

11th January 2019

Dear Mr Birkinshaw and Mrs Lucas,

I refer to your letter dated 17 December 2018, containing initial questions regarding the draft Local Plan. I will respond to each point in turn.

Sustainability Appraisal

The Summary Interim Sustainability Appraisal Report produced to accompany the issues and options consultation in 2013 assessed options for the draft Thanet Local Plan. These options are set out at Appendix G of the Sustainability Appraisal - Environmental Report August 2018 (CD7.4) - in table form with the reasons for selecting the preferred options and discounting the reasonable alternatives.

The preferred options were then tested against the option of “no policy” in the report. This can be found at Appendix E of the Sustainability Appraisal - Environmental Report August 2018.

The distribution of housing growth was first considered using broad spatial options:

- Adjoining the Urban Area
- Adjoining the Villages
- Freestanding Countryside Sites
- In the Green Wedges
- Housing in the Form of a New Settlement

The options of locating housing adjoining the urban area and adjoining the villages were the preferred option and sites in these locations were selected accordingly. The evaluation of these options can be found on page G4 of Appendix G of the Environmental Report August 2018 (CD7.4).

Since the issues and options consultation, significant additional housing demand has been identified in Thanet. As such it was considered that the option of a freestanding new settlement should be further explored with the implementation of robust mitigation, especially as the strategic sites already covered the majority of the urban edge in Thanet. Several sites had been submitted that could either on their own or combined with another site form a freestanding new settlement. The New Settlement Mitigation Study Summary report November 2016 carried out an appraisal of those individual sites as well as recommending the mitigation required. The New Settlement Mitigation Study can be found at Appendix A of the Sustainability Appraisal - Environmental Report August 2018 (CD7.4).

The Council rejected the proposed draft Plan in January 2018, featuring a freestanding new settlement on the airport site, on the basis that the site should not be allocated for development,

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leaving the site available for aviation use pending the outcome of the DCO process. This meant that there were two options for delivering the housing requirement considered by Cabinet in July 2018 - allocating a freestanding new settlement (at Manston); or finding alternative sites for the 2,500 homes.

The two options for delivering the housing requirement were assessed. Option 1 (to allocate a mixed use development on the airport site; assessed previously as Policy SP05 and in strikeout in the Environmental report (Appendix E))

Option 2 (to redistribute the housing from the airport site) was assessed in the Revised Options Sustainability Appraisal June 2018 and appended to the committee report for Council in July 2018 (Annex 5 of that committee report). The changes in assessment were highlighted in this document and incorporated into the Sustainability Appraisal - Environmental Report August 2018 (Appendix E). This assessment dated June 2018 is attached with this letter and has been made a Core Document reference CD7.4.1.

The Sustainability Appraisal - Environmental Report August 2018 discusses the evolution of options (reasonable alternatives) in Section 5 of the Report (pages 22 to 24).

Transport evidence

The Transport reports referred to in the Duty to Cooperate Statement are Core Documents CD6.7 - SRN Impact Report and CD6.8 - A28 Technical Note. These have been shared with neighbouring Councils and other key partners (such as Highways England), and were published at Reg 19 stage in August 2018.

With reference to the Sandwich Bay SAC, detailed traffic modelling of the relevant road sections (Sandwich Road in Cliffsend, and Royal Harbour Approach, Ramsgate) was not undertaken as part of the Local Plan transport modelling. The modelling was focussed on those areas of the network where the material impact from Local Plan-related development was anticipated.

However, the Habitats Regulations Assessment (CD7.5) considers the potential impact of traffic flows on A or B roads within 200m of the SAC, noting that the interest features of the SAC are outside the Thanet District (p48, para 5.3):

“The Department of Transport’s Transport Analysis Guidance states that “beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant” and therefore this distance is used to determine the potential significance of any local effects associated with the plan. There are two A- or B-roads within Thanet and within 200m of Sandwich Bay SAC, namely the A256 between Sandwich and Cliff’s End, and the A299 in Ramsgate. However, these roads are some distance from the emissions-sensitive features of

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the SAC: the dune systems are primarily associated with the section of coast between the Great Stour estuary and Deal, and so are at least a kilometre from the nearest section of main road (the A256 around Richborough). In addition, none of the major allocations are within 2km of the dune systems, so local air quality changes associated with these developments (and increased traffic in their vicinity) are unlikely to affect the integrity of the SAC. It is therefore unlikely that any increases in emissions from vehicles that could be associated with the Thanet plan (alone, or in combination with other local plans) would adversely affect the integrity of this SAC.”

Housing

The Council used the 2014-based figure for its latest Objectively-Assessed Needs (OAN) calculations (GL Hearn, January 2017). The Strategic Housing Market Assessment (SHMA) Update (CD4.1) represents the most recent assessment of the OAN by GL Hearn as the Council's professional advisors on housing issues which follows both the NPPF and the national Planning Practice Guidance. The Council believes that this is a robust study based on the available evidence.

The 2014-based household projections (ONS Table 406) indicated 75,015 households in Thanet in 2031. The 2016-based figure was 74,042 households.

The new 2016 household projections do not have a significant impact on the work undertaken to date and a review of the SHMA at this stage would be an extensive task, and is not likely to result in a significant change to OAN.

In line with recent advice from the Ministry of Housing, Communities & local Government (MHCLG), the Council does not intend to seek to alter the OAN figure on the basis of the 2016-based projections.

A review of the SHMA could also cause delay to the draft Plan process. You will be aware that the Council has been subject to intervention, and at the time of writing, no decision has been received from the Secretary of State on this matter.

In the light of the above, and the advice in para 31 of the Planning Practice Guidance that “Strategic policy-making authorities will need to consider carefully the need to commission evidence that will add delay and cost to plan production”, the Council has not proceeded with work to review the OAN.

The phasing contained in Appendix B is based on the Council's normal approach as set out in the Annual Monitoring Report (AMR). An annual review of housing sites is undertaken each year as

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part of the Housing Information Audit which is published on the website of Kent County Council as part of the returns for all Kent Districts and also within Thanet District Council's AMR.

The phasing of sites, both allocations and planning permissions, is based on a number of factors. In general phasing of sites with planning permission tend to have a 3 year lead in time before completions are generated. Allocations are based on information provided by developers or a combination of the factors below.

- 1) The annual Phasing survey - each year the Council consults developers/agents on the phasing of their sites asking them if the Council's proposed phasing is an accurate reflection of the site's phasing and encouraging them to amend if required. The survey also asks if there are any constraints / barriers preventing the site from coming forward in the envisaged timescale;
- 2) Local knowledge of the housing market reflecting the market conditions within each of the settlements (i.e. completions tend to come forward more quickly in some areas than others);
- 3) Regular meetings with developers - Council officers within the Housing and Planning teams hold meetings with developers and any information on phasing is fed back to the Strategic Planning Team. The Council is currently reviewing phasing for strategic sites in conjunction with agents and developers; and
- 4) As part of this year's survey, the Council has further refined the under construction survey status by noting the stage of construction on site to help inform delivery and thereby improve the accuracy of phasing information.

The Council recognises that the question of sites and their associated phasing will be discussed in great detail at the forthcoming examination. The Council is currently finalising its AMR and the phasing of sites is likely to be amended in due course following completion of this work together with any new information arising from the forthcoming update meeting with developers. This will enable you and other interested parties to have the most up-to-date position in advance of the hearings.

Alternative (Omission) sites

A schedule of Omission sites is attached for information. This has also been added to the Core Documents list as CD4.5.

Employment land

Below is a table detailing the Thanet Local Plan employment allocations by size along with details of extant planning permissions. The Employment Land Update and Economic Needs Assessment July 2018 (CD2.2) sets out a justification for the employment land supply at page 53.

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Site	Total Site Area (ha)	Remaining employment allocation (ha)	Extant Planning Consents at 8 th January 2019
Manston Business Park	75.2	42.53	17/1063 22 units 2184sqm B2 17/1589 19 units 1250sqm B2 17/1756 11 units 1021sqm B1c 137sqm B2 68 sqm B1a 18/0093 136 sqm B8 9 units 768 sqm B1c 18/0637 1000sqm B8 1 units 18/1185 1980 sqm B2 18 units 4849 sqm B2
Eurokent	38.6	5.45	Appeal APP/Z2260/A/14/2213265 allows up to 5.45ha 54,550sqm of B1 floorspace
Thanet Reach	9.74	3.7	No extant planning consents
Hedgend	2.46	1.61	No extant planning consents
TOTAL	126	53.29	67,943sqm (6.8 ha)

Please note that on Manston Business Park there is a further 5,468sqm, the subject of current planning applications.

I hope that this fully answers the queries raised in your letter, but please let me know if any further clarification is required.

Yours sincerely

A Verrall

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