



LAND NORTH AND SOUTH OF SHOTTENDANCE ROAD

Stage 1 Thanet Local Plan
Matters, Issues and Questions
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1.0 Introduction

- 1.1 This submission is made for and on behalf of Mr Christian James Martin concerning Matter 5 (Strategic Sites Policies SP13-SP18 and HO2).
- 1.2 The submission is made with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions (CD 8.4)* and supplements the representations lodged with Thanet District Council on the *Local Plan to 2031 Publication Stage* (October 2018). The two should be read together.
- 1.3 This submission is concerned with Matter 5 and in particular:
- Issue 8, Questions Q1-Q13;
- 1.4 The current draft allocation which will become a strategic allocation in the adopted Local Plan has been formed in two stages:
- 1) The land allocated to the south of Shottendane Road was included in the Proposed Revisions to the Local Plan – Consultation Document (January 2017). A new policy was introduced which allocated this parcel of land within Section 10 of the document. It was allocated for up to 250 dwellings at a maximum density of 35 dwellings per hectare. The wording of the policy made specific reference to other draft policies with regards to ecological mitigation, transport etc....
 - 2) The Call for Sites exercise of 2018 on page 9 included the land to the north of Shottendane Road and the capacity given was 364 dwellings based on 35 dwellings per hectare (as per the south parcel) with a site area of 10.41ha.

Question 1 – 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?

- 1.5 The Site boundary has been defined based on the site's ownership and physical characteristics. Both parcels of land are wholly and singularly within the legal ownership of our client Mr Christian James Martin.
- 1.6 Both parcels of land are clearly demarcated by natural and hard boundaries which contain the land in a logical manner. Taking each parcel of land in turn. The parcel to the south is sandwiched in between Shottendane Road to the north-west and Manston Road to the south-east. To the north-east the land abuts an existing residential development whilst to the south-west the boundary is formed by a natural hedgerow. The southern parcel is therefore a clearly defined, contained and easily accessible site making it a logical residential development site and strategic allocation.
- 1.7 The second land parcel to the north of Shottendane Road boasts similar characteristics. This borders two carriageways, to the south-east (Shottendane Road) and north-east (Hartsdown Road) respectively. The south-western and north-western boundaries are clearly demarcated by mature and established hedgerows interspersed by supplementary tree screening which is most prevalent on the north-western boundary close to Hartsdown Road and along the south-western boundary.
- 1.8 In similar fashion to the southern parcel, the northern site is also a clearly defined, contained and easily accessible site making it a logical residential development site as a strategic allocation.
- 1.9 This statement is further supported by a full and comprehensive legal report on the titles for both parcels of land undertaken by Blake Morgan. This concludes that our client, Christian James Martin, holds good and marketable title to the whole property. We can confirm that title to the property is registered with title absolute at HM Land Registry – being the best class of title available in the UK and amounting to a state title guarantee.
- 1.10 The legal report identifies all covenants and third-party rights which are limited and standard. We are pleased to confirm therefore that there is no legal issue prevalent which could delay or frustrate the site from coming forward.

Question 2 - 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?

Question 3 - What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?

- 1.11 Without prejudice to the questions asked, we consider that Question 2 and Question 3 are both related and should be treated together rather than as sperate issues.
- 1.12 The SHLAA dated July 2018 (**CD4.4**) sets out that a general density of 35 dwellings per hectare has been applied to most strategic allocation sites, with this figure being adjusted (lower/higher) dependant on the market demand, housing type/characteristics/accessibility etc.
- 1.13 The density figure is widely accepted within local plans as including a maximum density within the Draft Local Plan Policy ensures that the allocation is developed as efficiently as possible. Section 6 of the NPPF 2012 which is a material consideration to the draft Local Plan, states at paragraph 47 bullet point 5 that local planning authorities should '*set out their own approach to housing density to reflect local circumstances*'.
- 1.14 It is this density which has then been applied to the site area to provide a figure of up to 550 dwellings. The actual number of dwellings that can be accommodated on the site is more but a figure of up to 550 allows the site to provide for physical infrastructure such as the road link required through the southern allocation to connect Shottendane Road and Manston Road as set out within the District Transport Plan 2018 (**CD 6.1**).
- 1.15 The figure of up to 550 dwellings based on a maximum density of 35 dwellings per hecate is fully justified and supported. The NPPF does not require Local Plans to specifically have a policy on housing densities; but to set their own approach based on local circumstances.
- 1.16 The figure of up to 550 dwellings is an achievable figure based on the market demand, the demand for housing and the appropriate density level. Our response to Question 13 sets out the delivery rates of the proposed allocation.

Question 4 - 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?

- 1.17 It is clear to decision-makers, developers and local communities what is required of the masterplan and the development brief. These two documents will fully complement each other in order to inform the final planning application(s).
- 1.18 The development brief will be the document that sets out the requirements of the adopted Local Plan and will be specific in this instance to Draft Local Plan Policy HO2 – land north and south of Shottendane Road. The Development Brief will reflect the Local Plan policies on design, transport and highways, ecological mitigation, open space and type, housing mix and tenure requirements, affordable housing and other relevant adopted Local Plan policies and guidance documents.
- 1.19 The development brief will shape the policy context of what the site needs to deliver and why, together with the overall vision of the final development.
- 1.20 The masterplan will be fed from the development brief and this will illustrate the site layout/design within the context of the development brief. The masterplan will be an approved document by the Council which will set out the broad areas for development as well as the allocation of where open space, community facilities, roads and connections, and mitigation/green buffers will be located.
- 1.21 Draft Local Plan Policy HO2 sets out that the masterplan should be informed by a transport assessment and travel plan with measures to provide multi-modal access, as well as providing highway improvements as identified in the Thanet Transport Strategy. The Draft Local Plan Policy HO2 also clearly sets out what the masterplan will overall need to cover for both parcels as well as setting out issues specific to each parcel.
- 1.22 The masterplan will also be informed by other work in addition to that set out in the Draft Local Plan Policy HO2 such as landscape and visual assessments, surface water drainage, ecology etc... these are not set out specifically in the Draft Policy, but they will have to be undertaken and are not required to be included at the Local Plan level. Without a suite of assessments/report the masterplan will not be of any value and will not gain the support of decision makers and the local community.
- 1.23 This approach is essentially ‘front-loading’ (NPPF 2012 paragraph 188) the planning process by engaging decision makers, developers and the local community early on in the masterplan process, rather than undertaking public consultation as part of the application process, at which point it can be too late to make any significant amendments to layout/designs.

- 1.24 The NPPF at paragraph 59 supports the use of design codes to guide development and deliver high quality development. These should not be too descriptive, but provide the framework for overall scale, landscape, height and layout. This is precisely what the design brief together with the masterplan will achieve.
- 1.25 Paragraph 154 of the NPPF 2012 clearly states that Local Plans should be aspirational but also be able to realistically deliver. Opportunities for development should be clearly set out and have clear policies which sets out what will and will not be permitted. Policies that *“provide a clear indication of how a decision maker should react to a development proposal should be included in the plan”*.
- 1.26 The policy is both clear and effective and will deliver a comprehensive set of guidelines for detailed planning application(s) to be submitted against and provide decision-makers, developers and the local community with a clear set of criteria in which to determine the application(s) against.

Question 5 - 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?

- 1.27 The early stage modelling work, undertaken by Kent County Council (KCC), is at the appropriate level of assessment for the consideration of impacts and mitigation at this stage of the process. This work is reported in KCC's Technical Note – Strategic Site Allocations Impact (CO04300697/TN-01 Revision 02), submitted as part of the Local Plan Evidence Base but listed as confidential.
- 1.28 As the site progresses through the planning process, more detailed assessment work will be undertaken in the form of a Transport Assessment (TA). The preparation and submission of a TA (together with a Travel Plan) is a policy requirement in Draft Local Plan Policy HO2. This is entirely appropriate. The specifics of the Policy require that the TA includes an assessment of the impact on the local road network. An assessment of all modes of travel will be undertaken and site-specific mitigation measures will be outlined in a costed site transport strategy.
- 1.29 The local transport impacts will be assessed using site specific calculations and also extracting future year base flows and traffic assignment/distribution information from KCC's SATURN model. The precise scope of the TA and TP will be agreed formally with KCC.
- 1.30 The effect of the development on the local road network has therefore been taken into account in KCC's network modelling and within the Draft Transport Strategy (**CD 6.1**). The strategic mitigation measures have taken into account the development and the cumulative impacts from other development sites and SDLs.
- 1.31 It is proposed that there will be two main points of access to both the northern and southern parcels of the site. These are illustrated in principle in Figure 21 of the Draft Transport Strategy (**CD 6.1**) (which also illustrates the supporting highway links and mitigation).
- 1.32 It is considered that a roundabout on Shottendane Road will be able to serve both the north and south parcels of the site(s). The land on either side of Shottendane Road is within the landowners control or within the existing adopted highway and there are therefore no third-party requirements or constraints to delivery.
- 1.33 The northern parcel of the allocation will provide a link to Hartsdown Road (B2052). Due to the nature of the existing highway it is likely that a priority junction with right turn

facilities could provide a suitable and adequate access to the site in the north east. This is subject to detailed design considerations but there are no landownership barriers to the delivery of this junction.

- 1.34 The southern site can also provide an access onto Manston Lane; the precise form of this junction will be assessed but this is also likely to be in the form of a priority junction. The design will take into account its role and function in the future highway network and existing points of access, such as to the cemetery.
- 1.35 Together, the accesses and routes through the development sites (north and south) form part of the Inner Circuit Improvement Strategy (ICRIS); this strategy is included in Section 9 of the Draft Transport Strategy. The sites will assist in the delivery of the ICRIS and the access points and inner highway network will be consistent with it.
- 1.36 Initial scheme costs are also included within the Infrastructure Delivery Plan (IDP) and the Draft Transport Strategy. It is recognised that the IDP requires further refinement but the information within it allows initial calculations to be made. Costs and phasing of delivery (and costs) needs to be determined at the next stage of the planning process.
- 1.37 Discussions have also been held with KCC and the developers/promoters of the SDL sites in respect of the modelling and highway mitigation measures. A method of apportionment of the strategic costs is proposed and set out to ensure an equitable split of the key highway costs and the delivery of the ICRIS, this is set out in the Strategic Site Allocations Impact report.
- 1.38 Not all costs have been determined at this stage but the per dwelling costs established at this stage can be used in the overall viability assessments.
- 1.39 The viability is unknown at this stage as the masterplan has to be fully developed. Draft Local Plan Policy HO2 is based on a total provision of up to 550 dwellings. However, the refinement of the masterplan, taking into account all constraints will impact on the total level of housing that can be delivered on site. This will also impact on overall viability and the total level of mitigation required. Detailed costs and contributions have to be determined, taking into account any variation in housing numbers.
- 1.40 The Draft Transport Strategy (**CD 6.1**) considers funding sources within Section 12. These funding sources also include external funding (such as those available to assist in housing delivery from Central Government via the DfT for instance). Due to the strategic nature of the highway mitigation measures and the relationship with housing delivery and economic uplift it is considered that by joint working with KCC and the other SDL sites that access to these funds will be favourable.
- 1.41 S106 payments will be used to fund some of the key infrastructure projects. It should also be noted that the alternative method of delivering transport infrastructure is via planning obligations; the Draft Transport Strategy notes the use of S38/S278 Agreements (under the Highways Act 1980). This would be appropriate for the delivery of some of the highway infrastructure associated with the proposed allocation.

- 1.42 The above factors (external funding, use of S106 or S38/S278) will all need to be considered and taken into account in the viability assessments at the appropriate stage. However, the measures set out in the Transport Strategy and those costed in the IDP are deliverable based on KCC's apportionment across the SDL sites; together with contributions from smaller sites.

Question 6 - 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?

- 1.43 The objective of the link is to provide a dual function of serving the development and providing access to the housing (including for buses) but also providing an alternative highway link and route to avoid the B2052 – Coffin House Corner junction.
- 1.44 The above junction is described in the Draft Transport Strategy (**CD 6.1**) as one of the busiest junctions in the District. It is the intersection between four important local routes. There are a number of schools adjacent to it and the area is subject to on-street parking. It also results in extended delays at the Manston Road to Shottendane Road junction which also serves a number of key local destinations. Due to the nature of the junction and the availability of land it is very difficult to provide additional highway capacity at the junction. The provision of an alternative route will provide relief to the junction and allow for safety improvements to be carried out. The route through the allocation relieves pressures from a known and reported congestion and safety ‘hotspot’.
- 1.45 The Draft Transport Strategy (**CD 6.1**) reports on the new link between Hartsdown Road and Manston Road and the benefits it delivers. The Draft Local Plan Policy HO2 requirements are consistent with this strategy. The link will also allow Shottendane Road to be made into a cul-de-sac; allowing the highway to achieve optimal capacity and to improve highway safety.
- 1.46 A high level of modelling and appraisal has been conducted which sets out the benefits of this link as part of the overall ICRIS mitigation strategy. The Coffin House Corner junction is listed as one of the worst three junctions in the District with major constraints. The provision of a better quality, alternative route will result in significant highway benefits.
- 1.47 The costs of this link will be subject to a number of factors and at this stage only a very indicative cost could be provided. Issues such as detailed design requirements (standards to be applied – width, inclusion of bus and cycle facilities etc) and other detailed design matters such as ground conditions, topographic position, drainage requirements and the presence of stats and utilities. Including optimisation bias the cost of the link is estimated at around £800,000, excluding junctions.
- 1.48 The cost of providing this infrastructure will be part development cost (as it will provide access to the housing) and also an element of the overall strategic mitigation providing benefit for the District overall. As such it is considered that some of the cost of its provision could be used to ‘discount’ provision of funding under S106 towards the wider highway mitigation. This should be considered within the overall viability calculations.
- 1.49 As a positive mitigation measure its provision is entirely justified and is consistent with the Draft Transport Strategy (**CD 6.1**).
- 1.50 The provision of the link will be commensurate to the delivery of housing and can be provided entirely within the landownership of the northern section of the allocation

without recourse to third party land and hence there would be no barrier to the delivery of this aspect of Draft Local Plan Policy HO2.

Question 7 - 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?

- 1.51 The requirement for 6.23ha of open space to be provided across the parcels is based on the Draft Local Plan's requirement to provide a mix of open spaces in new developments based on the Sport England open space calculator and Fields in Trust standards.
- 1.52 Within the submission version of the Draft Local Plan (**CD1.1**) paragraph 4.67 states that the provision of large open spaces will be delivered through strategic locations as these are most appropriate. This should be considered integral to the masterplanning process for developments as set out in the Open Space Strategy June 2018 (**CD5.14**).
- 1.53 The Open Space Strategy June 2018 (**CD5.14**) identifies that the district has an under provision of all typologies in respect of the Fields in Trust guidelines of 1.8ha per 1,000 population, including natural and semi-natural green space. Draft Local Plan Policy GI01 requires that new residential development will make appropriate provision for amenity green space and equipped play areas to meet the Fields in Trust standards as set out in the Plan. How much and what type of open space will depend on the size of the development, existing provision and the estimated increase in population as a result of the development.
- 1.54 Draft Local Plan Policy SP31 requires developments of 50 dwellings or more to provide natural and semi-natural green space.
- 1.55 The 6.23ha requirement will need to be spread across the two parcels but how this will be split and what type will be set out in the masterplan process which will then feed into any application(s) submitted.
- 1.56 The Draft Local Plan Policy is fully justified and effective as it is based on using an established and accepted set of guidelines and standards, as part of an up to date evidence base which clearly sets out the needs and quality of the existing open space facilities, the deficiencies as well as what additional requirements are needed. This has then been used to calculate how much open space each strategic allocation needs to provide as well as the typologies based on the type and level of development. This fully accords with paragraph 73 of the NPPF 2012, which requires planning policies to be based on robust and up to date assessments of open space needs and typologies.

Question 8 - 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?

- 1.57 It would be difficult for a Draft Local Plan Policy to set out how off-site mitigation will be identified and delivered for the loss of ground nesting bird habitats. It is the role of Local Plan policies to identify and highlight such issues so that the planning application process can suggest solutions and mitigation through required, compulsory reports that would be commissioned, for example, in this instance a full Ecological Survey Report. The lack of suggesting suitable off-site mitigation measures would form part of the ecology brief.
- 1.58 The whole of Thanet District falls within a 6km radius of the Thanet Coast and Sandwich Bay SPA and the whole district is included within the zone of influence and all developments will be subject to the mitigation measures as set out in the SAMM Strategy.
- 1.59 The SAMM tariff applies to all housing developments within the district and will be collected via a S106 payment (Draft Local Plan Policy S26 and **CD 5.5**).
- 1.60 Draft Local Plan Policy SP24 requires developers to respect and where possible to enhance the district's green infrastructure. This can be done by mitigating against the loss of any farm land bird habitats and providing and managing new accessible open space for informal recreation and dog walking.
- 1.61 The Sustainability Appraisal August 2018 (**CD 7.4**) states that its Objective 10 is to improve efficiency in land use through the re-use of previously developed land and existing buildings. This objective cannot be applied to this allocation as development will occur on greenfield, which then requires the need for the provision of mitigation for ground nesting bird habitats.
- 1.62 Draft Local Plan Policy HO2 is effective in making it clear that mitigation will be required which is supported by the Sustainability Appraisal August 2018 (**CD 7.4**). The publication of the Development Brief and the Masterplan for the allocation will also be informed by this need as the provision will need to be understood and factored into any development proposals. Together with this and other Draft Local Plan Policies such as SP24, SP26 and SP27 will all ensure that the ecological mitigation requirements are met on all strategic allocations.

Question 9 - 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?

- 1.63 The improvements identified within the Draft Transport Strategy (**CD 6.1**) are incorporated within the development and will be designed into the masterplan. The site and the draft Local Plan Policy HO2 are entirely consistent with the aspirations of the Transport Strategy (**CD 6.1**). The Infrastructure Delivery Plan also shows what each site should deliver. Not all of the requirements in the IDP are strategic measures and many are localised mitigation.
- 1.64 Both documents will be worked up to ensure consistency and any future planning application(s) for the allocation will be in compliance.
- 1.65 Strategic network modelling has been conducted by Kent County Council and this assesses the mitigation interventions required and seeks to apportion the funding of these measures across the SDLs to ensure an equitable approach to its provision. The District Council need to ensure that a contributions policy which seeks reasonable contributions from other, non-SDL sites is developed.
- 1.66 Kent County Council will be working with the SDL sites in respect of the overall funding and phasing of the delivery of the strategic mitigation measures. The development of this overall strategy approach will ensure that developers will come together to assist in the overall delivery of all sites as well as assisting with any public sector funding bids.
- 1.67 However, if such bids are not forthcoming or some of the SDL sites are not delivered in accordance with the initial phasing programme there is sufficient flexibility within the provision of mitigation that it will not have an adverse impact on the delivery of housing.
- 1.68 As noted in response to Question 6, some of the mitigation measures that form part of the overall strategic mitigation are provided within the ownership of the allocation and/or within the adopted highway and therefore the delivery of the specific measures (link and junctions) are not dependent on others. This is important in respect of providing the link road which provides traffic with an alternative route away from the Coffin House Corner junction. This forms part of the ICRIS and would provide instant benefit not only to the allocation but the base highway network and existing users as well.
- 1.69 Overall, we are supportive of the modelling work and the methodology adopted by Kent County Council in the overall assessment of the SDL sites. Further details will be provided in the next stage of the planning process and in individual TAs for the respective sites. The level of detail provided for the Local Plan is appropriate.
- 1.70 Kent County Council have a long-term strategy for the District. The infrastructure is deliverable and there is a trajectory/programme within the Local Plan. There is sufficient flexibility within the Plan process to enable delivery to continue without impacting on the delivery of housing.

- 1.71 The allocation is deliverable, has control of sufficient land to deliver the key mitigation measures and there are no transport barriers to delivery. The site's contribution to the overall Transport Strategy and provision of the ICRIS can be part satisfied by the delivery of infrastructure on land within the direct control of the site and it is not dependent on the delivery of other sites.

Question 10 - 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?

- 1.72 Margate Cricket Club is located on Hartsdown Road and is adjacent to the easternmost part of the northern allocated parcel. This is the closet sports facility to the site.
- 1.73 Any increase in the local population is going to place additional demands/requirements on community services; either by creating new demands or increasing the demand for existing facilities. Draft Local Plan Policy SP36 clearly sets out that the Council will work with developers and organisations to create new community facilities, safeguard existing facilities, safeguard or provide open space, sport and recreation facilities.
- 1.74 Draft Local Plan Policy 39 also requires that developers ensure the delivery of relevant and sufficient community and utility infrastructure.
- 1.75 The financial costs of providing the improvements to Margate Cricket Club has not been agreed as of yet as it is unknown at this very early stage as to what these will be. This is likely to be a developer contribution as part of a S106 Agreement and will form part a package of measures once planning permission has been granted. However, the Open Space Strategy, Playing Pitch Strategy and Sports Facility Strategy June 2018 Executive Summary (**CD 5.13**) states within Table 1.3 that the current demand for cricket facilities is being met, but there is a need to improve existing cricket facilities in Thanet for use by new residents.
- 1.76 The Infrastructure Development Plan July 2018 (**CD 1.2**) does not set out any costs for the provision of community facilities and these will need to be determined on a case by case basis dependant on what is required.
- 1.77 The justification for improvements is supported by the Local Plan evidence base with specific regards to cricket facilities. It is not justified to require the costs of improvements to be included in any assessment at this stage as until the exact development proposals are known and then the appropriate and related mitigation is provided for as required in paragraph 205 of the NPPF 2012. The requirement for improvements being included in the Draft Local Plan Policy ensures that a key piece of community infrastructure is included as it is identified as being a facility/sport which needs improvements across the district. This is in line with one of the key principles of the NPPF 2012 to *“take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”*
- 1.78 JIG has previous experience of working on other large-scale residential developments where financial contributions were agreed through S106 Agreements for improvements to the local Cricket Club. On those occasions, the contributions were used to facilitate the construction of a new clubhouse/changing facility. The cost of such facilities are not prohibitive and a scheme of up to 550 residential units should be able to absorb financially a meaningful contribution towards a valuable and important community facility. Moreover, we consider the integration of a new residential development and its occupiers with the existing community as being of real importance.

Question 11 - 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?

- 1.79 The Draft Local Plan Policy sets out that there is a need for a Heritage Impact Assessment to be provided as part of any masterplan to assess the impact of the development of the site on St Johns Cemetery (Margate Cemetery) and the listed buildings/memorials within it.

- 1.80 There are 14 Grade II or Grade II* Listed Buildings within the cemetery including the gates and gate piers and section of curved wall. To the south-west of the cemetery, lies the CEMEX Margate Concrete Plant and the Margate Refuse and Recycling Centre. Moreover, a housing development is located directly opposite to Thanet Crematorium which forms part of Margate Cemetery.
- 1.81 There is therefore already development located adjacent to the cemetery.
- 1.82 Until the Heritage Impact Assessment is completed in conjunction with the masterplan it is not possible to say exactly how the proposed allocation will impact on designated heritage assets. However, St. John's Cemetery is separated from the south parcel draft allocation by Manston Road. The Masterplan for this southern parcel could also demonstrate that development on the Manston Road frontage could be set back in certain locations in order to protect the setting of listed assets at the cemetery. The Heritage Impact Assessment would highlight this accordingly. A design solution will therefore ensue to ensure that the heritage assets of the cemetery will be preserved. The Heritage Impact Assessment will guide how development will be designed and located to minimise any impact or make a positive impact. The masterplan is also required to enable a soft edge between the site and the open countryside and so will provide an opportunity for this to be reviewed.
- 1.83 The requirement of the Draft Local Plan Policy to undertake a Heritage Impact Assessment is fully justified given the proximity of the listed buildings/memorials located at the cemetery. This ensures that the design of the allocation is sensitive to the historical assets. The policy ensures that the requirements of paragraph 128 of the NPPF 2012 are met in providing an assessment of the impact to heritage assets.
- 1.84 We are aware that Shottendane Farm House is also a Grade II Listed Building which is located to the north of Shottendane Road and immediately south of Margate Cricket Club. The Heritage Impact Assessment will also need to look at the impact of the proposed allocation to the farm house. However, it is not considered that this would prove to represent a significant issue at all given that Shottendane Farm House is well screened through mature tree coverage, is set well within its curtilage thus being well contained. The presence and views of the listed building would be much obscured by the tree coverage and thus the impact of any new residential development on the northern parcel on the listed is expected to be negligible. We are aware that the Council are proposing a minor amendment to this element of the policy to reflect the inclusion of the farm house.

Question 12 - 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?

- 1.85 The Thanet Surface Water Management Plan (**CD5.22**) in Section 3.1, states that when it comes to SUDS, the most appropriate site-specific techniques depend on the proposed development and local conditions. The suitability of areas for different types of SUDS techniques is often determined by existing land-use and in the case of SUDS involve infiltration, soil type, underlying geology and groundwater conditions.
- 1.86 In the Draft Proposals Map, the site does not fall in Flood Risk Zone 3 or 2, nor is it in a Groundwater Protection Zone as set out in Draft Local Plan Policy SE04.
- 1.87 At this stage of the Local Plan it is not known what type or how much additional infrastructure will be required. Currently the land is greenfield and that the underlying geology in Thanet is mostly permeable. Any development on this site will have an impact on the surface water drainage as there would be a loss of permeable land, as there would be in all the housing allocations proposed in the Draft Local Plan.
- 1.88 The development brief and masterplan will need to take into account policies which require the management of groundwater such as Draft Local Plan Policy CC02, as well as providing information on the required mitigation based on the layout of the proposed allocation. The masterplan will also present an opportunity to locate any drainage mitigation on site. The allocated development will need to provide certainty that flood risk is not increased as a result of the development and where it is suitable mitigation is provided as set out in paragraph 103 of the NPPF 2012. This would be part and parcel of any masterplanning exercise.

Question 13 - 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?

- 1.89 Within our reps made in October 2018, we did indicate that 30 dwellings could be delivered on the site in 2021/22. This is based on the following factors and assumptions.
- i. The site becomes a formal strategic allocation within the adopted Thanet Local Plan.
 - ii. Thanet Local Plan is adopted in a timely manner in 2019.
 - iii. On behalf of the landowner, JIG is acting as sole land agent in identifying a suitable development partner to deliver the site. At this moment in time, JIG is in advanced discussions with an interested party with an enviable track record and with national coverage. A proposal from them for the site's acquisition is expected between now and the commencement of the Examination-in-Public. An update can be provided at the EIP.
 - iv. Under the guidance of the lead consultant, JIG Planning & Development, a professional team is in place that is capable of preparing the Development Brief and Masterplan which will then lead on to the submission of the planning application.
 - v. It is expected that a Development Partner will be on-board by the end of the summer 2019. It is therefore not unrealistic to believe that a Development Brief and Masterplan could be finalised by the Spring of 2020. This would then enable a planning application to be submitted shortly thereafter. The first planning application could be for a small part (any part) of the site only, with further planning applications to follow in due course. The parameters of course would be set by the Development Brief and Masterplan where the planning applications would follow the principles set. Therefore, it is not beyond the realms of reason to think that a planning application could be submitted in the summer of 2020 for 30 units say as a first initial phase. Allowing 3 months for determination and a further 3-6 months to discharge conditions, this would lead to the first units coming out of the ground in 2021/22. This loose timeframe is not an unrealistic proposition.
 - vi. The beauty about the HO2 allocation is that it concerns two separate land parcels albeit adjacent and under the same single ownership. This provides multiple access options which is a rare but positive factor when assessing a site's suitability and its accessibility. For example, the first phase could come forward off Shottendane Road (either side, north or south), Manston Road, or even Hartsdown Road. Indeed, the site could be delivered through 3 or 4 different outlets via the access options aforementioned. This would significantly accelerate housing delivery on the site and for the District as a whole.