

Thanet District Council **Matter Statement**

Matter Statement 13 - Transport

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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?

SP43 is a generally-framed policy designed to guide applicants as to the transport issues to be considered in preparing development schemes, dependent on the impact of the proposals on the functioning of the transport network. It does not set out specific measures that all developments must provide, but identifies the issues to be considered and can then react to any changes in circumstances in relation to Highway and Transport matters during the lifetime of the Plan.

Even some small sites may have the capacity to accommodate features such as bus stop facilities or pedestrian links which add value to the network.

This is consistent with National Planning Policy (Chapter 9), which seeks to encourage sustainable transport measures as part of new development.

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?

The policy requirement for electric vehicle charging points is specific and set out in the relevant policies for key developments, such as housing (draft Policy SP12) and employment uses (draft Policy SP03). Draft Policy SP43 is designed as a general policy to address the functioning of the transport network.

The policies in the Plan are consistent with para 35 of the NPPF, when read together.

Q3. What is the rationale for Policy SP44? Is it clear what is expected of decision-makers, developers and local communities?

The Council considers that the combination of journey time improvements to London (planned and underway) and the provision of a new Parkway Station (draft Policy SP45) has a potentially significant beneficial effect on both the local economy and the local housing market, and could assist in accelerating housing delivery.

The policy does not require a specific response from any particular party. However, in the event of development proposals coming forward that might prejudice the Council's desired outcome in this matter, the impact would be considered in any Council decision or response.

However, this could be incorporated in supporting text to draft Policy SP45, rather than in policy.

Issue 2 – New Railway Station – Policy SP45

Q1. What is the justification for Policy SP45?

As mentioned in Issue 1, Question 3 above, the Council considers that the combination of journey time improvements to London (planned and underway) and the provision of a new Parkway Station

(draft Policy SP45) has a potentially significant beneficial effect on both the local economy and the local housing market, and could assist in accelerating housing delivery.

Kent County Council are leading on the project and have submitted a planning application, [reference KCC/TH/0105/2018](#), which is currently under consideration. The planning application and the project is supported by research by Wessex Economics for Kent County Council, which sets out the regeneration benefits of the proposed Station. A separate study was undertaken for TDC specifically in relation to housing delivery, and this has been added as Core Document CD8.12.

Q2. Is it clear to decision-makers, developers and local communities where the new station will be located?

The site is located just west of Cliffsend, and is shown on the draft Policies Map. The additional reference to land west of Ramsgate reflects the “area of search” for a suitable site. Until planning permission is granted, it was considered that there should be a continued reference to the broad location.

Q3. Is the provision of a new railway station on land to the west of Ramsgate deliverable within the Plan period?

According to Kent County Council, it is anticipated that work on the Station could commence in 2022. There is a range of funding from Central Government, local authorities and others, and the project is supported by Network Rail. A number of organisations, including the District Council, have committed funding to support the proposal.

Since the inception of the project, KCC has been exploring avenues to raise funding for the project to meet the estimated project cost. On April 12th, 2019 the South East Local Enterprise Partnership approved the project business case to grant KCC £14m Local Growth Funding for the project at their accountability board meeting. Combined with funding contributions from Thanet District Council, the East Kent Spatial Development Company and additional funding committed by KCC, the project now has a complete funding package against the current cost estimate.

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?

The purpose of the draft Policy was to provide a framework for the transport modelling and assessment that has informed the draft Local Plan and also relates to the development of the Transport Strategy. There are no specific requirements for developers set out in the policy.

The objectives of this policy have been largely fulfilled through the work undertaken by Amey (CD6.3) and the related SRN impact report (CD6.7) and A28 Technical Note (CD6.8), and the draft Policy may no longer be required, at least for the purposes of this Plan.

The general text could be amended to update the position on modelling and the work undertaken with Highways England and the neighbouring Councils to ensure that there were no significant impacts on the strategic road network.

Q2. What is the status of the Thanet Transport Strategy?

The Thanet Transport Strategy is a draft document that has been developed in parallel with the draft Local Plan. It was approved for consultation (alongside the draft Local Plan publication under Reg 19) by both Thanet District Council and Kent County Council, and reflects the strategic approach to development set out in the draft Local Plan, and the involvement of other key partners in the development of the transport aspects of the draft Plan.

Following publication, the draft TTS was considered by the Thanet Joint Transportation Board (11th December 2018) and endorsed by KCC's Environment & Transport Cabinet Committee on 17th January 2019 for consideration through the Local Plan Examination process.

The intention is to adopt the Transport Strategy alongside the Local Plan in due course.

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?

These routes are considered to be required to facilitate housing growth at the urban areas by relieving the pressure on the existing route network, and creating the opportunity for new bus services. The Inner Circuit as set out in the draft Transport Strategy has been discussed with the agents/developers for the strategic sites, and there is broad agreement as to its delivery. The sites that either have planning permission or have a resolution to grant are fully aligned with the Inner Circuit strategy (SP18 Phase 1 Land at Manston Court Road/Haine Road, known as Westwood Village; H04 Land fronting Nash Road and Manston Road, Margate; and SP13 Manston Green).

The delivery of the Circuit is primarily the responsibility of the site developers within their sites, but KCC and the developers are working towards agreement as to how the off-site elements of the route can be delivered. A Statement of Common Ground has been submitted on this matter, and is identified as Core Document CD9.4. A further statement regarding the delivery of the Inner Circuit has also been added as Core Document CD9.9.

The District Council has indicated that (para 41 of the draft Local Plan) that it will give consideration to the use of CPO powers (subject to securing the appropriate indemnity arrangements with developers), if critical sites or infrastructure are delayed, to the detriment of implementing the provisions of the Plan. Kent County Council has also confirmed its willingness to use its CPO powers where necessary (again, subject to securing the appropriate indemnity arrangements with developers) to assist in the delivery of the Inner Circuit scheme.

The District Council and County Council are working together (with engagement with the emerging strategic site allocations) to progress necessary feasibility designs and business cases to ready

these schemes for any external funding opportunities that have been announced or will be announced in the future. These initial designs have informed the Infrastructure Delivery Plan.

Q4. How have the costs associated with the highway's improvements been considered as part of the Plan's preparation?

Initial outline designs have been produced to identify high level costs of the required infrastructure, these costs will be reviewed as designs are developed further, however are considered to be robust at this stage. The District Council in collaboration with the County Council has developed a methodology for equitable apportionment of these costs based on the proportionate traffic impact of each site within existing and proposed highway links. This has been calculated using select link vehicle trip data from the Strategic Highway Model.

The Council intends to take a flexible approach to infrastructure delivery, with developers being given the option to deliver off site sections of the Inner Circuit through highway agreement (secured through Section 278 of the highways act 1980). Any externally funded infrastructure would be delivered by either Thanet District Council under an appropriate form of agreement or directly by the County Council in its capacity (as Highway Authority).

The costs of the proposed Inner Circuit have been taken into account as part of the viability work, as an update of the Strategic Sites High Level Review Viability Assessment (March 2019) (Core Document ref CD9.13). This concludes (para 2.1.3) that "the results continue to show a reasonable prospect of viable development in support of the Thanet Local Plan housing provision growth".

Q5. Are the safeguarded transport routes shown accurately on the submission policies maps?

The purpose of the policy is to set out the principle of provision of these routes. For the majority of the route, the line shown is based on initial design information supplied by Kent County Council (as Highway Authority).

In some instances, the road line is indicative (mainly where it falls within development sites), as a final decision has not been made as to the precise routing.

In addition, the on-line map-base changes according to scale, and may not appear to fit at some scales, but this can be addressed through amendments to the policy notation. The reason for this is that alignments could be subject to change following more detailed discussions with relevant allocation sites in relation to proposed masterplans.

KCC Highways have also identified in their Reg 19 response a couple of omissions - A28 (Brooksend to Minnis Road, through the SP14 site); and Shottendane Road to Hartsdown Road (through the HO2 site). The Council proposes to modify these elements of the Policies Map.

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?

Policy SP47 divides the Inner Circuit into a series of strategic routes, each of which is a discrete project element of the whole scheme, based on different links within the road system. Some of these links would be delivered directly on-site by the relevant developer. This includes sections 1; 4; 5; 7; 9 (part); and 12. Part of Section 8 was recently completed as part of the development of the Westwood SP17 site.

The Strategic Site Allocations Impact technical note (Amey, 2018)(CD6.11) outlines a proposed delivery apportionment methodology and Inner Circuit Route Improvement Strategy - Delivery Clarification Note (CD 9.9), demonstrate that a phased approach to infrastructure delivery will not require more than five separate contributions.

These routes are a key part of the draft Transport Strategy for the district, and the transport modelling indicates that this strategic approach will help to achieve the desired outcomes and support the delivery of the housing identified in the draft Plan.

Issue 4 – Transport Assessments and Travel Plans – Policy TP01

Q1. What is the justification for Policy TP01?

The draft Policy is required to ensure that new development does not have a significant traffic impact on the local network and the need to travel by private motorised transportation is minimised where possible. NPPF (para 110) outlines requirements for the prioritisation of pedestrian and cycle movements and the creation of places that minimise the scope for conflict between pedestrians, cyclists and vehicles. Draft Policy TP01 builds upon these principles.

The local planning authority receives advice from Kent County Council on planning applications and pre-application advice on whether a particular development might involve a “significant transport impact”, and the Council only asks for a TA where it is considered to be necessary. The draft Policy reflects the advice provided by NPPF (para 111, 2019).

A TA/TP would help to address any local issues not previously identified by the transport modelling.

The Policy could usefully make reference to the provision of transport statements, with the supporting text explaining the difference between a TS and TA.

Q2. Is it clear to decision-makers, developers and local communities when transport assessments and travel plans will be required? Is the policy effective?

It is not possible to provide a fixed set of criteria by which the need for TA can be definitively established. However, both the District Council and County Council offer pre-application planning advice. At this stage, the need for Transport Assessment can be established, based on an initial assessment of the proposals by KCC as the Highway Authority.

At previous Hearing sessions, KCC and TDC have indicated that a threshold of about 100 units is a good starting-point for consideration of whether a Transport Assessment, or a Transport Statement, is required.

However, transport modelling and reporting indicates that there are parts of the road network where there are severe traffic problems, and it would be sensible to require a TA (rather than a TS) in those circumstances.

This approach reflects the Government guidance on “Travel Plans, Transport Assessments and Statements” (<https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>), which takes a more general approach, which refers to a “significant” increase in traffic, but does not define the level of “significance”.

The draft Policy therefore allows for an initial assessment of possible impacts on transport at a local level, and provides the context for seeking TA/TP in appropriate circumstances. The Council therefore considers that the policy is robust and effective, and provides the necessary flexibility in order to consider specific circumstances at the time that a planning application is lodged.

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?

The purpose of having separate policies for each aspect of non-car travel is to recognise their individual importance. They are primarily focussed on the detailed application of requirements at a site level.

The Council recognises the imperative in the new NPPF “to promote walking, cycling and public transport use” (para 102), and the Local Plan seeks to do that, in terms of housing allocations, the identification of the Inner Circuit as part of the key infrastructure and through policies that seek to encourage the provision of facilities to support such use.

In the draft Local Plan, following the principles established by the Sustainability Appraisal, the Council has sought focus significant development in locations that will encourage the development of public transport improvements, and can link to existing footpath and cycle networks.

Policies TP02 to TP04 require new developments to consider the detailed design of sites to encourage the use of modes of transport other than the car. These detailed considerations can be as important as location in encouraging non-car mobility.

The Council has recently begun work, with KCC, on reviewing existing strategies for walking and cycling. The Council is also part of the Thanet Quality Bus Partnership.

This is also consistent with the draft Thanet Transport Strategy which outlines several interventions, measures and strategies to manage growth in a sustainable way.

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?

Tourism is a vitally important industry for the district, worth £319 million in 2017. A key part of the tourism offer is for coach visits to the area. Broadstairs also hosts a number of visitor events during the year (including Broadstairs Folk Week), and parking for coaches is at a premium. It is therefore essential that good coach parking facilities close to the town centre are maintained for the longer term. The provision of Coach parking will assist in reducing traffic impact and parking amenity impact on coastal highways such as Western Esplanade.

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?

IGN3 and the KVPS have formed the basis for the consideration of parking provision in new development across Kent for several years. However, the wording of the draft Policy could be improved by making it clear that the Council will “apply the guidance” in those documents, rather than “referring” to them. There is sufficient flexibility in the guidance to ensure the consideration of specific circumstances.

KCC are currently in the process of reviewing the parking standards in line with the review of Kent Design Guide. It is anticipated that this review will be completed by the end of this year. The Council would therefore propose to amend the policy to include reference to any superseding parking standards produced by KCC over the lifetime of the Plan

Q3. Are there circumstances other than those listed in Policy TP06 where a reduced level of provision may be acceptable?

The draft Policy sets the key criteria for considering a lower parking requirement. The town centres are considered to be the primary locations where this approach should be applied. However, the reference in the Policy to the standards allows for other material considerations to be taken into account.

The draft Policy does not preclude applicants from taking an evidence-based approach to parking requirements to reflect individual circumstances, such as using trip rate data to derive calculate parking accumulation. Many of the parking requirements Kent Vehicle Parking Standards 2006 are gauged at a maximum level, therefore this also allows for lower provision of parking where evidence suggests that this would be appropriate, on a case by case basis.

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?

Page 11 of Kent Vehicle Parking Standards outlines space requirements for those with disabilities. Page 33 outlines space size requirements. It is possible that Kent County Council will be publishing a new guidance note on parking soon that will potentially be linked to Kent Design.

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?

Draft Policy TP08 sets out the position that the District Council and County Council wish to achieve as the best solution for Thanet's town centres, as set out in para 18.27. This is consistent with para 110 of the new NPPF.

It is recognised that there may be occasions where this is not possible to achieve. In that case, the Council will take into account the other material considerations, and come to a judgement on the individual circumstances. This may include the provision of additional on street servicing facilities such as loading bays and waiting restrictions which also allow for loading and off-loading.

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?

In the 2006 Local Plan, the approach to car parking at Westwood was set out in Policy TR18, which required that "at Westwood and the out-of-centre locations shown on the proposals map, new commercial development proposals will be expected to demonstrate specific measures to encourage at least 20% of customers to arrive at the site by means other than car".

The Policy also limited maximum car parking provision in new development to 70% of the levels set out in the Kent County Council Vehicle Parking Standards. The Policy also stated that, where extensions to premises are proposed, no new car parking provision will be permitted.

This position was supported by the Local Plan Inspector at the time, on the basis that it reflected national policy at the time (including PPG13), responded to an over-supply of car-parking provision at the retail sites at Westwood and that the policy approach was reasonable and not excessive. It was recognised that it provided a reasonable balance "reflecting the aim of promoting less reliance on cars while recognising that a choice in means of transport must be planned for".

The Council recognises that there has been a change in the emphasis of Government transport policy since that time, but considers that the broad policy objective is in line with Government guidance on promoting sustainable transport, as set out in the NPPF (paras 102 onwards).

The draft Policy is more flexible than the previous adopted Policy, in that it seeks to 90% of car-parking requirement, rather than 70%. The aim to reduce car journeys to Westwood continues to be a policy aim. While there have been improvements to the road network around Westwood, it is still important to ensure that through-traffic capacity is maintained in the longer term. The approach set out in the Policy would also improve movement in and around the Westwood area.

It is generally good Transport Planning practice to ensure that traffic impacts from development are minimised in the areas of the local highway network where there is traffic pressure. It can be measured through effective Travel Plans and monitoring by the LPA/KCC thereafter using post occupation surveys. These can be secured through a Unilateral Undertaking or S106 agreement.

There is also a desire to encourage walking and cycling trips within the Westwood Area and a key element of this will be a strategy to reduce the prevalence of car park “hopping” between the different retail parks within Westwood. This is underpinned by longer term aspirations within the Thanet Transport Strategy to accommodate more pedestrian and cycle trips by reflecting desire lines by improving pedestrian facilities in the locality.

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?

Car parking provision is an important element of maintaining healthy town centres. The draft Policy seeks to ensure that where new development is proposed that affects that car parking provision, there is proper consideration of the impacts and how those might be addressed in the proposals.

Criteria 1 and 2 provide a framework for considering how parking can be retained or replaced; and Criteria 3 allows for circumstances where this may not need to be done.

Advice would be taken from KCC Highways and the Council’s own Parking Services Team in relation to such proposals.

The draft Policy could be more positively worded by indicating that development would be permitted where one of the three criteria can be met.