

Thanet District Council Matter Statement

**Matter 6 - Non-Strategic Sites (Policies
HO3 - HO9)**



Issue 1 – Land on west side of Old Haine Road, Ramsgate – Policy HO3

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 originally submitted as two sites during the SHLAA and local plan process. The sites were allocated as a single site in the Preferred Options Draft Local Plan (SHLAA 020).

Greenacre commented on SP18 and are the option holders for the site. In their response to the Pre-Submission consultation, Montagu Evans (Agent for Greenacre) stated that their clients option also extends to the northern part of the HO3 site. This part of the HO3 site was included in the planning application on Land at Manston Court Road/Haine Road (OL/TH/18/0261) which has recently been granted planning permission. 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 250 dwellings? What is this based on and is it achievable?

The northern part of the site has been included in a recent planning permission (OL/TH/18/0261 - Land On South Side Of Manston Court Road And West Side Of Haine Road RAMSGATE - Policy SP18)

The policy and site capacity will be revised for the southern part of the site as a modification to the plan.

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.

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.....'

Q5. How has the effect of the proposed development on the local road network been considered? 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 considered 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. Access to the site is expected to take place from Haine Road and/or in combination with Policy site (SP18)

The Viability Study Report (CD1.3), 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.

Q6. What is the justification for requiring a pre-design archaeological evaluation? How has the effect of the proposed development on nearby heritage assets been considered?

Archaeology was identified as an issue during the SHLAA assessment process therefore incorporated in the policy.

Q7. What consideration has been given to the standard of living accommodation for potential future occupants, having regard to the proximity of the site to 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.

However by the consultation of the Proposed Options Revisions the Council 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.

Q8. What is the justification for specifying that proposals should contribute towards provision of a new school, where required? What will be the cumulative impact of the proposed development on the capacity of local schools?

There are three strategic allocations in the Westwood area which are all required to provide a school, or an off site contribution towards the provision of a school. Kent County Council (as Education Authority) have analysed the cumulative impact of the developments proposed in this area on local schools, and have informed the preparation of the Infrastructure Delivery Plan. KCC provided further comments in response to the Pre-Submission consultation. An off-site contribution is considered appropriate for this site due to the cumulative development of this site and the strategic allocations.

Q9. Appendix B to the Plan estimates that 20 dwellings will be delivered on the site in 2020/21. 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 phasing survey and recent planning permission that has been agreed in principle for the northern part of the site.

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
		20	60	100	70							

Issue 2 – Land fronting Nash Road and Manston Road – Policy HO4

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 proposed for allocation in the 2015 Preferred Options Plan on the basis of submissions during the SHLAA and local plan process. There are no ownership constraints likely to affect the deliverability of the site.

The site is subject of a planning application with a resolution to grant permission subject to a S106 agreement re provision of road infrastructure:

OL/TH/16/1765 - Land Adjacent To Salmestone Grange Nash Road MARGATE Kent
Outline application for residential development of up to 250 dwellings and alterations to the surrounding highway network, including details of Access with all other matters reserved (Appearance, Landscaping, Layout, Scale)

Q2. What is the justification for allocating the site for up to 250 dwellings? What is this based on and is it achievable?

A capacity of 250 dwellings was considered appropriate to enable the provision of open space where medieval remains and archaeology may be present on the site and to safeguard the setting of Salmestone Grange and the Scheduled Ancient Monument within the site boundary

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 considered? 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 considered 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).

There has been a resolution to grant planning permission subject to a S106, including highway improvements/requirements which is currently being negotiated. There has been no indication from the Agents that this is unviable. These will include delivery of on-site road infrastructure and junctions that align with traffic forecasts within the plan period and reconfiguration of the Coffin House Corner Junction (B2052 Hartsdown Road, College Road, Shottendane Road, Nash Road) as outlined in the draft Thanet Transport Strategy. The costs of these improvements are still under consideration as part of the viability assessment of the planning application.

Q6. What is the justification for requiring a pre-design archaeological evaluation? How has the effect of the proposed development on nearby heritage assets been considered?

Salmestone Grange includes a Grade II* listed building and Scheduled Ancient Monument and there is known archaeology in this area of the site as identified during the SHLAA assessment process therefore an archaeological evaluation has been included as a policy requirement.

Q7. What liaison has taken place with service providers during the preparation of the Plan to inform the allocation? What evidence is available to show that upgrading capacity will be required and that this can be delivered in a timely manner?

Early responses to consultation on SHLAA sites suggested there could be a need to upgrade capacity of utility services and infrastructure at the site. Since then, liaison with service providers has taken place in the preparation of the Infrastructure Delivery Plan. More detailed information regarding the capacity of utility services has been required from the developer in Clause 5 of the policy (and was carried out by the developer for the purposes of this application).

Q8. Is it clear to decision-makers, developers and local communities how development proposals for the site will “meet the needs of particular groups”? Is the policy effective?

This policy was originally written for inclusion in the 2015 Preferred Option draft of the local plan. It has been superseded by subsequent discussions with developers and the granting in principle of planning permission. The council proposes the deletion of this part of the policy for the Inspectors’ consideration.

Q9. What is the justification for requiring sheltered and extra care housing as part of proposals for the site? What is this based on and is it justified?

This policy was originally written for inclusion in the 2015 Preferred Option draft of the local plan. It has been superseded by subsequent discussions with developers and the granting in principle of planning permission. The council proposes the deletion of this part of the policy for the Inspectors’ consideration.

Q10. Appendix B to the Plan estimates that 30 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 phasing survey.

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
		20	70	70	70	20						

Issue 3 – Land south of Brook Avenue, Garlinge – Policy HO6

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 proposed for allocation in the 2015 Preferred Options Plan on the basis of submissions during the SHLAA and local plan process (SHLAA 017)

Permission has been granted on the site as follows:

OL/16/0376 - Granted 21 June 2018
Land Rear Of 2 To 28 Kingston Avenue MARGATE Kent

Outline application for the erection of 43 No. dwellings comprising 8 No. 2-bed flats, 7 No. 2 bed dwellings, 25No. 3-bed dwellings and 3 No. 4 bed dwellings, including access and scale

R/TH/18/1416 - Granted 16 January 2019

Land Rear Of 2 To 28 Kingston Avenue MARGATE Kent

Application for the reserved matters to outline permission OL/TH/16/0376 for the erection of 43No. dwellings comprising of 8No. 2-bed flats, 7No. 2-bed dwellings, 25No. 3-bed dwellings and 3No. 4-bed dwellings, for the approval of landscaping, layout and appearance.

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 34 dwellings? What is this based on and is it achievable?

The site was allocated for up to 34 dwellings based on a density of 35 dwellings per hectare. However the planning application was approved for 43 dwellings units - the officers report considered this to be acceptable as it would be in keeping with the pattern of surrounding development.

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. What is the justification for requiring development to be informed by a Transport Assessment and Archaeological evaluation? How has the effect of the proposed development on the local road network and heritage assets been considered? Is the policy requirement justified?

A transport assessment was required to assess the impact of development on surrounding roads.

The site lies within an area of considerable archaeological interest therefore an archaeological evaluation is required.

These issues have been considered to be adequately addressed in the above planning applications.

Issue 4 – Land at Haine Road and Spratling Street, Ramsgate – Policy HO7

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 proposed for allocation in the 2015 Preferred Options Plan on the basis of submissions during the SHLAA and local plan process. 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 85 dwellings? What is this based on and is it achievable?

85 dwellings was considered appropriate and achievable based on a density of 35 dwellings per hectare and allowing sufficient land for access and landscaping.

The site has, however, recently been granted outline planning permission for 100 dwellings:

OL/TH/16/1374 - Granted 12 October 2018

St Stephens, Haine Road, RAMSGATE CT12 5ES

Application for outline planning permission for 100no. dwellings with creation of access on to Haine Road, and all other matters reserved, on land at and adjoining St Stephens Bungalow

The officers report states that the application proposes 100 dwellings at 24 dwellings per hectare, and that the illustrative layout accompanying the application demonstrates that the site can accommodate 100 units as well as the necessary open space and landscaping.

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 considered? 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 considered 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.

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 consented development proposals include a form of access junction that reflect the future needs of the Haine Road corridor in maintaining free flow of traffic where achievable.

Q6. What liaison has taken place with service providers during the preparation of the Plan to inform the allocation? What evidence is available to show that upgrading capacity will be required and that this can be delivered in a timely manner?

Liaison with service providers has taken place in the preparation of the Infrastructure Delivery Plan. More detailed information regarding the capacity of utility services has been required from the developer as part of the Masterplan as required by the policy.

Q7. Appendix B to the Plan estimates that 20 dwellings will be delivered on the site in 2020/21. 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 phasing survey.

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
		20	40	40								

Issue 5 – Land south of Canterbury Road East, Ramsgate - Policy HO8

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 proposed for allocation in the 2015 Preferred Options Plan on the basis of submissions during the SHLAA and local plan process (SHLAA 016). 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 27 dwellings? What is this based on and is it achievable?

An allocation for 27 dwellings was based on 35 dwellings per hectare and considered appropriate to allow for land to accommodate landscaping as required in policy. However, outline planning permission was recently granted for 14 detached dwellings:

OL/TH/16/1416 - Granted 03 September 2018
 Land Adjoining 1 Chilton Lane And Canterbury Road East RAMSGATE Kent
 Outline application for erection of 14No. detached dwellings including access, layout and scale

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. What is the justification for requiring a development brief to be provided?

There was some uncertainty around the relationship between the site and the road network, and access to Canterbury Road, therefore a development brief was required. These have since been resolved and Outline Permission has now been granted on the site.

Q5. What is the justification for requiring development to be informed by an archaeological and ecological evaluation? How has the effect of the proposed development on heritage assets and ecology been considered? Is the policy requirement justified?

This site has high potential for archaeological and ecological issues so relevant evaluations were requested in the policy. These were identified through the SHLAA assessment process but were not considered to be 'show stoppers' that would prevent allocation. The effects of the proposed development on heritage assets and ecology will be considered through the planning application process.

Q6. What is the justification for requiring development to retain and enhance trees and hedgerows for their biodiversity interest? Why has this policy requirement not been included in other site allocations in the Plan?

There are numerous trees both within and outside of the site along its northern boundary which are considered important to the character of the site and surrounding area. This policy requirement has not been included in other site allocations as the presence of such trees is not applicable.

Q7. Appendix B to the Plan estimates that 10 dwellings will be delivered on the site in 2021/22. 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. The phasing is based on the fact that planning permission has been granted and the development is underway. The capacity has also changed in response to the planning permission

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
		7	7									

Issue 6 – Land at Melbourne Avenue, Ramsgate – Policy HO9

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 proposed for allocation in the 2015 Preferred Options Plan on the basis of submissions during the SHLAA and local plan process (SHLAA 062). 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 49 dwellings? What is this based on and is it achievable?

The allocation for up to 40 dwellings is based on a density of 35 dwellings per hectare and allows land to accommodate amenity space, improved footpath connections and respecting the area of woodland at the south western part of the site.

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

Please see response to Issue 1, Question 3.

Q4. What is the justification for requiring development to be informed by a transport and ecological evaluation? How has the effect of the proposed development on the local road network and ecology been considered? Is the policy requirement justified?

This site has high potential for archaeological and ecological issues so relevant evaluations were requested in the policy. These were identified through the SHLAA assessment process but were not considered to be ‘show stoppers’ that would prevent allocation. The effects of the proposed development on heritage assets and ecology will be considered through the planning application process

Q5. Is it clear to decision-makers, developers and local communities how much, and what type of “amenity space” is required in addition to retaining The Copse?

The provision of amenity space will be as set out in Policy GI14

Q6. How will the woodland be managed as a community asset? How and by whom will its management be coordinated and funded? Has the viability assessment of the site taken account of this cost?

The Copse was an overgrown woodland site that has been brought back into use and is maintained by the community as a community asset.

Q7. Appendix B to the Plan estimates that 20 dwellings will be delivered on the site in 2021/22. What is this based on and is it a realistic expectation?

The trajectory has changed since the publication of the Submission plan as 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 phasing survey.

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
			20	29								