


# Thanet District Council

## Matter Statement

**Matter 7 - Sites allocated for Residential  
Development at Rural Settlements  
(Policies HO12 - HO17)**

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## ***Issue 1 – Land at Tothill Street, Minster – Policy HO12***

### **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 is part owned by St John's College, Cambridge and Spanton Farms Limited and largely reflects the SHLAA submission. An outline application for 214 dwellings was submitted in October 2018.

### **Q2. Unlike the strategic and non-strategic allocations, why does the policy not specify a dwelling yield or density for the site? Is it clear to decision-makers, developers and local communities what scale of residential development is permitted?**

Site capacity loosely reflects 35 dwellings per hectare taking into account the sites constraints and policy requirements. The scale of development is reflected in the table in Appendix B. The Council is prepared to add the relevant capacities to the rural settlement policies as modifications if the Inspectors' consider this would make the policies clearer.

### **Q3. 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?**

Tothill Street is the main route into Minster and suffers from congestion. It is considered that any development accessed off this road should be assessed its impact on the road network. 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 and the draft Transport Strategy.

There is a current outline application on the site - OL/TH/18/1488 - Land On The West Side Of Tothill Street Minster RAMSGATE Kent, Outline application for the erection of up to 214no. dwellings, cemetery expansion, and associated access, with all other matters reserved

Archaeology was identified as an issue during the SHLAA assessment process therefore incorporated in the policy. Furthermore, following evaluation, archaeological exclusion zones (where residential development is restricted) are proposed as part of the application.

### **Q4. 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?**

According to the outline application the site will be accessed from the northern part of Tothill Street just past the roadside services and hotel. There is also an emergency access proposed from Greenhill Gardens. Initial consideration of the current planning application suggests that the development will be required to make improvements to widen the carriageway to extend the two lane approach to the Tothill Street A299/B2190 roundabout. These improvements could be secured through an appropriate form of agreement under Section 278 of the Highways Act 1980 and appropriate costs established.

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.

**Q5. What is the justification for requiring land to be safeguarded within the site for the expansion of the existing cemetery, and for consultation to be carried out with Minster Parish Council? How will this affect the number of dwellings the site is expected to yield and the deliverability of the site?**

Expansion of Minster Cemetery was identified by the Parish Council through the early stages of the Local Plan process and unconstrained development of the Tothill Site would restrict its expansion. It is reasonable to request that the developer consult the Parish Council on the land most suitable for safeguarding.

The outline application would suggest this is not a barrier to delivery, nor would it restrict the level of development that could take place on site.

**Q6. What is the justification for requiring the provision of open space in accordance with Policy SP31?**

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).

***Issue 2 – Land at Manor Road, Nicholas St. Wade – Policy HO13***

**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 boundary includes part of the SHLAA submission that is better related to the village edge. At the time of allocation (2015) the objectively assessed need was 12,000 when significantly fewer homes were needed and therefore it was inappropriate/unnecessary to allocate the whole site. The scale of the allocation reflects an appropriate level growth in the village. See matter 4, Issue 1, Question 1.

It is considered that the number of consents on the site demonstrate that ownership constraints are not a barrier to delivery.:

F/TH/15/0770 Land Rear Of Manor Hall And Heritage Park Manor Road St Nicholas At Wade BIRCHINGTON Kent, - Erection of 17No. dwellings with associated parking and access from Manor Road

F/TH/15/1204 Land Adjacent And Rear Of Ashbre Manor Road St Nicholas At Wade BIRCHINGTON Kent - Erection of 39No. dwellings with formation of vehicular access to Manor Road and associated parking and landscaping

OL/TH/17/0305 Land Rear Of Ashbre Manor Road St Nicholas At Wade BIRCHINGTON Kent - Outline application for the erection of 2No. semi-detached two storey dwellings, with alteration to existing access, including layout and access

**Q2. Unlike the strategic and non-strategic allocations, why does the policy not specify a dwelling yield or density for the site? Is it clear to decision-makers, developers and local communities what scale of residential development is permitted?**

Site capacity loosely reflects 35 dwellings per hectare taking into account the sites constraints and

policy requirements. The scale of development is reflected in the table in Appendix B. The Council is prepared to add the relevant capacities to the rural settlement policies as modifications if the Inspectors' consider this would make the policies clearer.

**Q3. 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 and the draft Transport Strategy and have been addressed where necessary in the consented applications.

**Q4. What is the justification for requiring the provision of open space in accordance with Policy SP31?**

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 draft Local Plan).

### ***Issue 3 – Land at Walter's Hall Farm, Monkton – Policy HO14***

**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 boundary reflects the SHLAA submission bounded by existing hedgerow between the site and Walters Hall Farm buildings. An application for 20 dwellings was submitted in June 2017 indicating only one owner, Baxters Farms Ltd.

There is a planning application with resolution to grant consent - F/TH/17/0804 - Land Between 47 And 71 Monkton Street Monkton Ramsgate Kent, Erection of 20No. houses with associated access, parking and landscaping

**Q2. Unlike the strategic and non-strategic allocations, why does the policy not specify a dwelling yield or density for the site? Is it clear to decision-makers, developers and local communities what scale of residential development is permitted?**

Site capacity broadly reflects 35 dwellings per hectare taking into account the sites constraints and policy requirements. The scale of development is reflected in the table in Appendix B. The Council is prepared to add the relevant capacities to the rural settlement policies as modifications if the Inspectors' consider this would make the policies clearer.

**Q3. What is the justification for requiring development to be informed by an archaeological evaluation and to respect the setting of the Listed Building? Is it clear to decision-makers, developers and local communities which heritage asset(s) the policy refers to?**

Archaeology was identified as an issue during the SHLAA assessment process therefore incorporated in the policy. Walters Hall Farm House is a Grade II listed building. It may be appropriate to name it in the policy.

**Q4. How has the effect of the proposed development on heritage assets been considered? Is the allocation justified?**

The allocation provides a sufficient buffer between the built development and the listed building ensuring its setting is protected.

***Issue 4 – Land south side of A253, Cliffsend – Policy HO15***

**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?**

A large number of sites around Cliffsend village have been submitted and a proportionate level has been allocated having regard to available services and infrastructure.

At the time of allocation (2015) the objectively assessed need was 12,000 when significantly fewer homes were needed and therefore it was inappropriate/unnecessary to allocate the whole site. Since then the OAN has risen significantly and new strategic sites have been allocated around the Westwood area and adjoining existing allocations in order to reinforce the transport strategy. This has led to increased pressure on the Haine corridor which is now considered to be at capacity. KCC advice is to avoid significant additional traffic loading on the Haine corridor. Further allocations in the Cliffsend would exacerbate this.

Outline permission for the erection of up to 65 dwellings has been granted (OL/TH/17/0152 - Land East Of 40 Canterbury Road West RAMSGATE Kent, Outline Application for the erection of up to 65no. dwellings including access with all other matters reserved) suggesting that ownership is not a barrier to delivery.

**Q2. Unlike the strategic and non-strategic allocations, why does the policy not specify a dwelling yield or density for the site? Is it clear to decision-makers, developers and local communities what scale of residential development is permitted?**

Site capacity loosely reflects 35 dwellings per hectare taking into account the sites constraints and policy requirements. The scale of development is reflected in the table in Appendix B. The Council is prepared to add the relevant capacities to the rural settlement policies as modifications if the Inspectors' consider this would make the policies clearer.

**Q3. What is the justification for requiring development to be informed by a pre- design archaeological assessment? How has the effect of the proposed development on heritage assets been considered? Is the policy requirement justified?**

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

**Q4. What is the justification for requiring proposals for new development to explore and provide where possible sustainable connections to the proposed Parkway station? Is it sufficiently clear to decision-makers, developers and local communities what is meant by the term “sustainable connections”?**

Due to the sites' close proximity to the proposed Parkway Station and in order to ensure the

allocation is sustainable walking and cycling routes should be incorporated into the development to prevent short unnecessary car journeys. It is considered that this is sufficiently clear and allows for appropriate flexibility to be applied to the nature and standard of such connections.

**Q5. What will be the cost of providing these connections and how will they be funded? Has this cost been considered as part of the viability assessment for the site?**

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 extent of sustainable connection works is not considered to be an abnormal request for development of this scale and location. New development is typically expected to interface with the surrounding highway/public rights of way networks to provide convenient access to existing and future destinations and this is a normal part of readying a site for residential development.

***Issue 5 – Land north of Cottington Road, Cliffsend – Policy HO16***

**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?**

A large number of sites around Cliffsend village have been submitted and a proportionate level has been allocated having regard to available services and infrastructure.

At the time of allocation (2015) the objectively assessed need was 12,000 when significantly fewer homes were needed and therefore it was inappropriate/unnecessary to allocate the whole site. Since then the OAN has risen significantly and new strategic sites have been allocated around the Westwood area and adjoining existing allocations in order to reinforce the transport strategy. This has led to increased pressure on the Haine corridor which is now considered to be at capacity. Further allocations in the Cliffsend would exacerbate this.

Outline consent has been granted for up to 41 dwellings (OL/TH/17/0151 - Land North Of Cottington Road And East Of Lavender Lane RAMSGATE Kent, Outline application for the erection of up to 41 no. dwellings including access with all other matters reserved) suggesting that ownership is not a barrier to delivery.

**Q2. Unlike the strategic and non-strategic allocations, why does the policy not specify a dwelling yield or density for the site? Is it clear to decision-makers, developers and local communities what scale of residential development is permitted?**

Site capacity loosely reflects 35 dwellings per hectare taking into account the sites constraints and policy requirements. The scale of development is reflected in the table in Appendix B. The Council is prepared to add the relevant capacities to the rural settlement policies as modifications if the Inspectors' consider this would make the policies clearer.

**Q3. What is the justification for requiring development to be informed by an archaeological assessment including fieldwork, and include an assessment of development on the setting of St. Augustine's Cross? How has the effect of the proposed development on heritage assets been considered? Is the policy justified?**

Archaeology was identified as an issue during the SHLAA assessment process therefore incorporated in the policy. There is a sufficient buffer between St Augustine's Cross and the site.

**Q4. 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 constitutes “excessive traffic use”? Is the policy justified and effective?**

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 and the draft Transport Strategy.

The site will be accessed from Cottington Road. The policy seeks to ensure that Foads Lane is not excessively used as the sole/primary route to the road network due to its unsuitability to high volumes of traffic.

**Q5. What is the justification for requiring proposals for new development to explore and provide where possible sustainable connections to the proposed Parkway station? Is it sufficiently clear to decision-makers, developers and local communities what is meant by the term “sustainable connections”?**

Due to the sites' close proximity to the proposed Parkway Station and in order to ensure the allocation is sustainable walking and cycling routes should be incorporated into the development to prevent short unnecessary car journeys. It is considered that this is sufficiently clear. The extent of sustainable connection works is not considered to be an abnormal request for development of this scale and location. New development is typically expected to interface with the surrounding highway/public rights of way networks to provide convenient access to existing and future destinations and this is a normal part of readying a site for residential development.

***Issue 6 – Land south of Cottington Road, Cliffsend – Policy HO17***

**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?**

A large number of sites around Cliffsend village have been submitted and a proportionate level has been allocated having regard to available services and infrastructure.

At the time of allocation (2015) the objectively assessed need was 12,000 when significantly fewer homes were needed and therefore it was inappropriate/unnecessary to allocate the whole site. Since then the OAN has risen significantly and new strategic sites have been allocated around the Westwood area and adjoining existing allocations in order to reinforce the transport strategy. This has led to increased pressure on the Haine corridor which is now considered to be at capacity. Further allocations in the Cliffsend would exacerbate this and would not be able to positively contribute towards meaningful highway solutions. There are also concerns over the cumulative impact of additional development on Foads Lane and Cottington Link Road, due to geometrical highway constraints and road capacity respectively.

Outline consent for 23 units has been granted on the site (OL/TH/17/0150 - Land Adjacent To Oakland Court Cottington Road Cliffsend RAMSGATE Kent, Outline application for the erection of up to 23no. dwellings including access with all other matters reserved) suggesting that ownership is not a barrier to delivery.

**Q2. Unlike the strategic and non-strategic allocations, why does the policy not specify a dwelling yield or density for the site? Is it clear to decision-makers, developers and local communities what scale of residential development is permitted?**

Site capacity loosely reflects 35 dwellings per hectare taking into account the sites constraints and policy requirements. The scale of development is reflected in the table in Appendix B. The Council is prepared to add the relevant capacities to the rural settlement policies as modifications if the Inspectors' consider this would make the policies clearer.

**Q3. What is the justification for requiring development to be informed by an archaeological assessment including fieldwork, and include an assessment of development on the setting of St. Augustine's Cross? How has the effect of the proposed development on heritage assets been considered? Is the policy justified?**

Archaeology was identified as an issue during the SHLAA assessment process therefore incorporated in the policy. St Augustine's Cross is the Grade II 19th century Saxon cross thought to have been the site of St Augustine's landing on the shores of England in AD597, representing an integral part of Thanet's history. It is important that the setting of this significant heritage asset is protected. It is considered that there is a sufficient buffer between St Augustine's Cross and the site

**Q4. What is the justification for requiring proposals for new development to explore and provide where possible sustainable connections to the proposed Parkway station? Is it sufficiently clear to decision-makers, developers and local communities what is meant by the term "sustainable connections"?**

Due to the sites' close proximity to the proposed Parkway Station and in order to ensure the allocation is sustainable walking and cycling routes should be incorporated into the development to prevent short unnecessary car journeys. It is considered that this is sufficiently clear. The extent of sustainable connection works is not considered to be an abnormal request for development of this scale and location. New development is typically expected to interface with the surrounding highway/public rights of way networks to provide convenient access to existing and future destinations and this is a normal part of readying a site for residential development.

**Q5. What is the justification for requiring development proposals to include a flood risk assessment? Is it clear to decision-makers, developers and local communities what is required of proposals for new development?**

The site is in close proximity to flood zone 2 and has suspected drainage issues, therefore, a flood risk assessment is considered justified.

### ***Issue 7 – Additional Information***

**Q1. What is the status of the "additional information" provided underneath Policy HO17? Is the list intended to represent policy requirements? If so, why have the sites not been included as specific allocations in the Plan? Is the Plan justified and effective in this regard?**



The additional information is extra information on allocated sites in order to be helpful. It may be appropriate to include in a policy for each of the allocations concerned.