

Chapter 6 - Transport Strategy

Document Section Path				> Safe and Sustainable Travel > SP41						
Document Part Name				SP41						
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Austin	Patricia	379	Thanet Green Party		Object	We want to see a much more comprehensive public transport strategy as part of the Plan. This should actively discourage the use of petrol and diesel cars, particularly for short journeys, by providing and incentivising good quality public transport and ensuring recharging points for electric vehicles are routinely provided across the Isle.		1095		Web
Barar		375			Support	<p>6 - Transport Strategy - Safe and Sustainable Travel</p> <p>6.1 The National Planning Policy Framework (NPPF) states that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Key messages include that the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel. Local Plan policies are expected to aim for a balance of land uses to encourage people to minimise journey length for employment, shopping, leisure, education and other activities. The policy synopsis then goes on to say:</p> <p>6.8 An efficient and convenient public transport system and direct walking and cycling routes need to be at the heart of the transport network to reduce the risk that growth may cause traffic congestion, noise and air pollution, or isolate disadvantaged communities.</p> <p>6.9 Within the context of an established development pattern, the most significant change likely to generate demand for travel will result from new housing development. It is necessary, therefore, to consider the location of development in areas accessible to a range of services on foot and by public transport, preventing urban sprawl and improving local high streets and town centres. Methods such as providing showers and changing facilities in employment related development and locating cycle parking close to town centres/entrances will also help reduce the need to travel by car.</p> <p>Policy SP41 - Safe and Sustainable Travel</p> <p>The Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.</p> <p>I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors. Evidencing this policy, is the following article http://thecityfix.com/blog/united-nations-</p>		1096		Email

					<p>sustainabledevelopment-goals-walking-bicycling-active-transport-ben-welle/ and also http://www.brake.org.uk/rsw/15-facts-aresources/facts/1282-sustainable-and-active-travel . The emphasis and desirability of maintaining routes (green routes) to allow people to access their destinations within the village is effective and already in existence along the borders of grade 1 farm land bordering and dissecting the area identified as SP14. These areas should be maintained as green corridors / wildlife corridors. A housing development that inconsiderably obliterates such a facility, would force people to either rely on the existing or a modified public transportation infrastructure and alienate people further away from our countryside's natural heritage and invariably contribute to increased noise, air and light pollution. Alternatively, people will have no option but to use their vehicles more often. This would bring into focus an already undesirable increased effect on modern day vehicle reliance – please see https://www.environmentalprotection.org.uk/policy-areas/air-quality/air-pollution-and-transport/car-pollution/ and https://friendsoftheearth.uk/climate-change/roads-ruin-uks-most-controversial-road-plans for evidencing. Also, the results from the recent Birchington Village Appraisal 2018, shed some interesting statistics from all those residents who took part – 121.52% of people already rely on one or more vehicles to get about and 151.52% have one or more parking spaces. It is unlikely to imagine these percentages will decrease with the introduction of 1,600 new dwellings within SP14. One further shortcoming on an ill-thought out housing development, of the scale quoted in this Local Plan proposal, is the possibility that elderly and/or infirm existing or new residents of our village, would simply choose not to go out at all because they cant or wont for whatever reason which exacerbates the likelihood of loneliness and isolation – please see https://ie.reachout.com/getting-help-2/minding-your-mentalhealth/loneliness-and-isolation/ for evidencing. To get about, the current layout of green space / grade 1 farmland within SP14 offers just such walking/cycling accessibility to all manner of shops and services within Birchington and should be retained as green corridors / wildlife corridors. Should any development be considered outside of the above evidencing, I wish to question the policies soundness on the basis of it not being positively prepared, justified or effective.</p>				
Barnes	B	136	None	Observation	Do you have any plans before 2031 to introduce a Busway system within Thanet?		341		Web
Bransfield	Sheila	456		Observation	<p>POLICY SP41 – SAFE AND SUSTAINABLE TRAVEL</p> <p>Developers and transport service providers have, thus far, failed to manage travel demand. Thanet has many narrow country lanes that do not encourage walking or cycling, with footpaths and cycle paths being conspicuous by their absence in the many new developments since the 1990s. Public transport providers are mostly private companies, whose remit is making profit. Time and time again we hear of services being cancelled or reduced, due to little use. Money should not be the prime</p>		1308		Email

						consideration in the provision of public services.				
Carter	Viv	176			Observation	The current Loop bus service is excellent, and other bus services are also good during the day, but do not always operate in the evenings, or at weekends, thus increasing car traffic at these times. It has to be remembered that disabled residents also need access to local amenities, if we are to avoid isolation in the community.		499		Web
Cooper	Barbara	514	Kent County Council (KCC)		Observation	Highways and Transportation: KCC has been working closely with TDC in producing the necessary modelling and assessments with respect to highway matters. KCC and TDC are largely in agreement with the nature and level of highway assessment along with the headline interventions identified within the draft Thanet Transport Strategy and Infrastructure Delivery Plan (IDP). As each development site is progressed to formal planning application, more detailed Transport Assessments will be required, which will further examine the highway impact of each site within its immediate surroundings. The policies contained within Section 6 (Transport), are largely consistent with district and county priorities, including Local Transport Plan 4 (LTP4).		1515		Email
Cooper	Barbara	514	Kent County Council (KCC)		Observation	PRoW and Access Service: KCC is supportive of TDC's intentions to work with developers, transport service providers and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Planning applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.		1516		Email
Hall	John	174			Observation	I urge the council to install a 20 mph speed limit on St Augustines Road in Ramsgate. The current 30 mph limit is routinely broken by boy racers, wheelies and fast cars. There are no zebra crossings and the road is often used by people and children going to the beach. If the appropriate limit is not possible a smiley face machine may make drivers slow down.	Install 20mph zones	496		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	Whilst a laudable aim it seems to go against what is currently happening, with bus services being threatened, and the realisation that Thanet has an ageing population of whom many will not be able to walk or cycle any great distances even should they wish to do so!		140		Web
Repsch	John	126			Observation	6.1 For day trips from London, train operators and coach companies should be given subsidies with which to lower fares. Travel by Thanet's bus companies should be free. This would remove much of the need to travel by car. For those who continue to travel by car, a congestion charge and high parking rates would provide income to pay for the cheaper bus and train journeys. The return of trams to Margate sea front and the marking		747		Web

						out of cycle lanes would further lower air pollution. Provision of cycle lock-ups would also be helpful. Also bus times on bus shelter indicators should be re-introduced.				
Solly	C	419			Object	<p>Point 1: It is unclear and not witness that cycle path lanes have been designed and implanted on the new links and roads in Thanet. On the ring road around Westwood, no road markings are seen on roundabouts which make it very unclear on supporting cyclists and car users alike.</p> <p>Point 2: Westwood cross, and the road improvements so far has not improved walking routes and lends pedestrians are at a lower priority to the road users. The design of the road layout around Westwood lends to some confusion to drivers which can create a higher risk of accidents to cyclists and pedestrians.</p> <p>Point 3: The location of some of the strategic sites SP14 and SP15 are not close to the Primary Frontages and the Westwood Cross area. Most supermarkets are in the area of Westwood. The increase of housing which is on the edge of the urban area will result in more car journeys generated within the district. This could undermine the reason of having the Inner circuit route and create more traffic movements in the coffin house corner (due to the design of having a major link from Westwood near this junction).</p> <p>Point 4: there isn't a obvious provision for a cycle park at Westwood Cross (which is also secure). This is not promoting safe and convenient transport in the prime area for shopping.</p>	Improvements of road markings should be sought and part of the design of roads. A plan should be made to improve safety at the Westwood Cross area, which does not promote cycling and pedestrian access. Some strategic sites, may not be sustainable if supermarkets are in the Westwood Cross area. This can increase traffic which could remove the perceived benefit of the inner link road, especially at the coffin corner junction. Provision of more secure cycle parks.	1233		Email
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached submission from SPRU	See attached submission from SPRU	292	09.27.18.AB.K5022PS.GeneralRep.Final.pdf(739 KB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached Transport Appraisal from PTP	see attached submission from PTP	307	Land at Cliffsend, Ramsgate - TA (Final) 25-09-18.pdf (2.7 MB)	Web
Staples	Mark	24			Observation	Is the airport not part of Thanet's transport system. This policy should provide acknowledgement that air travel is an important part of the future of Thanet, especially if it is serviced by the new train station.	Include the airport in the transport policy	43		Web
Staples	Mark	24			Observation	The text states that "Transport is a critical factor to Thanet's aspirations for sustainable economic regeneration" yet seems to fail to mention how the airport will play a part in this.		44		Web
Stevens	David	175			Observation	Point 6.3 identifies the potential the development of Ramsgate Port has for economic development but there is no mention of the same potential from the development of Manston Airport. This is a serious omission.	The plan must include provision for the effects of a reopened Airport. Without it the plan will not be "deliverable" if and when	641		Web

					<p>Point 6.7 is valid at the moment but, if the plans for Manston Airport materialize, it will be the biggest single site for employment and must be taken into account when planning the Transport Strategy.</p> <p>Point 6.9 indicates the significant change to demand for travel will result from new housing but this ignores the demands made by a regenerated Port and reopened Manston Airport.</p>	the airport reopens.			
Stevens	Angela	163		Object	<p>Parkway Station in the quiet village of Cliffsend and HS2 are NOT needed in Thanet. It will reduce travel time to London by only 1 minute. Stratford is NOT London! KCC Leader, Paul Carter, goes against the people of Thanet and also HM Government about this project! It is a total waste of money! HS1 serves Thanet very well indeed from Ramsgate Station, where money could be spent modernising that station instead and buying nearby land for a car park.</p> <p>Mr Carter seems determined to turn Thanet and particularly Westwood Cross, into a living hell for Thanet residents! He needs reminding that we have an airport here at Manston, awaiting almost half a billion in investment, once the DCO is granted in 2019/20. We do NOT want a new town or a Westwood urban sprawl.</p> <p>I disagree that Thanet doesn't suffer gridlock. I travel regularly via the awful Lord of the Manor complex system to Westwood Cross and have to allow half an hour for what should be an 8 minute journey from my home.</p>	<p>1. Abandon KCC plans for the HS2 train and Parkway Station in Cliffsend.</p> <p>2. Add Policies SP05 and EC4 back into the Local Plan, as the possibility of Manston Airport reopening is very real, yet ignored.</p>	656		Web
Ward	Linda	157		Observation	<p>Many people have to travel out of Thanet to their jobs and this usually involves cars. This will only increase as the population multiplies.</p>		469		Web
Webber	Beau	192	Save Manston Airport association	Object	<p>It is strange in 2018 going on to 2031, when it has an airfield only slightly smaller than Gatwick, that the transport policy make no reference to aviation and the jobs and other benefits it can bring to the Isle.</p>		555		Web

Document Section Path		> Accessible Locations > SP42								
Document Part Name		SP42								
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation ?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Barar		375			Support	<p>Accessible Locations</p> <p>6.11 Guiding the location, scale and density of new development is an important way of reducing the need to travel, reducing travel distances, and making it safer for people to use alternatives to the car. Consistent policies directing location of travel generating uses will also guide infrastructure investment further supporting integration of transport and land use.</p> <p>Policy SP42 - Accessible locations</p> <p>Development generating a significant number of trips will be expected to be located where a range of services are or will be conveniently accessible on foot, by cycle or public transport. The Council will seek to approve proposals to cluster or co-locate services at centres accessible to local communities by public transport and on foot.</p> <p>I wish to comment that this is a welcome stance by the Council Planning Authority and should be encouraged, throughout especially in areas, identified as strategic sites with the retention / creation of green corridors / wildlife corridors. Evidencing this policy, falls within the same evidencing remit as quoted above in 'safe and sustainable travel'.</p>		1097		Email
Cooper	Barbara	514	Kent County Council (KCC)		Object	PRoW and Access Service: KCC is supportive of this policy, but requests that the word ' cycle ' is added to the last sentence.		1517		Email
samme	terence	140			Object	Thhe site is not easily accessable by foot.		348		Web
Solly	C	419			Object	<p>Point 1: The location of some of the strategic sites SP14 and SP15 are not close to the Primary Frontages and the Westwood Cross area. Most supermarkets are in the area of Westwood. The increase of housing which is on the edge of the urban area will result in more car journeys generated within the district. This could undermine the reason of having the Inner circuit route and create more traffic movements in the coffin house corner (due to the design of having a major link from Westwood near this junction.</p> <p>Point 2: No further expansion of Bus services, and The loop service to have the same level of service all over the urban area. Currently the major routes are on a hourly basis and in Birchington there is a disadvantage in getting to different areas of Thanet as opposed to the successful loop service</p>	<p>SP14 and SP15 may not meet or deliver this policy due to the distance from the primary frontages and Town Centres. These developments are on the edge of the urban area. Thanet loop services are not offered in these areas, which would improve and promote sustainable travel.</p> <p>Cuts to KCC subsidies could worsen the sustainability of public transport in the</p>	1234	Solly bus routes.jpg(372 KB) Solly Cllr Bus.jpg(194 KB)	Email

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						<p>which offers a bus every 7 to 10minutes. In some areas of North Thanet the walk to bus services are not as close as other town centres in the district. If 3600 houses are planned in Birchington and Westgate, appropriate upgrade of Bus services must be made to improve sustainability. It can be seen that bus routes for Margate, Broadstairs, Westwood and Ramsgate are well defined this is not the same in Birchington and Westgate.</p> <p>Point 3: KCC is cutting subsidies to bus services that affect the Thanet area. With an increase of population to be 27000 in the plan period, significant investment needs to be made to enhance the sustainability of Bus travel. As reported by a local councillor, Bus routes 56, 42, and the 39 are under consideration under the big conversation consultation (results of that consultation due sept 2018).</p> <p>News story: https://www.kentlive.news/news/kent-news/kent-county-council-looking-cut-1641348</p>	area and special provisions for buses should be enhanced if the population is due to grow by 27000 people.			
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached Submission from SPRU	See attached submission from SPRU	293	09.27.18.AB.K5022PS.GeneralRep.Final.pdf(739 KB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached submission from SPRU	See attached submission from SPRU	294	09.27.18.AB.K5022PS.GeneralRep.Final.pdf(739 KB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached TA from PTP	see attached Submission from PTP	308	Land at Cliffsend, Ramsgate - TA (Final) 25-09-18.pdf (2.7 MB)	Web
Ward	Linda	157			Observation	The large proportion of elderly people need improved services locally and the extra population would place unbearable pressure on systems.		470		Web

Document Section Path				> Transport Infrastructure > SP43						
Document Part Name				SP43						
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Highways and Transportation: This policy outlines a general requirement for development sites to contribute towards transport infrastructure (where a need is identified). Whilst this generally aligns with expectations for such policy at wider district level, a more specific policy in relation to the proposed 'Inner Circuit' (referred to in Strategic Routes Policy – SP47) and the proposed strategic allocation sites should be considered. This would provide more clarity over the level of funding required from each site.</p> <p>PRoW and Access Service: KCC is supportive of this policy and requests that the PRoW Network is referred to in the paragraph as suggested below:</p> <p><i>"Where appropriate, development will be expected to contribute to the provision, extension or improvement, of the Public Right of Way and Cycle Networks and facilities and to highway improvements"</i></p> <p>Where appropriate, development will be expected to contribute to the provision, extension or improvement of walking and cycling routes and facilities and to highway improvements</p>		1518		Email
dearing	john	269	Manston Parish Council		Observation	The report recognizes the need "...to relieve the pressure on the urban route network." I hope it takes that comment as a driving rule when determining priorities between housing and road infrastructure.		832		Web
Goodban	Rex	236	R A Goodban & Son		Support	<p>Roads are currently operating over capacity with little chance of improvement given the finance available.</p> <p>One opportunity is the proposed opening of the airport at Manstom</p>	Identify funding to match requirements	716		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	This has already been commented on under other policies and does not appear to be relevant to much of Thanet, what is needed is an adequate road network able to cope with the additional cars which all the planned development will add, to those already struggling to use our very inadequate roads.		141		Web
Latchford	Barry	45			Observation	There are still too many breaks in the cycle network where cyclists are either forced to dismount or to cycle through heavy		109		Web

						traffic on major roads. There should be an undertaking to address this.				
McCulloch	Andrew	44			Observation	<p>Traffic and Westwood Cross. These two are inter-related. The two major road arteries on the Island are the roughly north/south A254 between Ramsgate and Margate, and the roughly east/west A256; intersecting at what used to be called Pearce Signs traffic lights. When I first moved here in 1989, when Westwood was not developed, this junction was still a major bottleneck. Since then, as the Plan states, Westwood Cross has been allowed to develop ad hoc, with little improvement in the road layout in the area. Two rat runs exist; from the A256 to the A254 via Tesco's car park and from the New Haine Road to the A256 via the main Westwood Cross car park service road. Problems are magnified by the existence of pelican crossings proximate to roundabouts, causing traffic to tail back on to the roundabout every time a single pedestrian wants to cross, and the bus loop with attendant traffic lights off the A254 south of the Pearce Signs junction just finish off what is a disaster in road design. Now TDC want to build countless homes in this area, with single-carriageway road access through what are, in places, country lanes.</p> <p>Nothing will improve in this area until this mess is sorted out. It needs some imagination, co-operation from Kent County Council, and money. However successive administrations have buried their heads in the sand and the time has come to be realistic, before it is too late. A proposed Parkway Station will just add to the problems in this area.</p> <p>On the subject of rat runs another one is developing from Haine Road, through Manston Village and then down Spitfire Way to the Minster Roundabout, thus avoiding driving halfway to Richborough on the East Kent Access Road; even my ancient sat nav directs me along this route to and from the Thanet Way, although it does by-pass the village by using Manston Court Lane from Westwood Cross. I'm sure that the residents of Manston Village would welcome some improvements here.</p>		102		Web
Millwood Designer Homes Limited		508	Millwood designer Homes Limited	Anna Gillings - Gillings Planning Ltd	Object	<p>The principle of the contribution to highway improvements is accepted, as set out in Part 2 of these representations. However, any such contribution or provision must be on apportionate basis in light of the scale of the improvements, and the number of parties required to deliver them. This is particularly the case in respect of Shottendane Road and the 'inner link road' (comprising items 3 and 4 of Policy SP47). This has been accepted by the County Council and included within the Transport Strategy and reflected in the wording of Policy SP47. This should be reflected within this Policy. The definition of a proportionate contribution should be resolved at</p>	<p>The policy should therefore be amended to read:</p> <p>"Development proposals will be assessed in terms of the type and level of travel demand likely to be generated. Development will be</p>	1435	Gillings Millwood.pdf (74.4 MB)	Web

						application stage	<p>permitted only at such time as proper provision is made to ensure delivery of relevant transport infrastructure. Where appropriate, development will be expected to proportionally contribute to the provision, extension or improvement, of walking and cycling routes and facilities and to highway improvements.</p> <p>Subject to individual assessments, schemes maybe required to provide or proportionally contribute to:</p> <ol style="list-style-type: none"> 1) Capacity improvements/connections to the cycle network 2) Provision of pedestrian links with public transport routes/interchanges 3) Improvements to passenger waiting facilities 4) Facilities for display of approach time information at bus stops along identified quality bus corridors 5) Improvement and expansion of public transport services 6) Improvements to the road network in line with schemes identified through the Transport Strategy. 			
Solly	C	419			Object	Point 1: It is very unclear on how much the transport costs will	Improve wording to	1236	Solly cycling	Email

					<p>be, the IDP makes no provision for this, and from the transport plan not all costs are provided. Site costs are not declared. However from the figures which are declared the transport plan requires £55'000'000 to implement fully. It is hard to judge if this is viable, all costs from what I can see solely from developers. There is no declaration on what method will be used for funding S106 or CIL with no further detail or analysis on risks on infrastructure not being delivered. The inner circuit does cast large problems if funding and implementation is not met. The location of the housing supporting the funding could create more problems with traffic in those areas. The local plan needs to be clearer on how highways will be phased, developed, total costs, and clarity by policy on which development will support which road project.</p> <p>Point 2: The policy should be strengthened to ensure that no development under policy SP14 and SP15 are permitted until road infrastructure has been made. Due to the demand and phasing of SP14 and SP15 it is unlikely to be delivered as suggested.</p> <p>Point 3: Phasing of new roads and improvements should be declared and in line with phasing for housing.</p> <p>Point 4: Secure cycle parks should be improved and assessed.</p> <p>Point 5: Online information on live information should be consistent to the improvement of Bus stop displays.</p> <p>Point 6: Consideration to create safe dedicated cycle and walking links between North and South Thanet.</p> <p>Point 7: Update Cycle plan (2003 was found and out of date) It is unclear if the long term plan (2009 to 2011) has been delivered as shown below [see attachment]. However, from what I can see the links from Birchington and Westgate should be enhanced and links to Westwood should be improved. I am not sure the Shottendane road is the most effective way for cyclists to use (if you come from Westgate and Birchington)</p> <p>Point 8: Cycling should also be considered a sporting activity and should reflect the findings of the Open Space Strategy, Playing Pitch Strategy and Sports Facility Strategy 2017 Executive Summary June 2018 report in the evidence base especially with the shared vision.</p>	<p>strengthen responsibility of funding (S106 and CIL) and road projects linked with links to strategic site.</p> <p>Online tools for Bus stop displays</p> <p>In regard to policy SP14 and SP15 road infrastructure to be in place before development</p> <p>Phasing of Road Projects to be in time of house phasing</p> <p>Provision of Secure Cycle Parks, and promote cycling as a sporting activity.</p> <p>Update or Prepare cycle plan (2003 KCC was last document found).</p>		map.jpg(221 KB)	
Stevens	Angela	163		Object	<p>Manston Airport is again omitted from this section SP43 of the emerging Local Plan. The airport is and until 2014, always was at the heart of Thanet. With the proper investment promised by RSP (RiverOak's) investors, the airport will become better than it has ever been, creating more quality jobs than Thanet has ever known and bringing more prosperity to the area than Thanet has ever experienced. It is a vital asset to be considered and utilised, not pushed under the carpet and hidden away as if it doesn't exist. Manston Airport is still protected in Policies SP05 and EC4. That fact should be acknowledged in this</p>	<p>Include protection of Thanet's potentially most valuable asset - Manston Airport, by reinstating Policies SP05 and EC4.</p> <p>Inspector Nunn said at the Public Inquiry when Stone Hill Park lost their appeal for change</p>	657		Web

					emerging Local Plan!	of use from aviation to mixed use, that it was in line with National Policy to protect it until a Secretary of State deems otherwise. This has been totally ignored by TDC and needs correcting. The Airport is still protected in the existing 2006 Local Plan and needs full protection now and in the future.			
Ward	Linda	157			Observation	The nature of Birchington Square does not allow for the extra road space that would be needed for all the extra traffic.		471	Web
Way	John	32	Thanet Area Committee		Observation	Road Infrastructure our narrow country roads already cope with a vast volume of traffic- additional houses will mean additional cars and parking and there need to be plans to alleviate the current traffic problem. With the plan for the Parkway Station already underway, this will lead to an additional volume of traffic attempting to access the Station by way of our narrow roads.		65	Web

Document Section Path		> Connectivity > SP44								
Document Part Name		SP44								
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation ?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Bates	John	226			Observation	too much emphasis on supporting a minor improvement (ie a couple of minutes) on times at the risk of losing an existing station (possibly Minster) should not be pursued. Adding a Parkway Station is not the answer!	support existing services and improvements to local ones before HS1 ones	914		Web
Carter	Viv	176			Support	Providing a fast rail link between Ashford and Ramsgate can only benefit the area- provided existing stations are retained at Ramsgate, Broadstairs and Margate. Future planning should also consider a link with Manston Airport, should the development be given the go ahead.		500		Web
Cooper	Barbara	514	Kent County Council (KCC)		Object	Transport Policy: KCC recommends that the policy is rephrased to indicate that Thanet benefits from the High-Speed rail services, rather than to suggest that it is on HS1.		1519		Email
Field		178	Dane Valley Woods		Observation	Further improvement to traffic flow across Thanet could easily be achieved by better use of the A256 improvement. Use of the 'old' Haine Road as a shortcut by large volumes of traffic is not discouraged by current traffic calming measures, and the use of roundabouts at each end actively disrupts traffic flow in rush hours; Haine Road traffic has priority at the South roundabout, and blocks the flow of traffic from the more suitable road, making it unviable, and severely impacting ambulance traffic from the Haine Road depot.		513		Web
Jones-Hall	Jason	228			Support	Further investment to improve rail journey times, specifically progressing the necessary upgrades between Ashford and Ramsgate to extend HS1 services on this portion of the line, are crucial to the ongoing growth, development and regeneration of Ramsgate. Previously reported plans to improve journey times between Ashford and Canterbury and between Canterbury and Ramsgate suggested a target journey time of 63 mins was achievable by 2019, although these plans appear to have been shelved or put on hold. This must be a priority for the Local Plan and should not be dependent on the plans for the new		916		Web

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						Ramsgate Parkway station.				
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	See attached submission from SPRU	See attached submission from SPRU	296	09.27.18.AB.K5022PS.GeneralRep.Final.pdf(739 KB)	Web
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	see attached TA submission from PTP	see attached TA from PTP	309	Land at Clifsend, Ramsgate - TA (Final) 25-09-18.pdf (2.7 MB)	Web
Stevens	David	175			Support	i support this Policy because without appropriate Connectivity Thanet will not be able to reach its potential.		642		Web

Document Section Path				> New Railway Station > SP45						
Document Part Name				SP45						
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation ?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Austin	Patricia	379	Thanet Green Party		Object	We believe Thanet Parkway Station is a hugely expensive white elephant which will destroy farmland and encourage travellers to regard it as normal to drive some distance out of town in individual vehicles in order to park for the day and catch a train! Instead we would wish to see money spent on upgrading the lines from Ashford to the existing Thanet stations, and discussions take place between KCC, TDC and SouthEastern about how ticket prices for peak time travel to and from Canterbury, Ashford and London can be reduced, to make jobs in these cities accessible to modestly-paid workers from Thanet. The overall cost of this would be much less than the budget for the Parkway Station, but its impact on regeneration in Thanet would be much greater.		1113		Web
Bates	John	226			Object	<p>The planned location is where Ebbsfleet Halt was many years ago. It is located in the open countryside and any users will find it most difficult to reach as bus services at 'rush hour' times of travel are limited and at other times, non-existent for most Thanet residents. That will mean most of the potential users are most likely to have to travel there by car. Not an ideal for air quality across Thanet.</p> <p>The exposed location for an un-manned station is not one that many people will be at ease to use. The only real benefit is that it will shave only a minute or two off the current time to London. Funding for this proposal would be better spent elsewhere within Thanet/Kent.</p> <p>If it is built it will mean that the level crossing at Cliffsend will be closed, thus cutting Cliffsend in half and a long round trip by car from one part to the other. It will also possibly impact on Minster Station and the potential that could close in consequence – not something that would be of benefit to Minster residents, workers who utilise that station (in all directions) or students travelling to Sandwich schools, etc. All of this when Ramsgate station has recently undergone an expensive upgrade and rearrangement of its forecourt area. Provision for long-term car-parking at Ramsgate Station should be encouraged rather than building a new station a couple of minutes travel away by train.</p> <p>Vehicle access to the proposed station is an accident waiting to happen given the adjacent dual carriageways requiring to be realigned to allow for an entrance to the station.</p> <p>Integration with wider public transport services isn't possible as they are limited and appear to be in danger themselves with bus providers starting to reduce services and certainly none on a regular 7 day a week from early morning until late evening that many train users would need to utilise to</p>	Delete it	685		Web

					reach the proposed station. As things stand it has been reported in the Press recently that KCC has failed to secure Government financial support for the venture at this point in time				
Bates	Alison	268		Object	A total waste of public money and an even bigger potential white elephant given that Kent County Council has not secured any funding from Central Government towards its costs. An unmanned station miles from the town centres in the middle of a field in the middle of nowhere up an embankment exposed to northerly and westerly winds - definitely not a sound idea in the first place. Then there is the issue of passengers reaching the station in the first place as bus services are few and far between, not in walking distance of most Thanet residents and a possibility of it impacting on Minster and Ramsgate stations, to the extent that the former could be closed - something the residents of Minster could not live with	Remove support of a Parkway Station and remove reference to it from any new Local Plan	812		Web
Bates	Zoe	288		Support	<p>It is to be located in the open countryside and any users will find it most difficult to reach as bus services at 'rush hour' times of travel are limited and at other times, non-existent for most Thanet residents. That will mean most of the potential users are most likely to have to travel there by car. Not an ideal for air quality across Thanet.</p> <p>The exposed location for an un-manned station is not one that many people will be at ease to use. The only real benefit is that it will shave only a minute or two off the current time to London. Funding for this proposal would be better spent elsewhere within Thanet/Kent.</p> <p>If it is built it will mean that the level crossing at Cliffsend will be closed, thus cutting Cliffsend in half and a long round trip by car from one part to the other. It will also possibly impact on Minster Station and the potential that could close in consequence – not something that would be of benefit to Minster residents, workers who utilise that station (in all directions) or students travelling to Sandwich schools, etc. All of this when Ramsgate station has recently undergone an expensive upgrade and rearrangement of its forecourt area. Provision for long-term car-parking at Ramsgate Station should be encouraged rather than building a new station a couple of minutes travel away by train.</p> <p>Vehicle access to the proposed station is an accident waiting to happen given the adjacent dual carriageways requiring to be realigned to allow for an entrance to the station.</p> <p>Integration with wider public transport services isn't possible as they are limited and appear to be in danger themselves with bus providers starting to reduce services and certainly none on a regular 7 day a week from early morning until late evening that many train users would need to utilise to reach the proposed station.</p> <p>As things stand it has been reported in the Press recently that KCC has</p>	Spend money elsewhere - this is not needed by Thanet- it will be far too detrimental to more worthy existing stations	841		Web

						failed to secure Government financial support for the venture at this point in time				
cole	john	305			Object	I object to the building of Parkway station on the grounds poor value for money the estimated cost of 15 million for a gain of ten minutes less journey time to London. Also a poor use of agricultural land for the sit	Inconsistent with government guid lines value for money. We already have 7 railway stations in a very small area.	904		Web
Cooper	Barbara	514	Kent County Council (KCC)		Object	<p>Transport Policy: KCC is pleased to see the continued inclusion of this policy. The project continues to remain a strategic priority for KCC and TDC and will improve access to the rail network in Thanet for current and future residents, as well as attracting inward investment and bringing wider economic benefits to the area.</p> <p>SP45 erroneously gives the impression that a journey time of less than an hour would eventually be possible between Thanet Parkway and London. This will almost certainly be unattainable. The best estimate at present, based on full delivery of the journey time savings, is 62 minutes to Stratford and 69 minutes to St Pancras – but these are only estimates. KCC recommends that the text could be modified to reflect both these timings and the fact that these are only estimates at present.</p> <p>PRoW and Access Service: KCC requests that “Pedestrian and cycle access” is added to this policy.</p>		1520		Email
Davies	Julie	147	CPRE Kent		Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>Reiterate comments made in previous Local Plan consultation and recent planning application.</p> <p>We understood that the original purpose of this proposal was to provide a parkway station serving Manston Airport for travellers from both within Thanet and from further afield. The present proposal would support greater out commuting from Thanet by people driving to the station. It would also involve development in the countryside.</p> <p>The fast dual carriageways which form much of the approach to the main entrance to the north of the station are not at all conducive to walking or cycling from other directions. Safe and intuitive access by sustainable transport modes is essential.</p> <p>Whilst we note the comments about integrating it with public transport, we believe that it will essentially attract car-borne traffic, hence why it is proposed next to the East Kent Access Road. It, therefore, will essentially encourage more car journeys and encourage out commuting which cannot be of any real benefit to the local economy. This in turn will increase the demand for housing because Thanet may be seen as a dormitory for London commuters. We are also concerned that it could have a detrimental impact on the train services that currently call at Ramsgate and Minster, for example it could result in fewer services stopping at these stations. A full justification of the need for and purpose of the new station needs to be provided, as well as details on how and when it will be</p>		397		Web

					<p>provided.</p> <p>In August 2018 CPRE Kent objected to the Planning Application for the proposed new rail station and the associated car parking for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposed Thanet Parkway is not the right solution to deliver the benefits that are claimed. Further alternatives such as enhanced coordination of bus transport to “feed” existing stations need to be explored and compared with the environmental disbenefits of a new station. 2. Our interpretation of the proposals is that the Parkway is a country car park for the railway and would greatly increase car traffic, contrary to all planning policies. Rail growth which replaces car journeys is clearly beneficial, but the Parkway is predicated on providing more car parking places, not fewer. 3. We note that the 2015 Parkway was originally projected to need up to 223 parking spaces in 2031. However the current application is for 311 car parking bays confirming our concerns that the Parkway is a country car park for the railway and would greatly increase car traffic, contrary to all planning policies. 4. The extra station could delay trains on the whole network, adversely affecting not only the existing east Kent stations but also services and passengers between east Kent and London. 5. The option of providing a shuttle bus service using Ramsgate Station has never been seriously considered or pursued. 6. Bus services to link to Stations have not been considered by KCC officers during or before the Rural Transport Consultation 2018. 7. KCC, in proposing the Parkway Station, has <u>not</u> taken into account issues of connectivity and the evaluation of whole journey costs. 8. The focus for Thanet should be the provision of local jobs rather than a new station for fanciful commuting elsewhere. 9. Rail growth which replaces car journeys is clearly beneficial, but the Parkway is predicated on providing more car parking places, not fewer. 10. No business case for the Parkway Station should be complete without a robust and independent analysis on the effects on other local railway stations particularly Ramsgate and Margate Stations together with a comprehensive Environmental Impact Analysis. 11. The proposal is dependent upon reliance on continuous HS1 rail facility capacity without any consideration of the limited and finite fleet size of the current Javelin fleet of HS1 Trains. 12. The Parkway Station would not contribute to KCC's vision for rail accessibility. 13. TDC/KCC Council Tax payers will be paying for commuter parking. 14. The land required for car parking and the station is best and most versatile quality in terms of its Agricultural Land Classification. 15. The downside of the Parkway Station is that existing stations in urban and rural areas are those which feeder services can help maintain viable bus services, so the abstraction that would occur in these areas would have knock on effects on urban and rural stations. 				
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						16. We have significant concerns about the adequacy and robustness of the costs provided so far especially the need to assess the consequential and wider negative impacts as usually required for major infrastructure projects.				
Dove	Clare	298			Object	We do not need a new railway station. Ramsgate Station should have extended Parking into the Warre Recreation Ground or build a multi storey car park at this site.		915		Web
Dunn	Danielle	499	Broadstairs & St.Peter's Town Council		Observation	6.18 refers to new Parkway railway station, this implies that it will be unmanned. The new railway station needs to include facilities for station users i.e. toilets.		1403		Email
Huckstep	Terence	40			Object	I object to the proposal of a new station. All evidence is against this and the cost of construction is growing yearly. It will also add to the journey time by adding a further stop in the current journey. No consideration should be given until the DCO is progressed and Railtrack upgrade the line between Ramsgate and Ashford to enable the highspeed trains to run at their full potential.		91		Web
Johnson	Elisabeth	51	Monkton Residents Association		Object	There does not seem to be any need whatever for this, 10 minutes for a huge amount of money which could be put to much better use.		142		Web
Lorenzo	Peter	37	The Broadstairs Society		Observation	The thing missing from the policy is suitable level of staffing otherwise this is not a station but merely a terminus.		295		Web
McCulloch	Andrew	44			Object	I see absolutely no need whatsoever for this. To be perfectly blunt, the whole idea is a giant ego-trip for KCC and a few local dignitaries who should know better It will be of only marginal use to occupants of Discovery Park It is on the wrong side of Manston Airport to function as a passenger drop off It will encourage more car usage as commuters drive from the north side of the Island to join HS1 here – through the Westwood Cross junction, thereby creating even bigger traffic jams. It merely massages the travel time to London. The KCC claim of under one hour is intentionally misleading since this time is from the Parkway Station to Stratford International. Most people will interpret this claim as meaning the time to St Pancras International so by including this in the Local Plan TDC are party to what is tantamount to fraud. A far better plan would be to investigate the possibility of a light railway or tram link between Ramsgate Station and the airport. Central Government have indicated that they will not back this white elephant.		101		Web
McNamar	Francis & Yvonne	183			Support	We agree that there should be a Parkway Station in order to relieve the strain on Ramsgate Railway Station , even more so with		780		Web

						new developments at Manston Green, Westwood, Cliffsend and possibly mixed use development at the former Manston Airport site.				
Miss P A Smith		395			Object	<p>I wish to lodge my objection to this proposal on several grounds</p> <ol style="list-style-type: none"> 1. Provision of the station will not improve Travel times it will extend it. No increase in speed is likely unless al level crossings are removed. 2. Proposed site is on prime agricultural land. 3. Design will not blend in with environment @ (SP23) 4. Increased traffic to existing congested area. 5. Proposed access of Hengist Way will result in accidents plus delays resulting in cars relocating to the A253 – already hazardous through non-compliance with traffic regulations, Hi3 speed and weightload. 6. It will be quicker to remain on the train from other stations rather than drive to the site. 7. Light pollution (SE08) 8. Safety of site 9. There is unlikely to be any public transport provision – non in that area at present <p>Objections lodged with KCC</p>	My only comment is to remove it entirely from the Plan.	1157		Paper
Newing	April	322	Dover District Council		Support	<p>Thanet Parkway Railway Station</p> <p>DDC supports Policy SP45: New Railway Station that safeguards land to the west of Cliffsend for KCC's Thanet Parkway Railway Station project. The proposed provision of a new railway station will provide an opportunity to enhance connectivity to Discovery Park and in turn positively contribute toward the economic regeneration of East Kent.</p>		981		Email
O'Neill	Hugh	250			Observation	<p>I currently commute to London from Birchington on a regular basis and welcome the idea of the Parkway station. I do have concerns about both the cost of the commute and the capacity of the current stock on the route. While I get a seat on the train to London, for any 6-car train, the stock is completely full on the return journey - to the extent that people are unable to get on the train at Stratford. If you are seeking to encourage more people to travel on this service, there must be some investment in more stock to ensure all services are 12-car. My employer is moving to Stratford in a year and I will not continue to make the commute if I cannot be sure of getting on the train home - I won't be pleased if I have to stand until Rochester either. The cost from Birchington is £70 per day - and I imagine that the Parkway station will be more, and add parking on top of that. I find this this quite discouraging.</p>		765		Web
Ransom		153			Object	<p>The construction of this station is contrary to the Landscape Assessment as it is on Grade 1 agricultural land. Encouraging too many Londoners to purchase properties in Thanet will exacerbate the problem of local young people not being able to afford to buy houses in Thanet as prices will rise significantly. This station will be unmanned and may well attract antisocial behaviour and lone travellers may feel unsafe if there is no-one around to</p>		557		Web

						assist in case of emergency. The argument for a reduction in travel time is spurious as passengers will have to drive to the station from Ramsgate and if they board the train in Ramsgate there will be an additional stop, causing the train to be slower! The multi-million pound cost of the station is not justified.				
Repsch	John	126			Support	<p>This would:</p> <ol style="list-style-type: none"> 1. Use up valuable farmland. 2. Knock a minute or so off the journey to London. 3. The cost (£60m?) would be better spent in renovating the nearest railway stations. 4. Most of us can walk to the existing stations nearby, instead of driving to them. 5. A huge car park of 350 spaces would be built on prime farmland. 6. Access roads on farmland would have to be built. 7. It would cause a horrific loss of wildlife habitats. 8. The station would be superfluous because it would mainly feed off other stations' passengers. 9. Every significant town in Thanet already has a station. 10. Unmanned stations are a magnet for thieves, yobs and down-and-outs. 		749		Web
Samme	Linda	16	Manston Parish Council		Object	This railway station is NOT needed. It will be under used. No woman would want to get off a train there in the dark with no staff		273		Web
samme	terence	140			Object	The proposed station is within 2 miles from Ramsgate station (the closest to) and 4 miles of Birchington station (the furthest from) from the proposed site and is unnecessary, especially as it will only reduce journey times to/from London by about 3 minutes.		350		Web
Schembri	Angela	387	RPS Planning & Development Ltd		Support	RSP is supportive of the proposals for a new railway station close to the airport. Discussions will continue with Kent County Council as the scheme's promoters to consider ways in which the new station could be utilised in the future to assist with airport operations both for passenger and freight transfer.		1142		Email
Shonk	Trevor	93	Ramsgate Town Council		Observation	<p>(Statement of need,) needed houses, unaffordable (Doctors) (Hospitals) (Dentist) (Infrastructure), ROADS</p> <p>106 agreements are I see are open <u>bribe</u></p>		217		Paper

					<p>Save our farmland. The best agriculture grade one.</p> <p>Greenbelt. Government imposed housing.</p> <p>Cliffsend. No way to Parkway Station up grade the North Kent Line. Don't spend £21 million use it on town areas re King St. High St M/Gate</p> <p>Manston Green./ land banking) – smother of the best agricultural land statement of need. As I said before Manston Airport kept as a regional airport, its an asset.</p> <p>Government has got it wrong again</p> <p>As I long standing local resident my concerns are as stated, food before (concrete)</p> <p>This best agricultural land in (Thanet) and the pressure is on all of Thanet B/Ton/Westwood X, Broadstair, Westgate when we have thousands of empty properties land banking etc. old industrial sites KCC to much influence on and around Thanet.</p> <p>My thoughts only.</p>				
Simpson	Marlene	286		Support	<p>A total waste of public money and an even bigger potential white elephant given that Kent County Council has not secured any funding from Central Government towards its costs. An unmanned station miles from the town centres in the middle of a field in the middle of nowhere up an embankment exposed to northerly and westerly winds - definitely not a sound idea in the first place. Then there is the issue of passengers reaching the station in the first place as bus services are few and far between, not in walking distance of most Thanet residents and a possibility of it impacting on Minster and Ramsgate stations, to the extent that the former could be closed - something the residents of Minster could not live with</p>	Remove support of a Parkway Station and remove reference to it from any new Local Plan	836		Web
Skerratt	Michael	254		Observation	<p>With an investment and improvement in high-speed rail links to the airport via a Thanet Parkway station, then Manston airport would be significantly more attractive as a viable alternative to LGW and LHR for either freight or passenger flights. The idea of a rail link to Manston airport is not a new idea and has been established for over twenty years ever since I moved to Thanet. I consider this a missed opportunity, which should have been implemented many years ago, and may have had a considerable bearing on the viability of the airport which we're now facing. The opportunity to reach the centre of London within 1 hour is highly significant both for airport passengers and commuters, and has a significant bearing on the sustainability of Manston airport as a passenger terminal. In this day and age, even with the current high speed trains it still takes too long to get to London from Thanet by train. At present the county council should consider the main reason for Thanet Parkway station as to service Manston Airport and not anything else.</p> <p>If the UK is going to be able to create new markets post- Brexit outside</p>		774		Web

					<p>Europe then goods inward and outbound are going to have to travel a great deal further and largely by air. There will still be a significant market within Europe too, which will remain important to the UK for export but also to the EU for importing and sale of their goods to the UK. Without Manston Airport, Britain and particularly the South East will struggle to handle the traffic, which will be vital for our country's prosperity and growth now and in the future. It will be fifteen years at least before any new runway at LHR or LGW is up and running. Despite the economic forecasts and benefits of further capacity at either, currently there is limited capacity either for additional air freight or the predicted rise in passenger demand, and considerable local objection to further expansion at either site. It seems absurd to me that here we have a perfectly good airport at Manston, certainly capable of taking significant air freight traffic, which could meet an immediate need and quickly relieve pressure on LHR and LGW and free up passenger capacity there, but is being ignored and considered for primarily a housing development. With investment in the transport infrastructure, which should have been done years ago with some forward thinking and planning, then there is real potential to develop Manston airport as a freight hub and possibly for passengers too. How much heavy goods traffic do we see passing through Dover and Folkestone to and from the continent, which should indicate with improved road links the viability of Manston airport for freight.</p>				
Smith	Andrew	11		Object	<p>1) If Manston Airport reopens, as it looks very likely now, there will not be the enormous number of new houses near the proposed new station site, so there will not be an increased commuter demand.</p> <p>2) If the airport reopens it will be as a cargo airport and the proposed new station will be of no use to it. All transportation will be by road. KCC would be better spending the money on upgrading the M2 and Thanet Way to a three lane motorway to allow for the likely increase of freight traffic to and from London.</p> <p>3) Thanet already has seven stations from Birchington round to Minster. Is there really a need for an eighth? This money would be far better spent on improving all the existing station parking and passenger facilities.</p> <p>4) This money would also be better spent on upgrading the track and signalling between Ramsgate and Ashford International, rather than purporting that a new station will decrease journey times to London.</p> <p>5) The existing Parkway proposal suggests that the new station will lessen journey times to London, but this has been calculated only as far as Stratford International, whereas most commuters go on to St Pancras International. Do KCC really think the public is so stupid as to accept that untruth?</p> <p>6) The proposed siting of this station is flawed. Who in their right mind would build a new station on a very narrow embankment which is about twenty five feet high and which will obviously need to be reinforced, when there is a much better site just to the west of the new Sandwich Road bridge, which is on a level site with enough land for parking and which</p>	Please see above.	20		Web

					<p>would still be able to have good, safe access to the Sevenscore roundabout on the New Road.</p> <p>7). The proposed site of this station has already been moved from the far western end of the embankment to the eastern end, extremely close to many houses in Earlsmead Crescent and Beech Grove. It will negatively affect these residents in almost every way possible and will doubtless result in compensation claims in the future. KCC had to pay out four figure sums to residents in Earlsmead Crescent and Beech Grove for the New Sandwich Road which is about half a mile away. This proposed station, if built, will be directly above and adjacent to many houses in Earlsmead Crescent and Beech Grove and doubtless will result in compensation claims well into five figures! If it is to be built, then to move the site again beyond the new Sandwich Road would be a much better option, having much less affect on any residents</p> <p>8) TDC has strict rules and regulations about the preservation of trees in Thanet and rightly so as we have so few. Is the TDC aware that along the whole of the south side of the embankment, where it is proposed to build the station, there is a half mile or so of probably one hundred or more healthy, mature trees which which is about ten yards wide. Currently these trees provides a visual and sound barrier to the existing railway and also an environmentally and aesthetically pleasing outlook from the back of Earlsmead Crescent and Beech Grove. KCC's proposal shows the removal of ALL of these trees and the planting of just a few "feathered" trees in their place. Surely TDC will not allow this to happen? It would be against their own rules and regulations. I would imagine that the Forestry Commission, RSPB and other environmental organisations would also have something to say about this!</p> <p>This whole project is flawed and unsound. Why also has the KCC continued to push for this project when they have been told by the Department for Transport that it is unnecessary and that they do not support it and will not fund it in any way. Is this the personal or vanity project of someone in KCC? Why are KCC so determined to waste public money which could be better spent on so many things over which they have control.</p> <p>I would urge TDC to look again at their view on this project in the light of these matters and not be pressured or duped by KCC into supporting it.</p>				
Solly	C	419		Object	<p>Point 1: It is unclear on the location of the station what it promotes. It is close to the strategic road network, but its located in the countryside, close to the rural area, and there is no development or strategy for the area around it. It appears that Cliffsend will be developed in to a commuter hub, but there is no housing planned, no masterplanning in order to protect, enhance and sustain any development in the future. There are offers of land in the SHLAA but in the SHLAA it quotes these areas as unsustainable. In particular Site SHLAA 361 quotes "The site lies outside the urban confine within the open countryside, in a unsustainable location, contrary to the local and national policy". The provision of this</p>	<p>Proposal of the parkway station should be removed from the plan as it is in an unsustainable location and is currently unviable. Cliffsend residents have objected to the parkway station, and</p>	1237	Solly Kent GIF.jpg(94 KB)	Email

					<p>policy appears to not be showing the best option has been taken with choices made and does not promote sustainability in the location it serves.</p> <p>Point 2: The project is in excess of £10,000,000 which was originally stated. The project according to KCC's GIF is £21,400,000 and has a funding as can be seen on KCCs GIF overview for Thanet below [see attachment].</p> <p>Point 3: From what I understand the Parish council and local residents are unhappy with the whole proposal. Their comments have not been taken forward. This is understandable considering cliffsend is in the Rural area.</p> <p>Point 4: There seems to be little understanding on off site parking problems for which local residents will be concerned.</p> <p>Point 5: The road junctions proposed around sevenscore roundabout appear to create bottlenecks in the road with an element of risk to the various junctions. Suggest that a new exit from the sevenscore roundabout is provided.</p> <p>Point 6: Due to its location, walking routes are not optimised or robust to improve cycle and pedestrian access.</p> <p>Point 7: There are concerns that the parkway station could affect services at Minster station which is already in a more sustainable location for the area it serves. Minster appears not to have any road plan which would improve links to this station.</p> <p>Point 8: The site is on the best and most versatile agricultural land, and areas of poorer quality have not been proposed.</p> <p>Point 9: It is unclear how bus services will be served by this development and if it offers an improvement from other sustainable locations including extra costs. It is not close to the Westwood area for which a lot of the new housing will be. This also includes Discovery Park and what are the links to this area.</p> <p>Point 10: It is unclear on how this interfaces with the airport as it was originally suggested, there is no statement on how this will operate with the airport and appears there is no ability to use this station to load goods as cargo on to rail.</p>	<p>understandable considering Cliffsend is in the rural area. The road junctions should be considered further as the entrance to the station is not in the best place, especially for traffic coming from the Sevenscore roundabout and Cliffsend roundabout. In regard to the airport it is unclear what this development serves in this context.</p>				
Spanton	Ed	125	Ed Spanton Farms	Howard Courtley - Courtley Planning Consultants Ltd	Object	See submission from SPRU	See attached submission from SPRU	297	09.27.18.AB.K5022PS.GeneralRep.Final.pdf (739 KB)	Web
Stevens	David	175			Observation	I would question the wisdom of spending considerable sums of money to achieve very little in journey times and connectivity. Far better to spend		643		Web

						the money on improving the line between Ramsgate and Canterbury.				
Stevens	Angela	163			Object	I STRONGLY OBJECT TO THIS PROJECT! KCC and TDC are going against local feeling and also against the government. HS1 serves Thanet well already from Ramsgate Station. A new Parkway Station in Cliffsend is NOT needed. To knock 1 minute off the journey time to London is a TOTAL waste of taxpayers' money! What benefits will it bring to Thanet? None! This project was proposed by KCC Leader Mr Carter, to support his dream of a Garden City covering Manston Airport. NO, NO, NO! The DCO for the reopening of Manston Airport has already been accepted for examination as an NSIP, which will hopefully succeed, proving that this project is not wanted or needed. Also, Stratford is NOT London! St Pancras, Euston, Paddington, Waterloo, etc., are in London!	Abandon it and consider the reopening of Manston Airport instead of a garden city on the airfield. Any workers at the new airport can come into Ramsgate Station from other parts of Kent. RSP would use Parkway for freight if opened, but do not need to rely on it, as they can use Ramsgate Station, as stated at KCC this year!	659		Web
Sykes	Anthony	31			Support	Should be located for access to Manston airport for high speed access to London.		62		Web
Twyman	Paul	324			Support	This unsatisfactory approach to infrastructure investment is carried through in relation to the Thanet Parkway Railway Station, a project which does not, and cannot, meet any reasonable investment test but is a vanity project pursued by the County Council and Network Rail. for reasons which escape professional commentators like myself.		997		Email
Ward	Linda	157			Observation	No use of the most valuable agricultural land is acceptable.		472		Web
Webb	Simon	8			Object	There is no proven demand for a new railway station. Thanet already has adequate railway stations. The new station would eat up all but 1 minute of the reduced journey time resulting from line improvements. Even the Department of Transport have refused grant funding for this station.	Upgrade the parking, cycle lanes, and pedestrian access at Margate, Ramsgate & Broadstairs.	15		Web
Wellbrook	Jacqui	20			Support	What is the objective/purpose of siting a new railway station where it services no large housing area or jobs and is not supported by either the Dept of Transport or Network rail? Additionally there are continual staffing and service issues at the existing Broadstairs station which need attention.		34		Web

Document Section Path		> Strategic Road Network > SP46								
Document Part Name		SP46								
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation ?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
Bowie	David	327	Highways England		Observation	<p>Strategic Road Network Impacts – Thanet Local Plan Evidence Base Revision 01 (January 2018)</p> <p>This document is included within the Local Plan Evidence Base, and the methodology used was agreed in liaison with Highways England. The conclusion of the report, section 3.3.9 states that, <i>"Based upon the above assessments it is considered that the non-consented development within the Thanet Local Plan will have a negligible impact at these junctions. The forecast additional flows as a result of the Local Plan would represent a very small proportion of the total traffic flows at the junction both existing and in the future."</i> The findings of this report therefore appear to underpin the Transport Strategy, the Infrastructure Delivery Plan and the draft Local Plan itself.</p> <p>We are content that the indicated traffic at Brenley Corner junction with the M2, and the junctions of the A256 with the A2 near Dover (Duke of York roundabout) as outlined in the report will not have a significant impact during the AM peak hour. However the trip generation in the PM peak hour has not been provided; accordingly we require evidence of why a PM peak hour assessment is not required or confirmation of the impacts in the PM peak hour.</p>		1006		Email
Goodban	Rex	236	R A Goodban & Son		Support	This assessment should be contained in the plan		720		Web
Johnson	Elisabeth	51	Monkton Residents Association		Observation	The development planned under the Local Plan may have limited effect on the junctions mentioned but it will have a great deal of effect on those nearer to home!		586		Web
Newing	April	322	Dover District Council		Support	<p>Transportation</p> <p>The preparation of the Thanet Transport Strategy (2018) to support the proposals in the draft Thanet Local Plan to 2031 is welcomed. Specifically, the District Council recognises paragraph 6.2.1 that identifies the need and importance to consider the travel implications of future growth of growth plans associated with M2/A2/A299 Brenley Corner.</p> <p>The Strategic Route Network Impact Report (2018) assesses the potential impact of future growth in Thanet on the strategic road network which indicates that the impact of development in Thanet is likely to be negligible. DOC looks forward to continue to engage with neighbouring authorities and KCC - as Local Highway Authority - on</p>		980		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation ?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						this matter and is supportive of Policy SP46: Strategic Road Network, as well as TDC's commitment to provide any additional information and analysis in due course, as set out in paragraph 9.35 in the Duty to Co-operate Statement (2018).				
Sitch	Sue	38	Mr		Object	I understand there will be new roundabout installed town side of the railway bridge on Minnis road. How will the the current narrow road leading under the bridge down to the bay deal with the hugely increased traffic coming off the proposed 'estate'. This will just lead to congestion, increased possibility of accidents due to increased speed and the new road will become a 'rat run' down to what is a very quiet area lived in by what is mosetley an elderly population.	REDUCE THE CURRENT PLANS BY AT LEAST 50%. Do not create a 'rat run'. Look at our current roads and improve there conditions first, this is where our monies could be spent more wisely first	187		Web
Solly	C	419			Object	Point 1: It is somewhat concerning that Thanet Council did not contact Highways England on the Local Plan in the last consultation, no statement has been made on this either. The SRN will need to be improved with all of the development in in Kent. Thanet being in the location it is in could become more unsustainable, with travel times increasing if planning is not fully informed. It is stated that it will have a minimal effect with the increase of traffic, there doesn't seem to be any data to know what extent this is in the transport plan. Point 2: The last minute change over the airport and the suggested growth to Ramsgate port appears not to have been modelled or considered in this plan with road junctions not being fully informed in terms of freight movements, no data available. Point 3: Considering we are in the first consultation of the transport plan, further changes and work will need to be done, and the SRN needs to look at the bigger picture when it comes to traffic increase to the Thanet area. Point 4: There is no plan at the moment for a lorry park in Kent, However Manston Airport has been developed to become a lorry park for when operation stack takes place. This does have an impact of the SRN.	A large change to the local plan including the OAN could produce more traffic to the SRN which may not be mitigated. It is concerning that a key consultee has not fully planned the effects of the local plan to the SRN. It appears no modelling for the effects of traffic and the road junctions has been performed. The effect of Ramsgate Port and Manston Airport could provide more freight into the area which may not be accountable in the last minute decision made over the airport. Operation stack is unknown on the lorry park, Manston Airport could hold thousands of freight Vehicles, this could have a large impact to the SRN.	1238	Solly HE response.jpg (291 KB)	Email
Thompson	Andrew	162	Canterbury City Council		Observation	The A28 corridor is of strategic importance to both Districts, and indeed for wider East Kent, and the need to understand and plan for the cumulative impacts of growth on the A28 corridor will remain an		477		Email

Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation ?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
						<p>ongoing and high priority issue.</p> <p>Our comments at the Preferred Options stage (March 2017) sought further understanding of the potential impacts of the draft plan on the A28 corridor, Sturry and the Canterbury ring-road. We therefore welcome in principle the production of the A28 Technical Note (January 2018) which seeks to quantify the resulting movements, although the note stops short of identifying any impacts on specific junctions (including junctions which are currently over capacity).</p> <p>We would therefore strongly support aligning the position on the A28 corridor with that taken for Brenley Corner and the Duke of York roundabout near Dover in draft Policy SP46. We would be looking to work with Thanet DC on any proposed mitigation on the A28 corridor in the future and would therefore welcome reference to this within the draft plan.</p>				
Webber	Beau	192	Save Manston Airport association		Observation	The assessment also needs to confer with RiverOak, and optimise the transport to include their suggested upgrades and new roundabouts etc.		556		Web

Document Section Path		> Strategic Routes > SP47								
Document Part Name		SP47								
Respondent Surname	Respondent First Name	Respondent number in this document	Respondent Organisation Name	Agent Name	What is the nature of this representation?	Comment	What changes do you suggest to make the document legally compliant or sound?	Comment ID	Attached documents	Submission Method
.		408	Tesco Stores Ltd	Mark Buxton - RPS	Object	<p>This representation is submitted on behalf of Tesco Stores Ltd in the context of their operational interests at the trading Tesco Extra store and land to the rear within their ownership which lies both to the north and south of Millennium Way. Similar representations and concerns have been submitted by another party on behalf of 'Pavilion Property Trustees as Trustee of the Broadstairs Unit Trust' in respect of their land ownership interests at the Tesco store and Broadstairs Retail Park to the south. Transport consultants, TPA, are advising both our client and the Trust on the potential implications arising from the draft Thanet District Transport Strategy (July 2018) and particularly the Westwood Relief Strategy.</p> <p>We have serious concerns over Policy SP47 and consider that insufficient detail is provided in either the Pre-Submission Local Plan or the supporting evidence base to make the policy justified or effective as required by the 2012 NPPF paragraph 182.</p> <p>Under this draft policy a number of areas are proposed to be safeguarded for the provision of key road schemes and junction improvements including Land between A254 Margate Road and A256 Westwood Road (including Millennium Way), Broadstairs. The majority of this route has the potential to impact significantly on areas owned/controlled by our client including the existing Tesco Extra car park and petrol filling station. Furthermore, if Millennium Way is extended this would create a physical and psychological barrier between the Tesco store and the rest of the Broadstairs Retail Park, potentially impacting on values. An upgrade of Millennium Way to form part of the Westwood Relief Strategy would also fundamentally change the nature and function of this road and impact on development parcels either side. Other representations submitted to the draft Local Plan confirm our client's aspiration to bring forward land north and south of Millennium Way for a residential development of up to 225 dwellings. Tesco's transport consultants, TPA, have produced a Transport Review which demonstrates that this scale of development can come forward without resulting in severe impact on the highway network and without the need for an extension to Millennium Way. The Transport Review is attached to these representations (Annex 1).</p> <p>We therefore strongly object to the inclusion of land controlled by Tesco for the proposed road improvement measures. This is partly due to the lack of information provided within the draft Local Plan on the nature and precise routing of this 'key road scheme' and also an apparent inconsistency between the policy wording and the draft Policies Map. The wording of Policy SP47 (criterion 12), suggests two strategic routes (i.e. the link between the A254 and A256 and the Millennium Way extension – as referred to in the Draft Transport Strategy and Draft Infrastructure Delivery Plan). However, the Policies Map only seemingly shows an east-west route in the form of an extension to Millennium</p>	<p>Delete reference to 'Land between A254 Margate Road and A256 Westwood Road (including Millennium Way), Broadstairs,' from Policy SP47 until such time as it can be demonstrated that this is the only viable option (tested alongside a range of alternatives) for delivering the Westwood Relief Strategy and that impacts on Tesco's operational and land interests have been effectively mitigated and minimised.</p> <p>A concomitant deletion of the extension on Millennium Way as a 'Strategic Route' on the Policies Map.</p>	1190	Annex 1 Transport Review.pdf(7.8 MB)	Email

					<p>Way. There is no safeguarded north-south connection between the A254 and A256 shown on the Policies Map even though the Draft Transport Strategy seemingly retains this 'missing link' in terms of the relief road strategy.</p> <p>It is impossible to consider the full extent of these changes to the local and strategic highway network from the draft Policies Map, while the only information provided within the Draft Infrastructure Delivery Plan is that a "link road between A256 Westwood Road and A254 Margate Road and extension of Millennium Way to A254 Margate road/new link road" will be provided. The Draft Infrastructure Delivery Plan (July 2018), whilst updated, still notes that the 'estimated cost' and 'phasing' are "to be determined" and that the scheme will be brought forward through "external funding".</p> <p>Paragraph 154 of the 2012 NPPF states that "Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan."</p> <p>We do not consider draft policy SP47, and particularly criterion 12, meet this basic requirement. In addition to the lack of clarity and consistency we also maintain a fundamental objection on the basis of the potential adverse impacts the Council's proposals could have on the existing and future operations of a successful Tesco Extra superstore, adjoining viable businesses, and Tesco's wider land interests.</p> <p>Both the extension to Millennium Way and the A254/A256 link would have a significant impact on the operation of the Tesco demise. The introduction of new roads across the site would result in a significant reduction in car parking; affect the access into the site; harm the flow of movement through the site; displace the 'click and collect' facility; stifle future expansion plans; and sever the connectivity between the petrol station and the foodstore. These factors will affect the operation and profitability of the store.</p> <p>We estimate that the proposed east-west route through the site (i.e. the extension to Millennium Way) would result in the loss of at least 100 car parking spaces from the Tesco site alone. The loss of such spaces would significantly prejudice parking provision on the site to the detriment of the performance of the store.</p> <p>If Tesco customers are deterred from shopping at the store due to lack of parking provision they could choose to travel further afield to suitable alternative stores which would lead to further vehicle miles on the local highway network and additional impact on air quality. We contend this is an unsustainable option and would undermine the aim behind the need to relieve traffic in the Westwood area.</p> <p>Finally, there is no evidence within the background documents which support the Draft Local Plan that Thanet Council (or Kent County Council) have tested alternative options/routes for the Westwood Relief Scheme, or whether the viability of the proposed routes through the Tesco site have been properly assessed in financial and deliverability terms. The 2012 NPPF paragraph 154 requires local plans to be "aspirational but realistic." We understand there is</p>				
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					currently no funding in place for these improvement works and timescales for delivery remain uncertain. In the absence both of the evidence to support the policy position and of rigorous testing of alternative options needed to justify the safeguarding of third- party land, we object to these proposals both in principle and on prematurity grounds.				
Barar		375		Observation	<p>Strategic Routes</p> <p>6.24 The key element of the emerging Strategy is the development of a proposed "Inner Circuit" to serve new development and reduce pressure on the existing network. This incorporates a new bypass for Birchington; a relief road for Westgate; connections to Westwood from the north-west and south; and improved connections to Manston Business Park, and should bring benefits to the wider road network. It is intended that the Inner Circuit schemes will incorporate provision for buses and cycling.</p> <p>6.25 These road proposals are required to support proposed new development in the area, and the routes are safeguarded in this draft Local Plan to ensure that they can be completed in due course alongside the development set out in the draft Local Plan. As set out in the working draft of the Infrastructure Delivery Plan, this infrastructure is regarded as critical to support the development proposed in the draft Local Plan, and it is expected that all new development will contribute to the provision of all key infrastructure in a proportionate and appropriate way. The Council, with its partners, will also seek other forms of funding, to support infrastructure provision.</p> <p>SP47 - Strategic Routes</p> <p>The following areas, as shown on the Policies Map, are safeguarded for the provision of key road schemes and junction improvements, to support the implementation of the Thanet Transport Strategy, including land at:</p> <ol style="list-style-type: none"> 1. Birchington strategic housing site 2. B2050 Manston Road, Birchington 3. Shottendane Road (from Birchington to Margate) 4. Shottendane Road-Manston Road housing site 5. Nash Road-Manston Road housing site 6. Nash Road, Margate 7. Nash Road-Westwood strategic housing site 8. Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road) 9. B2050 Manston Road (from Manston Court Road to Spitfire Junction) 10. B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction) 11. From Columbus Way to Manston Road, Birchington 12. Land between A254 Margate Road and A256 Westwood Road (including Millennium Way), Broadstairs 13. Victoria Traffic Lights 14. Coffin House Corner Traffic Lights <p>The Council expects all new development to make a proportionate and appropriate contribution to the provision of this key infrastructure.</p> <p>Although pivotable in the proposed development of SP14, I once again wish to draw attention to the effects on the environment of such a road network (noise, air and light pollution) – please see above, but also the vagary of exactly pinpointing who, by when and how much, would such strategic road expansions be cost outside of the ‘proportionate and appropriate contribution’</p>		1098		Email

						all new development are expected to make (in this case on 1, 2 and 3).				
Bowie	David	327	Highways England		Object	Section 6.21 to 6.22 state that a high level assessment of the potential Local Plan proposals on the SRN has concluded that the potential impact is very limited, and not significant in the context of wider traffic patterns at these junctions. As outlined above, we require evidence of why a PM peak hour assessment is not required or confirmation of the impacts in the PM peak hour.		1023		Email
China Gateway International Ltd.		503	China Gateway International Ltd.	Abraham Laker - RPS	Support	<p>China Gateway International Limited supports the strategic routes that are safeguarded for the provision of key road schemes and junction improvements to support the implementation of the Thanet Transport Strategy and to support new development in the area.</p> <p>Land at and to the east of the Manston Business Park is located along two Strategic Routes which are classified as B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue Junction) and B2050 Manston Road (from Manston Court Road to Spitfire Junction). These two Strategic Routes will provide the necessary infrastructure to accommodate further development within this locality and provide good accessibility and connectivity to the local services and the wider surrounding area of Thanet District. Based on the foregoing, it is our view that the land at and to the east of Manston Business Park, should be allocated for mixed used and residential developments, as the proposed infrastructure improvement earmarked in the draft Local Plan will aid in supporting these uses.</p>		1422		Email
Cooper	Barbara	514	Kent County Council (KCC)		Support	<p>Highways and Transportation: The published 'Policies Map' does not include the proposed road link between the A256 Westwood Road and A254 Margate Road, which in turn forms part of the Thanet Transport Strategy. In addition, the Millennium Way Link should extend to the existing roundabout located on the A254.</p> <p>The policy (and the accompanying Policies Map) should include reference to the proposed road link between Shottendane Road and Hartsdown Road. This is a more recent addition to the Thanet Transport Strategy and is located within housing site H02..</p> <p>The northern highway link contained within site SP14 (as indicated within the Policies Map), should extend to Minnis Road. KCC notes that there is also no reference to the link between Nash Road and Continental Approach/Enterprise Way. These links are already included within the IDP and Thanet Transport Strategy, therefore KCC recommends that the appropriate amendment is made to the Policy to ensure consistency between the Local Plan and the IDP.</p>		1521		Email
Cooper	Barbara	514	Kent County Council (KCC)		Observation	<p>Infrastructure Delivery Plan</p> <p>Highways and Transportation</p> <p>There is a substantial amount of highway infrastructure included within the proposed IDP. It is encouraging that the TDC is giving significant weight towards the need for highway infrastructure to support the proposed Local Plan and to add resilience within an already constrained highway network. The creation of an 'Inner Circuit' of highway improvements and new links (with the associated safeguarding policies) will assist in achieving managed growth.</p> <p>It is necessary for TDC to undertake viability testing within the framework of the</p>		1537	Appendix 1 Schedule of KCC's Technical Responses to Policies.pdf(415 KB) 181004 KCC Response to Thanet Draft Local	Email

					<p>IDP and this should also include the current outline costs of highway-based infrastructure. The infrastructure costs for off-site works stated within the IDP are based on very early design estimates, with theoretical delivery by KCC using funding to be secured from developers under section 106 agreements or external sources (or a combination of both). It is essential that all highway infrastructure is fully funded at zero cost or financial risk to KCC.</p> <p>At this time, it is unclear within the viability reports that have been produced, if the full (and considerable) costs relating to transport infrastructure (outlined within the IDP), have been included. KCC requests clarity on this matter.</p> <p>It may be possible for developers to pursue alternative delivery mechanisms for some of the required highway infrastructure, such as direct delivery under an appropriate form of highway agreement. This method could potentially result in a reduction in delivery costs. Early engagement by TDC with relevant developers will be essential in identifying common ground in relation to cost apportionment and delivery mechanisms. Preferably, TDC should seek a Statement of Common Ground with KCC and the relevant developers ahead of the Examination in Public.</p> <p>KCC is keen to work with TDC to seek positive infrastructure solutions, however there are several areas where third party land may be required to deliver off site highway infrastructure. As the infrastructure is required to facilitate Local Plan growth, it will be necessary for TDC to use its powers of compulsory purchase to progress schemes where land parcels cannot be secured through conventional negotiation. KCC is pleased to see that the Implementation Policy SP01 refers to the potential use of CPO powers by TDC where required.</p> <p>Page 13 – ‘Improvements to B2050 Manston Road between junction with Acol Hill and Shottendane Road’ should be amended to reflect its nature as off-site works rather than on-site.</p> <p>Page 14 – ‘Create new road between A256 Haine Road and B2050 Manston Road’ should be amended to state that development will need to fund the remaining off-site sections of this highway link to Manston Road and not just the central section (although this may be directed by future uses/development on the Manston Airport Site).</p> <p>Page 15&16 – ‘To re-route tourist traffic away from Margate seafront’ (and other complimentary cycling-based interventions) could potentially be funded by imposing a CIL tariff on non-strategic development sites. Further dialogue between the LPA and KCC with respect to this would be welcomed.</p>			Plan Consultation.pdf (191 KB)	
Davies	Julie	147	CPRE Kent	Object	<p>Comments on behalf of CPRE Kent Thanet District Committee.</p> <p>At the early stages of the Local Plan preparation the Council had hoped that Thanet could receive South East LEP monies to fund the new proposed road system. However, it has become clear that no such funding will be available. KCC has also clarified that there will be no contribution from KCC funds toward the highway proposals. (This seems to be confirmed by the lack of plausibility of the Transport Strategy - see comments made by CPRE Kent on the Transport</p>		398		Web

					consultation). Because of the extent of the proposed highway provision, a large proportion of potential developer contributions would be required to fund these roads. It is clear that KCC - as the strategic highway authority - has no evidence to be able to convincingly support the notion of complete financial support by developers with respect to the delivery of the 'Inner Circuit'. Multiple S106 Agreements will need to be agreed in tandem, or Community Infrastructure Levy monies – which the Council seem to accept would be unlikely. CPRE Kent is concerned that the impractical dependence wholly on developer contributions raises serious doubts on the whole viability and deliverability of the draft Local Plan and accordingly, in its present form, it is totally impractical, unrealistic and consequently undeliverable. The reduced household need identified in the ONS 2016-based household projection may reduce the need for the schemes identified in the policy or their funding.					
Johnson	Elisabeth	51	Monkton Residents Association		Observation	It is to be hoped that all this new roadwork infrastructure will be in place before any building work takes place.		587		Web
Quashie	Lorna	285	Pavilion Property Trustees as Trustee of the Broadstairs Unit Trust	Justin Mills - Contour Planning Services Ltd	Object	<p>The 'safeguarded' Strategic Route referred to in Policy SP47 (Criterion 12. "Land between A254 Margate Road and A256 Westwood Road (including Millennium Way")), Broadstairs (and also identified (in part) on the draft Policies Map) is located across an existing commercial site, owned in a Joint Venture by 'Pavilion Property Trustees as Trustee of the Broadstairs Unit Trust' (the 'JV site').</p> <p>The JV site comprises an existing Tesco foodstore (13,523 sq. m gross), together with Broadstairs Retail Park (currently occupied by Dreams, Laura Ashley, Currys PC World, The Range and Wickes), which has a gross floorspace of 12,838 sq. m. The wider site also includes a Tesco petrol filling station, Tesco 'click and collect' facility, various retail concessions (within the Tesco demise) and several 'development sites' (the largest of which is a grassed area located between the foodstore and retail park). The retail park and foodstore share the same access (from Margate Road) and are both served by a shared car park providing 1097 car parking spaces.</p> <p>Prior to outlining our client's objection to Policy SP47 (and the 'safeguarded' route shown on the Policies Map) we are concerned with the confused nature that the Draft Local Plan has in relation to our client's site. In this regard there is a clear discrepancy between the wording of the Draft Local Plan (Policy SP47) and the draft Local Plan Policies Map. The wording of Policy SP47 (criterion 12), suggests two strategic routes (i.e. the link between the A254 and A256 and the Millennium Way route – as referred to in the Draft Transport Strategy, Draft Infrastructure Delivery Plan and several of the evidence base documents). However, the Policies Map only identifies the safeguarded route as an east/west route in the form of a connection between Millennium Way to Margate Road. There is no safeguarded north-south connection between the A254 and A256 shown on the Policies Map even though the Draft Transport Strategy retains this route as part of the Westwood Relief Strategy. Consequently, our client is confused with the nature of the proposals affecting them and whether it is the</p>	Policy SP47 (and the safeguarded route included in the Policies Map) should be amended to remove Criterion 12 ("Land between A254 Margate Road and A256 Westwood Road (including Millennium Way), Broadstairs") since these strategic routes are undeliverable and their inclusion in the draft Local Plan makes the document unsound and fails to comply with the requirements of good plan-making (due to the lack of rigorous testing, including of alternative options, needed to support the safeguarding of third-party land) set out in the 2018 NPPF (Para 16) (formerly Para 154 of the 2012 NPPF).	830	L001jm (Thanet Draft Local Plan Reps).pdf(178 KB)	Web

					<p>Council’s intention to safeguard two routes through their land, or only the single route illustrated on the Policies Map.</p> <p>Notwithstanding this discrepancy, our client strongly objects to both proposals (whether insinuated or explicitly shown on the Policies Map) for strategic routes (i.e. roads) through their site. The nature of their objection is expanded upon below:</p> <p><i>Lack of ‘Viability’ Evidence and Testing of Alternative Options to Support the Proposed Safeguarding of the Routes</i></p> <p>The draft Local Plan advises (at paragraph 6.25) that the routes safeguarded for future road schemes and junction improvements are Identified as ‘critical schemes’ within the draft Infrastructure Delivery Plan (July 2018) (‘IDP’). However, the draft ‘IDP’ is vague in relation to the nature of infrastructure required for the ‘Westwood Relief Strategy’, with the only reference in the document being to “provide link road between A256 Westwood Road and A254 Margate Road and extension of Millennium Way to A254 Margate Road/new link road”, noting that the ‘estimated cost of funding’ and ‘phasing’ is “to be determined” and that the scheme will be brought forward through “external funding”. Therefore, contrary to the comment in the draft Local Plan, the IDP does not provide guidance or evidence as to the alignment of the route, nor does it indicate whether alternative options have been tested. Without this evidence, it is impossible for the Local Plan to consider the full extent of these changes to the local and strategic highway network.</p> <p>Furthermore, contrary to the Draft Transport Strategy’s comment that “alternative links explored if necessary”(Para 9.4.5), there is no evidence within the background documents that Thanet District Council (or Kent County Council) have tested alternative options/routes for the Westwood Relief Strategy, or whether the viability of the proposed routes through the JV site have been properly assessed in financial and deliverability terms.</p> <p>In this regard, it is noted that Kent County Council prepared a more detailed plan showing the alignment of the north/south route (connecting the A254 to the A256 – partly using the Tesco internal road, between the car parking and petrol station), which was due to be presented to the KCC’s 15th June 2017 Environment and Transport Cabinet Committee. However, this item was withdrawn from the Committee and we can find no record of it being taken back before the Committee at a later date. There is also no record of a detailed design of the east/west route (extending Millennium Way) being presented to KCC’s Transport Committee.</p> <p>Whilst the draft Thanet District Transport Strategy 2015–2031 (July 2018) also makes reference to the two routes through the JV site (estimating that the cost of the works are £8 million - funded through external funding), this document also lacks the detail (and rigorous testing and inclusion of alternative options) needed to justify the safeguarding of third-party land in compliance with the requirements of good plan-making.</p> <p>We therefore contend that without sufficient evidence (including the testing of alternative options), and through the inclusion of policies which are neither viable nor deliverable (due to the need for third party land), the draft Local Plan is unsound. The draft Local Plan is also contrary to the requirements of the 2018 NPPF (Para 16 - which replaces Para 154 of the 2012 NPPF), which requires Local</p>				
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					<p>Plans to “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” and that plans should be “aspirational but deliverable”.</p> <p>Lack of Clarity with Traffic Modelling Evidence The evidence base presented in support of the draft Local Plan does not appear to be sufficiently robust in relation to traffic modelling at a local level.</p> <p>Firstly, it is noted that SATURN was utilised in modelling the strategic impact of the Local Plan. With regard to the model produced by Amey , they identified that the strategic model not only had “limited level of coding and zoning” for the Westwood shopping / employment area, but also that the “model was to provide traffic information for individual junction assessments in the area of interest, using specific junction modelling software (e.g. Arcady, Picady, Linsig etc.)”.</p> <p>We are unsure what is meant by “limited level of coding and zoning” in Westwood, but the phrase appears to cast doubt on whether the model provides an accurate or appropriate base from which to test the potential impact on the area.</p> <p>In summary, our client is concerned that there is a lack of robust testing of the evidence which has led to the identification of the safeguarded route(s) through their site, making the draft Local Plan unsound.</p> <p>Impact on Future Investment and Development Proposals on the JV Site The owners of the JV site have aspirations to further develop the site. The grassed land on which the proposed east/west safeguarding route is proposed, forms a key element of their redevelopment plans, together with other development sites in the west and north of the JV site.</p> <p>In this regard it is of note that the JV site owners secured planning permission (in 2009) for a 2,842 sq. m extension to the Tesco store, together with improvements to the site (including the provision of an enhanced pedestrian cycle path). Whilst this development was never completed, it illustrates the scale of floorspace that can be achieved on the land located between the foodstore and Broadstairs Retail Park. The other parcels of undeveloped land on the site (which are likely to be blighted by the north/south route) would also be capable of accommodating development (e.g. restaurants and/or retail units) and, in this regard, the JV owners are actively in discussion with a number of parties who are interested in developing commercial schemes.</p> <p>The JV owner’s aspirations to improve the value of their land, whilst bringing new jobs and services to the Westwood Cross Centre, will be significantly harmed were the proposed routes through the JV site to be brought forward. The JV partners development aspirations (which are expected to be compliant with the Council’s policies for the area) are a material consideration in valuing the site, and any attempt to acquire the land needed for the routes (through whatever mechanism) will need to have regard to the impact on both the actual and potential value of the land.</p> <p>Impact on Operation of Tesco Store/Petrol Filling Station Both the safeguarded extension to Millennium Way and the north/south route will have a significant impact on the operation of the JV site, particularly</p>				
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					<p>affecting the Tesco demise. In this regard, the introduction of new roads across the site will result in a significant reduction in car parking (described in further detail below); affect access into the site; harm the flow of movement through the site; displace the 'click and collect' facility; and sever the connectivity between the petrol filling station (PFS) and foodstore.</p> <p>In relation to this latter point, Tesco's transaction data shows that circa 50% of customers visiting the store also visit the PFS. The introduction of a road between the foodstore and PFS will sever this connectivity, resulting in lost trade for both elements of Tesco's business. In addition, products sold in the PFS kiosk are delivered from the Tesco store. It would not be feasible for these deliveries (which are made using hand pushed trolleys) to have to cross a main road to access the PFS.</p> <p>Accordingly, from an operational and commercial point of view, it would be totally unacceptable for the Tesco PFS to be severed from the rest of the Tesco site by a new road. Accordingly, the JV site owner strongly objects to this element of the proposed strategic route.</p> <p>Loss of Car Parking</p> <p>It is estimated that the proposed east/west route through the site (i.e. the extension to Millennium Way) will result in the loss of at least 100 car parking spaces from the Tesco site were the link road to be constructed across the JV site. Furthermore, were a north/south route to be introduced, we estimate that at least another 60 spaces would be lost. The loss of such spaces would significantly prejudice parking provision on the site, to the detriment of the performance of the retail outlets.</p> <p>The effects of the potential loss of parking on the site are illustrated in the following table:</p> <table border="1"> <thead> <tr> <th></th> <th>Tesco Demise</th> <th>Broad Demise</th> </tr> </thead> <tbody> <tr> <td>Existing Car Parking Provision</td> <td>644</td> <td>453</td> </tr> <tr> <td>Parking Provision After East/West Link Road (assuming 100 lost spaces)</td> <td>544</td> <td>453</td> </tr> <tr> <td>Parking Provision After North/South Link Road (assuming 60 lost spaces)</td> <td>484</td> <td>453</td> </tr> <tr> <td>Existing Car Parking Ratio</td> <td>1 per 21 sq. m</td> <td>1 per 21 sq. m</td> </tr> <tr> <td>Parking Ratio After East/West Link Road (assuming 100 lost spaces)</td> <td>1 per 24.8 sq. m</td> <td>1 per 21 sq. m</td> </tr> <tr> <td>Parking Ratio After East/West & North/South Link Roads (assuming 160 lost spaces)</td> <td>1 per 27.9 sq. m</td> <td>1 per 21 sq. m</td> </tr> </tbody> </table>		Tesco Demise	Broad Demise	Existing Car Parking Provision	644	453	Parking Provision After East/West Link Road (assuming 100 lost spaces)	544	453	Parking Provision After North/South Link Road (assuming 60 lost spaces)	484	453	Existing Car Parking Ratio	1 per 21 sq. m	1 per 21 sq. m	Parking Ratio After East/West Link Road (assuming 100 lost spaces)	1 per 24.8 sq. m	1 per 21 sq. m	Parking Ratio After East/West & North/South Link Roads (assuming 160 lost spaces)	1 per 27.9 sq. m	1 per 21 sq. m				
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					<i>Reduced Thanet Parking Standards (for Westwood Cross)</i>	<i>1 per 15.4 sq. m</i>	<i>1 per 24.8 sq. m</i>			
					<p>The above table illustrates that the east/west link road alone is likely to reduce the foodstore car park to a ratio of 1 space per 24.8 sq. m, with this ratio falling to 1:27.9 sq. m in the event that both routes are introduced in to the JV site (which is significantly below the 1:15.4 sq. m parking standard which the Council is looking to encourage in Westwood Cross). Such a significant under-provision of car parking will harm the performance of the Tesco store (and retail park), leading to congestion within the site (as customers search for spaces), as well as causing congestion in surrounding car parks (and on the road network) as foodstore customers look for parking spaces in nearby car parks. This will lead to further vehicle miles and impact on air quality and therefore undermines the aim behind the need to relieve traffic in the Westwood area.</p> <p>Impact on Access The proposed link road would detrimentally affect the access/egress into both parts of the JV site.</p> <p>Impact on Linked Trips Retailers within the JV site currently benefit from linked trips. Such linkage is most obvious between the stores in the Broadstairs Retail Park and the Tesco store. In essence shoppers are currently able to park and then visit both parts of the JV site without the need to drive between them.</p> <p>This opportunity for linked trips would be severed by the proposed link roads, which would create physical and psychological barriers for pedestrians (and cyclists) between the existing retail park and Tesco store, as well as between the Tesco store and PFS. Consequently, there would be less opportunity for movement between various facilities within the JV site, and the introduction of pedestrian crossing points would have the effect of congesting traffic flow along the new link roads.</p> <p>In summary, the proposed routes will create congestion and additional (unnecessary) vehicle trips, as shoppers are forced to drive between the different parts of the JV site. Such congestion (and impact on air quality) would undermine the aim behind the proposed linked roads.</p> <p>Impact on Highway, Cyclist and Pedestrian Safety Draft Local Plan Para 2.14 seeks to ensure the safe movement by pedestrians and cyclists within the Westwood Cross commercial area, with Para 2.19 recognising that “the area currently suffers from poor connectivity between sites, both vehicular and pedestrian”. Given these comments, it is surprising that Policy SP47 seeks to introduce new roads into the area which will further fragment the nature of the wider Westwood Cross area, and which will create physical barriers for pedestrians and cyclists between the existing Broadstairs Retail Park and Tesco store, as well as between the wider JV site and other parts of Westwood. This conflict in the Local Plan’s approach makes the document unsound.</p> <p>Summary of JV Site Owners Objection The Draft Local Plan’s inclusion of the safeguarded strategic routes across the</p>					

					<p>land owned by the JV partners is unsound for the following reasons:</p> <p>There are discrepancies between the various background documents and the Local Plan as to how many strategic routes are being safeguarded across the JV site (i.e. is it just the east/west extension to Millennium Way shown in the policies maps, or does the safeguarding include a north/south route between the A254 and A256);</p> <p>The proposed alignment of the routes is not backed up by the supporting evidence base, and has not been subject to rigorous scrutiny and testing of alternative options (a key requirement of plan making);</p> <p>The safeguarded strategic routes are not deliverable since the land is not available for the routes and the proposed cost of the works (identified as £8 million in the draft Transport Strategy) significantly under-estimates the cost of the scheme due to the impact on third party land (in terms of both the existing and potential value of this land);</p> <p>The safeguarding of the strategic routes blights a number of commercial operations (including by severing the opportunity for linked trips, through lost car parking and blighted access/egress arrangements) and would prevent the JV site owners from enhancing their asset value (through the development of undeveloped parts of the site);</p> <p>The proposal would encourage increased vehicular movements as customers would chose to drive between the retail park, foodstore and PFS (as well as other parts of the Westwood area), creating congestion and harming air quality, thereby defeating the aim of the relief road.</p> <p>Notwithstanding, the JV partners are prepared to work with Thanet Council/KCC and adjoining land owners to help devise alternative routes which relieve the traffic congestion within Westwood, but which do not result in the loss of land (or impact) on the JV site.</p> <p>(The above comments and objections are set out in the attached letter of objection, which also includes our client's objection to the Draft Transport Strategy).</p>				
Repsch	John	126		Support	<p>Strategic Routes</p> <p>SP47.1</p> <p>Birchington's proposed link road would encourage traffic from the Thanet Way to ignore the road to Ramsgate and instead take the A28. That would create more noise and air pollution in a residential area.</p> <p>2. B2050 Manston Road</p> <p>The noise and air pollution of heavy traffic would badly affect wildlife habitats in nearby Quex Park.</p>		826		Web
Schembri	Angela	387	RPS Planning & Development Ltd	Object	<p>The proposal to introduce a new strategic road link between the B2050 Manston Road to A256 Haine Road as part of The Inner Circuit Route Improvement Strategy (ICRIS) which is currently shown to cross the Northern Grass area of the Manston Airport site, is not consistent with the Council's proposal not to allocate airport land for any particular purpose. For this, and other reasons, this section</p>		1144		Email

					<p>of the link road needs to be reevaluated. RSP are in discussions with Kent County Council's Highways team about this issue and discussions are ongoing.</p> <p>The draft Thanet Transport Strategy (July 2018) provides the evidence base to support the key road schemes and junction improvements presented in Policy SP47. There is no evidence provided about any alternative options that may have been considered or indeed how this key infrastructure has been derived. Furthermore, there is no consideration of a phasing strategy for the proposed 'Inner Circuit Route' to deliver the Local Plan growth as the modelling considers the 2031 end of Local Plan state only with no interim modelling or identification of what infrastructure needs to be in place and by when. The delivery/funding of the central section of the B2050 Manston Road to A256 Haine Road link which is the part that crosses the Manston Airport site, appears to be dependent on development which is not currently envisaged within the Local Plan (see Schedule of Key Local Plan Infrastructure, Working Draft Infrastructure Delivery Plan, updated July 2018). This raises the question as to whether this link road is actually needed to deliver the planned growth in the new Local Plan.</p>				
Solly	C	419		Object	[See attachment]	<p>Connection to Enterprise road to Nash Road should be included in Policy.</p> <p>On strategic routes new road infrastructure should be built first</p> <p>Assessment of air quality following changes implemented of this policy</p> <p>Issue of housing delivery to fund this policy</p> <p>Clearer identification of new roads and improvements linked with strategic policy.</p> <p>Strengthen wording on road contributions</p> <p>Modelling is unclear on several scenarios</p> <p>No redundancy of road sections not being fully funded on ICRIS</p> <p>Issues of road design on outcome of Manston Airport DCO</p> <p>2 versions of the transport plan have been published due to indecision on Manston Airport.</p> <p>Question on S106 and CIL</p>	1239	Solly SP47 comments.pdf (1.9 MB)	Email

							funding fully meets the costs required. Include Landscapes policy on any road project to limit the effect of development. No consideration or assessment on health delivery especially in regard to stroke services HASU services , large concern on proposed HASU at William Harvey hospital, Ashford. Expansion of Railway Bridge at Minnis Road, Birchington.			
Stevens	David	175			Object	<p>This plan needs to be scrapped and to undergo a total rethink. The plan is not funded and relying on 100% of the cost to be provided by developers is a recipe for disaster. There are large sections, notably large parts of Shotendane Road with no developer to pay for it and the plans for the Margate end of Shotendane Road are a complete mess. With the likelihood of Manston reopening increasing significantly, there is little chance of the "ring" road being able to pass over the airport site. With this gap and several others in the planned route for the inner ring road, the Thanet Transport Strategy will not work.</p> <p>The new plan must also take into account the proposed change to the NHS Stroke provision in Kent. With potential patients having to travel to Ashford it is vital that the journey times from areas such as Broadstairs out of Thanet are drastically reduced. This is more urgent than making it easier for people to travel to Westwood Cross!</p>	Unfortunately this needs a total rethink.	645		Web
Stevens	Angela	163			Object	A ring road/inner circuit would make sense if only it joined up and flowed!	Rethink the inner circuit route and make it join up all round.	661	A3A7F7AC-928B-4542-8F10-52A75CAA2991.jpeg(388 KB)	Web
Trotter	AR & PJ	388			Observation	<p>TRANSPORT</p> <p>Thanet is becoming a no-go area for transport at peak times. There are pinch points at the Spitfire Museum cross roads, Coffin Corner Traffic Lights and Victoria Traffic Lights, to name but a few. The Council's answer appears to be the construction of an inner ring road from Brooksend Hill Birchington, linking up to Shottendane Road, Nash Road, and Manston Court Road. It appears that this will be funded by the housing developers under Section 106 agreements. The link road will then be totally dependent on whether the various housing developments will be built. In a worst case scenario the link road may not ever be completed. Added to this the existing roads at Shottendane Road, Nash Road and Manston Court Road will have to be upgraded. Who will pay for this? We have recently seen Nash Road closed for a week following a serious factory fire at the Westwood Industrial Estate. This has caused serious havoc with local traffic and major delays at the Coffin Corner and Victoria traffic lights.</p>		1145		Paper