



Independent Examination of the Thanet Local Plan

Inspectors' Matters, Issues and Questions for Examination

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Introduction

Prior to the forthcoming Hearing sessions responses are invited from participants on the following Matters, Issues and Questions ('MIQs') for Examination. The MIQs are based on the Main Issues identified by the Council, the Inspectors' Initial Questions¹ and other relevant issues raised by representors.

Further information about the Examination, Hearings and format of written statements is provided in the accompanying Guidance Note, which should be read alongside the MIQs.

Update – 4 March 2019

1) Following comments by representors the MIQs have been updated. Six additional questions are shown in ***bold italics*** as follows:

- Matter 10, Issue 1, Question 8
- Matter 12, Issue 3, Question 4;
- Matter 13, Issue 3, Question 6;
- Matter 13. Issue, 6, Question 7;
- Matter 14, Issue 2, Question 3; and
- Matter 18, Issue 2, Question 5.

¹ Document L-001

Matter 1 – Compliance with the Act and Regulations, the Habitats Regulations and Strategic Flood Risk Assessment

Issue 1 – Duty to Cooperate

- Q1. What strategic, cross-border matters have arisen through the preparation of the Plan and what cooperation took place to resolve them? Has the cooperation between neighbouring authorities been constructive and proactive?
- Q2. What specific actions were identified as a result of dialogue with neighbouring authorities? What were the outcomes and how did they shape the preparation of the Plan?
- Q3. Have any strategic, cross-border matters arisen through the preparation of the Plan which the draft policies do not seek to address at this stage? If so, what are the reasons for taking this approach?
- Q4. Paragraphs 9.6-9.7 of the *Draft Thanet Local Plan Duty to Cooperate Statement* confirm that discussions have been held with Dover District Council regarding the extent of the housing market area referred to in the Council's *Strategic Housing Market Assessment* ('SHMA') but that no final agreement has yet been reached. What is the current status regarding ongoing discussions with Dover District Council on this issue? What were the outcomes of dialogue with other Kent authorities on the approach to housing market areas?
- Q5. How has the effect of additional growth on the highways network across Kent been considered during the preparation of the Plan? What cooperation has taken place with neighbouring authorities and Kent County Council to consider these impacts? Has this led to any specific actions or policy outcomes?
- Q6. How were issues surrounding economic growth, employment land requirements and retail capacity considered with neighbouring authorities? What actions were identified as necessary, and what were the outcomes?
- Q7. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to advice contained in the National Planning Policy Framework (the 'Framework') and the National Planning Practice Guidance (the 'PPG')?²

Issue 2 – Public Consultation

- Q1. Has public consultation been carried out in accordance with the Council's *Statement of Community Involvement*, the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations?
- Q2. Were adequate opportunities made available for participants to access and make comments on the Plan, and other relevant documents, in different locations?
- Q3. Were adequate opportunities made available for participants to comment on the Plan in paper, and electronic form?

² Inspectors' Note – Please refer to the Examination Guidance Note for commentary on the changes to national planning policy and guidance, and the implications for the examination of the Thanet Local Plan

- Q4. Were representations adequately taken into account? Where is this set out?

Issue 3 – Local Development Scheme ('LDS')

- Q1. Has the Plan been prepared in accordance with the LDS?
- Q2. The Plan period runs from 2011 to 2031. Is this consistent with paragraph 157 of the Framework, which states that Local Plans should be drawn up over an appropriate timescale, preferably a 15-year time horizon?

Issue 4 – Sustainability Appraisal

- Q1. Have the likely environmental, social and economic effects of the Plan been adequately assessed in the *Sustainability Appraisal – Environmental Report ('SA')*?
- Q2. Does the SA test the Plan against all reasonable alternatives, such as different options for the scale and distribution of growth? Where is this set out?
- Q3. Appendix G1 of the SA ('Justification of Preferred Options – Updated with further iterations of Policy') states that Option 9k (a new settlement) "...would be unsustainable for the same reasons as freestanding countryside sites". Freestanding countryside sites were considered unsustainable due to their access to services, facilities and public transport connections. How does this correlate with paragraph 5.4 of the SA, which states that "...sustainable implementation of a new settlement option could be achieved."? Has the SA considered reasonable alternatives on a consistent basis?
- Q4. How has the provision of a new settlement, as an alternative to the proposed growth strategy, been considered as part of the SA process?
- Q5. In response to the Inspectors' Initial Questions the Council confirmed that the options of locating housing adjoining the urban area and adjoining villages was considered in Appendix G of the SA. However, Appendix G is taken from a report to Cabinet, dated 11 December 2014, and appears to be based on a different housing requirement to the one found in the Local Plan? Please can the Council point to where an assessment of reasonable alternatives has been carried out having regard to the housing requirement in draft Policy SP11?
- Q6. Does the assessment of policies in the SA take into account the findings of the People Over Wind & Sweetman vs. Coillte Teoranta judgement? In particular, whether policies are likely to have an adverse effect on site integrity?
- Q7. What is the justification for concluding that proposals for residential development and solar parks on greenfield sites will have a positive effect on the objective of conserving and enhancing biodiversity?
- Q8. How has the SA considered infrastructure proposed in the Infrastructure Delivery Plan ('IDP'), which at this stage is only in draft form and may be subject to change?

Issue 5 - Habitats Regulations

Sandwich Bay Special Area of Conservation ('SAC')

- Q1. How have the potential impacts of recreational disturbance (arising from policies and allocations in the Plan) on the Sandwich Bay SAC been considered?
- Q2. What specific measures does the Plan include to ensure that its policies are not likely to give rise to adverse effects, either alone or in-combination with other plans and projects?
- Q3. How have the potential impacts of atmospheric pollution (arising from policies and allocations in the Plan) on the Sandwich Bay SAC been considered?
- Q4. How are traffic flows predicted to change as a result of the development proposed in the Plan on A or B roads within 200m of any emission-sensitive features of the SAC, both within and outside of Thanet District?
- Q5. Paragraph 5.2 of the *Thanet Local Plan Habitats Regulations Assessment* ('HRA') states that, amongst others, Policy SP26 will mitigate against the in-combination effects of new development. However, Policy SP26 refers specifically to the Thanet Coast SPA and Ramsar Site. How will Policy SP26 benefit the dune features of the SAC?

Thanet Coast and Sandwich Bay Special Protection Area ('SPA') and Ramsar Site

- Q6. How have the potential impacts of recreational disturbance (arising from policies and allocations in the Plan) on the Thanet Coast and Sandwich Bay SPA and Ramsar Site been considered?
- Q7. How has the effect of development on functional habitats in close proximity to, and associated with the SPA, been considered?
- Q8. What specific measures does the Plan include to ensure that its policies are not likely to give rise to adverse effects, either alone or in-combination with other plans and projects?
- Q9. What is the justification for requiring proposals of 10 dwellings or more to include an assessment of the site's functionality as a roosting or feeding resource for the SPA, regardless of location? Is Policy SP12 necessary for all development proposals, including the re-use of previously developed land in urban areas?
- Q10. What is the justification for requiring the assessment (referred to in Question 8 above) to include areas within 400m of the site's boundary?
- Q11. What is the justification for requiring development proposals on land at Manston Court/Haine Road (Policy SP18) to include a survey of ground nesting bird habitats? How does this differ from other site allocations in the Plan?

Strategic Access Management and Monitoring

- Q12. Does Policy SP26 (as referred to by Policy SP12) relate to all proposals for residential development, or just proposals for residential development on

allocated sites? Is this clear to decision-makers, developers and local communities?

- Q13. What is the justification for requiring all proposals for residential development to contribute towards the Strategic Access Management and Monitoring Plan ('SAMM'), regardless of location?
- Q14. What are the tariffs in Table 8 to Policy SP26 based on? Have they been considered as part of the viability evidence which supports the Plan?
- Q15. Is Policy SP26 consistent with paragraph 204 of the Framework which states that planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind?
- Q16. How will Regulation 123 of the Community Infrastructure Levy Regulations ('CIL') (2010) apply where five or more separate planning applications provide funding towards the projects referred to in Policy SP26? Will Policy SP26 be effective in mitigating the in-combination effects of additional recreational pressure arising from new development in Thanet?
- Q17. Has policy SP25 taken account of Dover District Council's *Thanet Coast SPA Mitigation Strategy (2012)* and ongoing visitor disturbance study at Pegwell Bay and Sandwich Bay? Are there any cross-boundary implications relevant to the policy?
- Q18. Where relevant are the policies in the Plan consistent with the avoid, mitigate and compensate hierarchy in paragraph 118 of the Framework?

Issue 6 – Strategic Flood Risk Assessment ('SFRA')

- Q1. Do any of the sites allocated for development in the Plan fall within Flood Zones 2 or 3? If so, are the allocations and policies consistent with paragraph 100 of the Framework which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change?
- Q2. How has the Council taken a sequential approach to identifying sites for new development?
- Q3. What is the justification for requiring development proposals within 40m of a coastline or clifftop to demonstrate that it will not expose people or property to the risks of coastal erosion and flooding, or accelerate coastal erosion?
- Q4. What affect (if any) has the Environment Agency's latest modelling for the North and East Kent Coast had on the allocations and policies in the Plan?

Issue 7 – Public Sector Equality Duty ('PSED')

- Q1. In what way does the plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

Matter 2 – Objectively Assessed Need and the Housing Requirement (Policy SP11)

Issue 1 – Housing Market Area ('HMA')

- Q1. What is the justification for a Thanet HMA, rather than a wider 'East Kent' HMA?
- Q2. What evidence supports the use of a HMA for Thanet, having particular regard to household migration and travel to work patterns? Is the degree of containment sufficient to justify this approach? Does it accord with national guidance in the PPG?
- Q3. How will housing needs be met across the wider 'East Kent' HMA?

Issue 2 – Population and Household Projections

- Q1. Table 12 in the *Updated Assessment of Objectively Assessed Housing Need* compares household growth in Thanet between 2011 and 2031. Using the 2012-based projections it states that there will be a growth of around 14,297 households, or 715 per year. Assuming a vacant and second home rate of 6.3%, 760 dwellings per annum ('dpa') would be needed to accommodate this level of growth (or **15,200** in total). By comparison, the 2014-based projections identify an increase of 15,397 households. Applying the same vacancy rate would equate to a need for 818 dpa (or **16,360** dwellings in total). What are the reasons for this increase?
- Q2. How does this compare to the latest 2016-based household projections?
- Q3. What is the justification for using a vacant and second home rate of 6.3%? What is this based on?
- Q4. The SHMA Update includes a sensitivity analysis which considers migration trends over 10 and 14-year timeframes. How does this compare to the 2012 and 2014-based household projections? Are 10 and 14-year trends more likely to be representative of what will happen over the plan period than 5-year trends?
- Q5. How have household formation rates changed in Thanet? Is there evidence to suggest that household formation has been suppressed by affordability or constrained supply, especially amongst 25-34 and 35-44 age groups? Does the SHMA apply any adjustments to account for suppressed household formation?
- Q6. What is the justification for the 'rebased' scenario in the SHMA? Using the 2014-based projections it predicts an increase of 15,450 households over the plan period, equating to a need for **16,460** dwellings (or 821 dpa).

Issue 3 – London Migration

- Q1. How has migration between London and Thanet varied prior to, during and after the latest recession? What does this demonstrate?
- Q2. What are the reasons behind migration trends to and from London? What evidence is there to suggest that past-trends will continue over the plan period?

- Q3. Taking into account answers to the questions above, what is the justification for applying an uplift to account for London migration?
- Q4. Is the suggested uplift consistent with other development plans across the wider 'East Kent' HMA?

Issue 4 – Market Signals

- Q1. The PPG³ advises that household projections should be adjusted to reflect appropriate market signals, as well as other market indicators. How does the evidence demonstrate that Thanet is performing with regard to:
- Land prices;
 - House prices;
 - Rents;
 - Affordability;
 - Rates of development; and
 - Overcrowding.
- Q2. How has the position changed since preparation of the SHMA Update? Have factors such as affordability been improving or worsening?
- Q3. Paragraph 2.15 of the SHMA Update states that a further upward adjustment is warranted to improve affordability and support younger households in forming. This has been done by returning household formation rates for those aged 25-34 back to 2001 levels over the period to 2025, which increases the overall housing need from 16,760 dwellings (838 dpa) to **17,140** dwellings (or 857 dpa). Is it appropriate to use adjustments to household formation rates as a mechanism for responding to worsening market signals?
- Q4. What impact will this uplift have on affordability and is it appropriate? If not, what adjustments should be made to account for market signals and why?

Issue 5 - Housing Trajectory

- Q1. What is the justification for the housing trajectory in Policy SP11? What is it based on and why does it propose a significantly higher housing target during the middle-to-end of the plan period?
- Q2. Does the stepped trajectory reflect the type and size of sites proposed for new residential development in the Plan?

Issue 6 – Housing Requirement

- Q1. Is the housing requirement justified and is it based on robust, up-to-date and available evidence? If not, what should the housing requirement be?
- Q2. Policy SP11 states that provision is made for a 'total' of 17,140. Is this consistent with the evidence-base, or should the figure be referred to as a minimum?

³ Paragraph: 019 Reference ID: 2a-019-20140306

Matter 3 – Affordable Housing Need

Issue 1 – Definition of Affordable Housing

- Q1. Does the Plan include a definition of affordable housing? If not, to be effective should one be included?

Issue 2 – Affordable Housing Need

- Q1. What is the annual net need for affordable housing as defined by the SHMA? For clarity to decision-makers, developers and local communities should the need for affordable housing be clearly set out in the Plan?
- Q2. Has the affordable housing need been correctly established, and is it based on up-to-date information?
- Q3. How does it compare to the housing requirement?
- Q4. What is the justification for requiring at least 30% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?
- Q5. Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Plan expected to deliver?
- Q6. How does this compare to the identified need?
- Q7. How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5-10 years?
- Q8. The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?

Issue 3 – Viability

- Q1. The *Thanet District Council Local Plan and CIL Viability Assessment* indicates that for schemes on previously developed land, where development costs are typically higher than greenfield sites, the affordable housing target could be lowered to 20% (paragraph 3.12.3). With this in mind, what is the justification for a 30% target across all development types and locations? Is Policy SP20 justified?
- Q2. How has the evidence-base considered the differences between bringing forward strategic and non-strategic sites? Does it justify a consistent approach to affordable housing across all sites, regardless of size?

Matter 4 – Spatial Strategy (Policies SP12, SP21, HO1, HO10, HO11 and HO18)

Issue 1 – Settlement Hierarchy and Housing Distribution

- Q1. Does the Plan set out a hierarchy of settlements where new development will be directed towards? If so, is it clear to decision-makers, developers and local communities?
- Q2. How have the main urban areas of Margate, Ramsgate, Broadstairs and Westwood been defined? Do they represent a single urban area where the majority of new development is concentrated?
- Q3. Does the Plan seek to direct a certain percentage, or proportion of growth, to particular areas and/or settlements? If so, where is this set out and what is it based on?
- Q4. How did the Council decide on the scale and level of growth attributed to Margate, Ramsgate, Broadstairs, Westwood and the Rural Settlements?
- Q5. How did the Council consider the economic and other benefits of best and most versatile agricultural land in pursuing the growth options in the Plan?
- Q6. Is the distribution of development consistent with the Framework's Core Planning Principles which, amongst other things, seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?
- Q7. What alternative options were considered as part of the Plan's preparation and why were they discounted?
- Q8. What is the rationale for pursuing growth on larger, strategic sites, rather than smaller site allocations to meet the housing requirement?
- Q9. Is the spatial strategy justified? Does it represent the most appropriate strategy, when considered against the reasonable alternatives?

Issue 2 – Housing Development – Policies HO1 and SP12

- Q1. What is the justification for requiring proposals on allocated housing sites to be consistent with the indicative phasing schedule in Appendix B? How will this be determined, and is it clear to decision-makers, developers and local communities what is expected of proposals for new development?
- Q2. What is the justification for restricting proposals on non-allocated sites to only previously developed land? How would a decision-maker be expected to react to a proposal for residential development on a greenfield site within one of the main towns?
- Q3. What is the justification for specifically referring to residential gardens under Policy HO1(3)? Does this apply to all residential gardens, regardless of location? Is this sufficiently clear to decision-makers, developers and local communities?
- Q4. Is the final requirement of Policy HO1 consistent with the strategic site allocations, some of which seek to promote alternative uses as part of new mixed-use developments? Is the policy effective?

- Q5. What is a housing implementation strategy referred to in paragraph 11.8 of the Plan? Is the purpose of this strategy clear? Who will be responsible for the strategy and what outcomes does it seek to achieve?
- Q6. What is the justification for having separate criteria for housing developments over 10 units in Policy SP12?
- Q7. Does the Plan provide sufficient support for self-build and custom housebuilding? Has a need been identified, and if so, how does the Plan seek to meet this need?
- Q8. How will the Council ensure that developments make every reasonable effort to accommodate self-build needs as required by Policy SP12?
- Q9. What is the justification for requiring a Statement of Social Impacts to be provided on developments of 50 or more dwellings? Is it clear to decision-makers, developers and local communities what is required?

Issue 3 – Cliftonville West and Margate Central – Policy HO10

- Q1. What is the justification for requiring development proposals in Cliftonville West and Margate Central to increase the number of family homes?
- Q2. Is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?

Issue 4 – Housing at Rural Settlements – Policies HO11 and HO18

- Q1. Policy HO11 permits housing development within "*the confines of the rural settlements...*". Are the rural settlements defined in paragraph 11.11 of the Plan? Is this clear to decision-makers, developers and local communities?
- Q2. What is the justification for development proposals in rural settlements to be compatible with the historic scale of growth of the settlement? How would this be determined? Is the policy effective?
- Q3. For the purposes of Policy HO11(2) how will development "*more than minor in scale*" be determined? Is this sufficiently clear to decision-makers, developers and local communities? Is the policy effective?
- Q4. Is the text under Policy HO11 part of the policy, or supporting text? What is the justification for points (1) and (2)?
- Q5. Is Policy HO11 consistent with paragraph 55 of the Framework? Will there be sufficient growth in the Rural Settlements to help support sustainable rural communities?
- Q6. Is it clear to decision-makers, developers and local communities what settlements Policy HO18 applies to?
- Q7. Is Policy HO18 consistent with paragraph 54 of the Framework which states that local planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs? Is the policy positively prepared and worded?
- Q8. How often are the detailed parish surveys referred to in Policy HO18 carried out? Are they available for all rural settlements?

Issue 5 – Development in the Countryside – Policy SP21

- Q1. How would a decision-maker determine if the need for a development overrides the need to protect the countryside for the purposes of Policy SP21? Is the policy effective?
- Q2. Is Policy SP21 consistent with paragraph 55 of the Framework which allows for certain forms of development in the countryside, such as the need for rural workers to live at or near their place of work?

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?
- Q2. Was the process of allocating sites robust? Did it take into account sufficient factors?
- Q3. How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?
- Q4. For the strategic sites, how was the mix of uses determined?
- 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?
- 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?
- 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?
- Q8. How has the effect of development on the landscape character of the area been considered as part of the allocation process?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 785 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- Q5. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school will be delivered?
- Q6. Have the costs associated with the open space and primary school been taken into account in considering the viability of the site?
- Q7. What is the justification for restricting development to the northern part of the site? Is this justified?

- 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?
- 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?
- 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?
- Q11. How does the Plan ensure that any necessary infrastructure will be provided as part of proposals for the site?
- Q12. Why, unlike the other strategic allocations, does the site not have an indicative phasing in Appendix B to the Plan?

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?
- Q2. What is the justification for allocating the site for up to 1,600 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- Q5. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school will be delivered?
- Q6. Is it sufficiently clear to decision-makers, developers and local communities what is expected in relation to the provision of additional healthcare?
- 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?
- 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?
- 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?
- 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?
- 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?

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

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?
- Q2. What is the justification for allocating the site for up to 1,450 dwellings? What is this based on and is it achievable?
- 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?
- Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- 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?
- Q6. Is it clear to decision-makers, developers or local communities when the access road will be provided, and by who?
- 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?
- Q8. How does the scale of proposed development relate to the size, role, function and character of Westwood?
- 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?
- 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?
- 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?
- 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?
- 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?

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

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?
- Q2. What is the justification for allocating the site for up to 2,000 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- Q5. Is it clear to decision-makers, developers and local communities what community facilities are required as part of the development?
- 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?
- 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?
- Q8. What is the justification for the provision of a new District Centre as part of proposals for the site?
- 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?
- Q10. What is the justification for requiring a Landscape and Visual Impact Assessment, but not for other strategic allocations?
- 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?
- 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?
- Q13. How does the scale of proposed development relate to the size, role, function and character of Westgate-on-Sea?
- Q14. What effect will the proposed development have on the setting of the Grade II* listed 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?

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

- 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?
- 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?
- Q3. What is the justification for not specifying a maximum density, unlike other strategic housing allocations?
- Q4. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- Q5. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed school and medical centre will be delivered?
- 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?
- 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?
- 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?
- Q9. How does the scale of proposed development relate to the size, role, function and character of the area?
- 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?
- 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?
- Q12. Does the allocation form part of the sites listed in Appendix B to the Plan?

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

- Q5. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- Q6. Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed school will be delivered?
- 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?
- 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?
- 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?
- 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?
- Q11. How does the scale of proposed development relate to the size, role, function and character of the area?
- 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?
- Q13. What is the current status regarding the submitted planning application for the site?
- 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?
- 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?

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

- 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?
- 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?
- 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?
- 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?
- 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?
- 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?
- 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?
- 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?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 250 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- 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?
- 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?
- 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?
- 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?
- 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?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 250 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- 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?
- 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?
- 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?
- 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?
- 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?
- 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?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 34 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 85 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- 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?
- 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?

- 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?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 27 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- Q4. What is the justification for requiring a development brief to be provided?
- 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?
- 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?
- 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?

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?
- Q2. What is the justification for allocating the site for up to 49 dwellings? What is this based on and is it achievable?
- Q3. What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?
- 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?
- 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?
- 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?
- 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?

Matter 7 – Sites Allocated for Residential Development at Rural Settlements (Policies HO12-HO17)

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

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

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?
- 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?

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

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?
- 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?
- 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?
- 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*"?
- 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?

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?
- 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?
- 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?
- 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?

- 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*"?

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?
- 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?
- 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?
- 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*"?
- 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?

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?

Matter 8 – Housing Land Supply

Issue 1 – Five-Year Housing Land Requirement

- Q1. What is the basic five-year housing land requirement, what is it based on and how has it been calculated?
- Q2. How does the five-year housing land requirement compare to previous rates of delivery?

Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

- Q3. Taking a longer-term view, how has the Council performed against previous annual housing requirements? Does this represent the 'persistent undersupply' defined by the Framework? In this context, should the buffer be 5% or 20%?
- Q4. If a 20% buffer applies, should this be applied to the basic five-year requirement, or the five-year requirement and any undersupply?
- Q5. If there has been an undersupply, should this be addressed within the next five years (the 'Sedgefield' method), or over the remainder of the plan period (the 'Liverpool' method)? Is the Council's approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?⁴
- Q6. Taking the above into account, what is the five-year housing land requirement?

Issue 2 – Supply Methodology

The PPG⁵ states that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

The PPG also advises that the size of sites will be an important factor in identifying whether a housing site is deliverable within five years. Plan makers should consider lead-in times and build-out rates to ensure a robust five-year housing land supply. Taking this into account:

Sites with Planning Permission

- Q1. What evidence is there to indicate that the sites with planning permission will come forward as illustrated in the housing trajectory?

⁴ Paragraph: 035 Reference ID: 3-035-20140306

⁵ Paragraph: 031 Reference ID: 3-031-20140306

- Q2. What lead-in times and build-out rates have been applied to sites with planning permission? What are they based on?
- Q3. Have the same lead-in times and build-out rates been used for sites across the District, and for sites with outline and full planning permission? If so, is this appropriate and justified?
- Q4. Are there any sites in the trajectory which have a resolution to grant planning permission subject to the completion of a planning obligation? If so, how has this been considered in determining deliverability?
- Q5. How has the trajectory considered that some sites may not come forward due to unforeseen circumstances? Has a lapse-rate or allowance for non-deliverability been applied? If so, has it been applied to all sites?

Sites without Planning Permission

- Q6. What evidence is there to indicate that the sites without planning permission will come forward as illustrated in the housing trajectory?
- Q7. Have the same lead-in times and build-out rates been applied to sites without planning permission? How do they vary?

Issue 3 – Components of Supply

- Q1. What evidence is there to support the housing trajectory for Birchington (Policy SP14)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?
- Q2. What evidence is there to support the housing trajectory for Westgate-on-Sea (Policy SP15)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?
- Q3. What evidence is there to support the housing trajectory for Westwood (Policy SP16)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?
- Q4. How has the development of land fronting Nash Road and Haine Road (Policy SP17) been considered in the housing trajectory?
- Q5. What evidence is there to support the housing trajectory for land at Manston Court (Policy SP18)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?

Issue 4 – Windfall Allowance

Paragraph 48 of the Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. Taking this into account:

- Q1. What allowance has been made for windfall sites coming forward over the first five years, and thereafter throughout the plan period?
- Q2. What is this based on and is it justified on appropriate available evidence?

Issue 5 – Future Supply

Paragraph 47 of the Framework states that local planning authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, years 11-15.

- Q1. How has the Council arrived at the figures in the Housing Trajectory for years 6-10 and 11-15?
- Q2. What factors were considered in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?
- Q3. Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?

Issue 6 – Flexibility

- Q1. What flexibility does the plan provide if some of the larger sites do not come forward in the timescales envisaged?
- Q2. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

Matter 9 – Meeting Housing Needs (Policies SP19-SP20, QD04-QD05, HO20-HO26)

Issue 1 – Type and Size of Dwellings – Policy SP19

- Q1. How does Plan address the need for different types of housing and the needs of different groups in the community? Is the Plan consistent with paragraph 50 of the Framework?
- Q2. Is it clear to developers, decision-makers and local communities what the "SHMA recommendations" consist of for the purposes of Policy SP19?
- Q3. Is Policy SP19 sufficiently flexible to react to changing circumstances over the plan period, and to reflect the different characteristics of sites, such as smaller, town centre developments?
- Q4. What is the justification for encouraging proposals that incorporate a higher proportion of houses than recommended in the SHMA? Is Policy SP19 justified and consistent with the evidence base in this regard?
- Q5. What is a dwelling house "suited to modern living requirements" for the purposes of Policy SP19? Is this sufficiently clear to decision-makers, developers and local communities? Is the policy effective?
- Q6. In what circumstances might there be conflict between the Local Plan and the Cliftonville DPD as expressed in Policy SP19?

Issue 2 – Provision of Affordable Housing – Policy SP20

- Q1. What is the justification for requiring at least 30% of dwellings to be affordable on all qualifying sites? Is the requirement consistent with, and justified by, the evidence contained in the *Thanet District Council Local Plan and CIL Viability Assessment*?
- Q2. What affect will the requirement for proposals to provide 30% affordable housing have on the deliverability of housing, especially for proposals on previously developed land?
- Q3. Is it clear to decision-makers, developers and local communities under what circumstances a lower amount of affordable housing is acceptable?
- Q4. What is the justification for the proposed affordable housing split in Policy SP20? What is this based on, and will it be appropriate for all qualifying development proposals across the District?

Issue 3 – Housing Standards – Policies QD04 and QD05

- Q1. The PPG⁶ states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. In doing so local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Has this been carried out? What is the justification for the standards in Policies QD04 and QD05?

⁶ Ref ID 56-002-20160519

- Q2. The PPG⁷ also states that local planning authorities should consider the impact of using optional Building Regulation requirements and the nationally described space standard as part of their Local Plan viability assessment. Has this been carried out? Have the standards in Policies QD04 and QD05 been tested to ensure that new residential development will remain viable?
- Q3. Is it clear to decision-makers, developers and local communities what proportion of affordable dwellings need to be wheelchair accessible? Is the policy effective in this regard?
- Q4. Is Policy QD05 consistent with guidance contained in the PPG, which makes the distinction between wheelchair accessible dwellings (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable dwellings (a home that can be easily adapted to meet the needs of a household including wheelchair users)?

Issue 4 – Accommodation for Gypsy and Travelling Communities – Policy HO22

- Q1. The SHMA (paragraphs 8.75-8.77) refers to the *East Kent Gypsy, Traveller and Showpeople Accommodation Assessment* (2014) which concluded that that there was no need for any residential pitches. Does the assessment provide a robust and up-to-date assessment of need in the District that is consistent with national guidance and policy?
- Q2. How has the situation changed in Thanet since publication of the East Kent Assessment? Has there been any increase in unauthorised developments? If so, what does this demonstrate?
- Q3. Based on the 2014 Assessment, the Plan does not make any specific provision for Gypsy, Traveller or Travelling Showpeople accommodation. Is this appropriate and justified by the evidence? Will the Plan make suitable provision for accommodation to meet the need for gypsy and traveller communities?
- Q4. Are the criteria for determining planning applications in Policy HO22 justified, clear and appropriate? Is the policy effective?

Issue 5 – Care and Supported Housing – Policy HO20

- Q1. Is the reference to "good quality accommodation" in Policy HO20 sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

Issue 6 – Non Self-Contained Residential Accommodation - Policy HO21

- Q1. What is the justification for the thresholds provided in Policy HO21? Is the policy supported by appropriate local evidence?

Issue 7 – Residential Use of Empty Property – Policy HO23

- Q1. What is the justification for Policy HO23?
- Q2. What are the reasons for only supporting the residential re-use of buildings in the urban areas and villages? Is the policy consistent with paragraph 55 of the Framework in this regard?

⁷ Ref ID 56-003-20150327

Issue 8 – Retention of Existing Housing Stock - Policy HO24

- Q1. Does Policy HO24 seek to restrict proposals for the change of use from residential to tourist accommodation? Is this clear to decision-makers, developers and local communities?

Issue 9 – Ancillary Accommodation for a Family Member – Policy HO25

- Q1. What is the justification for requiring ancillary residential accommodation to have a "*functional connection*" with the main dwelling and be in the same ownership?

Issue 10 – Fostering Homes – Policy HO26

- Q1. What is the justification for Policy HO26? Which evidence-based documents support the restriction of foster homes in the Cliftonville West Ward?
- Q2. What are the reasons for restricting foster homes in this location only?
- Q3. Is it clear to decision-makers, developers and local communities what constitutes "*similar facilities*" for the purposes of Policy HO26?

Matter 10 – Economic Development (Policies SP02-SP04 and E01-E03)

Issue 1 – Economic Growth – Policy SP02

- Q1. Is the target of 5,000 additional jobs justified? How has it been calculated, and how much of this will be achieved from development proposals in the Plan?
- Q2. How does this compare to past performance?
- Q3. How does the number of additional jobs planned for correlate to the housing requirement? Are the strategies for housing and economic development aligned?
- Q4. The *Economic Development in Thanet (Employment Land Update and Economic Needs Assessment)* states that the past take-up of employment land averages 10,446 square metres per annum. How is this translated into a forecast for future employment land?
- Q5. Is the use of past take-up rates robust, considering that it covers a post-recession period up to 2016?
- Q6. The *Economic Development in Thanet (Employment Land Update and Economic Needs Assessment)* concludes that based on past trends and labour supply calculations, the land supply to be planned for should be 15 hectares. In contrast, Policy SP02 plans for 53.5 hectares of employment land. What is the justification for this difference?
- Q7. What are the implications of this? If taken up, will there be enough housing to support the development of allocated sites? Will there be an appropriate balance between workers and homes?
- Q8. *What provision does the Plan make to support creative industries across Thanet? Is the Plan consistent with paragraph 21 of the Framework in this regard which seeks to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries?***

Issue 2 – Land Allocated for Economic Development – SP03

- Q1. How were the allocated sites identified? What factors were considered in deciding whether to allocate sites under Policy SP03?
- Q2. Were any other locations considered as suitable alternatives?
- Q3. How much land is available at each of the four allocated sites, and are they developable within the plan period?
- Q4. Paragraph 6.8 of the *Economic Development in Thanet (Employment Land Update and Economic Needs Assessment)* concludes that Thanet Reach South should no longer be allocated for employment purposes. How does it differ from Thanet Reach North?
- Q5. What is the justification for restricting development to Use Classes B1, B2 and B8 at Manston Business Park and Hedgend Industrial Estate, but having a more flexible approach elsewhere?

- Q6. Is it clear to decision-makers, developers and local communities what uses will be permitted at Eurokent and the Thanet Reach Business Park? Is the policy effective in this regard?

Issue 3 – Retention of Existing Employment Sites – Policy E01

- Q1. Is Policy E01 consistent with paragraph 22 of the Framework which states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose?
- Q2. Is it clear to decision-makers, developers and local communities how proposals for alternative uses of land and buildings on the sites listed under Policy E01 will be considered?
- Q3. What is the list of sites under Policy E01(2) based on?
- Q4. How will decision-makers, developers and local communities consider development proposals which involve existing employment land and buildings not listed under Policy E01(2)?
- Q5. What policies support proposals for economic development on non-allocated, windfall sites? Does the Plan include specific criteria for decision-makers, developers and local communities to follow?

Issue 4 – Home Working – Policy E02

- Q1. In what instances might a proposal for home working require planning permission? Is it clear to decision-makers, developers and local communities when Policy E02 might apply?
- Q2. Are the criteria sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

Issue 5 – Digital Infrastructure - Policy E03

- Q1. Is it clear to decision-makers, developers and local communities what is required of Policy E03? Is the policy effective?
- Q2. Is Policy E03 consistent with paragraphs 42-46 which seek to support the expansion of electronic communications networks, including telecommunications and high-speed broadband.

Issue 6 - Manston Business Park – Policy SP04

- Q1. What is the justification for allocating over 40 hectares of land at Manston Business Park? Will there be a demand for the allocated land over the plan period? If so, what evidence supports this?
- Q2. What is the justification for requiring development proposals at Manston Business Park to be accompanied by a Transport Assessment and Travel Plan? Is this appropriate for all development proposals, regardless of size?
- Q3. In deciding to allocate the site for employment uses how have the cumulative effects of additional development on the local and strategic road network been considered?

Issue 7 – Manston Airport

- Q1. What is the justification for including reference to Manston Airport alongside policies related to the allocation of employment land? Are paragraphs 1.38-1.45 intended to represent supporting text to Policy SP04?
- Q2. What is the status regarding the proposed Nationally Significant Infrastructure Project? How does its timescales align with the Local Plan Examination?
- Q3. What are the implications for the Plan should the Development Consent Order be approved?
- Q4. What are the implications for the Plan should the Development Consent Order be refused?
- Q5. If a Local Plan Review is required, is it clear to decision-makers, developers and local communities when this would happen? Is there a clear mechanism to ensure a timely review of the Plan, which currently refers to a 'minimum' period of 2 years?
- Q6. Is it clear how a decision-maker would react to a proposal for new development at Manston Airport prior to a review of the Plan?
- Q7. What is the justification for paragraph 1.44? If a Development Consent Order for aviation use is granted, what "*housing land supply provisions*" would need to be reviewed and why?
- Q8. What are the implications of The Town and Country Planning (Manston Airport) Special Development Order 2019 No. 86 on the soundness of the submitted Local Plan and its strategy for the airport?

Matter 11 – Tourism (Policies E07-E14)

Issue 1 – Serviced Tourism Accommodation – Policy E07

- Q1. How will decision-makers, developers and local communities determine whether proposals for tourist accommodation are "*well related to existing built development*"? Does this apply in the main built-up areas or across the District? Is the policy effective?
- Q2. Is the Plan consistent with paragraph 28 of the Framework which, amongst other things, states that plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas?
- Q3. What impacts does Policy E07(1) seek to avoid? Is the policy sufficiently clear? Is it effective?

Issue 2 – Self-Catering Accommodation – Policy E08

- Q1. What is the justification for requiring proposals for self-catering accommodation to be well related to the primary and secondary road network? Is this requirement clear to decision-makers, developers and local communities? Is it effective?
- Q2. What is the justification for requiring proposals to be capable of being extensively landscaped? Is this necessary for all development proposals, regardless of size or location?
- Q3. What are the reasons for requiring new tourist accommodation to mitigate the impacts of recreational disturbance on nature conservation sites (Policy E07), but not new self-catering accommodation?

Issue 3 – Protecting Existing Tourist Accommodation – Policy E09

- Q1. How has the threshold of 10 or more bedrooms been determined in Policy E09? What is it based on and is it justified?
- Q2. How will decision-makers, developers and local communities determine when Policy E09 applies? What constitutes "*high quality*" tourist accommodation for this policy?
- Q3. What is the justification for requiring evidence of occupancy rates over a period of 3 years, in addition to marketing, to demonstrate that the accommodation is not viable?

Issue 4 – Beaches – Policies E10, E11 and E12

- Q1. What is the rationale and justification for identifying major holiday beaches (Policy E10) separately from intermediate beaches (Policy E11)?
- Q2. Does the Plan provide enough detail to clarify to decision-makers, developers and local communities what type of development is permitted and where? Are Policies E10-E12 effective?
- Q3. What is the justification for restricting new built facilities on undeveloped beaches (Policy E12)? Under what 'exceptional event' may development be considered acceptable? Is this sufficiently clear to decision-makers, developers and local communities?

Issue 5 – Language Schools – Policy E13

- Q1. What is the justification for Policy E13? Will the criteria be effective in seeking to meet its aims and objectives?

Issue 6 – Quex Park – Policy E14

- Q1. What is the justification for requiring development proposals at Quex Park to be accompanied by a transport assessment? Is this appropriate for all development proposals, regardless of size?
- Q2. In considering a proposal for new development how would a decision-maker consider the setting of relevant heritage assets at Quex Park?

Matter 12 – Town and District Centres (Policies SP06-SP10 and E04-E06)

Issue 1 – Thanet’s Town Centres - Policy SP06

- Q1. What criteria have been used to determine the hierarchy of centres? Does this relate to the size and existing provision within settlements?
- Q2. Is the hierarchy of centres justified and clear to decision-makers, developers and local communities? Are the town centre boundaries illustrated on the policies maps for Westwood, Margate, Ramsgate and Broadstairs?
- Q3. Is the Plan consistent with paragraph 23 of the Framework which, amongst other things, states that Local Plans should define the extent of town centres and primary shopping areas?
- Q4. Is Westwood identified as a centre at the top of the retail hierarchy? If so, what is the justification for this?
- Q5. Is the retail strategy (set out in paragraph 2.10 of the Plan) to retain Thanet’s market share of retail expenditure in the sub region, and not increase it, the most appropriate strategy for the area? Is it justified by appropriate available evidence?
- Q6. What are the figures in Table 1 based on? Are the figures for convenience and comparison goods accurate and robust? Are the figures net or gross?
- Q7. What is the justification for stating that the quantitative level of retail need should be regarded as a ‘guide’ rather than a ‘target’? Does the Plan allocate a range of suitable sites to meet the scale and type of retail needs as required by paragraph 23 of the Framework? How does the Plan ensure that the needs for retail will be met in full and will not be compromised by limited site availability?
- Q8. Does the Plan identify the need for other uses such as leisure, commercial, office, tourism, cultural, community and residential development needed in town centres? How will the need for such uses be met over the plan period, having regard to paragraph 23 of the Framework?

Issue 2 – Westwood - Policy SP07

- Q1. What sites have been identified to meet the need for comparison retail goods at Westwood? How will the identified need be met over the plan period?
- Q2. What is the justification for identifying Primary and Secondary retail frontages at Westwood? Do the frontages reflect the retail role, character and function of the centre at present?
- Q3. What is the justification for requiring development proposals to secure the implementation of the Westwood Area SPD and Westwood Relief Scheme? What progress has been made in developing the SPD and details of the scheme? Should policy SP06 set out more detail as to the content (for example specific objectives or policies) that applications will be expected to comply with to ensure that the policy is clear and effective?
- Q4. Is it clear to decision-makers, developers and local communities what uses will be permitted at Eurokent? Is the policy effective?

- Q5. What is the justification for allocating the site for up to 550 dwellings and 5.45 hectares of land for business uses? What is this based on and is it achievable?
- Q6. What is the justification for requiring development proposals to contribute towards the Local Employment and Training Fund? Is this appropriate for all proposals? Is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy justified and effective?
- Q7. How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?
- 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?
- Q9. What is the justification for requiring an archaeological assessment? How has the effect of the proposed development on nearby heritage assets been considered?
- Q10. What is the justification for allocating land at Thanet Reach as part of a mixed-use development? Is the site deliverable?
- Q11. Is it clear to decision-makers, developers and local communities how much residential development is permitted on the site? Is the policy effective?

Issue 3 – Margate - Policy SP08

- Q1. What is the justification for resisting the loss of existing commercial premises in Margate Old Town? Is the policy justified, effective and consistent with national planning policy?
- Q2. Is it clear to decision-makers, developers and local communities how the Council would consider whether a proposal for new development reduced the attractiveness of Dreamland or its leisure/tourism potential?
- Q3. Should Policy SP08 refer to resilient design, taking account of Margate's coastal location and the need to consider climate change and flooding? Additionally, would a reference to the need for development essential for public safety in the Margate Seafront and Harbour Arm area be justified?
- Q4. Does the Plan adequately define the extent and purpose of the 'Opportunity Sites'? Is it clear to decision-makers, developers and local communities what is required of proposals for new development in these areas?**

Issue 4 – Ramsgate - Policy SP09

- Q1. What is the justification for requiring development proposals to have regard to the emerging *Ramsgate Maritime Plan*? What is the current status of the Maritime Plan and is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?
- Q2. Should Policy SP08 refer to resilient design, taking account of Ramsgate's coastal location and the need to consider climate change and flooding?

- Q3. What are the reasons for not referring to heritage considerations in Policy SP09, such as the Heritage Action Zone in partnership with Historic England? Is this referred to elsewhere within the Plan?

Issue 5 – Broadstairs - Policy SP10

- Q1. What is the justification for resisting the loss of existing commercial premises along the Broadstairs Promenade and Beach Front? Is the policy justified, effective and consistent with national planning policy?
- Q2. Should Policy SP08 refer to resilient design, taking account of Broadstairs' coastal location and the need to consider climate change and flooding?

Issue 6- Primary and Secondary Frontages - Policy E04

- Q1. What criteria have been used to determine the primary and secondary frontages? Are they justified and clear to decision-makers, developers and local communities?
- Q2. What is the justification for the extent of the secondary frontages in the coastal town centres?
- Q3. What is the justification for allowing uses falling within Use Classes A1-A5 throughout primary frontages? Is this consistent with national planning policy?
- Q4. What criteria will be used to determine whether a proposal within a secondary frontage would fragment or erode the frontage to a degree that compromises footfall or undermines the function of the centre? Is the policy sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

Issue 7- Sequential and Impact Tests – Policy E05

- Q1. What are the thresholds in Policy E05 based on? Are they justified by appropriate available evidence?
- Q2. Will it be clear to decision-makers, developers and local communities whether a development proposal is within the urban or rural Area?
- Q3. Is Policy E05 consistent with paragraph 26 of the Framework in requiring impact assessments for proposals for main town centre uses?
- Q4. Is it necessary, effective and justified to largely repeat the requirements of paragraph 26 of the Framework within Policy E05?

Issue 8- District and Local Centres - Policy E06

- Q1. Is Policy E06 consistent with national planning policy in requiring development proposals to meet a local need?
- Q2. What is the justification for restricting development proposals to no more than 1,000 square metres?

Matter 13 – Transport (Policies SP41-SP47 and TP01-TP10)

Issue 1 – Safe and Sustainable Transport – Policies SP41-SP44

- Q1. Is Policy SP43 intended to apply to all proposals for new development, regardless of scale or location? Is the policy effective and consistent with national planning policy?
- Q2. What is the justification for not including reference to electric vehicle charging points in Policy SP43? Is the policy consistent with paragraph 35 of the Framework in this regard?
- Q3. What is the rationale for Policy SP44? Is it clear what is expected of decision-makers, developers and local communities?

Issue 2 – New Railway Station – Policy SP45

- Q1. What is the justification for Policy SP45?
- Q2. Is it clear to decision-makers, developers and local communities where the new station will be located?
- Q3. Is the provision of a new railway station on land to the west of Ramsgate deliverable within the plan period?

Issue 3 – Strategic Road Network - Policies SP46-SP47

- Q1. What is the rationale for Policy SP46? Is it clear what is expected of decision-makers, developers and local communities?
- Q2. What is the status of the Thanet Transport Strategy?
- Q3. What is the justification for safeguarding the routes set out in Policy SP47? Are these routes necessary for the implementation of the growth identified in the plan? If so, what evidence has been prepared to demonstrate that the routes are deliverable within the plan period? Who will be responsible for delivering the necessary highways infrastructure, especially where third-party land is required?
- Q4. How have the costs associated with the highway's improvements been considered as part of the Plan's preparation?
- Q5. Are the safeguarded transport routes shown accurately on the submission policies maps?
- Q6. *How will Regulation 123 of the CIL Regulations apply where five or more separate planning applications provide funding towards the projects referred to in Policies SP46-SP47? Will the new strategic road proposals be effective in mitigating the in-combination effects of additional transport movements and pressure arising from new development in Thanet?***

Issue 4 – Transport Assessments and Travel Plans – Policy TP01

- Q1. What is the justification for Policy TP01?
- Q2. Is it clear to decision-makers, developers and local communities when transport assessments and travel plans will be required? Is the policy effective?

Issue 5 – Walking, Cycling and Public Transport – Policies TP02-TP04

- Q1. What is the justification for having separate policies relating to cycling, walking and public transport? Are they consistent with the Framework's Core Planning Principles which seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling?

Issue 6 – Parking Provision and Traffic Management- Policies TP05-TP10

- Q1. What is the justification for safeguarding land at Vere Road, Broadstairs for use as coach parking?
- Q2. Policy TP06 states that the Council will "refer to" guidance provided in the *Kent Design Review: Interim Guidance Note 3 – Residential Parking* and the *Kent Vehicle Parking Standards 2006 (Appendix C)*. Is it clear to decision-makers, developers and local communities what is required of proposals for new development?
- Q3. Are there circumstances other than those listed in Policy TP06 where a reduced level of provision may be acceptable?
- Q4. Does Policy TP06 take adequate account of the need to provide disabled parking facilities? Is the Plan consistent with paragraph 35 of the Framework in this regard, which, amongst other things, states that Plans should consider the needs of people with disabilities by all modes of transport?
- Q5. What is the justification for Policy TP08? Is the policy effective? How would a proposal for new development within a town centre meet the policy requirements, where opportunities for off-street servicing may be limited?
- Q6. What is the justification for requiring new commercial development proposals to encourage at least 20% of customers at Westwood to arrive by means other than the private car in Policy TP09? What is the figure of 20% based on and how will it be measured? Is the policy effective?
- Q7. *Is Policy TP07 justified, positively prepared, and will the criteria be effective in considering proposals for new development on town centre public car parks?***

Matter 14 – Community Infrastructure (Policies SP01, SP36-SP40 and CM01-CM04)

Issue 1 – Implementation – Policy SP01

- Q1. What is the justification for requiring development proposals to comply with the provisions of the IDP in Policy SP01?

Issue 2 – Community Infrastructure – Policies SP36-SP40

- Q1. What is the justification for allocating land as an extension to the QEQM Hospital under Policy SP37? What effect will this policy have on the Green Wedge in this location?
- Q2. Is it clear to decision-makers, developers and local communities how proposals under Policy SP37 will "*involve the minimum take of fresh land*"? What is the justification for this policy requirement if the land is allocated for an expansion of the hospital?
- Q3.** Is Policy SP37 deliverable within the plan period? ***Does it adequately allow for the continued improvement, expansion, reconfiguration and consolidation of the hospital?***
- Q4. Is it clear to decision-makers, developers and local communities where the new medical centre referred to in Policy SP38 will be provided? How will the medical centre be funded, who will provide it and is the centre deliverable within the plan period? Is Policy SP38 justified and effective?
- Q5. Is it clear to decision-makers, developers and local communities where the new secondary school referred to in Policy SP40 will be provided? How will the new school at Westwood be funded, who will provide it and is the school deliverable within the plan period? Is Policy SP40 justified and effective?

Issue 3 – Provision of New Community Facilities – Policy CM01

- Q1. Is Policy CM01 consistent with paragraph 70 of the Framework which, amongst other things, states that planning policies should plan positively for community facilities?

Issue 4 – Protection of Existing Community Facilities – Policy CM02

- Q1. Is Policy CM02 consistent with paragraph 70 of the Framework which, amongst other things, states that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs?
- Q2. What is the justification for requiring proposals for new development to meet criteria 1) to 3) inclusive?
- Q3. What is the justification for providing additional requirements in the supporting text to Policy CM02? Is it clear what will be required of applicants for planning permission?

Issue 5 – Expansion of Margate and Minster Cemeteries – Policies CM03-CM04

- Q1. What is the justification for Policies CM03 and CM04? How will the expansions be funded and who will provide them? Are the policies effective?

Matter 15 – Green Infrastructure and Open Space (Policies SP22-SP24, SP29-SP32 and GI04-GI07)

Issue 1 – Landscape Character – Policies SP22-SP23

- Q1. What is the justification for the green wedges referred to in Policy SP22?
- Q2. How were the green wedges identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?
- Q3. Are the green wedges justified, effective and consistent with national policy? Are there any significant factors that indicate that sites should not have been designated?
- Q4. Is the approach in Policy SP22 to “*protect areas of open countryside*” consistent with national planning policy in the Framework?

Issue 2 – Landscaping and Green Infrastructure – Policies SP24 and GI06

- Q1. What is the justification for listing types of Green Infrastructure in paragraph 4.36? Is this a policy requirement that proposals will be expected to provide? If so, should it be a specific policy requirement? Is the policy effective?
- Q2. What is the justification for requiring a landscape survey under Policy GI06 for all development proposals that require a design and access statement?
- Q3. What is the justification for requiring developers to demonstrate that adequate arrangements have been made to ensure the continued maintenance of landscaping? Is this necessary for all development proposals, and how have the costs associated with this requirement been taken into account?

Issue 3 – Protection of Open Space and Playing Fields – Policy SP29 and GI05

- Q1. Are policies SP29 and GI05 consistent with the criteria set out in paragraph 74 of the Framework?

Issue 4 – Local Green Space – SP30

- Q1. How were areas of Local Green Space identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?
- Q2. Are the Local Green Spaces consistent with paragraphs 76-77 of the Framework which state that such designations should only be used:
 - Where the green space is in reasonably close proximity to the community it serves;
 - Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - Where the green area concerned is local in character and is not an extensive tract of land.

Issue 5 – Open Space, Parks, Gardens, Recreation Grounds and Allotments – Policies SP31-SP32 and GI04

- Q1. What is the justification for requiring development proposals of 50 dwellings or more to provide natural and semi-natural green spaces in Policy SP31? What is the threshold based on? Will the policy requirement be achievable on all qualifying sites?
- Q2. Policy SP31 requires proposals to meet the requirements in “Table 7” – where is this set out in the Plan?
- Q3. What is the justification for Policy SP32? How will decision-makers determine whether the need to protect the allotments is outweighed by the overriding need for a development?
- Q4. Subject to meeting the first part of Policy SP32, what is the justification for also requiring alternative provision to be made? What criteria would need to be considered in providing alternative provision nearby?
- Q5. What are the standards in Policy GI04 based on? Are they justified and supported by appropriate available evidence?
- Q6. Have the cost implications of Policy GI04 been considered as part of the Plan’s preparation? What impact would the policy requirements have on the viability of new residential development?
- Q7. What is the justification for requiring developers to fund the ongoing maintenance and management of amenity and play areas? Is this appropriate for all development proposals, regardless of type, scale or location?

Issue 6 – Jackey Bakers – Policy GI07

- Q1. What is the justification for requiring ancillary development at Jackey Bakers to be justified, and subsidise the sports use?
- Q2. Is it clear to decision-makers, developers and local communities what the policy expects of proposals for new development? Is the policy effective?

Matter 16 – Design, Heritage and the Rural Economy (Policies QD01-QD03, QD06-QD07, SP33-SP34, HE01-HE05, HO19 and E15-E19)

Issue 1 – Design – Policies QD01-QD03, QD06-QD07 and SP33

- Q1. Is it clear to decision-makers, developers and local communities what constitutes the "*most recent government guidance*" for the purposes of Policy QD01? Is the policy effective?
- Q2. Is it necessary and effective to have a policy requiring development to accord with Building Regulations?
- Q3. What is the justification for requiring residential development on garden land to make a positive visual impact to an area in Policy QD02? Is this consistent with the requirements in Policy HO1?
- Q4. Does Policy QD02 provide an appropriate policy framework to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion? As submitted is the policy consistent with paragraph 58 of the Framework?
- Q5. Does the Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 of the Framework?
- Q6. Policy QD03(3) requires the provision of private or shared external amenity/play space in new residential development. Is this suitably flexible to take account of circumstances where this may not be possible, such as the conversion of an existing building or where shared amenity space will be provided on site?
- Q7. What is the justification for requiring bin storage facilities within 15 metres from where the collection vehicle will pass in Policy QD03(4)? Is the policy justified and effective?
- Q8. What is the justification for requiring an independent design review for proposals under Policy SP33? Will it be sufficiently clear to decision-makers, developers and local communities when such a review will be required?

Issue 2 – Conservation of the Historic Environment – Policies SP34 and HE01-HE05

- Q1. What does Policy SP34 require of proposals for new development?
- Q2. Is Policy HE03 consistent with paragraph 135 of the Framework which states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining planning applications. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset?
- Q3. Is Policy HE04 consistent with national planning policy, having particular regard to its approach to historic parks and gardens, whether or not they are included on the statutory list?

Issue 3 – The Rural Economy – Policies HO19 and E15-E19

- Q1. Is it clear to decision-makers, developers and local communities what is required to demonstrate that agricultural units are 'viable' in Policy HO19? Is the policy effective?
- Q2. Is Policy HO19 consistent with paragraph 55 of the Framework which refers to the essential need for a rural worker to live permanently at or near their place of work in the countryside?
- Q3. What is the justification for requiring development proposals for economic development to be located in "*sustainable locations*" in Policy E15? How will decision-makers, developers and local communities determine what constitutes a sustainable location? Is the policy effective?
- Q4. What is the justification for requiring development proposals to accord with criteria 1-6 in Policy E16?
- Q5. What is the justification for restricting development proposals that would result in the "*irreversible loss*" of best and most versatile agricultural land in Policy E17?
- Q6. Is Policy E17 consistent with paragraph 28 of the Framework which, amongst other things, states that local plans should promote the development and diversification of agricultural and other land-based rural businesses?
- Q7. Is Policy E18 consistent with paragraph 112 of the Framework relating to the use of best and most versatile agricultural land?
- Q8. Is Policy E19 consistent with paragraph 28 of the Framework which, amongst other things, states that local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings?

Matter 17 – Biodiversity and Geodiversity (Policies SP25-SP28 and GI01-GI03)

Issue 1 – Biodiversity and Geodiversity Policies SP25-SP28 and GI01-GI03

- Q1. Are Policies SP25-SP28 consistent with paragraph 113 of the Framework which states that local planning authorities should set criteria-based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged?
- Q2. Do Policies SP25-SP28 make distinctions between the hierarchy of international, national and locally designated so that protection is commensurate with their status and give appropriate weight to their importance and the contribution that they make to wider ecological networks?
- Q3. Does the Plan include policies which plan for biodiversity at a landscape-scale, including across local authority boundaries as required by paragraph 117 of the Framework? Does the Plan identify and map components of ecological networks, including wildlife corridors and stepping stones that connect them?
- Q4. Is it clear to decision-makers, developers and local communities how any habitat loss and/or mitigation will be determined to ensure that proposals for new development secure net gains in biodiversity?
- Q5. Does Policy SP25 reference the correct Regulations?
- Q6. Is it the wording of Policy SP27 clear as to whether the need for ecological surveys applies to all sites? Is the policy effective?
- Q7. Is the information contained in diagram 1 (Chapter 12) regarding designated sites accurate?
- Q8. Will Policy GI01 deliver real gains in biodiversity in the area over the plan period? Is the policy effective and consistent with national policy?
- Q9. Unlike policy GI02, policy GI01 does not contain a specific reference to new developments including measures to enhance and improve connectivity to designated sites. Why is there a different approach to Nationally and Locally Designated Sites in this regard? Is the policy justified?
- Q10. Unlike Policies GI01 and GI02, Policy GI03 does not include a reference to permitting development if the need outweighs the importance of the designated site. Why is the approach different? Is this policy justified?

Matter 18 – The Environment and Climate Change (Policies SP35, CC01-CC07 and SE01-SE08)

Issue 1 – Climate Change – Policy SP35

- Q1. Is it clear to decision-makers, developers and local communities what is required of proposals for new development under Policy SP35? Is the policy effective and how does it relate to the more specific policies on climate change in Chapter 15 of the Plan?

Issue 2 – Flooding – Policies CC01-CC03

- Q1. Is Policy CC01 consistent with paragraphs 100-102 of the Framework regarding when the Sequential and Exception tests should be required? Should the policy also take account of surface/groundwater flooding?
- Q2. How does the Plan consider the multi-functional benefits of Sustainable Urban Drainage Systems ('SUDS'), such as the provision of amenity and biodiversity benefits?
- Q3. What is the justification for the threshold distance of 40m in Policy CC03? Is it clear to decision-makers, developers and local communities when this policy applies? Will it be effective?
- Q4. Does Policy CC03 ensure that new development proposals take account of natural habitats and how they might respond to coastal change?
- Q5. *Is it clear to decision-makers, developers and local communities when Flood Risk Assessments will be required? Should Policy CC01 also refer to sites over 1 hectare in size in Flood Zone 1?***

Issue 3 – Renewable Energy – Policies CC04-CC07

- Q1. What is the justification for requiring major new development proposals to include renewable energy or micro-generation equipment? Is it clear to decision-makers, developers and local communities what is expected of proposals for new development?
- Q2. How does Policy CC04 take account of circumstances where the provision of renewable energy or micro-generation equipment may not be appropriate, feasible or viable?
- Q3. What is the justification for requiring the provision of an Energy Statement in Policy CC05?
- Q4. Is Policy CC06 consistent with national planning policy and guidance, and how will it ensure that new development proposals take account of any effects on the Thanet Coast SPA and Ramsar site in particular?
- Q5. How will development proposals for wind turbines be considered under the policies contained in the Plan? Is the Plan consistent with national planning policy in this regard?
- Q6. What is the justification for Policy CC07? Is clear to decision-makers, developers and local communities where the policy applies to?
- Q7. Does Policy CC07 require applicants to consider impacts other than on sites of nature conservation value, such as heritage assets? Is the policy effective in this regard?

Issue 4 – Contamination and Pollution – SE01-SE08

- Q1. Are policies SE01-SE03 consistent with paragraph 109 of the Framework which, amongst other things, states that the planning system should contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate?
- Q2. How will Policy SE04 ensure that development proposals involving piled foundations take account of the risks of ground disturbance that may cause turbidity in the water supply, potentially resulting in contamination reaching groundwater beneath any sites impacted by contamination and/or landfill?
- Q3. Is it necessary for Policy SE04 to refer to the provision of water supply or foul drainage in a timely manner to ensure that it is effective, and that new development is not unduly delayed?
- Q4. Is it sufficiently clear to decision-makers, developers and local communities what is required to meet Policy SE05 with regard to promoting the use of sustainable low emission transport? Is the policy effective?
- Q5. How have the cumulative effects of the development proposed in the Plan on air quality been considered as part of the evidence-base? Where necessary is it clear to decision-makers, developers and local communities what mitigation will be required?
- Q6. Is it clear to decision-makers, developers and local communities where the Important Areas in the Noise Action Plan are located? Is Policy SE07 effective?
- Q7. What constitutes a "*large development*" for the purposes of Policy SE08? As submitted is the policy effective?
- Q8. What is the justification for referring to the Institute of Lighting Professionals Standards in Policy SE08? Is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?