreements could be used to provide community facilities for large scale developments	This is an issue that may be addressed through CIL. The Council is currently preparing a CIL schedule.	No action.
	Design and scale of community facilities should attract use by not only the local community but appeal to the wider visitor economy	Agree. Community facilities should be accessible to the local community but also provide parking facilities for visitors from further afield.	Include a requirement for local accessibility and space for car parking in policy.
	It is the service that should be assessed – not the land and buildings they are provided on – service may be provided in other accommodation if a building closes	Disagree. It is considered appropriate to consider the last lawful use of a building or site in order that it can be retained if there are no other suitable sites within the community for the provision of a community facility.	Include criteria based policy for the retention of community facilities allowing an alternative site to accommodate provision if appropriate.

	Public Rights of Way should be protected or enhanced	Agree. This will be included in the Natural Environment section.	No action
	Plan should provide sufficient protection to ensure continued theatre use	Agree. Theatre, arts and entertainment are important features to be retained.	Acknowledge in supporting text
	Need to ensure planned approach to the provision of facilities and opportunities for sport and recreation	Agree.	Addressed in section relating to the provision of open space.
	Warre Rec, Nethercourt and Ellington parks should be retained for community use	Agree – these are currently areas of open space which will continue to be protected in planning policy	No action – policy protecting open space elsewhere in local plan.
	Ensure Thanets community has access to good quality social and health services	Agree. The council is liaising with relevant authorities in order to achieve this	Include policy to promote, protect and improve the health of Thanet's residents.
	Broaden and improve the range of active leisure facilities to encourage greater participation within the local community	This plan places more emphasis on a healthy community and addresses this issue in various parts of the plan.	No action.
	Redevelopment of the Jentex site would provide a care home and additional local facilities including potentially a doctors surgery/pharmacy and small convenience store, which are currently lacking in Cliffsend.	This will be considered as part of the housing site allocations process	No action

(19)

Headline views	Issues Raised	Council Response	Action in Local Plan
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<p>Considerable consensus that all factors identified in consultation are important to an efficient and effective transport system. Transport infrastructure is key to increasing job growth. Plan should improve public transport including for new development.</p>	<p>Need to increase safety and use of cycling and walking, (including capitalising on heritage and green tourism), need to improve public transport and reduce dependency on car use.</p> <p>Need to reduce pollution/emissions, vehicle speeds, noise and pressure on infrastructure, improve health and road safety, and protect habitat and green image.</p> <p>Need to facilitate safe cycling) e.g. between secondary schools and settlements) and walking as normal activity.</p> <p>Need for bigger buses/cheaper fares and for more frequent bus services to certain destinations. Need for additional services and improvements including need to widen the coverage of the Loop service and update/ provide services in rural areas including Cliffsend. Need for Park and ride facility.</p> <p>Development should be located where well linked to services but</p>	<p>Agree issues raised are important for the transport and infrastructure objectives.</p> <p>Responses suggest a variety of relevant concerns and initiatives including for example providing footpaths and cycle routes, signposting, locating development where services can be accessed without the need to travel by car, providing bigger buses, additional ticketing systems and alternative charging regimes. Some of these can be influenced directly through planning policy. Some cannot but may for instance be addressed through ongoing liaison between the council and the county council as transport authority, providers and users groups.</p>	<p>Headline policy expressing Council's intention to work with developers and transport providers to manage travel demand and the need for development schemes to address safe and sustainable travel.</p> <p>Policy expecting development proposals to take into account need to facilitate use of public transport (including provision of relevant facilities such as improved waiting facilities) in accordance with the Thanet Transport Strategy in preparation.</p> <p>Policy requiring development with significant transport implications to be supported by a Transport Assessment / Travel Plan showing multi-modal access travel options and how transport infrastructure will be achieved.</p> <p>Policies requiring design of new development to incorporate safe convenient movement by pedestrians, cyclist safety, supporting provision and enhancement of walking routes, supporting extension of the cycle</p>
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	<p>need to accept that some people will always need to use cars.</p>		<p>network and provision of cycle parking and storage.</p> <p>Policy signifying that trip generating development proposals should be located where a range of services will be accessible without the need to rely on private cars.</p>
	<p>Capacity of the Strategic Road Network</p>	<p>The Highways Agency has identified potential capacity issues at junction 7 of the M2 and at the junction of the A2/A256. While these junctions are located at some distance from Thanet consideration needs to be given to the potential impact upon them of traffic movement that may be generated by development and growth at the Airport proposed in the Local Plan.</p> <p>In liaison with neighbouring districts and Highways Agency a joint overview of development and associated traffic movement in</p>	<p>Address how any material impact of planned development upon the Strategic Road network will be addressed/mitigated</p>

		East Kent will be prepared to inform assessment of impact upon these junctions and the need for any mitigation measures.	
	Need, and measures appropriate, to address traffic issues and potential/existing congestion at Westwood including for example signing of alternative routes for traffic heading to alternative destinations.	<p>Agree there is scope to achieve significant improvement to the transport system and circulation at Westwood. However, this will require significant rationalisation of its land use configuration and road layout in line with a conceptual layout.</p> <p>To this end a Westwood Relief Scheme is in preparation, including the concept of realigning traffic routes to enable free movement by pedestrians between town centre facilities. The Local Plan will be fundamental to its implementation.</p>	Policy requiring development to have regard to and where appropriate contribute to successive implementation of a Westwood relief Scheme.
	Need to improve rail speeds	Agree further improvements to rail speeds will further improve perceptions of District as a credible location for investment and commuting.	<p>Include statement that Council will continue to lobby for investments to secure further improvements to rail journey times for CRL domestic services between Ashford and Ramsgate.</p> <p>Including policy supporting</p>

			proposal to provide new Parkway Station
	Is the Parkway Station project justified? Better to improve efficiency of/parking at the existing stations?	With a location agreed by the County Council and significant funding secured it is anticipated that this project will be delivered early in the Plan period.	Land to be allocated/safeguarded as appropriate in light of the business case for providing a Parkway Station.
	Sufficiency and attractiveness of car parking, including demand that will arise from developments such as Dreamland and Tesco at Margate.	Agree that existing provision may not be adequate to accommodate demand arising when such developments are operating.	Acknowledge the issue and support solutions such as identifying land for additional car parking, better signage of existing provision.
	Address disparity of charges between coastal town centres and Westwood. Should car parking be free to some /all users? Should street parking charges be retained/introduced?	<p>Agree parking charges will influence attractiveness of individual centres and places to residents and visitors. As car parking at Westwood is essentially on private land the Council cannot directly control parking charges there. Moreover the Local Plan cannot address parking charges in general but preparation of the Plan is being informed through liaison with the Parking Operation unit.</p> <p>Concerns suggest it is appropriate that policy should aim to retain/provide adequate and</p>	Retain policies safeguarding off-street public car parking in the coastal town centres, and restricting additional car parking provision at Westwood which is considered adequately served as a multi-purpose destination. .

		suitable coastal town centre car parks to meet demand and to limit additional provision at Westwood.	
Representations include suggestions for various transport improvement schemes such as a St Peter's by-pass, a Clearway route (to be implemented successively) from St Peters to the A28 at St Nicholas, widening of Nash Lane, closure to traffic/ pedestrianisation of certain town centre streets and the suggestion that development at "Manston Green" be permitted including housing, a school, a Parkway station, a multi-modal interchange, Park and Ride and strategic highway improvements to the A256 corridor, and strengthening of links through Richborough corridor to Discovery Park.	Consider the merits of particular schemes and development projects prospectively delivering substantial transport infrastructure improvements.	Transport infrastructure improvements need to be deliverable and considered in the context of wider growth proposals over the plan period. A transport strategy, informed by traffic modelling has been prepared as a component to inform assessment of options regarding future development site allocations and to identify the strategic transport infrastructure required to support them.	Development strategy to be informed by transport strategy and to identify transport infrastructure improvements and schemes as are required and deliverable to support it. Include policies to enable delivery of such improvements and schemes.

Appendix 4: Main Issues & Recommended Responses (Preferred Option Stage)

Vision, Strategy & Strategic Objectives

Policy/Section	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
Vision & Strategy	A number of respondents have raised issues about the realism and clarity of the Vision and Strategic Priorities set out in the draft Plan.	<p>More detailed responses to particular housing and employment issues can be found in other parts of this Schedule relating to specific policies.</p> <p>However, there is a general point regarding the realism and clarity of the Vision and Strategic Priorities for the draft Plan.</p> <p>The Vision and Strategic Priorities set out in the draft Plan were relevant at the time of writing. The Council recognises that some significant changes have taken place in the local area of the last 2 years, which require a review of some of the detailed elements of the Strategy.</p> <p>However, the overall strategy to meet housing requirements and to help strengthen and diversify the local economy remain valid. The overall employment projections, in relation to housing need, are broadly consistent with the work undertaken for the Preferred Options stage, although the trend employment figure is higher.</p> <p>1</p>	Amend vision and strategy section to recognise changes in the district and to set out how the Council will use the Local Plan to address changing circumstances.

Vision	<p>The main part of the vision that we disagree with is the intention of the plan to promote Westwood as a new integrated community. As we explain in response to Policy SP05 [Policy SP07] in the questionnaire, we acknowledge that Westwood has grown as a major retail centre and that this has been designated for some time as a town centre in planning terms. However, it functions as an out of town shopping destination rather than as a town centre. Because of this, we consider it is inappropriate to try and justify it as a town centre by proposing a new residential community around it. This will only serve to push the urban area further into the countryside and will go a long way to infilling the 'horseshoe' of coastal urban development that is described in the plan as being characteristic of Thanet. It will also continue to undermine the vitality and viability of the coastal communities. We do not consider that such further expansion of Westwood to create a new residential community is justified.</p> <p>Furthermore, we believe that by focusing further growth at Westwood other elements of the vision will be undermined, especially</p>	This issue is dealt with in detail under Policy TC07.	
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	the revitalisation of the coastal towns. Indeed, we believe that it has been the growth of Westwood that has in large part lead to the demise of the economic fortunes of the coastal towns.		
Strategic Priority 1	Comments raised about whether Manston Airport and Port Ramsgate should be included in this Strategic Priority	<p>The Airport closed in 2014, and since that time, the Council has been investigating whether the site might be brought back into full and active Airport use. The most recent aspect of that investigation was the “soft marketing” process to invite Expressions of Interest in operating the Airport.</p> <p>The Harbour and Port have undergone some changes since the draft Plan was written. This section needs updating to reflect those changes.</p>	<p>Airport position to be determined.</p> <p>Retain and update references to Port Ramsgate and Harbour.</p>
Strategic Priority 3	Strategic Priority 3 – we support the stated priority and objectives, though as we have explained elsewhere in our comments the housing target is too high being based on an unrealistically high employment growth target. We believe that the priority and objectives can equally be achieved if a lower housing target is set. We also consider that an objective should be included which seeks to ensure that the many long-term vacant dwellings in the district are brought back into beneficial	<p>The housing target aspect of this comment is dealt with in the Housing schedule.</p> <p>In relation to the vacant properties point, for some time the advice of the Planning Inspectorate has been that empty properties cannot be counted in the housing land supply, because they are already part of the housing stock.</p> <p>However, more recent advice indicates that some empty properties can be counted towards the supply, but only under strict circumstances, as follows:</p>	Amend residual housing target to make allowance for 540 dwellings to be brought back into use during the Local Plan period.

	residential use.	<p>(1) The properties in question have been empty for a period of 4 years or more; and</p> <p>(2) The Council has an active and robust programme for bringing those properties back into use.</p> <p>The Council has therefore carried out a rigorous review of empty homes based on these criteria, and the likely impact of its Empty Homes Initiative over the period of the Local Plan.</p> <p>It has calculated that it can make an allowance of 540 dwellings coming back into residential use during the period of the Local Plan.</p>	
Policy SP01	Policy SP01 and associated map 4 and 5 - showing the hierarchy of development, Natural England would wish the evidence base of farmland birds and functionally related habitats to SPAs to be taken into account prior to allocation this should be addressed both in the HRA and SEA, that should consider these impacts. There is data that would help with (i.e. HLS/ELS, report on where over 50% of SPA feed offsite around Pegwell Bay, the importance of Birchington and Plum pudding with regard to roosting birds etc. and farmland bird targets) and we would be happy to discuss with the LA.	The Council recognises the importance of land functionally related to the Special Protection Area, and has commissioned Golden Plover surveys in discussion with Natural England. The results of the surveys indicate that there are no significant issues in relation to the proposed site allocations. However, it is the intention to require affected sites to include mitigation measures in conjunction with Natural England.	It is proposed to delete Policy SP01.

Economic Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP02	Over-ambitious growth target	The Baseline scenario forecasted job growth in Thanet at 3,100 based on the economy performing as it does at the moment and therefore this scenario would maintain the status quo. This scenario would not deliver the improvements to Thanet's economy that the Council wishes to see. This target also includes an element of growth on the airport site which is a reasonable assumption over the plan period. In addition the 2015 SHMA carried out by GL Hearn looked at the employment growth scenario used by the South East LEP produced by Oxford Economics using the East of England forecasting model. This showed that the baseline forecast for Thanet at 4,800 which is close to the 5000 target.	No change
SP02	Growth target not ambitious enough	The figure is based on assessment of future employment need carried out by Experian. Three scenarios were provided and a level between the baseline figure and an optimistic level of employment growth was selected. An overly high target would not be capable of being delivered.	No change
SP02	Lack of clarity on where jobs are coming from	The job growth figures are the result from an Economic and Employment Assessment. The report breaks down the job growth figures to employment sectors (SIC level). The nature of forecasting is that detail is very difficult to accurately capture. Alongside the adoption of	No change

		the Local Plan other projects are in play that aim of to attract employment growth to Thanet, such as the Economic Growth Strategy.	
SP02	Querying growth sectors	The growth sectors identified in the “Policy On” economic growth scenario assumed enhanced performance in the tourism and green sectors. These are sectors that Thanet are currently strong in and they have also been targeted in the Councils Economic and Regeneration Strategy. Other sectors that Thanet are particularly strong on include public sector administration, education and health. Increasingly the cultural and creative sectors are growth areas, this is particularly true in Margate.	No Change
SP02	Why the differential between housing and job numbers	The housing target and job target in the Local Plan do not appear to align due to the fact that many people that need to be housed are economically inactive. There is a very large growth in the retired population that will not need a job. In addition the housing target takes account of people that are already in Thanet in overcrowded households. Many of these people already have jobs and would simply be moving out of their parents’ house, for example.	No Change
SP02	Too much weight is given to growth at the airport in the jobs target	It is clear that some people refer to other documents such as KCCs Growth Without Gridlock and Infratil’s Airport Masterplan that all predict job growth at the airport. The Draft Plan did not base growth forecasts on these documents but rather used the Economic and Employment Assessment 2012.	No Change

		<p>The Council assumed that given the recent uncertainty at the airport that the low growth scenario at the airport should be assumed. This assumes 240 jobs until 2031. It was considered that it is reasonable to assume that the site will deliver a level of job growth over the plan period.</p>	
SP03	There should be a reduction in the employment land supply	<p>The Council is aware of the oversupply of employment land has re scored all of the allocated sites to assess their contribution to the overall employment strategy. The assessment concluded that 19.7hecatres should be released. With the subsequent removal of much of the employment allocation from Eurokent following the appeal decision released employment land has risen to over 34 hectares.</p>	No Change
SP03	Employment sites should be used to accommodate some of the housing	<p>The Council is aware of the oversupply of employment land has re scored all of the allocated sites to assess their contribution to the overall employment strategy. The assessment concluded that 19.7hecatres should be released. Some of these sites have been allocated for housing.</p>	No Change
SP03	Employment oversupply is contrary to the NPPF that states we should avoid the long term protection of employment sites	<p>The Council is aware of the oversupply of employment land has re scored all of the allocated sites to assess their contribution to the overall employment strategy. The assessment concluded that 19.7hecatres should be released. With the subsequent removal of much of the employment allocation</p>	No Change

		from Eurokent following the appeal decision released employment land has risen to over 34 hectares.	
SP03	Some felt there should be more flexibility on allocated strategic employment sites	The Eurokent site has been identified as Thanet's flexible employment allocation and is included within the sequential test to allocate town centre and leisure uses should the scale and format preclude their location within the identified town centres. An element of development that is ancillary to the employment use would be acceptable on all employment sites.	No Change
SP04	Support from statutory authorities and a mixed response from local people. Seems to be based on a misunderstanding that it is part of the airport.	The Manston employment site is an established site and is approximately half developed. Due to the name of the business park it would appear that some people thought that this is part of Manston Airport.	No Change
SP05	Mixed response – majority indicate wish for Airport to remain open, some arguing that the Council should serve a CPO; some respondents suggest the site should be developed for housing as an alternative to other allocated sites.	Cabinet resolved on 31st July 2014 to carry out a soft-market testing exercise to identify a CPO Indemnity Partner – a third party who could cover the costs of compulsory purchase of the Manston Airport site. Subsequently in December 2014 Cabinet resolved that no further action be taken at the present time on a CPO of Manston Airport, on the basis that the Council has not identified any suitable expressions of interest that fulfil the requirements of the Council for a CPO indemnity partner and that it does not have the financial resources to pursue a CPO in its own right. In July 2015 Cabinet decided to review the	Draft Mixed-Use policy for the airport site
SP05	The issue with the CPO needs to be resolved before the Local Plan proceeds		
SP05	Some support for alternative mixed use development as they believe the airport is no longer viable		

SP05	Some think night flights are needed to make the airport more viable	<p>December decision and authorised that advice be obtained to determine whether RiverOak are a suitable indemnity partner in relation to a CPO for Manston Airport and to provide advice on the indemnity agreement and CPO process generally. Subsequently in October 2015 Cabinet reviewed its position and decided that no further action be taken at the present time on a CPO of Manston Airport, on the basis that RiverOak do not fulfil the requirements of the Council for an indemnity partner;</p> <p>In December 2015 Cabinet sought to set out a formal process for identifying interest from third parties to be a Council indemnity partner for a potential CPO for Manston Airport.</p> <p>Subsequently in June 2016 Cabinet considered a report which drew the conclusions that in terms of the key lines of enquiry, the market cannot deliver on the council's requirements; there is no established market which is able to deliver, or an adequate number of operators; the market has no capacity to deliver the requirements and there is no cost or other benefits in taking this matter further. Cabinet noted the results of the soft market testing assessment and decided to take no further action in respect of the interested parties.</p> <p>Also in 2016 the Council commissioned an airport viability study to assess whether an airport was a viable option for the site within the plan period to 2031.</p> <p>The report concluded that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031.</p>	
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		Taking on board the conclusions of the airport viability report and given the level of objectively assessed housing need the Council considers that the best use for this 320ha brownfield site is for a mixed use development primarily focused on residential.	
SP05	There is no “need” for the airport as an employment site	Partially agree. The airport site is not included as part of the employment land portfolio as it is such a unique use. A small element of the jobs target assumes the delivery of some jobs on the site over the plan period. If the site is not an airport it is considered that it shouldn't be solely residential and should be a sustainable mixed use settlement comprising employment, retail and community facilities, as well as residential.	Draft Mixed-Use policy for the airport site

Town Centre Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP07 (SP06?)	Objections to the role/status of Westwood. More effort should be put into the other centres	Many people have expressed concern that Westwood is identified as being at the top of the retail hierarchy. This is the case merely because it has the largest catchment of all the town centres and this catchment extends outside the District. The hierarchy reflects the	Make it clear in the text that Westwood is not prioritised over the town centres.

		<p>inter relationship between the town centres as is required by the NPPF.</p> <p>The Plan does not propose to extend Westwood beyond its built up limits and has concluded that there is very little retail need to the end of the plan period and therefore any development can be accommodated by mezzanine and reconfiguration of the site. The Council have decided not to increase the market share of Westwood.</p> <p>Westwood's status as a town centre was established in the 2006 Local Plan as a response to the piecemeal developments taking place and the leakage of retail expenditure out of the District, and in particular to Canterbury.</p>	
SP07	<p>There is some misunderstanding that the Council wishes to expand Westwood Retail area. Many are against expansion making reference to the existing traffic problems around the area</p>	<p>Many people have expressed concern that Westwood is identified as being at the top of the retail hierarchy. This is the case merely because it has the largest catchment of all the town centres and this catchment extends outside the District. The hierarchy reflects the inter relationship between the town centres as is required by the NPPF.</p> <p>The Plan does not propose to extend Westwood beyond its built up limits and has concluded that there is very little retail need to the end of the plan period and therefore any development can be accommodated by mezzanine and reconfiguration of the site. The Council have decided not to increase the market share of Westwood.</p> <p>Any development in the vicinity of Westwood will be expected to have regard to the</p>	No Change

		Westwood Relief Strategy and pedestrian connectivity.	
SP07	Re Westwood, some think we are putting too much faith in a failing centre	Retail need has been assessed by Nathaniel Lichfield and partners and they have concluded that 27,870 metres squared of retail floorspace is required at Westwood. 14,124 sqm of which has been taken up by the Sainsburys permission. 22,864 of the committed development is open and trading. The remaining floorspace requirements can easily be accommodated within the footprint of Westwood. The scenario of increasing the market share was tested and the Council decided against further expansion of Westwood. It is unrealistic to de allocate Westwood as it has already established its role in the retail hierarchy. Peaks and troughs of vacancy's are to be expected especially at the time of rent reviews.	No Change
SP08	Margate should not flourish at the expense of Ramsgate	The town centre policies treat all of the centres the same in terms of allocating primary and secondary frontages and highlighting specific areas of interest within the towns (Opportunity areas?) The overall town centre strategy seeks to build on the strengths of all of the town centres. In terms of tourism and leisure uses the Council sees Thanet as a destination encompassing the range of areas and assets.	No Change
SP09	General support for the policy but scepticism expressed over the future of the Port/ferry operation	The policy is supportive of development of the port which would contribute to Thanet's economy and the aspirations of the Port Masterplan. In relation to the scepticism it is	No Change

		worth noting that since the consultation period a freight operator has been found representing the car industry which is an encouraging development.	
SP09	The port should be used for leisure uses/luxury apartments rather than for concrete processing	Ramsgate Port is safeguarded for port related uses. Leisure and tourism uses are permitted within the Ramsgate Waterfront area around the Royal Harbour. The reference to concrete processing refers to a piece of pre application advice and this is not a proposal of the Local Plan.	No Change

Housing Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
SP11 – Housing Provision			
	<p>In broad terms:</p> <ul style="list-style-type: none"> • support for the proposed housing numbers comes from statutory bodies such as the Homes & Communities Agency, neighbouring authorities and KCC • some house-builders/developers have objected because they believe the housing numbers should be higher to meet Government guidance • significant volume of objections seeking lower housing figures: (see bullets in row below) 	<p>Government guidance expects dwelling provision to be informed by Objective Assessment of Need. Housing numbers in the PO Plan were informed by scenario based dwelling forecasts (published as part of evidence base) and in light of economic aspirations. However, this evidence is being reviewed through an updated Strategic Housing Market Assessment conducted in light of government guidance and, alongside other evidence, including the Strategic Housing Land Availability Assessment, will inform review of the quantity and type of dwellings to be provided for in the pre-submission Plan.</p>	<p>Housing provision to be reviewed and established in light conclusions of updated SHMA and any other relevant aspects of the evidence base, in line with Government Guidance.</p>
	<p>Lower housing numbers - not needed – where is evidence for housing numbers?/flawed assumptions</p>	<p>See response above</p>	<p>As above</p>
	<p>Who is housing for? In-migration/London overspill</p>	<p>In line with Government Guidance the starting point for objectively assessing need will be household forecasts published by Department For Communities and Local Government. These are trend based and therefore the implied requirement can be expected to reflect an element of continuing inward migration an element of which has been from London.</p>	<p>No change</p>

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	Why not use empty properties first?	<p>In considering how much greenfield land is needed to meet total housing requirements, some allowance has been made for empty property. The Council works vigorously to bring empty property back into beneficial use.</p> <p>As a result of recent advice, the Council has calculated the amount of empty properties brought back into use after a vacancy of 4 years as a direct result of the Council's Empty homes programme, and projected that forward for the rest of the Plan period. This can be included as part of the housing land supply and totals 540 units.</p>	Amend Table 2 (p54) accordingly, but no other change required.
	Should use more brownfield first – protect “green belts”	An expectation stated in the NPPF is that policies should make effective use of previously developed (brownfield) land. In identifying sites to accommodate total housing requirements the Council's approach has been to optimise the capacity of previously developed land. However, to meet the total requirement, greenfield land is also required.	No change. This aspect has already been factored into the strategy for planned location of housing.
	Loss of best quality agricultural land	While acknowledging potential economic and other benefits of best and most versatile agricultural land, the NPPF does not signify that its presence would justify reducing housing targets below objectively assessed need, and states that where significant development of agricultural land is demonstrated as necessary, the local planning	No change. This aspect has already been factored into the strategy for planned location of housing.

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		housing provision figure also takes account of the need to accommodate the additional labour requirement to meet the level of employment growth anticipated in the District's Economic and Regeneration Strategy. It is not anticipated that a reduced employment target would reduce overall housing need which is largely driven by demographic factors including household formation.	
	Utilities not capable of supply Sewerage system inadequate	Engagement of the utility services including the agency responsible for sewerage is ongoing. The Plan will be supported by an Infrastructure Delivery Plan informed by such engagement. This process will assist these providers in understanding the impact of the Plan on their service delivery programmes and inform the Plan by identifying the infrastructure and resources needed, when they will be required and how they will be provided/funded.	No change other than to continue engagement to inform Infrastructure Delivery plan and Local Plan policies.
	Impacts on environment	<p>The process of identifying sites to accommodate future homes has included criteria to assess relative impact of options on the environment including issues such as landscape and sustainability of location.</p> <p>The NPPF is clear that the Plan should meet in full objectively assessed need for housing, as far as consistent with policies set out in the Framework. It identifies specific environmental features and designations where in general a</p>	No change as this aspect is considered to be adequately addressed through the Strategic Housing Land Availability Assessment and Strategy for Planned Location of Housing

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>presumption against harmful development applies: (Green Belt, National Parks, the Broads, Areas of Outstanding Natural Beauty and within or otherwise likely to adversely affect a Site of Special Scientific Interest). The only such designation applying to Thanet is the SSSI (largely coinciding with European nature conservation designations. However, this designation is essentially limited to the foreshore and housing development will be subject to sufficient mitigation. On this basis the policies in the Framework do not signify any constraints that would justify a level of housing provision below that of objectively assessed need.</p>	
	<p>Increase in deprivation Increase in crime</p>	<p>These representations evidently reflect concerns that providing more homes than needed by Thanet's existing population may fuel in-migration by vulnerable and benefit dependent households.</p> <p>Government policy as expressed in the NPPF is to boost the supply of homes, and in referring to its household projections as a starting point for assessing local need, it is clear that objectively assessed need will incorporate a continuing element of in-migration.</p> <p>The draft Plan acknowledges that the district is relatively deprived and contains pockets of severe deprivation. However, it aims to ensure</p>	<p>No change as these factors are considered to be already addressed.</p>

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>that planned development should serve to improve the social and economic position of the district by through a more aspirational and economically independent community through the measures summarised below.</p> <ul style="list-style-type: none"> • Adopting a positive economic and regeneration strategy to diversify and expand local job opportunities, • supporting a Parkway Station • setting out area based housing objectives including improvements to the quality and configuration of housing stock and environment in certain areas to support a mixed, settled and inclusive community. <p>The NPPF notes that the planning system can serve to facilitate social interaction and create healthy, inclusive communities and expects policies and decisions to promote safe and accessible environments where crime and disorder and fear of crime do not undermine quality of life. The Plan's primary aims for development include promoting inclusive design, including a policy requirement that development must improve people's quality of life by creating safe and accessible environments and promote public safety and security.</p>	
	Out of date evidence	It is acknowledged that the Strategic Housing	Content of Pre-Submission Draft

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		Market Assessment (SHMA) is dated. The SHMA has been revised to provide up to date evidence for the objectively assessed housing need for Thanet and the types and affordability of homes required. These will inform the level, size, type and affordability of housing to be provided for in the pre-submission draft Local Plan. The SHLAA will be updated for the pre-submission draft Local Plan.	Plan to be informed by updated Strategic Housing Market Assessment by GL Hearn.
	12,000 far too many for the district	The Council is required to set housing provisions having regard to objectively assessed need. Previous forecasts suggested that, alongside economic aspirations, 12,000 was the appropriate requirement. This situation is under review as outlined above.	Level of housing provision proposed in the pre-submission draft to be reviewed in light of the updated Strategic Housing Market Assessment.
	Urban sprawl will have an adverse effect on tourism	In making provision to meet the housing target, the Council has assessed potential new housing locations against a variety of important criteria, including coastal wildlife designations, landscape, archaeology and conservation and transport in order to identify the most suitable and sustainable sites.	No change
	Target is not localism	Government guidance is quite clear that establishing housing requirements to be provided for should be informed by an objective assessment of need (OAN), and that the starting point in this process is Governments published household growth projections. Other than coastal wildlife designations (which are not proposed as	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		housing allocations in Thanet) the guidance identifies no other constraints currently relevant in Thanet which may justify providing below the objectively assessed need.	
	More care and supported homes needed for our ageing population	The Plan acknowledges that housing requirements extend beyond conventional dwellings to include homes suited to households with mobility limitations and specialised accommodation such as sheltered housing, extra care housing and homes providing 24/7 care. Policy H07 expresses the Council's intention to seek to approve proposals for such housing for which there is evidence of need. The updated Strategic Housing Market Assessment (SHMA) together with Kent County Council's strategy for accommodation of adult social care clients will be important sources of reference regarding evidence of need.	No change other than to review policy supporting care and assisted homes in line with most recent evidence including the updated SHMA
	Conflict with not developing in the countryside	Strategic Priority 4 of the draft Local Plan includes protection and enhancement of Thanet's environment including the coast and countryside. In making provision to accommodate the housing target, the approach has been to optimise the number of such homes which can be accommodated on previously developed land in the district. However, the Strategic Housing Land Availability Assessment demonstrates that it will not be possible to meet the overall requirement without a	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		significant call on greenfield land in the countryside. In identifying the best greenfield sites selection criteria have included landscape and role of sites in maintaining separation between and identity of individual settlements.	
	Homes will not be affordable for local people	The type, size and affordability of the new homes required will be reviewed in the updated Strategic Housing Market Assessment. This will take account of data on local incomes and house prices. This will serve to inform policies regulating the type of housing to be delivered and how much should be delivered as affordable housing.	No change other than to review the calibration of policies regarding the type and quantity of homes required and target proportion of affordable homes in light of the conclusions of the updated SHMA.
	The location of houses does not follow the issues and options consultation as the chosen locations are villages	The issues and options consultation included scenarios featuring some housing at and adjoining rural settlements. The large majority of allocated housing sites are located within or adjoining the coastal urban belt containing the main Thanet towns and Westwood. A relatively modest element of housing is identified at the more sustainable rural settlements.	No change
	Unfair concentration of housing on Ramsgate	Table 12 on page 54 of the draft Plan shows an indicative distribution of housing numbers between the individual settlements. Aside from Westwood, Ramsgate has a higher notional total than the other settlements. (Much of its total figure is by way of sites in the urban area many of which already have planning consent). Reference to the map on page 226 gives a	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		clearer picture of the broad distribution of sites including the strategic sites adjoining the urban area containing the main towns. Selection of allocated sites has been informed by a range of criteria to identify the most sustainable options. On the basis of the illustrative disposition presented on the map, the distribution is not considered in any way disproportionate.	
	Some respondents saying SHMA needs review.	Agree. The content of the pre-submission draft will be informed by the updated SHMA.	The content of the draft Plan will be informed by an updated SHMA (conducted in 2015) prior to publication of the pre-submission consultation draft Plan.
	Comments relating to environmental capacity/optimum population.	National planning policy implies the need to provide for objectively assessed housing need, for which the starting point will be government's trend based household projections. It signifies (Footnote 9) that the specific environmental constraints which might exceptionally justify a lower housing target include various designations (such as Green Belt, AONB, National Park) which are not present in the district. It does refer to protected species and SSSI which are present in the district and protected in other local plan policies. In identifying sites to meet requirements, local assessment criteria have been applied to identify the most sustainable options including role of sites in retaining separation between settlements, biodiversity, landscape and	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		archaeology.	
	No significant objections from utilities, infrastructure providers.	Noted. However, engagement is ongoing and will be applied in reviewing most suitable sites to allocate and infrastructure requirements to be addressed.	No change (engagement ongoing)
	"In combination" recreational effects of housing sites on the SPA need to be addressed through the SAMM work.	Noted. The Mitigation Strategy reflects the overall level of housing development envisaged over the Plan period, and the Plan includes the requirement for housing developments to demonstrate sufficient mitigation.	No change
	Manston Green – building housing under the flight path could impact on airport operation and viability.	Policy SP13 relating to this site allocation clearly indicates that built development will be focused at the northern part of the site and that master planning will be expected to take account of the alignment of the airport runway and the operational needs of the airport.	No change
	(See also comments on strategic sites; majority of comments from local people living in the vicinity of the proposed sites).	Many representations oppose allocation of specific sites for housing development. The selection criteria which have informed identification of these sites is set out in the Strategy for Planned Location of Housing land. (See also section below).	See below
SP12, 14 & 15/H02C - HOUSING ALLOCATIONS			
	Significant level of local objections to allocations (particularly Birchington and Westgate), but also other sites, on a number of grounds as shown below		
	Lack of community services/impact on existing services (education; health; etc.)	Engagement with community service providers is ongoing and will serve to identify the additional/augmented facilities and services needed to support development. These will be incorporated into the Infrastructure Delivery	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		Plan which will support the Local Plan by identifying what is needed, when and how it will be funded.	
	Traffic/parking problems and related pollution	The Local Plan will be supported by a Transport Strategy setting out the transport improvements and infrastructure investment needed to deliver the Plan's proposals. This strategy has been informed by assessments of the impact on the road network of traffic associated with these proposals including planned future housing. The Plan includes policies regarding parking provision for new developments and to safeguard town centre parking provision in line with the Council's car parking strategy.	No change
	Inadequate services	Engagement with utility and service providers is ongoing to assess the infrastructure requirements and resources that will be needed to support development. This will inform the Infrastructure Delivery Plan which will support the Local Plan by identifying the infrastructure needed, when it must be provided and how it will be funded.	No change
	Flooding (historic) Urbanisation will lead to surface water	Flood risk is one of the principal criteria applied in assessing the suitability of sites for allocation. With the exception of the existing built up area in the vicinity of Margate Old Town, residential site allocations generally exclude land in Thanet's low lying identified flood risk areas. In relation to surface water management the Plan contains a policy	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		expectation for development to incorporate appropriate sustainable drainage systems/methods.	
	<p>Loss of views Loss of agricultural land/"green belt" Impact on wildlife Loss of community and historic identity (e.g. settings of Dent de Lion and Quex) Hedgerows</p>	<p>In identifying the most appropriate sites to accommodate planned housing requirements optimum use has been made of previously developed land. However to meet total requirements a significant call is placed on what are currently countryside sites.</p> <p>The Strategy for Planned Location of Housing sets out the key principles and criteria that have been applied in assessing and identifying the most sustainable sites to meet the requirement.</p> <p>These representations identify just some of the factors that have been taken into account (including landscape agricultural land quality, ecology, potential impact on separation between settlements, archaeology and heritage.</p> <p>Any new development will potentially result in loss of existing views. However, proposals will be judged against general design principles set out in the draft Plan (including high quality inclusive design, development relating to the surrounding development, form and layout, compatibility with neighbouring buildings and spaces, and landscape and boundary treatments being designed as an integral part</p>	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		of development and coordinated with adjacent sites).	
	Lack of jobs in area	The Council's Economic and Regeneration Strategy aims to accelerate economic growth and create more jobs. This has been taken account of in assessing how many new homes will be required. However, housing requirements are driven by a range of factors beyond employment : for example demands for additional homes from Thanet's existing population as well as from additional households who may elect to seek a home in the district over the Plan period.	No change
	Loss of walks and rights of way	The Plan recognises the recreational and health benefits of walking and refers to the local walking strategy which identified barriers to walking and specifies a network of routes to be improved. Policy SP34 states that new development must provide safe and attractive walking opportunities. Public rights of way are protected by Policy SP26 which signifies that built development or change of use will not be permitted. Where the need for development is overriding alternative provision would be required. Similar protection is also provided by policy CM02.	No change
	Housing will add to drought problem	Engagement with Southern Water has been ongoing and has informed preparation of the	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>Infrastructure Delivery Plan that will support the Local Plan by identifying what infrastructure will be needed and when.</p> <p>Southern Water uses local plans to inform its investment proposals and has indicated that it finds no fundamental constraints to development proposed in the Plan in terms of water resources.</p>	
	There were also comments from some developers on viability of some of the phasing/other housing sites	Phasing of allocated housing sites has been reviewed including by means of direct contact with promoters of key sites to assess what is likely and feasible.	No change
	Briary Close is not a suitable access for the housing site	The Plan does not signify that Briary Close would provide the/a fundamental access to the site allocation (reference ST1). As indicated in the site specific policy, master planning of development would need to be informed by a transport assessment supported by junction modelling and demonstrating appropriate road and junction improvements and signalling.	No change
	There was some support for a single new settlement elsewhere	<p>Responses to consultation at Issues and Options stage showed only limited support for a new settlement. The interim sustainability appraisal showed that the option of a new settlement (and of freestanding countryside sites) showed significant negative impacts against various criteria compared with other options.</p> <p>Since that time the Council has received additional guidance on how the negative effects of new settlements can be mitigated</p>	Draft new mixed-use policy for the former Manston Airport site

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		and the Council therefore believes that a new settlement could form a legitimate part of the housing strategy	
	There are also some objections from landowners/agents whose sites have not been allocated:	These are being considered on their individual merits in line with established assessment procedures set out in the evidence base	No change
SP19 - Affordable housing			
	Some local objections – appears to be on the assumption that such housing would be for people sent from London boroughs.	Government Policy Guidance indicates that the starting point in assessing the level of housing to be provided for is its latest household forecasts. These forecasts are trend based and thus reflect need and demand for housing from the existing local population and those who may choose to come to live in the district. In this respect an element of total provision arises from the assumption that people will continue to come to the district and some of these may be from London and elsewhere. However, neither the level of housing proposed or the site allocations are based on any assumption or intention of accommodating people sent from the London boroughs.	No change
	Objections from developers relate to viability/deliverability.	The Plan is supported by an Economic Viability Study which has appraised the development proposals including housing and demonstrates that the Plan is deliverable in these terms.	No change
	The percentage of affordable housing should be higher	The element of affordable housing to be negotiated for on housing developments has been informed by the Strategic Housing Market Assessment and the Whole Plan Viability	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>Study. It aims to accommodate forecast need as far as consistent with economic viability of such developments.</p> <p>Review in light of conclusions of new SHMA and final whole plan viability study.</p>	

Environment Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP20	Policy does not meet the test of soundness as it is not positive and lacks evidence to restrict development in rural areas. Landscape can be enhanced through proper planning	<p>The local plan has allocated enough employment and housing land to meet the identified need, therefore it is not necessary to build in the countryside (other than on allocated greenfield sites). The supporting text to policy SP20 sets out further justification.</p> <p>Policy SP20 meets NPPF requirements in 'recognising the intrinsic character and beauty of the countryside' and 'should avoid new isolated homes in the countryside'</p> <p>Thanet's countryside has always been protected from development by planning policy in response to the pressures of development. Structure Plans have recognised the importance of the countryside and included a policy protecting it from non-essential</p>	No change in respect of this comment, however, policy SP20 will need to refer to the Policies map rather than the 2006 Local Plan.

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
		development and protecting the countryside for its own sake. This has been implemented through local plan policies in the Thanet Urban Local Plan 1984 (policy CAC1), Isle of Thanet Local Plan 1998 (policy CL1) and Policy CC1 in the Thanet Local Plan 2006.	
SP21	Include areas between Westgate and Garlinge, and Westgate and Birchington	The area between Westgate and Garlinge is already partially built-up as part of the urban area. As there is not complete physical separation between the two, it would be inappropriate to allocate this as Green Wedge. There is already a Green Wedge between Westgate and Birchington.	No change
SP22	Policy does not meet the test of soundness as it is not positive and lacks evidence to restrict development in rural areas. Landscape can be enhanced through proper planning	The aim of this policy is not to restrict development in rural areas, but to safeguard and enhance the open and historic characteristics of Thanet's countryside and landscapes. Any development should respect the character of these landscapes	No change in relation to this comment. However, this policy may need reviewing in response to further work on landscape character.
SP24	Amendments required to ensure compliance with the Habitats Regulations.	Compliance with Habitat Regulations is addressed in other policies in the plan such as SP25. The aim of this policy is to encourage greater biodiversity through habitat enhancement, restoration and creation rather than being a restrictive policy. However the current policy wording could be improved and should be amended accordingly to refer to the joint work with KCC, Natural England, KWT and other partners on the identification of the Biodiversity Opportunity Areas.	Reword policy SP24 and supporting text with references to Biodiversity Opportunity Areas.
SP25	Amendments required to ensure	Work on a Strategic Access Management and	Rewrite Policy SP25 and supporting

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
	compliance with the Habitats Regulations.	Monitoring Strategy (SAMMS) has progressed since the draft preferred options local plan was prepared. In light of this, it is considered appropriate that policy SP25 and the supporting text be re-written.	text to reflect recent work on SAMMS and Natural England's comments and advice, to reflect the hierarchical nature of designations. Include a new policy relating to the protection of nationally designated nature conservation sites such as SSSIs and Marine Conservation Zones.

Transport Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP36: Transport infrastructure	Transport – roads should be in place before the housing – learn from Westwood.	<p>The Council is preparing an Infrastructure Delivery Plan (IDP), which includes transport measures, in conjunction with KCC and others. The IDP seeks to identify all necessary infrastructure to support the development set out in the draft Local Plan, and how that infrastructure should be implemented.</p> <p>The recent improvements around Westwood are indicative of what can be achieved, and the IDP process should help to ensure that occurs in other parts of the district as well.</p> <p>Given the relatively low level of direct government funding for such schemes, it is unlikely that significant infrastructure can</p>	<p>An implementation section, and new Policy should be added to the draft Plan to explain how infrastructure (including transport) will be provided and funded.</p> <p>An Infrastructure Delivery Plan will also be prepared alongside the next stage of the</p>

		<p>be put in place before any development occurs. However, road infrastructure should be provided in parallel with new development, and the Council with KCC is seeking other sources of funding to support the provision of new infrastructure.</p> <p>In taking forward its IDP, the Council will seek to provide a reasonable balance between deliverability, affordability and residual highway impact, between the phases of implementation within the identified mitigation strategy.</p>	draft Plan.
SP38: Strategic Road Network	<p>Highways England have indicated that their main concern is the impact of any planning documents or development management decisions on the M2/A2 corridor, principally M2 junction 7 (Brenley Corner) and A2/A256 junction. While these junctions are located some distance from Thanet, impacts of plans adopted and planning decisions made will be felt beyond individual district boundaries. All transport assessments for strategic sites should address this issue.</p>	<p>This is a matter that Highways England have been raising for some time. The Council's view is that it is highly unlikely that developments in Thanet will have a significant impact on these two junctions.</p> <p>However, the Council is committed to working with neighbouring authorities to assess the potential combined impact of development in East Kent on those two junctions.</p>	No change required to draft Policy SP38.
SP39: Parkway station	<ul style="list-style-type: none"> • Impact on Cliffsend – noise • traffic • People using Cliffsend as free parking • What benefit does it bring? • Wrong location – not joined up with public transport • Make journey time from Ramsgate to London longer 	<p>The proposal for a Parkway Station in Thanet was based on the wider economic benefits that could arise both for Thanet and Dover districts. A business case has been prepared by KCC, and Regional Growth Funding has been earmarked for the project through the South East Local Enterprise Partnership.</p> <p>Initially, it was seen as a driver for the Airport and Discovery Park. However, if the Airport is developed for mixed uses</p>	No change to principle of policy.

	<ul style="list-style-type: none"> • Future of Ramsgate Station? Use swimming pool site for parking • Will lead to pressure for housing • The station should be considered at Manston 	<p>including commercial uses, the Parkway Station could as easily serve that development.</p> <p>The Council also believes that there are wider benefits for the local economy, through improving journey times to the wider South East and London.</p> <p>A number of potential sites were considered for the location of the Parkway Station, and this location near Cliffsend was identified as the most suitable, based on a range of factors.</p> <p>The Council recognises that there may be localised impacts that need to be mitigated, and the draft Policy indicates that such mitigation will need to be provided.</p>	
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Housing

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
H4 – Housing at Rural Settlements			
	<p>General objections to various rural housing sites:</p> <ul style="list-style-type: none"> • change character of settlement • traffic/inadequate roads • lack of/pressure on services • loss of farmland/wildlife • flooding • lack of services/infrastructure 	<p>The majority of housing provision is focused within and adjacent to the urban area containing the Thanet towns. However, the rural settlements have a role not only in meeting local housing need but also in providing a degree of locational choice. As indicated in the topic paper addressing housing levels in the rural settlements, certain of Thanet's rural settlements are considered sufficiently sustainable as to be capable of accommodating development of a scale beyond minor infilling and have been assessed for potential alongside other sustainable locations. The size and location of sites allocated has been informed by the criteria set out in the Strategic Housing land Availability Assessment and Strategy for Planned Location of Housing. This includes character of locality, townscape, trees, sustainability, access, highway capacity, agricultural land quality, ecology, flood risk. Availability of services is subject to ongoing engagement with delivery agencies.</p> <p>Policy H04 subjects all proposals to being compatible with the size form, historic character and historic scale of growth of the settlement</p>	No change
	Not for local people	<p>An element of the housing need to be provided for will be to accommodate the needs of Thanet's existing population as their circumstances change. However, government policy requires that requirements be founded on trend based projection of need and this will thus reflect a continuing degree of in-migration. The Strategic Housing Market Assessment will assess affordability of homes in relation to local incomes and inform policies which aim to assist those who cannot meet their needs through the local market.</p>	No change

	Minster has had too much housing development already	<p>A range of criteria including accessibility to services and character of location has been applied in identifying the most suitable sites to accommodate total housing requirements. These are set out in the Strategic Housing land Availability Assessment, the topic paper on Housing Levels for Rural Settlements and the Strategy for Planned Location of Housing. Within the rural settlement hierarchy Minster is a highly sustainable settlement.</p> <p>Total housing provided for in the draft Plan (12,000) would represent an increase of over 18% of the district's current housing stock over the period to 2031. The provisions indicated for Minster in the draft Plan would represent a significantly lower proportion (less than 12% increase to the village's housing stock) over that period.</p> <p>In light of the overall level of provision and the criteria applied in selecting suitable sites, the quantity proposed for Minster is considered appropriate and proportionate.</p>	No change
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Safe & Healthy Environment

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
Para 16.17	<p>Objection to SuDS reference – suggested the following wording:</p> <p>Many parts of Thanet have vulnerable groundwater, as a consequence discharges to the ground must be</p>	It is considered important to raise the issue of Sustainable Urban Drainage Systems SUDs and groundwater to increase awareness of the potential consequences of inappropriate SUDs. However, agree that the paragraph could be more positive about SuDs.	Reword paragraph 16.17 accordingly.

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
	carefully designed to ensure that they are appropriate and does not cause further degradation. SuDS can be designed so that pollutants are removed prior to discharge, we would recommend in sensitive areas that these are considered and properly designed in order to improve the groundwater quantity where possible. Discharges to the ground in sensitive areas should be approved by the Environment Agency.'		
CM01	New community facilities should have regard to viability	Agree that the plan should set out how new facilities will be delivered – either through developer contributions or through Community Infrastructure Levy (CIL). The viability for S106 contributions and CIL are considered in the Plan Viability Study. Viability is taken into account when planning applications are assessed in respect of the provision of new community facilities.	Additional policy to be included in a new section on Implementation and Monitoring relating to contributions via S106 or CIL.
CM02	The policy protecting community facilities is over-restrictive and unsound.	<p>Paragraph 70 of the NPPF states that planning policies and decisions should</p> <ul style="list-style-type: none"> •guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; • ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community..... 	No change in relation to this comment. However, supporting text may need to be strengthened to refer to a minimum time period for marketing the facility.

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
		It is considered important to safeguard community facilities, or land which has been occupied by a community facility, as in some areas of Thanet -particularly the villages, once a community facility site has been lost there would be little or no scope to provide new community facilities in the future. Paragraph 17.8 of the draft local plan explains how the change of use or redevelopment of a community facility can be justified to ensure that the policy does not restrict growth or have a negative impact on the community.	

Transport

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
TP05 – Coach Parking	A number of respondents have highlighted coach parking as a problem, particularly the perceived unsuitability of Barnes Avenue Car Park and coach parking in general in Broadstairs.	<p>The draft Local Plan protects existing coach parking areas, but also recognises the problems of limited coach parking in certain areas of the district. The provision of suitable coach parking areas is important in ensuring that the visitor economy is supported.</p> <p>The draft Plan also indicates that the Council will consider the need to identify a site to meet demand at Ramsgate.</p> <p>The Council is now undertaking a review of coach parking in</p>	<p>The draft Plan should be amended to reflect the current corporate coach parking review.</p> <p>Draft Policy TP05 should be amended once the review is complete to include any new sites that are</p>

		the district. The draft Local Plan will be amended in due course once the review has been completed.	identified through the review process.
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General points

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
Consultation process	A number of issues have been raised by various respondents regarding the length and complexity of the consultation.	<p>This consultation was not a statutory part of the Local Plan process. However, the Council considered that it would be helpful to carry out an extended 8-week consultation.</p> <p>It is appreciated that the Local Plan is complex, so Council staff were available at a number of drop-in sessions to help people respond to the consultation. A list of Frequently Asked Questions was also produced after the consultation opened, and was revised as new questions were raised.</p> <p>The questionnaire for this consultation was long. This was because it set questions for each of the policies in the plan which was necessary in order to provide the Council with the most meaningful feedback.</p> <p>Details are given below of the methods used to inform people about the consultation:</p> <p>Press Coverage</p> <ul style="list-style-type: none"> • Press release on the website - Press briefing took place on 8 January 2015. 	<p>No change required to draft Local Plan.</p> <p>With the Communications Team, a plan has been prepared for consultation and engagement at the next stage of the draft Local Plan.</p>

		<ul style="list-style-type: none"> • Coverage in the KM Thanet Extra (33,000 circulation)(14 January 2014) – Focus On Local Plan – including drop-in session details • Coverage on www.kentonline.co.uk – including drop in session details (average 637,396 visits a month) • Some coverage in the Thanet Gazette (mainly relating to Westgate/Minster) - 9,000 circulation <p>Press Advertising</p> <ul style="list-style-type: none"> • Half page advert in Thanet Gazette (9 January 2015) – promoting consultation and drop-in sessions (9,000 circulation) • Half Page advertisement in KM Thanet Extra (16 January 2015) - promoting consultation and drop-in sessions (33,000 circulation) • Digital space booked on Thanet pages of www.kentonline.co.uk <p>Social Media</p> <ul style="list-style-type: none"> • Twitter - sent out on 9 January 2015 to 4,500 followers • Facebook - two posts to Facebook to 624 followers: <ul style="list-style-type: none"> - Post 1 (2 January 2015) – Drop in dates and times - reached 490 people - Post 2 (9 January 2015) – Local Plan Launch (including drop in sessions) - reached 651 people • Facebook paid for advert – promoting the Local Plan and drop-in sessions - started on Friday 9 January - advert seen by 	
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		<p>11,436 people</p> <p>Mail/Email distribution</p> <ul style="list-style-type: none"> • Email sent to 12 business networks who forward to their members and contacts • Emails and letters sent to Planning list of those who have previously taken part in consultations (about 1000 contacts) <p>Poster/Leaflet Distribution</p> <ul style="list-style-type: none"> • Posters and leaflets were sent to Parish Councils; Libraries; Council Offices; Thanet Gateway <p>Events</p> <ul style="list-style-type: none"> • Drop-in sessions at Birchington (13 Jan 2015); Broadstairs (21 Jan 2015); Ramsgate (29 Jan 2015); Hartsdown Leisure Centre (3 Feb 2015); Margate (10 Feb 2015); and Westwood Cross (600+ visitors in total) • Staff briefing sessions • Member briefing sessions • School Sixth Form briefing sessions and workshop (5 Jan 2015) • Officers (and in some cases Members) attended public meetings at Westgate (16 Jan 2015); Birchington (13 Feb 2015); Minster (25 Feb); St Nicholas (23 Feb); Monkton (24 Feb); Ramsgate (14 Jan); and Cliffsend (22 Jan). • Briefings to: Thanet Business Forum (8 January 2015); Ramsgate Town Council (14 January 2015); Invest Thanet Board (16 January 2015) 	
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Documents	Infrastructure Delivery Plan, Sustainability Appraisal, Viability assessment and Transport Modelling work should have been published as part of the consultation.	<p>The Preferred Option consultation is not a formal stage of consultation. However, the Council has published evidence base documents and information in the past, and is committed to continue doing so, as and when evidence is available and at the appropriate stage.</p> <p>The Council recognises that these are important elements of evidence for the Examination. It is the intention to publish the evidence mentioned at the next stage, if available.</p>	No change required. Intention to publish all available evidence at next consultation stage.
Duty to cooperate	Thanet has failed to cooperate on major cross boundary issues and evidence base documents	Do not agree. The Council has a long history of cooperation with neighbouring authorities dating back to the preparation of the South East Plan and beyond.	No change required to draft Local Plan. It is the intention to publish more information on duty to cooperate at Publication stage.
	Not meeting duty to cooperate (specifically in relation to housing numbers)	<p>The Council has engaged with neighbouring authorities (as well as KCC and other statutory bodies) over a long period of time on a range of issues, including housing numbers, economic strategy and employment land, retail provision, transport matters, Habitat Regulations matters, social and physical infrastructure, green infrastructure and so on. The duty is supposed to focus on those matters where there is a strategic cross-boundary issue.</p> <p>In relation to housing, the East Kent districts have co-operated on the approach to this matter over many year, including through the South East Plan process. More recently, the Council has engaged with neighbouring Councils both in relation to its</p>	

		<p>own Strategic Housing Market Assessment work, and the work currently being undertaken by Dover in relation to their housing requirements.</p> <p>That engagement is ongoing, and it is believed that any outstanding issues can be resolved prior to Submission of the draft Plan.</p> <p>The Council has also adopted the East Kent Memorandum of Understanding of the Duty to Cooperate.</p>	
Infrastructure provision/s106/CIL/viability	<p>Many respondents have raised concerns about the provision of various elements of key infrastructure to support the proposals in the draft Local Plan – transport, water, sewerage, education, health, and so on – either in terms of absolute provision; the viability of infrastructure provision; or the timing of infrastructure provision.</p>	<p>The provision of infrastructure to support development is vitally important. The Council has been working with the relevant agencies to ensure that it is fully informed about future infrastructure requirements and the timing of those requirements.</p> <p>The Council has also prepared a draft Infrastructure Delivery Plan (IDP) in conjunction with those agencies, setting out the infrastructure requirements and the known costs; the phasing of the requirements and the body responsible for ensuring delivery. Some infrastructure would need to be provided directly by a developer on a given site; some would be off-site infrastructure funded by a developer and some would be funded by other mechanisms. The IDP will also need to address any viability issues.</p> <p>The IDP addresses the full range of infrastructure.</p> <p>KCC have (with TDC) been preparing a new Transport Strategy for the district, the primary</p>	<p>It is proposed to amend the draft Local Plan to include an implementation Policy and explanatory text to explain how the Plan addresses the issues of implementation, monitoring, infrastructure delivery and viability.</p>

		feature of which is the development of an “inner circuit” to improve traffic flows between the different parts of the district and to provide some relief to the existing road network. KCC have also sought grant funding (through the RGF) for parts of this scheme.	
Viability issues	A number of respondents have raised concerns about whether development in this area will be viable; particularly in relation to supporting infrastructure.	<p>The draft Local Plan has been subject to a Whole Plan Viability Assessment, which will be published shortly.</p> <p>The Assessment indicates that, including key infrastructure, the draft Plan is viable. Some areas of the district experience higher development values than others, but as a whole it is regarded as viable. Further testing of key components will be undertaken as part of the IDP process.</p>	No amendment to draft Local Plan.

Appendix 5 – Preferred Options Revisions – Main Issues and Responses

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Support for mixed use policy on the airport site. Airport not viable - Several attempts at operating a commercial airport have failed. Jobs and homes are needed therefore it is making best use of a redundant facility.	Noted	No change
Housing on airport should be subject to a proper masterplan including parking, broadband, amenities, trees and open space.	Agree. The current policy requires a development brief and comprehensive masterplan detailing open space, and landscaping. Other proposed policies in the plan cover digital infrastructure and parking.	No Change
No desire for night flights and pollution. Cargo facility will lead to night flights which will be detrimental to Thanet. Welcome reduction in noise and pollution if the airport changes use.	Noted.	No Change
Airport is a national infrastructure asset. Once lost it can never be recovered. Safeguarding the airport would alleviate capacity issues at Heathrow and Gatwick. Advantage over London airports due to weather conditions (fog). Need for an emergency landing strip. Airport needed for post Brexit cargo.	<p>There is currently a DCO process underway which provides the framework for the consideration of national infrastructure.</p> <p>The Davies Commission's Report into airport capacity did not reach the same conclusion in July 2015. The report by AviaSolutions into the Commercial Viability of Manston Airport 2016 looked at scenarios about how future passenger and freight demand might be distributed around the six airports in the London area when coming to the conclusion about the viability of Manston airport. (including the scenario in which no new runways are developed was also looked at and this most favoured Manston.)</p> <p>Advice from Avia is that it is still too early to assess the impact of Brexit as an agreement has not been reached.</p>	No Change

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Mixed use would have environmental consequences and damage the aquifer (Paleogene Thanet Sand Formation often mentioned). There will be water and sewerage issues. Manston is a rainwater catchment area so development will lead to drought. Mixed use development will affect drinking water.	Potentially any development on the airport site could have environmental consequences and damage the aquifer. Policies in the Local Plan seek to ensure that no development can take place that would risk the contamination of groundwater sources. The Council will work closely with the Environment Agency and Southern Water to ensure this.	No Change
Lack of infrastructure for housing - doctors, dentists, schools, roads shops, utilities, sewerage etc.	The Council has been producing an infrastructure delivery plan in liaison with utility providers, the Clinical Commissioning Group and Kent County Council education and highways.	No Change
Functioning airport will bring much needed employment. Airport is important for the regeneration of the area. Thanet needs the airport for employment	It is agreed that the site has the potential to deliver job growth. The Plan identifies 85,000sqm metres of employment floorspace on the site which should provide employment. The Council has to ensure that the plan is deliverable and has to have evidence to support this.	No Change
A functioning airport use would support the parkway development.	The Business case for the Parkway states the Thanet Parkway is not dependent on the Airport and is required because the network is already at capacity.	No Change
SP05 should accommodate self build.	Agree that all Strategic sites should support new build. This is mentioned in the Policy.	No Change
Should wait for DCO before making decisions about the site.	Current advice from the Department of Communities and Local Government is not to delay the submission of Local Plans. There is the risk of Government intervention in doing so. The DCO process has a long timescale and there are risks to the Council in waiting for this to be resolved. If the DCO process is successful then the issue of the airport site can be revisited at that time.	No Change

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Airport would harm the regeneration efforts in the district. A reopened airport would blight Ramsgate when it has begun to flourish.	Noted.	No Change
Thanet doesn't need more housing.	The Strategic Housing Market Assessment has identified a housing need for Thanet of 17,140 homes to the end of the Plan period in 2031. This assessment was carried out in accordance with the methodology in the NPPF and NPPG.	No Change
Flawed evidence in Avia report. Some refer to the disclaimer Avia made. Others say that is didn't look sufficiently at Cargo.	Avia are responding to the representations which relate directly to their report and this will be reported to Members in due course. Members will be aware that Avia have previously responded to criticisms of the report by RiverOak. See link https://www.thanet.gov.uk/media/3553862/AviaSolutions-RiverOak-Response-TDC-Manston-Airport-Viability-Final.pdf	No Change
No environmental impact carried out of mixed use development on the airport site.	The policy would not permit development that would have an adverse environmental impact. There are many provisions ranging from landscape and visual impact to protection of habitats and prevention of the contamination of groundwater.	No Change
We should increase the amount of housing on the airport so as to avoid using high quality farmland.	The number of homes on the site is driven by the goal of creating a sustainable community rather than site capacity. There are also risks to delivery associated with over reliance on large strategic sites. There may be scope to increase the number of homes on the site beyond the plan period.	No Change
Topography of the site is not great for housing and is better suited to airport or other commercial development if an airport operator is not found.	The airport is located on the central chalk plateau which is one of the highest points of the District. Any development of the site would have to avoid skyline intrusion and the policy requires a landscape and visual assessment survey to address this.	No Change

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Transport solutions for a mixed use airport site need to consider walking, cycling and routes to Westwood.	Agreed. The policy seeks specific road improvements to ameliorate development of the site. The Local Plan is also accompanied by a Transport Strategy which sets out a series of road improvement to facilitate development.	No Change
There is nothing in the NPPF that overrides existing airport policies.	Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. This does not override the currently adopted airport policies but it does mean that the airport allocation should be reviewed and evidence into the prospect of development for the intended use investigated.	No Change
Closing the airport is detrimental to the jobs market in the District.	The Council did not close the airport. The current owners of the airport are pursuing a mixed use development on the site as they state they were making losses running it as an airport. The current proposals include 85,000sqm of employment floorspace which should deliver jobs. The Economic and Employment Assessment 2012 concluded that the site would deliver a modest amount of employment growth over the plan period.	No Change
Concern about levels of and impact on archaeology.	The current proposed policy requires a pre design archaeological assessment. Proposed policy HE01 further sets out how archaeology will be managed through applications and the strategic housing policy will be updated to give further guidance on this. The Council will work closely with KCC and Historic England to achieve the best outcomes.	No Change to Policy SP05

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Concern over the future of the museums.	The museums are an important part of the Airport's heritage and should be safeguarded. Details of this will be required through the Design and Heritage Statement.	Add to the Design and Heritage Statement list: Details of how the RAF Manston Spitfire and Hurricane memorial Museum and RAF History Museum will be safeguarded.
No justification for the designation of more employment land.	This justification will be available at submission in an economic development needs assessment style document. This will explain the amount of floorspace needed over the plan period. Thanet's reasons for maintaining an oversupply of employment land (i.e. deliverability issues, accommodating flexible uses and providing a choice of sites) and details of the employment land supply including the loss of Eurokent following the appeal decision and that there is no net addition to the oversupply in allocating 85,000sqm of employment space at the former Manston Airport site.	No Change
Concern about the size and impact of the District Centre.	The District Centre is described in the retail hierarchy detailing the catchment the centre is expected to serve ie the development itself. A centre that would serve a larger catchment would not be appropriate and would be contrary to the clause in the proposed policy. Furthermore Thanet proposes to apply a stronger threshold for the impact test than the NPPF suggests which we believe is justified by local circumstances. The NPPF states that the impact test should be applied for developments of over 2,500sqm or less if local circumstances suggested otherwise.	No Change

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	Thanet currently proposes that the impact test be applied to developments that are over 1000sqm in the urban area and 280sqm in the rural area.	
Development of the site should consider and provide for bridleways.	Agree. The policy currently says that applications should be accompanied by a design and heritage statement to include equestrian routes and facilities.	No Change
There is not enough brownfield land available to build 2,500 homes on.	The availability of large brownfield sites across the District is limited. Past delivery of housing on brownfield sites has been high but the supply has been depleted. The site offers at least an element of brownfield land.	No Change
The additional housing will lead to traffic congestion particularly at Westwood.	The transport strategy that accompanies the Local Plan requires a range of improvements in order to facilitate the development proposed in the Plan. A specific project in the Strategy is the Westwood Relief Strategy which is well underway and is alleviating traffic at Westwood. Policy SP05 also stipulates upgrades to Manston Court Road and Spitfire Junction which could alleviate the network around the Westwood Area.	No Change
There is enough housing land allocated in the Local Plan and there is a surplus of employment land.	The objectively assessed need over the plan period is 17,140 home. 2,500 of this requirement is allocated at the site of the former Manston airport. If this allocation does not go forward then 2,500 homes will need to be found elsewhere. Thanet deliberately maintains an oversupply of employment land due to deliverability issues at Thanet's largest employment allocation and also to maintain a choice of sites for businesses and to allow for flexible uses in accordance with the NPPF. This is discussed further in the Economic development Needs Assessment that will be submitted to the Secretary of State alongside the Plan.	No Change

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Concern over the amount of contamination of the site due to its former use.	Development of the site will be subject to the satisfying the requirements of the Council's Contaminated Land policy which currently states that development on land known or suspected to be contaminated will only be permitted subject to investigation, assessment and remediation criteria and permission may be subject to planning conditions. TDC will work closely with the Environment Agency and other relevant authorities	No Change
The site should have a secondary school.	Thanet does need the development of a new secondary school within the Plan period. Kent County Council's Education Commissioning Plan will identify how this need is to be delivered. TDC are working closely with KCC to facilitate this delivery and the Local Plan will reflect this.	No Change
The site should incorporate a hospital.	TDC is liaising with the Clinical Commissioning Group through the Infrastructure Delivery Plan. Contributions from development will be made to ward health care in Thanet including at the existing hospital in Thanet (the QEQM).	No Change
Concern over the size of the primary school.	The policy states that the development needs to provide 4 forms of entry but it is not prescriptive about how this is delivered. This could be 2x2 forms of entry for example. The Policy should clarify this.	Amend policy wording to state that 2 primary schools each of 2 forms of entry capacity will be required.
2,500 homes are not needed as there are 3,000 empty properties.	LPA's are not allowed to take into account all empty properties in their housing supply because they are not readily available. LPA's are allowed to take into account homes that have been empty for 4 years that are subject to a scheme to bring them back into use. The Council has such a scheme in place and is therefore able to minus of 540 homes. This has already been taken into account and the 2,500 homes are still needed.	No Change

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Where will the occupants of the housing work	The policy also allocates the site for 85,000sqm of employment and leisure floorspace. Over the plan period over 56ha of employment land is allocated and the Economic Growth Strategy sets out the key priorities and transformational initiatives to deliver growth.	No Change
Development needs to make fullest use of public transport, walking and cycling opportunities	Agree. The current proposed policy requires a travel plan to be submitted to include a public transport strategy to link the site to existing services. In addition it requires integrated green infrastructure to include walking, cycling and equestrian routes and facilities.	No Change
Owners should demonstrate actual businesses so as not to merely deplete employment sites in the rest of the District.	Agree. The current proposed policy requires a business plan to demonstrate how the employment will be delivered, and how it will relate and link to Manston Business Park.	No Change
Adds open spaces to Ramsgate which has been lacking	Agree. The 31.77ha of open space required by the current proposed policy will act as a resource for the whole District.	No Change
The site must include vehicle charging points	Agree. The current proposed policy requires one electric car charging point for every 10 parking spaces provided.	No Change
Skyline views must be maintained even for mixed use development	Agree. The current proposed policy specifies this.	No Change
Development of the site should explore the opportunity of biodiversity enhancement.	Biodiversity enhancement is required in Policy SP23 Green Infrastructure but agree that this should be mentioned in relation to the strategic site.	Add a requirement for biodiversity enhancement.

SECTION – 3 – REVISED POLICY SP11 – HOUSING PROVISION		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Challenges to the Objectively Assessed Need (OAN) calculations	The Councils OAN was prepared by consultants using a methodology consistent with national guidelines.	No change
Over-reliance on windfall sites and empty properties to deliver the OAN – too much reliance on unidentified sites	The evidence to support windfall sites and empty properties is robust and based on local evidence. However allocation of smaller sites may be considered	Include allocations of smaller sites as appropriate
Land at Westwood – (S511, S553 and S447) – create flexibility for the expansion of Margate Cemetery	The location of the cemetery extension is under discussion with developers who own the currently allocated site.	Amend map as appropriate
Land at Tothill Street, Minster (S512, S436) – Capacity needs reviewing – current proposal of 150 dwellings would be very low density (15 dwellings per ha) – suggest 250 dwellings	Agree in principle. Capacity was limited in the first instance due to Highways issues. Agree that capacity could be increased subject to an acceptable resolution on Highways impacts on the Prospect Roundabout/Laundry Road resulting from this development and cumulative impact from other nearby allocations	Increase capacity if resolutions to highways issues can be demonstrated
Over-reliance on large strategic sites – will not meet the required levels to maintain a 5 year supply. Smaller sites should be allocated and recognise the role of SME housebuilders.	Allocation of smaller sites may be considered if necessary to support 5 year supply	Include allocations of smaller sites as appropriate
The 2013 consultation asked for views on where housing should go for around 7000 houses. If that consultation had been for 17,100 houses people may have suggested a new settlement rather than individual allocations bolting on to existing towns. This could have saved large areas of agricultural land and distress caused by adhoc bolt on allocations to towns and	The Sustainability Appraisal advice is that new development should be located on the periphery of existing settlements rather than create a new settlement in an unsustainable location. The new settlement proposed at the former Manston Airport site is a sustainable location due to it being a Brownfield site with a significant amount of infrastructure already in place. (This site was not available in 2013 as it was still operating as an airport). The actual housing requirement figure is just over 9,300 dwellings as about 7,800 have already been accounted for in planning	No change

SECTION – 3 – REVISED POLICY SP11 – HOUSING PROVISION		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
villages	permissions, windfalls and empty homes brought back into use.	
The Plan makes no reference to provision of broadband and should include a policy to promote Fibre to the Premises (FTTP) – it is imperative that new development, wherever practical, adopts the FTTP initiative.	Agree	Include in new General Housing Policy – requirement for new development to adopt the Fibre to the Premises

SECTION – 4 – REVISED LOCATION OF HOUSING		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Collective additional site allocations and infrastructure (ie roads) have a possible effect on numerous heritage asset and their settings and potential unidentified significant archaeological resources. Present wording of new policies does not provide adequately for assessments that would provide mechanism for understanding, safeguarding and enhancing their significance. HIA as early as possible methodology for achieving this	Agree	Include wording in new General Housing Policy applicable to strategic sites and infrastructure for a requirement for Heritage Impact Assessments to be carried out
Birchington sites show incorrect land ownership boundaries	Factual amendment – correct boundaries have been supplied	Amend boundaries accordingly
S525 (Land at Holy Trinity Primary School) has planning permission so should be removed from allocations	Noted	Remove from Appendix B and include in list of allocations with planning permission

SECTION – 5 – LAND AT MANSTON COURT ROAD/HANE ROAD		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Occupiers of the new dwellings would be disrupted by aircraft noise day and night if Manston is operating as an airport	The site is allocated for a mixed use development. Policy SE06 in the Safe and Healthy Environment section relates to noise sensitive development.	No change
'Provide one electric car charging point for every 10 parking spaces provided' – this should specify 'in communal parking areas'. An additional requirement should be for every dwelling with parking provision in its curtilage to be provided with one car charging point.	Agree – this is appropriate following the government's announcement to ban new petrol and diesel cars and vans from 2040 due to the risk to public health from rising levels of nitrogen oxide.	Amend clause in new General Housing Policy to specify 'in communal parking areas' and for a charging point to be provided for every new dwelling with parking provision within its curtilage.
Alternative housing options were not considered if they didn't assist with the delivery of the proposed Highway Strategy. Concentration has been to deliver a transport solution rather than the broader housing strategy that might meet the wider needs of other communities.	All sites submitted were assessed under the same criteria as part of the Strategic Housing Land Allocation Assessment	No change
Site should be listed as expansion of existing allocations, not a new site for development.	The policy acknowledges the existing allocations and requires a development brief and masterplan for the whole site integrating with development at the adjoining sites.	No change

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINE ROAD		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
The western boundary of sites S549 and S535 (Land west of Old Haine Road) should be expanded to be consistent with the western boundary of this site	The cumulative impact of extending the boundaries (and presumably increasing dwelling numbers) would have a significant detrimental impact on the landscape. The allocated sites meet the housing target requirement so there is no need for further allocation of greenfield land.	No change
There is no mention of cycling and walking provision between proposed developments	Noted. This issue should be addressed in the emerging Transport Strategy.	No change
Timescales for the proposed delivery of sites S511, S553 and S447 (Westwood) is optimistic and will have a knock on effect on the total number of units that can be delivered over the plan period – will be unable to demonstrate 5 year supply.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed to ensure a 5 year supply can be demonstrated.	Indicative phasing in Appendix B to be reviewed
Policy should require Sustainable Drainage Systems	Policy CC02 – Surface Water Management requires new developments to use Sustainable Drainage Systems and for any developments within the Groundwater Source Protection Zones to demonstrate that suitable methods will be used that will not cause detriment to the quality of the groundwater.	No change
Policy wording should include 'masterplanning shall take into account the archaeological heritage of the site and be informed by appropriate assessment, survey and field evaluation'.	This is addressed in Policy HE01 which states that planning permission will be refused without adequate assessment of the archaeological implications of the proposal.	No change
Policy wording should include 'masterplan will be informed by up to date ecological surveys and site plan will be designed to retain ecological interest'	Agree. This comment has been made to other housing allocations – include in general housing policy.	Add suggested wording to general housing policy

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAIN ROAD		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
<p>Concern that development will affect the Brown Hare (a Kent Biodiversity Action Plan species), dormouse, harvest mouse and breeding birds. Recommend the following be included in policy wording:</p> <ul style="list-style-type: none"> • No net loss of field margins and boundary features • provide specific mitigation and compensation measures where loss is unavoidable • identify open space within the Green Infrastructure network for habitat creation of bird breeding sites and boundary features’. 	<p>Addressed under Policy GI03 – Protected Species and Other Significant Species and GI06 – Landscaping and Green Infrastructure</p>	<p>No change</p>
<p>Policy should include the following wording to recognise the requirement for adequate utility infrastructure to serve the proposed development: ‘The development must provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider’.</p> <p>The facilities need to be protected for new and existing residents so the following wording should be included: ‘Development proposals must ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes’.</p>	<p>Noted. This should apply to other potential development sites so should be included in new General Housing Policy.</p>	<p>Include suggested wording in new General Housing policy.</p>

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINES ROAD		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Masterplanning should include a specific requirement for an internal spine road to be provided and laid out in accordance with requirements set out in the draft Transport Strategy.	Agree.	Reword Clause 1 of the policy: 'Contributions to provide an internal spine road laid out in accordance with the requirements set out in the draft Transport Strategy'
Policy wording recommended: 'masterplanning shall take into account the archaeological heritage of the site and be informed by appropriate assessment, survey and field evaluation'	Addressed under Policy HE01 - Archaeology	No change

SECTION 6 – Local Green Space		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
A total of 43 submissions have been proposed by individuals, local groups, parish and town councils. The proposed sites broadly fall into the following categories - local plan allocations or sites with planning permission; coastal clifftop; parks, gardens, playing fields and recreation grounds; allotments; amenity areas and other areas within urban areas; and small amenity areas on residential estates.	These have been assessed against the NPPF criteria for their suitability. This is the subject of a separate report.	Identify in the submission plan, those sites that meet the local green space criteria as set out in the report.
Support for the concept of local green space although some comments state that there are not enough green spaces within Thanet. Another comment is that existing open spaces should be properly maintained.	A number of cliff top areas and parks within the urban area have previously been protected as open space. An open space strategy is currently being prepared for the Council which will identify existing and future needs which will need to be reflected in the plan.	No change
Concern that local green spaces will be suggested for sites that are allocated or on farmland and landowners should be formally notified and consulted.	Land that has been allocated or is the subject of planning permission, or is a large tract of farmland is unlikely to meet the NPPF criteria for local green space designation.	No change
Council should consider whether there are any playing fields that are suitable for local green space	These types of sites could be considered however, the NPPF states that the local community should identify green spaces that are important to them.	No change
It is vital that local green space is provided, maintained and hopefully enlarged with any development proposals	Local green space can only be suggested by the community. It is advisable to consider how the space will be managed in the future.	No change

SECTION 7 - Parkway Station		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
No need/benefit to Thanet/travel costs will put off potential commuters/it will reduce services at existing stations/it will attract more commuters to London rather than attract inward investment	The scheme needs to be seen in the context of wider service proposals and the review of the current Rail Franchise. The Council is keen to ensure that the overall service package serves local people who commute elsewhere to work and benefits the wider economy of the area.	No change
Not a sustainable location/it will attract car borne traffic/fast dual carriageway entrance is not conducive to walking and cycling; location would be better east of the Cliffsend level crossing; objection to building on agricultural land	The key factor in selecting a suitable location for Parkway is the proximity to a suitable point on the rail network, and this clearly limits the options available for sites. In addition, the detailed scheme will address the needs of pedestrians and cyclists. Any location along the line in this area would be likely to be on agricultural land.	No change
Concerns expressed about detailed design/ management issues and proximity to housing; congestion; parking in Cliffsend; landscape impact; car parking charges; provision for future expansion	Detailed design matters will be dealt with through the project design and planning application process, being led by Kent County Council. KCC ran a parallel, more detailed, consultation on the Parkway Station, and some the representations reflect the comments on the draft Local Plan.	No change
Ashford-Ramsgate line needs improving/ it will slow down the journey times to London for existing Thanet stations	Network Rail is undertaking other network improvements on the Ashford-Ramsgate line, which should benefit both the Parkway Station and the wider network.	No change
Parkway would support the Airport	The provision of the Parkway would support whatever development takes place at the Airport site.	No change
Access to the station is dangerous. Putting traffic signals on the A299 high speed road is a poor design. Access to the station should be via slip road off the southbound A256 Richborough Road	The initial design work was the subject of a safety audit, and clearly it will be important to make sure that whatever access arrangements are finally agreed provide safe travel to and from the site.	No change

SECTION 7 - Parkway Station		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
proceeding adjacent to and along the north side of the railway line. Egress from the station should be along the north side of the railway line and thence to a slip road onto the westbound A299. Access should be from the roundabout		
Needs Habitat Regulations Assessment	The draft Local Plan has been the subject of Sustainability Appraisal and Habitat Regulations Assessment. It is recognised other assessments may be required when the planning application is submitted.	No change

SECTION 8 – Strategic Routes policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
No need for these roads – Thanet isn't that congested compared to other parts of the country (eg: outskirts of London)	It is important, as part of the Local Plan process, to deal with the related transport issues, to ensure that the relevant infrastructure is in place to serve new development. The Highways Authority (KCC) have advised the Council that new roads/road improvements are necessary to serve new development and these form part of the draft Local Plan.	No change
Should be linked to Transport Strategy – these proposals should be delayed until then	These proposals form part of the strategy for both the Local Plan and the Transport Strategy. It is the intention to publish the draft Transport Strategy alongside the Local Plan, so that people can see the links between the two documents, and the evidence base that supports them.	No change to draft Local Plan
<p>Impact of roads on other parts of the network:</p> <ul style="list-style-type: none"> • Potential impact on Brenley Corner (DDC, HE) • Park Lane – how will traffic flows be dealt with? • One-way section in Birchington seems unnecessary • Impact of new Minnis link on Minnis Road at the railway bridge • Impact on Garlinge High Street from closure of Shottendane Road/Manston Road • Link to Thanet Way from Birchington needs upgrading • Impact on properties in Manston Court Road area • Coffin House Corner and Victoria Road junctions – close Manston Road approach to Coffin House Corner • Alternative suggestion for Birchington – new 	<p>The road proposals shown in the draft Local Plan are indicative only and do not show an exact route. More detailed proposals will be included in the Transport Strategy, and detailed designs will be developed as the Local Plan progresses.</p> <p>However, the routes shown in the draft Local Plan are considered to provide the most effective for helping to relieve the existing urban route network; providing a freer flow of traffic (including buses) between centres; and dealing with localised air quality issues.</p> <p>The Council would only use compulsory purchase powers as a last resort. The intention is to identify road improvements that cause the least local disruption, including to existing residents.</p> <p>It is not believed that the road improvements will have more than a marginal effect on Brenley Corner.</p>	No change

SECTION 8 – Strategic Routes policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
<p>road from the A28 (east of St James Terrace, Birchington) to Park Road (near North Lodge, Quex Park)</p> <ul style="list-style-type: none"> • Should include new road at “Manston Green” • Also need improvements to Nash Road and A28 between A299 and Birchington to dual carriageway standard 		
<p>More detail needed on design at local level; may create new rat-runs; design of routes needs to be of high quality (careful lighting; tree-planting; not urbanising)</p>	<p>The road proposals shown in the draft Local Plan are indicative only and do not show an exact route. More detailed proposals as to the exact route and design will be included in the Transport Strategy. Issues such as lighting, rat-running, design, landscaping, etc will be addressed at the detailed design stage.</p>	<p>If detailed route designs are available, amend draft Plan to indicate such routes.</p>
<p>Developers should pay for these roads and be delivered before new housing is built; How will this be funded?; Developer concerns about phasing and costings</p>	<p>The Infrastructure Delivery Plan indicates that the funding of road infrastructure will be primarily the responsibility of site developers. TDC and KCC are also committed to pursuing external funding where it is available to try to accelerate the delivery of such infrastructure.</p> <p>The Council, with KCC, are working with developers to ensure that the phasing of development is consistent with the provision of infrastructure.</p>	<p>No change</p>
<p>These new roads are needed already (parking at key destinations – eg: Margate Football Club); What about dangerous roads elsewhere?; Should be concentrating on improving the roads in existing centres/existing roads are in a bad state of repair and should be the priority; Margate-Ramsgate Road should be dualled as much as possible</p>	<p>See other responses in relation to the new road proposals.</p> <p>KCC are aware of other issues on the network and are considering various mitigation schemes, some of which form part of the Inner Circuit or related schemes.</p> <p>This issue of road maintenance is acknowledged, but it does not fall within the scope of the Local Plan, unless it is addressed by</p>	<p>No change.</p>

SECTION 8 – Strategic Routes policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	<p>the implementation of one of the identified road schemes.</p> <p>The dualling of the Margate-Ramsgate has not been identified as one of the key schemes to be undertaken as part of the improvements associated with the Local Plan. This is a route served by the dedicated “Loop” bus route, and proactively encouraging additional car use along this route is not desirable.</p> <p>In any event such proposals would almost inevitably lead to the demolition of a substantial number of properties, or to a significant diminution of residential amenity for occupiers of properties along the route.</p>	
If there was less housing, not so many new roads needed/roads are just a reaction to development. New housing sites to support roads <u>or</u> roads are just a reaction to development	<p>The Local Plan needs to make provision for sufficient housing land to meet the Objectively Assessed Need for new housing identified in the Strategic Housing Market Assessment.</p> <p>In selecting sites, a key factor is the nature of the existing road and transport network, assessing where there is capacity and where there are potential improvements. The Highways Authority (KCC) have advised the Council on these matters and it is considered that the proposed new roads/road improvements are the most suitable solution.</p>	No change.
Not very sustainable on its own. Need to also address non-car travel – cycling; buses; rail services. New roads need high quality cycle paths, links to National Cycle Routes	The Local Plan and emerging Transport Strategy both need to address other forms of transport than the private car. The draft Local Plan already contains policies (draft Policies TP02, TP03 and TP04) to support bus services and cycling and walking. The Council and KCC are working to encourage new services incorporating the allocated strategic sites.	No change to draft Local Plan.

SECTION 8 – Strategic Routes policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Manston Court Road improvement could have a detrimental impact on Manston village's historic centre	The road proposals shown in the draft Local Plan are indicative only and do not show an exact route. More detailed proposals as to the exact route and design will be included in the Transport Strategy. Issues such design, conservation, etc will be addressed at the detailed design stage.	No change to draft Local Plan.
<p>Need to be aware of:</p> <ul style="list-style-type: none"> • archaeology/heritage assets • air quality issues and AQMA • water run-off protection • loss of best and most versatile farmland • public bridleways – need to provide crossings and protect Half Mile Ride 	Agreed. These matters are addressed by other policies in the draft Local Plan and will need to be addressed as detailed schemes are developed.	No change.
Farmers need to be involved in discussions as main landowners and need to ensure that the scheme does not have a detrimental impact on farming – need to keep compulsory acquisition to a minimum	KCC and TDC will need to discuss routes with landowners (including farmers) as necessary as detailed design work progresses.	No change.

SECTION 9 – Implementation policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Costs need to be proportionate to proposed development; need to consider all other relevant forms of funding – not clear what the full obligations for each site might be. Needs more detail; viability testing/evidence; what is the relationship with CIL?	<p>The Council has undertaken Whole Plan Viability work, which will help to inform the draft Plan. The Council is also committed to ensuring the development contributions to key infrastructure meet the requirements of Government guidance.</p> <p>As part of the IDP process, the Council is seeking to ensure that the infrastructure is deliverable and is also committed to pursuing external funding where it is available.</p> <p>Provisionally, the Council's position is that key infrastructure should be delivered via s106 on strategic sites, and that smaller, less critical projects funded through the use of CIL.</p>	No change
30% Affordable housing may not always be possible – flexibility may be needed on this to deliver other infrastructure requirements	There is built-in flexibility in the planning and s106 processes for viability to be considered in relation to individual circumstances. In dealing with applications, the Council takes a robust, but pragmatic approach to development viability, and commissions independent advice, where necessary.	No change
Different views expressed about whether larger sites should or should not be CIL-free	Provisionally, it is the Council's view that, in order to deliver some elements of key infrastructure at an early stage of development, the s106 model provides the most flexible and effective tool. It is important to ensure that development is viable, so the use of CIL on strategic sites will be dependent on the balance of contributions (whether financial or "in kind" on-site) to infrastructure across all the sites in the draft Plan.	No change
Infrastructure Delivery Plan (IDP) requirements not sufficient to meet community needs	The IDP is not a static document, and the Council recognises the need to maintain the IDP as a working document through the Plan process. The IDP is a reflection of advice from statutory bodies and infrastructure providers, so the Council considers that it	No change

SECTION 9 – Implementation policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	represents the appropriate level of infrastructure to support new development. However, if new key infrastructure is identified as the IDP develops, that can be incorporated as necessary.	
Concerns raised about water supply	The water supply industry has its own business planning process, and regularly reviews its provisions in relation to new development. However, the Council is seeking to involve all service providers in the infrastructure planning process to make sure that key infrastructure is delivered in a timely manner alongside new development.	No change
Important to deliver infrastructure early in the development process, even now before any new housing is built	The Council is committed to working with site developers to make sure that infrastructure is delivered in a timely way alongside development. The point at which delivery of individual elements of infrastructure are brought forward will depend on the individual developments. Delivery programmes will be secured through s106 agreements or other suitable mechanisms.	No change
The infrastructure requirements of development (especially on strategic sites) should be detailed within the policies of the draft Local Plan and should not be delegated to a non-statutory unadopted document, which carries limited weight in planning terms as at best it would be considered a material consideration.	The draft Local Plan in its strategic site policies identifies a range of key infrastructure where it needs to be delivered on the site. Other policies in the draft Plan identify other infrastructure that needs to be provided, or where a contribution is required to off-site infrastructure.	No Change
More detail needed on Transport Strategy; concerns raised about ability of roads to cope with new development	The Transport Strategy is a joint document prepared by KCC and TDC. It addresses a range of transport issues and sets out measures for improving both public and private transport. KCC has undertaken a strategic assessment of the impacts of new development on the network, and the proposal for the Inner Circuit developed from that assessment, which should help to	No change to draft Local Plan

SECTION 9 – Implementation policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	significantly relieve pressure on the existing road network.	
<p>Need to work with:</p> <ul style="list-style-type: none"> • CCG/NHS to ensure adequate healthcare infrastructure. No actual policy for QEQM. • Kent Police - requests £13m for Police Service requirements (mainly accommodation costs) • KCC/EFA on both primary and secondary education provision - needs specific reference in the draft Local Plan 	<p>The Council is aware of the requests of the various bodies and is aiming to address these through the IDP process, subject to viability.</p> <p>It is also the intention to carry forward the allocation in the adopted Local Plan to allow for possible expansion of facilities at QEQM.</p>	Amend the draft Local Plan to include a policy for expansion of QEQM (see adopted Policy CF4)
<p>Other matters need to be addressed:</p> <ul style="list-style-type: none"> • Strategic Route Network impacts • identified needs of villages • need to attract business to the area should be a priority • SPA mitigation measures 	<p>The Council (working with KCC) has undertaken an assessment of the potential impacts of the development proposed in the Local Plan on the junctions of the strategic route network (ie: with the A2). The assessment indicates that the impact of new development is marginal.</p> <p>The needs of villages can be addressed to some extent through Neighbourhood Plans, but where specific requirements arise as a result of new development in villages; these can be addressed through the Infrastructure Delivery Plan process.</p> <p>The Council has adopted an Economic Growth Strategy which sets out the Council's priorities for economic development over the next few years. This sets out a number of initiatives and priorities to support local business and new business in the district.</p> <p>SPA mitigation measures are already included in the draft Local Plan (draft Policy SP25) and through the Strategic Access, Management & Monitoring (SAMM) strategy.</p>	No Change

SECTION 9 – Implementation policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Other agencies need to guarantee their contribution to infrastructure provision – how can this all work with Government cuts?	The Council's intention is to seek the agreement and commitment of the relevant bodies to delivering their elements of the Infrastructure Delivery Plan in a timely way through the Plan period.	No change
Manston Airport is an infrastructure asset and should be retained; development of the Airport for housing would put a strain on local services	This issue is addressed under section 2. However, the draft Plan needs to identify land to meet the Objectively Assessed Need for housing in the Strategic Housing Market Assessment, and so the need to address local service requirements is necessary for the IDP.	No change to Implementation section

SECTION – 10 – LAND AT MANSTON ROAD/SHOTTENDANE ROAD		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Issues with Shottendane Road – speeding problems, blind area turning out of Firbank Gardens, surface water flooding	These issues will be addressed in the detail of the emerging Transport Strategy and detailed masterplanning of the site.	No change
Policy should include requirement for a HIA to assess the effects on St Johns Cemetery and sites within it, as cemetery is of some historical significance and there are a number of listed memorials within it.	Agree – this is an issue specific to this site.	Add wording to policy requiring a Heritage Impact Assessment to assess the impacts on St Johns Cemetery
No masterplan yet so unlikely that first dwellings will be completed by 2020-21	The indicative phasing for strategic sites and smaller allocations is being reviewed	Indicative phasing in Appendix B to be reviewed
Policy should include a clause requiring that consideration is given to policies CSW 16 and DM 8 of the adopted Kent Minerals and Waste Local Plan (July 2016) to ensure the identification of the potential impacts of new development on existing waste management capacity and associated mitigation measures.	Noted.	Include references to relevant policies of the adopted Kent Minerals and Waste Local Plan in the policy.
Designated Bridleways TM28 and TM14 should be retained. TM13 should be designated as a footpath – could be upgraded to a multi user route. TM23 and TM28 could be multi user routes.	Agree that bridleways should be retained and/or upgraded either as existing or new routes.	Include wording in the policy to retain or upgrade designated bridleways.

SECTION 11 – National Standards: Water Efficiency		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
There has been much support for the national standard relating to water efficiency as Thanet is within a water-stressed area.	Noted	Include the text and a policy relating to water efficiency in the submission local plan
Comments received relating to insisting that Southern Water must improve facilities to ensure waste water leakages into the sea never occur again.	The Council will continue to work with Southern Water to improve facilities.	Include a reference in the local plan to working with southern water to improve facilities.
<p>Water efficiency should also include:</p> <ul style="list-style-type: none"> • Water harvesting and purification for low-grade functions eg toilet flushing and watering gardens • A greywater system so that water used in the shower and bath can be recycled through a cleansing unit and reused for toilet flushing or garden • Ground source water which should be for drinking use 	The inclusion of other water efficiency measures may be appropriate in certain circumstances where they do not affect viability of a scheme.	Include a reference in the submission local plan to other water efficiency measures where appropriate.
Government should take into account that Thanet is a water-stressed area when imposing an unsustainable number of new housing.	One of the Government's main objectives is to address the housing crisis through increased provision, therefore the district is required to provide a certain level of housing. In order to ensure that new development does not have a detrimental impact on water resources the Council can include a requirement for water	Include the text and a policy relating to water efficiency in the submission local

SECTION 11 – National Standards: Water Efficiency		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	efficiency and apply a reduced water usage limit in the local plan which can be implemented through the building control process.	plan
If the current best practice is for 105lpd then why is the proposal to include only 110lpd	Although EA and SW recommend 105 lpd the current mandatory national standard set out in building regulations is 125lpd. The Housing Optional Standards state that where there is a local need a reduced usage allowance per person of 110lpd can be implemented.	Include the text and a policy relating to water efficiency in the submission local plan

SECTION 11 – National Standards: Internal Space Standards		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
There has been one objection to the internal space standards stating that maximum flexibility should be provided to housebuilders to allow for new housing products to be tested and a reduction in space standards can still provide a quality product.	One of the main objectives of the plan is to improve the health and well-being of residents by providing good quality accommodation. The council has for a long time been concerned about the size of units in development, for example the 1988 Conversion to Flats Guidelines and the Cliftonville DPD 2010. As development densities increase on new developments this can have an effect on space standards for individual units which the Council is trying to address through implementing the national internal space standards	The council will draw on local evidence to support implementing the National Space Standards. Include a policy in the Submission draft relating to internal space standards.
National Standards for internal space in new development; accessible and adaptable accommodation; and water efficiency; TDC should adopt codes of sustainable building. At the moment, developers are permitted to make a profit from the sale of homes built unsustainably. It is left to the new occupiers to pay high bills for energy, water, etc. Swale has, for at least 5 years, demanded that developers meet a high standard. TDC should do the same. This is from Wikipedia "As a result of the increased interest in green building concepts and practices, a number of organizations have developed standards, codes and rating systems that let government regulators, building professionals and consumers embrace green building with confidence. In some cases, codes are written so local governments can adopt them as bylaws to reduce the local environmental impact of buildings.	The Government has revised its approach to sustainable construction since the production of the preferred option local plan in 2015. This section of the plan needs to be rewritten to reflect this change and the supporting text will include a reference to rating systems such as BREEAM.	This section is to be rewritten in light of changes of government guidance.

SECTION 11 – National Standards: Internal Space Standards		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Green building rating systems such as BREEAM ... help consumers determine a structure level of environmental performance. They award credits for optional building features that support green design in categories such as location and maintenance of building site, conservation of water, energy, and building materials, and occupant comfort and health.” I would also urge TDC to apply the same standards to conversions.		
There have been a number of planning applications agreed in recent years in Broadstairs where accommodation is too small and the development squeezed onto a very small plot, to the detriment of the new residents and neighbouring properties.	Noted	Include a policy in the Submission draft relating to internal space standards.
There are a number of general comments from various local groups supporting the application of internal space standards.	Noted	Include a policy in the Submission draft relating to internal space standards.

SECTION 11 – National Standards: Accessible and Adaptable Accommodation		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
General comments in support of implementing the Accessible and Adaptable Accommodation standard to allow residential units to meet the needs of elderly and those with mobility problems.	Noted	Include a policy relating for accessible and adaptable accommodation in the submission draft.
Encourage TDC to opt for at least a 10% minimum percentage of dwellings meeting requirement M4(2) of accessible and adaptable dwellings. We believe the long term viability and sustainability of communities should be key in all such decisions, and Thanet's population is older than average with a poorer than average health profile.	Noted	Include a policy relating for accessible and adaptable accommodation in the submission draft.
All new dwellings should be built to provide disabled access. It is not sufficient for the disabled to have access to their own properties. They also require free access to the homes of their friends and families, along with accessible toilet provision	Whilst this is desirable, there may be viability issues for smaller developments. It may be more appropriate to relate this need as identified on the housing register.	Include a policy relating for accessible and adaptable accommodation in the submission draft.
Support for 10% minimum of all homes to be designed to building regulation optional requirement M4(2). Although there was a comment for this to be increased to 15%	Noted	Include a policy relating for accessible and adaptable accommodation in the submission draft.

SECTION 11 – National Standards: Accessible and Adaptable Accommodation		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
In order to accommodate the ageing population, developers do not need 'encouragement', they need tight standards that ensure that the appropriate housing is constructed. For example: A minimum of 1 in 10 units constructed must be fully wheelchair accessible. All units constructed must have basic wheelchair accessibility to the ground floor accommodation.	This requirement needs to be balanced against viability considerations. The council is looking to relate the policy to the household need on the housing register.	Include a policy relating for accessible and adaptable accommodation in the submission draft.

AMENDMENTS TO APPENDIX B OF THE PREFERRED OPTIONS DRAFT LOCAL PLAN		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Housing developments at Manston Road/Shottendane Road and Nash/Manston Roads should specify earlier delivery periods in order to prioritise improvements to the road networks at these locations. These improvements are required now, unlike other road proposals which are required because of new development.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed	Indicative phasing in Appendix B to be reviewed
Current delivery plan suggests the strategic sites will deliver a total of 1590 dwellings in the first 5 years. Several of these sites will be competing within the same market area. Unlikely that three developers on the same large site could deliver 50 dwellings pa each, ie 150 pa. Therefore maximum delivered on these sites is likely to be around 100-120 pa with three housebuilders on site.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed	Indicative phasing in Appendix B to be reviewed
Tothill Street, Minster and west of Cliffsend – proposed delivery rates are shown as starting in 2019-20 and 2020-21. Sites have been subject of pre-application submissions with intentions of early planning applications in 2017. Appendix B should be amended to show delivery periods of 2017-18 and 2018-19. Reasonable to assume an average of 50 dwellings pa given favourable market demand for these sites.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed	Indicative phasing in Appendix B to be reviewed

AMENDMENTS TO APPENDIX B OF THE PREFERRED OPTIONS DRAFT LOCAL PLAN		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
Land at Manor Road, St Nicholas at Wade, should be amended from 17 units to 39 to reflect recent planning application.	The 17 units relate to the net number of dwellings and does not include the 39 dwellings on part of the site that already has planning permission.	No change
Allocations S536 (Land off Northwood Road, Ramsgate) and SS34 (Thanet Reach, Southern part) – addresses are misleading as they lie adjacent to each other on the south of Millenium Way. More realistic trajectory needed as they should be capable of coming forward earlier than 2019-20 and 2020-21 as assumed in Appendix B.	The indicative phasing for strategic sites and smaller allocations is being reviewed. Agree re-naming the sites would be clearer.	Indicative phasing in Appendix B to be reviewed. Rename sites as ‘Land south of Millenium Way’

PROPOSED NEW SITES FOR DEVELOPMENT		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
<p>New sites proposed for residential development (some have been submitted previously but not allocated):</p> <ul style="list-style-type: none"> • Sarre Windmill • Land off Pudding Mill Lane, to the west of Birchington • Land to the west of Minnis Road • Land adj Manston Park Bungalows and Esmonde Drive • Land at Summer Road, St Nicholas at Wade • Land at Shottendane Farm, Shottendane Road, Margate • Land to the south of Monkton Street, adjacent to Foxhunter Park, Monkton • Land at corner of Manor Road and Canterbury Road, St Nicholas at Wade • Land at Woodchurch • Land between Manston Road/Preston Road, Manston • Site known as Lanthorne Court, Broadstairs • South west of Sarre Business Park, Canterbury Road, Sarre • Former Manston Court Garage and Worlds Wonder, Manston • Land at Walters Hall Farm yard, 	<p>These sites are currently being assessed under the Strategic Housing Land Allocations Assessment process.</p>	<p>Include any new sites suitable for allocation in Appendix B to meet housing target requirement.</p>

PROPOSED NEW SITES FOR DEVELOPMENT		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
<p>Monkton</p> <ul style="list-style-type: none"> • Land at Chantry Park, Sarre, Birchington • Land east of Sarre Court, Sarre • Land north of Millenium Way • Additional land to Birchington Allocation • Additional land to Manston Court Road/Haine Road 		
Sites suggested but not as a formal proposal.	Some suggestions were made which were not formal site proposals so did not include details such as site plans, proposed capacities and ownership details. If these suggestions were to come forward for residential development they would be counted as windfall sites.	No change

APPENDIX 6 - PUBLICATION STAGE (REGULATION 19) - MAIN ISSUES ARISING FROM COMMENTS

During the Publication period, the Council received a total of 1,540 representations from just over 500 respondents, a mix of local residents, statutory consultees, development agents and landowners. Of those, a total of 920 comments are classified as objections.

Set out below are the policies that received the largest amount of objections and a summary of the issues raised (based on the outputs from the consultation portal).

Main Issues	Total number of comments made against policy
<p>Infrastructure provision/viability (Policy SP01)</p> <p>Objections have been raised regarding the provision of infrastructure to support the development identified in the draft Local Plan. Particular concerns are raised about the following:</p> <ul style="list-style-type: none"> • Transport (primarily roads and public transport) • Education provision at both primary and secondary school level • Health provision • Affordable housing and elderly care • Lack of employment opportunities • Utilities (including water, sewerage, power) • The viability/funding of providing the necessary infrastructure to support development • Provision of a Community Infrastructure Levy • Not sufficient cooperation in developing the Infrastructure Delivery Plan <p>Comments are also raised by agents/developers about the need for infrastructure requirements to be affordable and not to prejudice housing delivery.</p>	24
<p>Economic Strategy (SP02)</p> <p>A number of respondents argue that there should be a higher jobs target or lower housing target, as the relationship between the two is unbalanced.</p> <p>Some comments were received questioning the deliverability of 5,000 jobs and particularly whether the growth sectors identified deliver “quality” jobs.</p>	39
<p>Manston Airport - future use (Policy ex-SP05)</p> <p>A large number of respondents have objected to the position set out in the draft Plan, many because they object to the possibility of an airport</p>	157 comments; 101 objections classified as objections/28

<p>operating from Manston on a range of grounds:</p> <ul style="list-style-type: none"> ● Viability of the operation; ● Aircraft noise; ● Air pollution; ● Potential for, and impact of, night flights; ● Impact on local residents and towns (particularly Ramsgate); ● Impact on heritage assets/tourism ● Impact on the road network <p>Conversely, some respondents argue that the draft Plan does not go far enough and should include policies actively supporting Airport use (31).</p>	as support.
<p>Westwood (Policy SP07)</p> <p>A number of comments have been received stating that Westwood should not be identified as a town centre.</p>	14
<p>Ramsgate (Policy SP09)</p> <p>There were some comments regarding the need to consider alternative uses at the Port and not rely on industrial uses and the reintroduction of ferry services.</p>	29
<p>Housing - total requirement (Policy SP11)</p> <p>A range of comments have been received on this issue, but the majority of respondents argue that the overall housing requirement is too high, for the following reasons:</p> <ul style="list-style-type: none"> ● Locally-generated housing need much lower; housing likely to be taken by people from outside the district ● Population density in Thanet much higher than elsewhere in Kent ● Local services not able to cope with additional pressures ● Environmental constraints and landscape impacts ● Permanent loss of high-grade agricultural land contrary to Government guidance ● Infrastructure constraints - transport; education; health; utilities ● Impact on tourism <p>There were also a number of comments from statutory bodies, including neighbouring authorities, welcoming the intention of the draft Local Plan to fully meet the identified Objectively Assessed Need for housing in Thanet district, as identified in the latest update of the Strategic Housing Market Assessment.</p> <p>Representations were made regarding the fact that the OAN is not generated using the new Local Housing Need methodology.</p>	112
<p>Housing - 5-year supply/housing trajectory (Policy SP11)</p>	112

<p>A number of respondents argue that the draft Local Plan does not provide a 5-year housing land supply.</p> <p>There were some concerns expressed about the level of “windfall” sites assumed to come forward during the Plan period. A number of comments question whether the allocated strategic sites can deliver the anticipated level of housing during the Plan period. The status of empty homes is also questioned. A number of comments have been received suggesting that the draft plan has an over-reliance on strategic sites, and does not allocate sufficient small sites.</p>	
<p>Housing - locations/sites (Policy SP11, SP14, SP15, SP16, SP17, SP18, H01 or other relevant policies)</p> <p>A large number of respondents have objected to strategic housing sites allocated in the draft Plan. A number of respondents have indicated that other or new sites should be allocated for housing. Some people have indicated that the Council should have retained/identify Manston Airport as housing/mixed-use development (41).</p> <p>A large number of comments indicate that the council should allocate more “brownfield” land for housing and bring back into use more empty homes, instead of agricultural land.</p>	<p>Total - 267 comments SP14 - 128 SP15 - 86 SP16 - 13 SP17 - 5 SP18 - 15 Other housing sites - 39 Rural housing sites - 35</p>
<p>New/repeat site proposals - Housing (Policy SP11).</p> <p>A number of respondents have indicated that other sites should be allocated for housing.</p> <p>Two new sites have been submitted in this consultation.</p> <p>23 sites have been re-submitted as they were not allocated in the Publication Draft Plan.</p> <p>Comments have been received from representatives of 6 allocated sites (strategic allocations)</p>	
<p>General Housing Policy Requirements (Policy SP12)</p> <p>Comments received both supporting and objecting to provision of digital infrastructure and fibre to the home.</p>	<p>29</p>
<p>Parkway Station (Policy SP45)</p> <p>The Policy is supported by Kent County Council and Dover District Council, but there are objections to the proposal on the following grounds:</p> <ul style="list-style-type: none"> ● It is not needed ● It is not value for money in terms of what it delivers ● It will not result in a significant reduction in travel time to London ● It would result in the loss of agricultural land ● It is located in open countryside ● It is not accessible by public transport 	<p>35</p>

<ul style="list-style-type: none"> • There would be a detrimental impact on services to existing railway stations • Station will not be staffed, making it an unsafe facility • Potential for off-site parking problems (in Cliffsend) • Likely to lead to a significant level of car traffic to the station 	
<p>Strategic Routes “Inner Circuit” (Policy SP47)</p> <p>There is some support in principle for the proposal, but also objections raised to the following matters:</p> <ul style="list-style-type: none"> • when it is to be provided relative to development; • the cost of the provision of the new route; • the reliance on development to fund the scheme, and • the precise route of the proposed circuit in some locations. 	15
<p>Sustainability Appraisal</p> <p>Some comments have been submitted questioning whether the SA fully addresses reasonable alternatives.</p>	7
<p>Appendix B - housing sites</p> <p>A number of comments have been received regarding the allocation of the former Club Union site in Reading Street, Broadstairs for 24 units. This relates to a planning application (Ref: F/TH/18/0142) which was recently refused by the Council.</p>	63
<p>General/procedural comments</p> <p>A number of objections have been raised on “duty to cooperate”, where objectors consider that there has not been sufficient cooperation in relation to:</p> <ul style="list-style-type: none"> • Transport - impacts on Strategic Route Network • Future of the Airport • Education and health <p>There have been numerous comments regarding detailed wording of policies.</p>	29

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
Thanet's Profile and Key Issues	17	2	8	7
The Local Plan Strategy	19	1	12	6
Strategic Priorities and Objectives	19	3	10	6
SP01 Plan Implementation and Infrastructure	24	1	17	6
Monitoring and Review	5	1	0	4
SP02 Economic Growth	39	4	16	19
SP03 Land for Economic Development	8	3	4	1
SP04 Manston Business Park	9	3	4	2
Manston Airport (formerly SP05)	157	28	101	28
SP06 Town Centre Strategy	12	3	7	2
SP07 Westwood	14	2	8	4
SP08 Margate	15	2	12	1
SP09 Ramsgate	29	4	16	9
SP10 Broadstairs	9	3	5	1
SP11 Amount of Housing; Location of Housing	112	9	78	25
SP12 General Housing Policy Requirements	29	2	19	8
SP13 Manston Green	20	3	13	4
SP14 Birchington	128	3	110	15
SP15 Westgate	86	2	76	8
SP16 Westwood	13	2	8	3
SP17 Land fronting Nash-Haine Roads	5	0	4	1
SP18 Land at Manston Court Road-Haine Road	15	0	13	2

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
SP19 Type and size of dwellings	8	0	6	2
SP20 Providing affordable homes	13	0	7	6
SP21 Protecting the Countryside	19	3	10	6
SP22 Green Wedges	22	6	9	7
SP23 Landscape Character Areas	23	6	7	10
SP24 Green Infrastructure	17	3	8	6
SP25 International and European Sites	9	2	4	3
SP26 Strategic Access Management and Monitoring Plan (SAMM)	6	3	1	2
SP27 Protection, Conservation and Enhancements of Biodiversity Assets	8	3	3	2
SP28 Biodiversity Opportunity Areas	4	1	1	2
SP29 Protection of Open Space	12	0	6	6
SP30 Local Green Space	10	6	3	1
SP31 Provision of accessible natural and semi-natural green space	6	1	4	1
SP32 Allotments	5	0	3	2
SP33 Quality Development	5	2	1	2
SP34 Heritage	18	3	6	9
SP35 Climate Change	5	0	4	1
SP36 Healthy and Inclusive Communities	9	2	1	6
SP37 QEQM Hospital Margate	13	5	3	5
SP39 Community and Utility Infrastructure	6	0	1	5
SP40 Provision of Schools	6	0	4	2

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
SP41 Safe and Sustainable Travel	19	1	6	12
SP42 Accessible Locations	8	1	6	1
SP43 Transport Infrastructure	11	1	4	6
SP44 Connectivity	8	3	3	2
SP45 New Railway Station	35	9	19	7
SP46 Strategic Road Network	8	2	2	4
SP47 Strategic Routes	14	3	8	3
E01 Retention of employment sites	4	0	3	1
E02 Home Working	4	0	3	1
E04 Primary and Secondary Frontages	4	1	3	0
E05 Sequential and Impact Test	4	0	4	0
E06 District and Local Centres	3	1	2	0
E07 Serviced Tourist Accommodation	4	2	2	0
E08 Self Catering Tourist Accommodation	2	1	1	0
E09 Protection of Existing Tourist Accommodation	0	0	0	0
E10 Major Holiday Beaches	8	3	3	2
E11 Intermediate Beaches	7	1	4	2
E12 Undeveloped Beaches	7	2	2	3
E13 Language Schools	2	1	0	1
E14 Quex Park	3	1	2	0
E15 Economic development in rural areas	4	0	4	0
E16 Conversion of rural buildings	2	1	1	0

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
E17 Farm Diversification	3	0	1	2
E18 Best and most versatile agricultural land	12	0	7	5
E19 Agricultural related development	3	0	2	1
HO1 Housing Development	15	2	11	2
HO2 North and South of Shottendane Road	13	1	11	1
HO3 Land west side of Haine Road	2	1	1	0
HO4 Land fronting Nash Road and Manston Road	1	0	1	0
HO5 Land fronting Park Lane Birchington	2	0	2	0
HO6 Land south of Brooke Avenue Garlinge	2	0	2	0
HO7 Land at Haine Road and Spratling Street, Ramsgate	1	0	1	0
HO8 Land south of Canterbury Road East, Ramsgate	2	0	2	0
HO9 Land at Melbourne Avenue, Ramsgate	1	0	1	0
HO10 Cliftonville and Margate	5	2	2	1
HO11 Housing at Rural Settlements	35	1	7	2
HO12 Land at Tothill Street Minster	19	2	12	5
HO13 Land at Manor Road, St Nicholas at Wade	1	0	1	0
HO14 Land at Walter's Hall Farm, Monkton	1	0	1	0
HO15 Land south side of A253, Cliffsend	1	0	1	0
HO16 Land north of Cottington Rd, Cliffsend	2	0	2	0
HO17 Land south side of Cottington Rd, Cliffsend	1	0	1	0

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
HO18 Rural Housing Need	4	2	0	2
HO19 Agricultural dwellings	1	0	0	1
HO20 Care and Supported Housing	1	0	0	1
HO21 Housing in Multiple Occupation	2	1	0	1
HO22 Gypsy and Travelling Communities	3	1	1	1
HO23-24 Making best use of existing stock and retention of housing stock	2	0	1	1
HO25 Ancillary accommodation for a family member	0	0	0	0
HO26 Fostering Homes	2	2	0	0
GI01 Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)	8	1	1	6
GI02 Locally Designated Wildlife Sites	2	2	0	0
GI03 Regionally Important Geological Sites (RIGS)	1	0	1	0
GI04 Amenity Green Space and Equipped Play Areas	8	0	4	4
GI05 Outdoor Sports Facilities	3	0	2	1
GI06 Landscaping and Green Infrastructure	6	2	1	3
GI07 Jackey Bakers	1	1	0	0
QD01 Sustainable Design	4	2	0	2
QD02 General Design Principles	2	1	0	1
QD03 Living conditions	1	0	0	1

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
QD04 Technical Standards	6	2	1	3
QD05 Accessible and adaptable accommodation	1	0	1	0
QD06 Advertisements	2	1	1	0
QD07 Telecommunications	3	1	0	2
HE01 Archaeology	3	0	1	2
HE02 Development in Conservation Areas	1	0	0	1
HE03 Local Heritage Assets	8	1	3	4
HE04 Historic Parks and Gardens	4	0	0	4
HE05 Works to a heritage asset to address climate change	0	0	0	0
CC01 Flood Risk Areas	3	0	1	2
CC02 Surface Water Management	4	1	3	0
CC03 Coastal Development	3	0	2	1
CC04 Renewable energy	8	1	5	2
SE01 Potentially Polluting Development	3	1	0	2
SE02 Landfill Sites and Unstable Land	2	0	0	2
SE03 Contaminated Land	2	0	1	1
SE04 Groundwater Protection	6	0	2	4
SE05 Air Quality	7	2	1	4
SE06-07 Noise Pollution/Action Plans	8	3	3	2
SE08 Light Pollution	6	1	2	3

Plan/Policy Reference	Total	Support	Object	Comment
All representations	1540	211	920	409
CM01 Community Facilities	3	0	2	1
CM02 Protection of Existing Community Facilities	3	2	1	0
CM03 Margate Cemetery Expansion	2	1	1	0
CM04 Expansion of Minster Cemetery	3	0	3	0
TP01 Transport Assessments and Travel Plans	5	0	4	1
TP02 Walking	4	1	1	2
TP03 Cycling	6	2	3	1
TP04 Bus and rail	1	0	1	0
TP05 Buses	3	0	0	3
TP06 Coach parking	1	0	1	0
TP07 Town Centre Car parking	11	0	4	7
TP08 Freight and service delivery	3	1	1	1
TP09 Car parking at Westwood	5	1	2	2
Appendix B - Housing Allocations and Permissions	63	2	58	3
General	30	2	16	12