

# Thanet District Council **Matter Statement**

**Matter 5 - Strategic Sites (Policies SP13 -  
SP18 and HO2)**



## ***Issue 1 – Methodology***

### **Q1. What was the process for identifying the residential site allocations, including their size, location and distribution? How were they chosen?**

The Council carried out an Issues and Options consultation in 2013 which discussed issues to be taken into account when considering where new homes should be provided. The accompanying Sustainability Appraisal tested broad options such as the amounts and location of housing including where the greenfield element should be accommodated. The option for accommodating development on brownfield sites within the urban area scored the best. The option for where best to locate the greenfield element favoured urban edge sites (based on the 2006 Local Plan Urban and Village Confines) which scored the best in sustainability terms. This informed the allocation strategy.

The key site selection principles are set out in the SHLAA (CD4.4) and summarised below:

- 1) Optimise capacity from sites in the confines of the built up area containing the Thanet towns.
- 2) Accommodate remaining provision at sites which abutt the boundary of those confines. Priority will be given to maintaining the function of the Green Wedges between the towns.

In parallel with the above steps consideration will be given to making provision for some housing of appropriate scale at the rural settlements. Capacity from sites within the settlements' existing built up confines will be optimised. Sites abutting those confines would then be considered in accommodating any residual requirement.

The concept of a new settlement to address housing demand was also put forward as an option of the Local Plan Issues and Options consultation.

As limited details regarding a new settlement option and any mitigation were known at this time, the option performed poorly within the sustainability appraisal as there would be a high level of greenfield development requiring additional infrastructure and public transport investment in order to function. As such, the poorly performing option was discounted as a viable solution to addressing Thanet's housing demand.

Since the Issues and Options consultation, additional housing need has been identified within Thanet resulting in a need to review the preferred housing strategy. For completeness, it was decided that a review of a potential new settlement option should be undertaken, but exploring the opportunity to implement robust mitigation in order to facilitate as sustainable new settlement scenario as possible.

An assessment of possible new settlement sites due to their size and location, either on their own or adjoining other sites were appraised against the sustainability appraisal. The study concluded that given the implementation of defined and robust mitigation (based on the content of exemplar planning policies from other authorities, which have progressed through the plan preparation process), sustainable implementation of a new settlement option could be achieved.

Based on SA assessment, option NS5 (the former airport site) was deemed the most likely opportunity to provide a sustainable new settlement due to its size, which would allow comprehensive provision of uses and facilities, and its unique status amongst options as a

brownfield site. However the former airport is currently subject to a Development Consent Order application and its current lawful use is for aviation activities. It has since been considered that the allocation of the site as a new settlement would not be appropriate if it might jeopardise any future aviation use.

The other potential new settlement sites were either unsustainable, or would not be appropriate for allocation due to their proximity to the airport site, if it is to return to active aviation uses. The housing sites required to accommodate the additional need were therefore identified in accordance with the original SA recommendations as sites at the urban edge.

The SHLAA process explored further sustainability criteria such as distance to public transport, healthcare provision, schools and shops.

The SHLAA sets out the sources of potential sites. These sites were assessed for their suitability, availability and achievability. This included two stages of assessment:

### **Category 1: National and Regional Issues**

Relevant policies included Flood Risk Areas, SPA, Ramsar, SAC, SSSI, NNR, AONB, Ancient Woodlands, Local Green Spaces. Any sites failing at this assessment stage were not progressed further.

### **Category 2: Local Issues**

Relevant policies included Urban/Village confines, Green Wedges, Local Wildlife Sites, Landscape Character Areas. This also included whether a site was currently in use or allocated for employment or other uses, whether a site was in or adjacent to a settlement and whether a site was in or adjacent to a site already allocated for housing development.

More detailed assessments were then carried out including issues such as site sustainability, access/highways issues, infrastructure, ecology, archaeology, heritage assets, ownership.

Sites that came out favourably against these assessments were selected, in conjunction with the key selection principles. In order to meet the most recent OAN of 17,140, it was considered necessary to allocate a number of large, strategic sites. These would also contribute towards Highways and other infrastructure identified as necessary for the district to accommodate this level of growth. A number of smaller sites were also allocated.

## **Q2. Was the process of allocating sites robust? Did it take into account sufficient factors?**

The process for allocating sites began with the sustainability appraisal which favoured urban and village edge sites when judged against reasonable alternatives. The SHLAA process made a comparative assessment of sites based on a number of sustainability factors including distances to public transport, healthcare provision, schools and shops.

Factors relating to the principal of residential development were considered including national and regional issues, and whether a site was inside or outside of urban or village confines or in one of the Green Wedges.

Other factors taken into account were:

- Access
- Highway capacity
- Infrastructure: - Water Supply, Sewerage/Drainage, Electricity supply, Gas Supply
- Electricity pylons
- Contamination/pollution
- Ecology
- Adverse Ground conditions
- Hazardous Risk
- Topography
- Flood zone
- Archaeology and Heritage Assets
- Landscape Character Areas

**Q3. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?**

The 2013 SHLAA explained that: *“an indicative dwelling capacity estimate was attributed to sites as part of the assessment process. This was informed by the benchmarks applied in Local Plan policy [H1 of the 2006 Adopted Local Plan] which indicate that a density of 30 dwellings per hectare net may be applicable or a density of 50 where the site meets the following criteria:*

*A) within 800 metres convenient walking distance of the town centres or local centres providing a range of shops and services, and/or*

*B) within both 800 metres convenient walking distance of a railway station and 400 metres convenient walking distance of bus routes with frequent services or public transport interchanges.*

*Before concluding estimated capacity, each site was subject to individual assessment to consider whether the 30/50 benchmark is inappropriate. This included considering whether the character of the locality or other established policies applying suggest that an alternative capacity is more realistic or desirable; for example where particular dwelling types, density or layout would be appropriate in the area. Where a valid and detailed planning permission existed then the relevant capacity was applied unless site assessment or other circumstances indicate otherwise.*

*Stakeholder partnership participation raised the issue as to whether the application of a density of 50 dwellings per hectare was appropriate on larger sites (typically those submitted by landowners and located just beyond the urban area). It was felt that with the potential policy direction to restrict flats and encourage more family homes, this density would be too high, and if applied to a number of such sites, could inflate deliverable capacity. A benchmark density of 40 dwellings per hectare on sites initially assessed as having capacity of 250 or more dwellings was suggested. In recognition of this, the assessed capacity of sites of 5 or more hectares has been reduced by 20% where that capacity estimate was originally based on 50 dwellings per hectare”.*

As site allocations were refined in the 2015 Preferred Options Draft Plan, a broad requirement of 35 dwellings per hectare was considered appropriate to ensure sufficient land would be available to accommodate, open space, education/health care/community facilities and other uses specified in policy requirements. However alternative capacities have been applied in circumstances where it is more realistic or desirable, for example, where particular dwelling types, density or layout

would be more appropriate in an area. Where a valid and detailed planning permission existed then the relevant capacity was applied unless site assessment or other circumstances indicated otherwise.

#### **Q4. For the strategic sites, how was the mix of uses determined?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies, such as KCC in relation to education provision.

#### **Q5. How have the constraints of each site been taken into account and any necessary mitigation been considered as part of the process of allocating land for housing? In particular, how has the Council considered and assessed the impact of development on transport infrastructure, heritage assets and drainage? Where is this set out?**

Sites have been being submitted for residential allocation since the preparation of the first SHLAA in 2010. The process has been ongoing and has involved submissions at various consultation stages and calls for sites. The response to Q1 explains how the sites were assessed, including any constraints. During the various stages of the SHLAA process, technical advice was sought which included KCC Highways, KCC Archaeology and Southern Water in relation to transport infrastructure, heritage assets and drainage. These consultations helped identify any site constraints and mitigation where applicable. These bodies were also invited to comment (and have submitted comments) at various stages of the local plan process. The SHLAA consultations and consultation responses helped inform the allocation of sites in the 2015 Preferred Options Draft Local Plan, which was the first version to include site allocations. Comments from subsequent SHLAA technical consultations on new sites submitted or subsequent consultation responses were taken into account in later versions of the local plan. Any issues/constraints raised on sites that have been allocated have been addressed in site specific policies. The last SHLAA review was carried out in 2013. Since then there have been changes in government guidance, and a change in the Council's OAN, so it was considered appropriate to carry out another SHLAA review in July 2018. The assessments were also reviewed and standardised as site information was held in a number of different places and in a number of different formats, due to the length of time this process had been ongoing. The assessment forms are now in a standard, easily accessible format. Only significant issues arising from any of the assessments have been included in order to maintain a manageable and easily accessible set of forms.

The impact of development on transport is also addressed in the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8). The outcomes of this work are also reflected in the draft Local Plan policies.

Heritage assets were considered in the allocation of sites, and allocations in sensitive areas has been avoided. Any heritage assets on or near sites that have been allocated have been addressed in policy where necessary.

Comments from Southern Water regarding drainage have been incorporated in policy where necessary (some comments made at the Publication Stage will be suggested as Modifications).

**Q6. Where the delivery of sites is dependent upon new infrastructure is it clear who will make this provision and when? Where applicable have the additional costs been factored into an assessment of viability?**

The draft IDP (CD1.2) sets out the broad requirements for new infrastructure, and wherever possible

The Viability Study Report (CD1.3) and the Update Report (which specifically address the viability of the strategic sites)(CD1.11), undertaken by the Dixon Searle Partnership, takes a standard approach to Local Plan viability assessment, and is in accordance with Government guidance. The detailed methodology is set out in Chapter 2 of the Report.

The study assesses a number of different Scheme Development Scenarios/typologies and locations of development, and applies a number of standard costs to different elements of infrastructure. The study also includes a number of specific policy costs, where these apply (for example, National Technical Standards and the SAMM tariffs). Additional information is contained in the Appendices to the Report (identified as CD1.4 - CD1.10).

It should be noted that DSP also carry out reviews of viability statements submitted by developers in relation to planning applications, so have a good understanding of the local market.

**Q7. How has the Council taken into account the agricultural land classification when considering whether to allocate sites for housing? Has an assessment of each site been carried out?**

As explained in the response to Matter 4, Issue 1, Q5 there is limited land available to accommodate the level of growth proposed in the Plan in line with government requirements. An assessment of each site has not been carried out with regards to agricultural land classification as the Defra agricultural land classification map indicates that the only lower grade land is within the flood risk area or in other small scattered pockets.

**Q8. How has the effect of development on the landscape character of the area been considered as part of the allocation process?**

Landscape Character Areas were included in the 2006 Thanet Local Plan and were considered as part of the site allocation process. The 2006 Landscape Character Areas were based on a district wide assessment carried out by the Council in 1993. This assessment was reviewed in 2012. The review concluded that although there had been some changes since the 1993 assessment (eg the construction of Thanet Earth, the demolition of Richborough Power Station towers), the characteristics identified in the assessment and the 2006 Local Plan were still relevant and applicable and informed the site allocation process for this local plan - sites were allocated in the least sensitive areas where possible. In order to maintain a fully up to date evidence base, a new Landscape Character Assessment was carried out in 2017 - the conclusions confirm the previous assessments and do not conflict with site allocations.

**Q9. Are there any factors which indicate that a site(s) should not have been allocated for development? Are all the sites developable within the plan period?**

The Council has carried out an assessment process to identify sites to accommodate the housing required in the OAN and is confident that the sites allocated are appropriate and developable within the plan period.



## ***Issue 2 – Manston Green Strategic Housing Site – Policy SP13***

### **Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The site was submitted as part of the SHLAA process and allocated in the 2015 Local Plan for 700 dwellings -SHLAA 135. An outline planning application was submitted in January 2014:

OL/TH/14/0050 - Land East and West of Haine Road, Ramsgate - Application for outline planning permission including access for the erection of 785 dwellings, highways infrastructure works including single carriageway link road), primary school, small scale retail unit, community hall, public open space.

There are no ownership constraints likely to affect the deliverability of the site as confirmed in the Statement of Common Ground

### **Q2. What is the justification for allocating the site for up to 785 dwellings? What is this based on and is it achievable?**

Initially the planning application proposed to accommodate 800 dwellings, however this was revised to 785 to allow for greater space around the listed buildings at Ozengell Grange.

The site was submitted in the Call for Sites consultation, proposing an increase in capacity to 900 dwellings. This was not seen favourably in Highway terms due to concerns over the link capacity on the Haine Road corridor - it was considered that any growth on the Haine Road corridor should be concentrated on sites that could directly assist in contributing towards longer term infrastructure solutions. This is explained in more detail in the Corridor Studies Existing Conditions report by Amey/KCC - CD6.6.

### **Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?**

Please refer to Matter 5, Issue 1, Q3

### **Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies, such as KCC in relation to education provision.

### **Q5. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school will be delivered?**

The new School requirements are set out in the draft IDP (although it may need updating in this respect) and in the draft Local Plan. The Council has been in regular contact with Kent County Council's Education Commissioning Team during the preparation of the draft Plan. The position in relation to school provision has evolved alongside the draft Local Plan. KCC's latest position is set out in their representations to the draft Local Plan at Reg 19 stage.

The decision on the precise phasing of new schools as part of new development will be a matter for determination through the planning application process, depending on the timing of individual applications and development, and the advice of KCC.

**Q6. Have the costs associated with the open space and primary school been taken into account in considering the viability of the site?**

The Viability Study Report (CD1.3) and the Update Report (which specifically address the viability of the strategic sites)(CD1.11), undertaken by the Dixon Searle Partnership, takes a standard approach to Local Plan viability assessment, and is in accordance with Government guidance. The detailed methodology is set out in Chapter 2 of the Report.

The study assesses a number of different Scheme Development Scenarios/typologies and locations of development, and applies a number of standard costs to different elements of infrastructure. The study also includes a number of specific policy costs, where these apply (for example, National Technical Standards and the SAMM tariffs). Additional information is contained in the Appendices to the Report (identified as CD1.4 - CD1.10).

It should be noted that DSP also carry out reviews of viability statements submitted by developers in relation to planning applications, so have a good understanding of the local market.

**Q7. What is the justification for restricting development to the northern part of the site? Is this justified?**

The purpose of this restriction is to ensure that the development of the site would not compromise the ability of Manston Airport to operate, as envisaged in draft Policy SP05 (2015 Plan). This also reflects the potential archaeological significance of the land to the south, and the presence of a groundwater source protection zone on this part of the site. Planning permission has been granted for the development of this site on this basis.

**Q8. How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?**

Access arrangements were approved as part of the outline planning permission including highway junction and link improvements to manage the traffic impacts of the allocation on the surrounding highway network.

**Q9. How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?**

The planning application identifies existing and proposed footway, cycleways and bridleway connections. These have been secured through associated planning obligations. It is relevant to note that this site was granted planning consent prior to the development of the Thanet Transport Strategy and the full suite of Local Plan impact assessments.



**Q10. What consideration has been given to the standard of living accommodation for potential future occupants, having particular regard to the proximity of the site to Manston Airport?**

The site is located approximately 1km to the east of Manston Airport. In 2015 when the site was first allocated, the airport had closed and had been identified as an opportunity site (Preferred Options Plan Policy SP05). This did not preclude airport use and clause 4) of the policy requested an assessment of cumulative noise impact and mitigation should there be proposals which would result in an increase in aircraft movements. The outline planning permission was granted on this basis.

The following comment was made on the planning application by TDC Environmental Health in respect of airport noise:

‘Airport Noise - raises no objection - the information provided by the applicant, based on the airport operations of the last airport operator demonstrates that they have the ability to provide adequate mitigation measures. The applicant has adopted a worst-case position based on the future aspirational operational targets of the last airport operators using the measured level of noise from the airport in 2013, 2010 worst-case noise contours and the future masterplan published by the last airport operator. Due to the current situation at Manston Airport there is an unknown potential for change in the future operation. It would be difficult for the applicant to devise a strategy to demonstrate future impacts and subsequent mitigation measures against any unknown alterations to the last operators masterplan. In short the applicants have demonstrated that they can mitigate within the known and previous aspirational aviation’.

**Q11. How does the Plan ensure that any necessary infrastructure will be provided as part of proposals for the site?**

Draft Policy SP01 requires that “all new development will be expected to fully meet its infrastructure requirements, whether directly on site or by contribution to that provision elsewhere, and to comply with the provisions of the Infrastructure Delivery Plan...”

**Q12. Why, unlike the other strategic allocations, does the site not have an indicative phasing in Appendix B to the Plan?**

As the site has planning permission, the indicative phasing is shown in the Extant Planning Permissions section of Appendix B (referenced 14/0050 Land East and West of Haine Road). It was still included as a strategic site for ease of reference, but the strategic site reference did not include phasing in order to avoid double counting.

***Issue 3 – Birchington Strategic Housing Site – Policy SP14***

**Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The Birchington Strategic site comprises a number of smaller sites that had been submitted as part of the local plan process:

Land at Gore End Farm - SHLAA 004 (S515) - Ptarmigan Land

Land at Street Farm - SHLAA 005 (S498) - Ptarmigan Land

Land at Court Mount - SHLAA 006 (S499) - Ptarmigan Land

Land west of Park Lane - SHLAA 009 (ST3) - Ptarmigan Land

Additional land at Birchington - SHLAA 008 - Ptarmigan Land

Land to the west of Minnis Road - SHLAA 007 - Church Commissioners - currently included but

proposing a modification to remove it

The Preferred Options Draft plan in 2015 allocated sites SHLAA 004, 005 and 006 to form a single strategic site to accommodate 1,000 dwellings. The housing target at that time was 12,000. Land to the west of Park Lane (SHLAA 009) was allocated as a non-strategic site under Policy HO2C.

In response to the Preferred Options Revisions consultation in 2017, additional land at Birchington was submitted for 1,500 dwellings (existing allocation of 1,000 plus 500 on additional land).

Land to the west of Minnis Road (Church Commissioners) was also submitted - no capacity was specified but the submission stated the area of the site to be 3.1ha (potential maximum capacity of around 108 dwellings at 35 dpha). In their 2017 submission, the Church Commissioners stated *'We consider that the site could be incorporated into the wider development proposals for the draft strategic allocation, as the railway line to the north of the site represents a more logical physical boundary for the development'*.

Following the decision by Council in January 2018 to remove the proposed mixed use allocation at the former airport site, the 2,500 dwellings proposed for that site had to be located elsewhere and a Call for Sites was carried out. The additional land at Birchington was submitted again for a total of 1,500 dwellings. As part of their call for sites submission, Barton Willmore (representing Ptarmigan) proposed that Land west of Park Lane - SHLAA 009 should be incorporated in the Strategic allocation.

It was therefore considered appropriate to allocate the additional land at Birchington and the land west of Minnis Road to accommodate a total of 600 additional dwellings to accommodate some of the 2,500 dwellings displaced from the airport site. This followed the original SA report recommendations for the allocation of urban edge sites as there were no other suitable sites that could accommodate a new settlement.

In their response to the Pre-Submission Reg 19 consultation, Barton Willmore state that they can accommodate all of the additional 600 dwellings within their existing boundary and without the need for the Church Commissioners land (Development Capacity Plan included in their submission to support this). Whilst Ptarmigan have control over the other sites, there has been no discussion with the Church Commissioners regarding the inclusion of their site in the strategic allocation.

The Council suggests a modification for the Inspectors' consideration to amend boundary to remove SHLAA007 from the strategic allocation to ensure there are no ownership constraints that would affect the delivery of the site. Accordingly clause 6 should be removed from the policy as this was only included with the allocation of SHLAA007.

### **Proposed Modification - amend boundary of allocation and delete Clause 6 of the Policy**

### **Q2. What is the justification for allocating the site for up to 1,600 dwellings? What is this based on and is it achievable?**

The site was allocated in the Preferred Options draft Plan for 1,000 dwellings as it was considered to meet the Sustainability Appraisal assessment as an urban edge site, and with good access to local services, schools and convenient transport options. 1,000 dwellings was considered an appropriate capacity for the site, allowing for the provision of open space and other community and infrastructure requirements. Please see response to Q1 for the allocation of the additional 600 dwellings..

### **Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?**

Please refer to Matter 5, Issue 1, Q3

**Q4. How has the mix of uses and minimum area of open space been established?  
Are they necessary, appropriate and justified?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies, such as KCC in relation to education provision.

**Q5. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school will be delivered?**

The new School requirements are set out in the draft IDP (although it may need updating in this respect) and in the draft Local Plan. The Council has been in regular contact with Kent County Council's Education Commissioning Team during the preparation of the draft Plan. The position in relation to school provision has evolved alongside the draft Local Plan. KCC's latest position is set out in their representations to the draft Local Plan at Reg 19 stage.

The decision on the precise phasing of new schools as part of new development will be a matter for determination through the planning application process, depending on the timing of individual applications and development, and the advice of KCC.

**Q6. Is it sufficiently clear to decision-makers, developers and local communities what is expected in relation to the provision of additional healthcare?**

The Thanet Clinical Commissioning Group is developing a new approach to providing primary healthcare in the district and this is set out in the draft IDP (CD1.2). This envisages the gradual replacement of a large number of sole practitioner services with four larger primary care "hubs", providing a wider range of services in focussed locations. This is also addressed in the representations from the NHS at Reg 19 stage.

**Q7. Have the costs associated with the open space, primary school and medical centre expansion been taken into account in considering the viability of the site? Is the site developable within the plan period?**

The Viability Study Report (CD1.3) and the Update Report (which specifically address the viability of the strategic sites)(CD1.11), undertaken by the Dixon Searle Partnership, takes a standard approach to Local Plan viability assessment, and is in accordance with Government guidance. The detailed methodology is set out in Chapter 2 of the Report.

The study assesses a number of different Scheme Development Scenarios/typologies and locations of development, and applies a number of standard costs to different elements of infrastructure. The study also includes a number of specific policy costs, where these apply (for example, National Technical Standards and the SAMM tariffs). Additional information is contained in the Appendices to the Report (identified as CD1.4 - CD1.10).

It should be noted that DSP also carry out reviews of viability statements submitted by developers in relation to planning applications, so have a good understanding of the local market.

**Q8. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?**

The impact of the development on the local road network was taken into account in the preparation of the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8).

Access is achievable into the site from the existing road network, with proposed site accesses at Minnis Road, the A28 and Park Lane. The exact configuration of these junctions has yet to be agreed, however initial engagement with the Local Highway Authority suggests that an acceptable form of access onto the existing highway network is achievable.

Highway improvements consist of the Inner Circuit link Road in order to avoid the busiest sections of the A28 within Birchington, particularly 'The Square'. The allocation boundary ensures necessary land is included to facilitate the delivery of the required portion of the Inner Circuit link road within the Site. Local Plan Policy SP47 - Strategic Routes refers.

**Q9. What is the relationship with the Strategic Route safeguarded under Policy SP47? How will the Strategic Route be delivered, and is the delivery of the allocation dependant upon this new infrastructure?**

This site includes a key element of the Inner Circuit Strategic route identified under draft Policy SP47. It includes a road link to Minnis Road to the north and to Manston Road/ Shottendane road to the south, thus bypassing the Square at Birchington, and relieving traffic pressure on the A28 to and from Margate. These elements are to be funded by the developers of the strategic site at Birchington through a combination of on-site infrastructure and off-site highway works and highway contributions. These new routes are regarded as critical to the delivery of this site.

As outlined within the draft Transport Strategy, the Inner Circuit is the appropriate transport solution for dealing with the combined traffic impacts of the housing development planned for the district.

**Q10. How has the effect of the proposed development on air quality been taken into account? What effect will the proposal have, and what mitigation will be necessary?**

The majority of Thanet's urban area is within an Air Quality Management Area. Whilst Birchington Square has previously been a 'hotspot', the proposed Highway improvements including the Birchington bypass proposed as part of the Inner Circuit is expected to have a positive effect on air quality at Birchington Square.

**Q11. How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?**

The draft Transport Strategy sets out the broad objectives for walking and cycling and bus provision in the context of the development proposed in the draft Local Plan. It will be for individual site developers to make detailed proposals at planning application stage.

**Q12. How does the scale of proposed development relate to the size, role, function and character of Birchington?**

The relatively low density of development, amount of open space and highways improvements re-routing traffic away from the Square, will allow Birchington to continue to function as a village.

**Q13. Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?**

The trajectory has changed since the publication of the Submission plan and is set out in the appendix to the Council's statement on Matter 8. This is based on the information received from the developer as part of the HIA phasing survey and confirmed in their Regulation 19 comments. An outline application is expected October 2019.

The housing trajectory for Birchington SP14 is as follows:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
			50	100	150	150	200	200	200	150	150	150	100

**Issue 4 – Westwood Strategic Housing Site – Policy SP16**

**Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The site comprises three parcels of land - SHLAA 001, 002 and 003 which were combined to form a strategic site allocation and allocated as such in the Preferred Options Plan 2015. The site is within walking and cycling distance of the area's key services and facilities, which include Westwood Cross Shopping Centre. It is adjacent to the residential allocation in the 2006 Adopted Local Plan.

**Q2. What is the justification for allocating the site for up to 1,450 dwellings? What is this based on and is it achievable?**

An allocation of up to 1,450 dwellings was considered an appropriate capacity for the site to allow sufficient land to accommodate open space and other policy requirements.

**Q3. What is the justification for specifying a maximum density of 40 dwellings per hectare? Is this policy requirement justified? Why is a higher density justified on this site, compared to other strategic allocations?**

A maximum of 40 dwellings per hectare was considered appropriate for this site to be consistent with the site allocated under the 2006 Local Plan which specified this density (to reflect the more built up nature of the surroundings).

**Q4. How has the mix of uses and minimum area of open space been established?  
Are they necessary, appropriate and justified?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies, such as KCC in relation to education provision.

**Q5. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?**

The impact of the development on the local road network was taken into account in the preparation of the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8). The necessary highway improvements are identified in Policy SP16, SP47 and the draft Transport Strategy.

**Q6. Is it clear to decision-makers, developers or local communities when the access road will be provided, and by who?**

This will be addressed as part of the Masterplan submitted by the developers. Highway improvements will need to be provided by developers in parallel with the development.

**Q7. How will proposals for the site be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?**

The draft Transport Strategy sets out the broad objectives for walking and cycling and bus provision in the context of the development proposed in the draft Local Plan. It will be for individual site developers to make detailed proposals at planning application stage.

**Q8. How does the scale of proposed development relate to the size, role, function and character of Westwood?**

This allocation contributes towards the evolution of Westwood as a sustainable mixed use business and residential community, consolidating its role and function as Thanet's primary retail centre.

**Q9. What is the justification for requiring development proposals to retain an undeveloped corridor as part of an extension to the Green Wedge to the east of the site? How will this be achieved?**

The Council has given further consideration to this point as more details of this, and neighbouring, developments have materialised, and no longer consider this part of the policy appropriate. The Council suggests the following modification to the final paragraph of Policy SP16 for the Inspectors' consideration:

**Integration of development and landscaping will be expected to take account of the presence of the overhead electricity transmission lines, ~~retain an undeveloped corridor as an extension of the open area of Green Wedge to the east of the site, and~~**



**enable a soft edge between the site and open countryside.**

**Q10. Is it clear to decision-makers, developers and local communities what is required in respect of contributions towards education provision? What existing and proposed schools are within the catchment area of the site, and how will they be affected as a result of the development proposed?**

The new School requirements are set out in the draft IDP (although it may need updating in this respect) and in the draft Local Plan. The Council has been in regular contact with Kent County Council's Education Commissioning Team during the preparation of the draft Plan. The position in relation to school provision has evolved alongside the draft Local Plan. KCC's latest position is set out in their representations to the draft Local Plan at Reg 19 stage. In the case of the SP16 site, there is a planned primary schools in the vicinity (on the adjacent SP17 site, which already has planning permission), where pupil growth might be accommodated.

**Q11. What is the justification for safeguarding land for the expansion of Margate Cemetery under Policy CM03? Does the cemetery expansion land fall within, or outside the boundary of the strategic site allocation? Is it clear who will deliver the expansion to the cemetery, and when?**

The Council agrees that, to provide flexibility in the Policy, this provision can be made "at a suitable location within the strategic site", rather than on a specified site, and will propose modification to the plan to that effect.

**Q12. What consideration has been given to the standard of living accommodation for potential future occupants, having particular regard to the proximity of the site to the CEMEX Margate Concrete Plant and Margate Waste Recycling Centre?**

The comments by KCC in relation to these matters are noted, in relation to the Margate Refuse and Recycling Centre and the CEMEX concrete production facility at the Manston Road Depot, and the need to ensure that development on this site does not compromise these operations.

The Council considers that the allocated site is sufficiently large to deal with these concerns, and that this is a matter of detailed design.

**Q13. What effect will the proposed development have on existing drainage infrastructure? Will additional infrastructure be required to accommodate the proposal, and if so, how will this be provided?**

Southern Water commented in response to the Publication Consultation that new sewage infrastructure will need to be provided and requested the following clause be added to SP16:

*Masterplanning will be informed by and address:*

1. [...]
1. the need to ensure occupation of development is phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider [...]

The Council suggests this as a modification for the Inspectors' consideration.

**Q14. What effect will the proposed development have on existing healthcare provision in the area?**

The Thanet Clinical Commissioning Group is developing a new approach to providing primary healthcare in the district and this is set out in the draft IDP (CD1.2). This envisages the gradual replacement of a large number of sole practitioner services with four larger primary care "hubs", providing a wider range of services in focussed locations. This is also addressed in the representations from the NHS at Reg 19 stage.

**Q15. Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?**

The trajectory has changed since the publication of the Submission plan and is set out in the appendix to the Council's statement on Matter 8. This is based on the information received from the developer as set out in their Regulation 19 comments

The housing trajectory for Westwood SP16 is as follows:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
			50	150	150	150	150	150	150	150	150	100	100

**Issue 5 – Westgate-on-Sea Strategic Housing Site – Policy SP15**

**Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The Westgate Strategic Site comprises a number of smaller sites submitted during the Local Plan process:

SHLAA 010 (ST1) - Land south of Canterbury Road, Westgate

SHLAA 011 (ST2) - Land south of Linksfield Road, Westgate

SHLAA 012 - Additional land at Westgate

SHLAA sites 010 and 011 were allocated as a single strategic site in the 2015 Preferred Options Plan to accommodate 1,000 dwellings. The sites were considered to meet the Sustainability Appraisal assessment as an urban edge site, and with good access to local services, schools and convenient transport options. 1,000 dwellings was considered an appropriate capacity for the site, allowing for the provision of open space and other community and infrastructure requirements

Following the decision by Council in January 2018 to remove the proposed mixed use allocation at the former airport site, the 2,500 dwellings proposed for that site had to be located elsewhere and a Call for Sites was carried out. SHLAA012 was submitted as additional land to the existing allocation to accommodate a further 1,500 dwellings.

There are no ownership constraints as confirmed by the Agent in their Call for Sites submission.

The representations from Gillings Planning suggests an amendment of the site boundary to align with Shottendane Road. The justification for this is to better accommodate the 2000 dwellings, create a neighbourhood with a lower average housing density and provide more green infrastructure. It also suggests increasing the amount of public open space from 17.7 ha to 25 ha. The Council is willing to consider a Modification to extend the site to achieve these objectives, but this should be informed by a masterplanning exercise to ensure that the appropriate land take is identified, given the need to protect best and most versatile agricultural land.

**Q2. What is the justification for allocating the site for up to 2,000 dwellings? What is this based on and is it achievable?**

Although the Call for Sites submission suggested an extra 1,500 dwellings for the site, the Council considered this to be too onerous on the existing settlement, and development of that intensity would not respect the settings of heritage assets present on the site (Dent-de-Lion and a Scheduled Ancient Monument). The Council considered Westgate could reasonably accommodate an additional 1,000 dwellings and reduced the proposed amended boundary accordingly. The allocation of additional land at Westgate followed the original SA report recommendations for the allocation of urban edge sites as there were no other suitable sites that could accommodate a new settlement.

**Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?**

Please refer to Matter 5, Issue 1, Q3

In their response to the Pre-Submission Local Plan, Gillings Planning suggested an 'average' density of 35 dwellings per hectare, rather than 'maximum' and is discussed in the Statement of Common Ground.

**Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies, such as KCC in relation to education provision. An increase in the provision of Open Space has been suggested by the Agent and discussed in the SOCG.

**Q5. Is it clear to decision-makers, developers and local communities what community facilities are required as part of the development?**

This is set out in the Policy and in the Infrastructure Development Plan. The Statement of Social Impacts required under Policy SP12 will identify any additional facilities that will be required.

**Q6. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school and medical centre will be delivered?**

These issues would be agreed at the more detailed stages of the planning application processes in agreement with relevant stakeholders.

**Q7. Have the costs associated with the open space, primary school and medical centre been**

**taken into account in considering the viability of the site? Is the site developable within the Plan period?**

The Viability Study Report (CD1.3) and the Update Report (CD1.11) include viability assessments of each of the strategic sites.

The site agents have confirmed that the site is capable of delivery within the Plan period (as set out in the appendix to the Council's statement on Matter 8).

**Q8. What is the justification for the provision of a new District Centre as part of proposals for the site?**

It is considered that the existing District Centre at Westgate would not adequately meet the needs of the new development proposed and there is no scope for it to increase. It is located on the northern side of the A28 and is comparatively small to the other District Centres. The proposed new dwellings are located on the southern side of the A28 and propose a significant increase to the size of the town. New retail provision is necessary on the southern side of the site to serve the needs of the proposed residential development and ensure that the total retail offer in Westgate retains its status as a District Centre.

**Q9. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?**

The impact of the development on the local road network was taken into account in the preparation of the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8). The necessary highway improvements are identified in Policy SP16, SP47 and the draft Transport Strategy.

**Q10. What is the justification for requiring a Landscape and Visual Impact Assessment, but not for other strategic allocations?**

The site is adjacent to one of the Green Wedges - a Landscape and Visual Impact Assessment is necessary to protect the wide open and landscapes and strategic views that are characteristic of the Green Wedges.

**Q11. How has the effect of the proposed development on air quality been taken into account? What effect will the proposal have, and what mitigation will be necessary?**

The majority of Thanet's urban area is within an Air Quality Management Area. The proposed Highway improvements set out in the Plan should not cause any further detriment to air quality and should improve air quality in some areas.

**Q12. How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?**

The draft Transport Strategy (CD6.1) sets out the broad objectives for walking and cycling and bus provision in the context of the development proposed in the draft Local Plan. It will be for individual site developers to make detailed proposals at planning application stage.

**Q13. How does the scale of proposed development relate to the size, role, function and character of Westgate-on-Sea?**

The scale of the proposed development is a significant increase to the size of the existing town. However, the south side of Westgate is currently remote from the existing facilities. The proposed development will create a better community feel to the south side of the town, and provide new facilities not currently available in the town.

**Q14. What effect will the proposed development have on the setting of the Grade II\* listed Dent-de-Lion Court?**

Policy SP15 requires the safeguarding of the setting of Dent-de-Lion Court as this is a known heritage asset within the site. This is reflected in the Masterplanning proposal submitted at Publication Stage which proposes a Village Green to safeguard its setting. The Agents have carried out an initial Heritage Assessment to understand the setting of the Scheduled Ancient Monument and Dent de Lion Court.

**Q15. Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?**

The trajectory has changed since the publication of the Submission plan and is set out in the appendix to the Council's statement on Matter 8. This is based on the information received from the developer as part of the HIA phasing survey and confirmed for the developer meeting January 2019

The housing trajectory for Westgate-on-Sea SP15 is as follows:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		25	75	100	150	200	250	250	250	250	250	200	

**Issue 6 – Land fronting Nash and Haine Roads - Policy SP17**

It should be noted that this site was allocated in the previous Local Plan (2006)(CD7.9); and is now fully consented and partially built out.

**Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The site was allocated in the 2006 Local Plan. The Inspectors Report states the following regarding the site allocation:

In identifying suitable housing sites I consider the Council has followed Government planning guidance particularly the sequential approach set out in PPG3 and applied its criteria for assessing the suitability of individual sites. This includes criteria regarding availability of previously developed sites, the location and accessibility of potential development sites to jobs, shops and services by modes other than car, capacity of existing and potential infrastructure, including public transport, water and sewerage, ability to build communities to support new physical and social infrastructure and physical and environmental constraints on development of land. Important local policy considerations were also taken into account to avoid development in Thanet's Green Wedges and avoiding Airport operational considerations and the need for a small quantity of village housing to provide locational choice.

**Q2. Is it clear to decision-makers, developers and local communities how many dwellings are allocated on the site? Is the policy effective in this regard?**

The Policy does not include a figure for the number of dwellings as the site is fully consented.

**Q3. What is the justification for not specifying a maximum density, unlike other strategic housing allocations?**

The Policy does not specify a maximum density as the site is fully consented.

**Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?**

These were established during the allocation process of the site in the 2006 Local Plan

**Q5. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed school and medical centre will be delivered?**

The delivery of the proposed school and medical centre have been negotiated and agreed through various stages of the planning application process.

**Q6. Have the costs associated with the open space, primary school and medical centre been taken into account in considering the viability of the site? Is the site developable within the plan period?**

These were accounted for during the allocation process of the site in the 2006 Local Plan.

**Q7. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?**

The impact of the development on the local road network was taken into account in the preparation of the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8). The necessary highway improvements are identified in Policy SP16, SP47 and the draft Transport Strategy.

The previous Inspectors opinion on the effect of the proposed development on the local road network was:

'I accept that some additional traffic congestion may arise as a result of the Westwood development. However, the Plan's policies aim to offset this by reducing growth in private car use and promoting alternative means of travel through appropriate improvements both to public transport and to the road network, including at Westwood. Detailed planning consent has been granted for Westwood Cross and this will provide for appropriate local highway improvements to accommodate the traffic movements which that development will generate. The Plan recognises that housing (and other) development will cumulatively impact on the capacity of the nearby Pearce Signs Roundabout and the local road network. It states that all such development will be required to make appropriate contributions (financial and/or land) towards improvements to relieve this.....

An emerging masterplan was submitted to the Local Plan Inquiry and it proposes a new relief



road to accommodate the additional traffic and achieve the above objectives alongside housing development. On this basis the development would put in place the new infrastructure needed to safeguard against potential danger and congestion.'

**Q8. How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?**

The draft Transport Strategy sets out the broad objectives for walking and cycling and bus provision in the context of the development proposed in the draft Local Plan. It will be for individual site developers to make detailed proposals at planning application stage.

**Q9. How does the scale of proposed development relate to the size, role, function and character of the area?**

The Inspectors Report states the following:

'The Plan allocates land at Westwood as an urban extension site for 1000 homes. In my view this site is at a highly sustainable location and will be of sufficient critical mass to attract new investment and support an integrated new community and related infrastructure. Westwood has distinct advantages as a major development location. It occupies a geographically and highly accessible position in Thanet's urban area at the junction of two primary distributor roads, and on a quality bus route corridor. The allocated site lies adjacent to the new town centre at Westwood Cross and in proximity to an established area of mixed uses with convenient access to a range of employment sources e.g. Eurokent Business Park and retail facilities. A housing development of 1000 new homes at a large single and centrally located site as proposed would enable a range of housing types and affordability to be provided together with appropriate social and service infrastructure to support a mixed community. I fully support the allocation of the housing site at Westwood and it should be released as soon as possible on a phased basis with the development of infrastructure alongside previously developed housing sites. In that Westwood is a greenfield site it will not only contribute to meeting overall housing needs but it will also attract large volume housebuilders to deliver housing of the right variety and quality in support of economic and social regeneration.'

**Q10. What is the justification for requiring proposals to provide and maintain air quality information to inform the Council's ongoing air quality review and assessment programme?**

The Council's Air Quality Action Plan requires developments likely to cause detriment to air quality to contribute towards the implementation of the Action Plan.

**Q11. What consideration has been given to the standard of living accommodation for potential future occupants, having particular regard to the proximity of the site to the MPL Recycling Centre?**

This was considered as part of the process of determining the planning application.

**Q12. Does the allocation form part of the sites listed in Appendix B to the Plan?**

Land North of Haine Road and West of Nash Road Phase 5 is included in Appendix B for 469 units.

This is Phase 5 of the consented development. The original allocation (SHLAA 031 - listed in Appendix B under its previous reference of S141) was for 1020 units, however this is shown as zero in Appendix B to avoid double counting as the site is fully consented.

The phasing for the remaining surveys has been confirmed by the agent (February 2019) as follows:

17/0726 Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 3C – 97 units.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		20	30	30	17								

The phasing of the other phases are set out below:

14/0320 Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 4 – 204 units.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		50	50	50	54								2

15/0250 Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 5 – 469 units

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
			50	50	75	75	75	75	69				

### **Issue 7 – Land at Manston Court Road/Haine Road - Policy SP18**

#### **Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The allocation comprises two sites - SHLAA 013 and 014, also known as Westwood Village. The eastern part of the site was submitted in response to the Preferred Options Consultation in 2015 and allocated in the Preferred Options Revisions Consultation in 2017. The western part was submitted in response to the Call for Sites in 2018 and allocated in the Publication Draft Local Plan in 2018. In their response to the Publication Draft Local Plan, the Option holders suggest that site HO3 (Land on west side of Old Haine Road, Ramsgate) which is currently allocated as a non-strategic site be included as part of this strategic allocation at the request of their client.

The eastern part of the site, incorporating part of HO3, is currently subject to a planning application -

OL/TH/18/0261 - Land On South Side Of Manston Court Road And West Side Of Haine Road RAMSGATE Kent :

Outline application for a mixed development of up to 900 dwellings together with a mix of use

classes A1 (retail) A2 (Financial and professional services) A3 (restaurants and cafe) A4 (drinking establishments) A5 (hot food takeaways) B1 (business) C1 (Hotel) D1 (non-residential institution) D2 (assembly and leisure) and a two form entry primary school, together with ancillary and associated development including new and enhanced pedestrian / cycle routes and open spaces, car parking and vehicular access with all matters reserved except for access

There are no ownership constraints likely to affect the deliverability of the site.

**Q2. What is the justification for allocating the site for up to 1,200 dwellings? What is this based on and is it achievable?**

SHLAA 013 was allocated in the Preferred Options Revisions at a capacity of 700 dwellings in response to the increased OAN to 17,140. Following the decision by Council in January 2018 to remove the proposed mixed use allocation at the former airport site, the 2,500 dwellings proposed for that site had to be located elsewhere and a Call for Sites was carried out. SHLAA 014 was submitted as additional land to the existing allocation to accommodate between 667 - 751 dwellings.

The allocation of the two sites at a total capacity of 1,200 dwellings allows for the provision of open space, highways and other infrastructure required.

**Q3. What is the justification for specifying a maximum density of 30 dwellings per hectare? Is this policy requirement justified? Why is a lower density justified on this site, compared to other strategic allocations?**

This requirement was a reflection of earlier development proposals for this site. The maximum density should be 35 dwellings per hectare as per the other strategic allocations - the Council proposes the following modification to Policy SP18:

**Land is allocated for a mixed use development, comprising up to 1200 new dwellings at a maximum density of ~~30~~ 35 dwellings per hectare net, and leisure uses.**

**Q4. Is it clear to decision-makers, developers and local communities what is required of the masterplan and how this will integrate with development at the 'adjoining sites'? Is the policy effective?**

The purpose of the Masterplanning process is to ensure that when planning applications are submitted, they can be considered in the context of the total requirements of the site allocation policy, and that any approved development is well-related to adjacent communities.

The purpose of the Development Brief is similar, but relates to the detailed design of the site, rather than the broad principles.

They could be incorporated in a single document, of form part of a Design & Access Statement. This will help decision-makers and local communities to understand how the site works and how it relates to neighbouring sites.

Although the northern part of the site has been granted planning permission as part of a wider allocation, it is still necessary for the development of the southern part of the site to be appropriate and well related to the northern part of the site.

For clarity, the Council proposes the following modification to Policy SP12 - General Housing Policy for the Inspectors' consideration:

**'Proposals for residential development on sites allocated in this plan must be submitted with a masterplan (to demonstrate how the requirements of site specific and other local plan policies can be fully met on site) and a development brief (including more details such as design, layout and access). Proposals must.....'**

An illustrative masterplan was submitted as part of the planning application, demonstrating the relationships between phase 1 (the subject of the application) and phase 2.

**Q5. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies, such as KCC in relation to education provision

**Q6. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed school will be delivered?**

The provision of the school was included in the outline planning application.

**Q7. Have the costs associated with the open space and secondary school been taken into account in considering the viability of the site? Is the site developable within the plan period?**

The Viability Study Report (CD1.3) and the Update Report (CD1.11), undertaken by the Dixon Searle Partnership, takes a standard approach to Local Plan viability assessment, and is in accordance with Government guidance. The detailed methodology is set out in Chapter 2 of the Report.

The study assesses a number of different Scheme Development Scenarios/typologies and locations of development, and applies a number of standard costs to different elements of infrastructure. The study also includes a number of specific policy costs, where these apply (for example, National Technical Standards and the SAMM tariffs). Additional information is contained in the Appendices to the Report (identified as CD1.4 - CD1.10).

It should be noted that DSP also carry out reviews of viability statements submitted by developers in relation to planning applications, so have a good understanding of the local market.

**Q8. What is the justification for requiring contributions to an internal spine road laid out in accordance with the requirements of the draft Transport Strategy? Is it clear to decision-makers, developers and local communities what is required? Is the policy justified and effective?**

This site lies at a critical location on the proposed Inner Circuit. The Inner Circuit proposal stems directly from the impacts of new development on the existing urban route network. It is vital that it provides a

suitable standard of route that connects Westwood to the wider route improvements. The draft Transport Strategy sets out the nature of improvements required to deliver effective improvements and this is reflected in the draft Local Plan (Policy SP47).

**Q9. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?**

The impact of the development on the local road network was taken into account in the preparation of the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8). The necessary highway improvements are identified in Policy SP18, SP47 and the draft Transport Strategy.

**Q10. How will proposals for the site be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?**

The draft Transport Strategy sets out the broad objectives for walking and cycling and bus provision in the context of the development proposed in the draft Local Plan. These are also included in the Sustainable Development Strategy that was submitted with the planning application.

**Q11. How does the scale of proposed development relate to the size, role, function and character of the area?**

This allocation contributes towards the evolution of Westwood as a sustainable mixed use business and residential community, consolidating its role and function as Thanets primary retail centre.

**Q12. What is the justification for requiring ecological surveys of breeding and wintering birds? What effect will the proposed development have on breeding and wintering birds? How has this been considered as part of the allocation process?**

Following comments from Natural England at the Pre-Submission stage, the Council considers it appropriate to remove this requirement.

**Q13. What is the current status regarding the submitted planning application for the site?**

There was resolution to grant permission for what is known as "Phase 1" of the site (ie: the eastern half of the site) by the Council's Planning Committee on Tuesday 26th February 2019, under planning application ref. OL/TH/18/0261.

**Q14. What consideration has been given to the standard of living accommodation for potential future occupants, having particular regard to the proximity of the site to Manston Airport?**

At the time of the consultation of the Proposed Options Revisions the Council had received evidence from an airport viability study that 'airport operations at Manston are very unlikely to be financially viable in the longer term...' therefore the proximity of the site to Manston Airport was not an issue.

If the current Development Consent Order for the airport is granted, there will be a review of the Local

Plan which will need to address issues including noise, air quality and public safety based on the quantity and nature of flights being proposed.

It may be necessary for some noise attenuation/mitigation to be included, however it is impossible to make any such policy provision at this stage with the current uncertainty surrounding the airport site. This could be addressed in the process of determining subsequent applications for Reserved Matters.

**Q15. Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?**

The trajectory has changed since the publication of the Submission plan and is set out in the appendix to the Council's statement on Matter 8. This is based on the information received from the developer as part of the HIA phasing survey and confirmed by the developer by email following the developer meeting in January 2019.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		90	110	120	130	140	130	120	110	50	100	100	

**Issue 8 – Land North and South of Shottendane Road – Policy HO2**

**Q1. How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?**

The southern part of site (SHLAA 022) was included by the Council at the Preferred Options Revisions stage to provide 250 dwellings in agreement with the landowner as its allocation played a key part in delivering the road network improvements identified in the Transport Strategy for the district. Following the decision by Council in January 2018 to remove the proposed mixed use allocation at the former airport site, the 2,500 dwellings proposed for that site had to be located elsewhere and a Call for Sites was carried out. The northern part of the site (SHLAA 023) was submitted to provide 300 dwellings in response to the Call for Sites. It was considered appropriate to allocate the northern part of the site to accommodate some of the displaced housing from the airport. It was also considered appropriate for the two sites to be brought together to form a strategic site to ensure comprehensive development between the sites and contributions towards the inner circuit.

**Q2. What is the justification for allocating the site for up to 300 dwellings at land north of Shottendane Road and up to 250 dwellings on land south of Shottendane Road? What is this based on and is it achievable?**

The allocation of the two sites for 300 and 250 dwellings respectively takes into account the sites areas and allows for the provision of open space, highways and other infrastructure required.

**Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?**

Please refer to Matter 5, Issue 1, Q3



**Q4. Is it clear to decision-makers, developers and local communities what is required of the masterplan and development brief? Why will both these documents be required and how will they relate to one another? Is the policy effective?**

The purpose of the Masterplanning process is to ensure that when planning applications are submitted, they can be considered in the context of the total requirements of the site allocation policy, and that any approved development is well-related to adjacent communities.

The purpose of the Development Brief is similar, but relates to the detailed design of the site, rather than the broad principles.

They could be incorporated in a single document, of form part of a Design & Access Statement. This will help decision-makers and local communities to understand how the site works and how it relates to neighbouring sites.

For clarity, the Council proposes the following modification to Policy SP12 - General Housing Policy for the Inspectors' consideration:

**'Proposals for residential development on sites allocated in this plan must be submitted with a masterplan (to demonstrate how the requirements of site specific and other local plan policies can be fully met on site) and a development brief (including more details such as design, layout and access). Proposals must.....'**

**Q5. How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of? What are the costs of these improvements and have they been taken into account when assessing the viability of the allocation?**

The impact of the development on the local road network was taken into account in the preparation of the draft Transport Strategy (CD6.1), and the accompanying modelling evidence from Amey (Core Documents CD6.3 - CD6.8). The necessary highway improvements are identified in Policy SP16, SP47 and the draft Transport Strategy.

**Q6. The masterplan for the northern site is expected to include a link road through the site to link Hartsdown Road and Shottendane Road. What is the justification for this? Has the cost of providing this infrastructure been included in the viability assessment of the site?**

This is a critical link in the Inner Circuit Strategic Route, that helps to secure improvements to the Coffin House corner junction, and provides a vital connection to Westwood.

The Viability Study Report (CD1.3) and the Update Report (CD1.11), undertaken by the Dixon Searle Partnership, takes a standard approach to Local Plan viability assessment, and is in accordance with Government guidance. The detailed methodology is set out in Chapter 2 of the Report. At this stage, the proposed link road infrastructure is not considered to place a disproportionate impact on development viability, as such internal roads and junctions onto the existing highway network would typically be required to deliver a housing site of this quantum. As with other strategic allocations located within the Inner Circuit, the internal roads will simply serve

a dual purpose of assisting in distributing traffic in the locality as well as provide direct access to the site.

The study assesses a number of different Scheme Development Scenarios/typologies and locations of development, and applies a number of standard costs to different elements of infrastructure.

**Q7. What is the justification for requiring 6.23 hectares of open space to be provided? Is it clear from the policy how the open space will be expected to be spread across the two sites? Is the policy justified and effective?**

Open Space requirements were calculated using Table 7 of the Preferred Options Plan 2015, based on the Open Space audit carried out in 2005. (This has since been revised as have the Open Space standards in the local plan). Other uses have been informed by the draft Infrastructure Delivery Plan, and by advice from other statutory bodies. The policy states that the open space may be spread across the two sites, rather than an expectation for it to be, to make it clear that the provision of open space is flexible between the sites.

**Q8. Is it clear to decision-makers, developers and local communities how off-site mitigation for the loss of ground nesting bird habitats will be identified and delivered? Is this policy effective?**

Following comments from Natural England at the Pre-Submission stage, the Council suggests this requirement should be removed from Policy HO2 as a proposed modification for the Inspectors' consideration:

**Master planning will:**

- Provide for the integration of development and landscaping to enable a soft edge between the site and the open countryside
- Provide pedestrian and cycle access between the two sites
- Provide a minimum of 6.23 ha of open space – this may be spread over both sites but must be easily accessible by both sites
- ~~Provide off site mitigation for the loss of ground nesting bird habitats~~

**Q9. Developments are required to incorporate and provide for improvements identified in the Thanet Transport Strategy. Is it clear to decision-makers, developers and local communities what specific improvements have been identified for the allocation and are these justified? Is the delivery of the site dependent on these improvements being delivered?**

This site lies at a critical location on the proposed Inner Circuit. The Inner Circuit proposal stems directly from the impacts of new development on the existing urban route network. The draft Transport Strategy sets out the nature of improvements required to deliver effective improvements and this is reflected in the draft Local Plan (Policy SP47).

**Q10. What is the justification for requiring improvements to Margate Cricket Club pitch and facilities? Has the cost of providing these improvements been included in the viability assessment of the site?**

The need for improvements to Margate Cricket Club pitch and facilities was identified in the recent Playing Pitch Strategy (2018). This is not considered to be critical to the viability of the site.

**Q11. How has the effect of the proposed development on nearby heritage assets been taken into account? What impact will the allocation have on designated heritage assets? Is the policy justified?**

A Heritage Impact Assessment has been required in the Policy for impacts on St Johns Cemetery and sites/memorials within it.

The following is also suggested as a proposed modification to the policy for the Inspectors' consideration:

**Master planning for the northern site will include:**

- a link road through the site to link Hartsdown Road and Shottendane Road.
- Improvements to Margate Cricket Club pitch and facilities
- Development proposals that respect the setting of the listed building at Shottendane Farm

**Q12. What effect will the proposed development have on existing drainage infrastructure? Will additional infrastructure be required to accommodate the proposal, and if so, how will this be provided?**

Additional local sewage infrastructure will be required to serve the proposed development. Southern Water suggest the addition of the following clause to the Policy:

**Ensure occupation of development is phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider**

The Council propose this as a Modification for the Inspectors' consideration

**Q13. Appendix B to the Plan estimates that 30 dwellings will be delivered on the site in 2021/22. What is this based on and is it a realistic expectation?**

The trajectory is based on the information received from the developer for the developer meeting in January 2019. This is set out in the appendix to the Council's statement on Matter 8.

Phasing 2018/19	Phasing 2019/20	Phasing 2020/21	Phasing 2021/22	Phasing 2022/23	Phasing 2023/24	Phasing 2024/25	Phasing 2025/26	Phasing 2026/27	Phasing 2027/28	Phasing 2028/29	Phasing 2029/30	Phasing 2030/31
		30	90	90	90	90	90	70				