

# Thanet District Council

## **Matter Statement**

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



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### **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?**

The infrastructure set out in the IDP, and modified by Reg 19 submissions from key infrastructure partners is considered to be essential for the delivery of sustainable development in the district. The key infrastructure identified in the draft IDP is also largely specified in the draft Local Plan under either infrastructure-specific policies (such as SP47); in relation to specific sites (such as SP15); or in the general housing Policy SP12. This includes road network improvements and new roads; new schools and medical facilities.

However, it is acknowledged that infrastructure requirements may evolve over the Plan period, and the IDP (designed to be a working document) may need to be updated as service requirements change. The reference to the IDP provides the necessary flexibility to deal with unforeseen circumstances over the Plan period.

During the discussion on Matter 8 Housing land supply, it was proposed that the text of SP01 be modified to set out the actions being undertaken by the Council to improve housing delivery.

### **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?**

The site was originally allocated in the 2006 adopted local plan and just over half has been developed by the hospital for nurses accommodation - The Nightingales. The area to the rear remains allocated for future hospital use and is adjacent to the green wedge. Allocation has been developed in conjunction with the hospital, and reflects the area of land that was required. The Council contacted the East Kent Hospital University NHS Foundation Trust on 17/06/16 to seek views on potential future needs of QEQM. The trust were asked for their views on the adopted plan hospital allocation and whether this was required and if so, whether it was large enough for their needs up to 2031. The Director of Estates and Facilities of the Trust confirmed by email on 17/06/16 that the existing allocation was sufficient for their needs for the plan period and confirmed this again on 22/06/16. He also confirmed that the proposed development (16/1114 which was subsequently granted 20/01/17) on the adjacent land to Yoakley House for the erection of a 32 bed annexe to care home, would not affect the existing hospital allocation and would not result in a greater land requirement for the hospital.

The justification for allocating land for the QEQM hospital is to ensure the proper planning of the area taking into future health care needs arising from new development together with the rationalisation and future changes of health care provision in East Kent, as opposed to a reactionary approach in response to individual applications leading to piecemeal development.

In order to minimise the impact on the Green Wedge particularly from longer distance views from St Peter's Road, the Council would prefer future expansion to be on the existing site

with car parking relocated to the allocation. This site has been released from the Green Wedge in exceptional circumstances to meet the health and social needs of the local population.

This policy recognises the exceptional need for future hospital development and aims to minimise the impact on the green wedge by putting necessary safeguards in the criteria of the policy such as a substantial landscaping screen.

**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?**

The phrase “minimum take of fresh land” is intended to ensure the efficient use of land as this allocation has been seen as an exception to policy. The policy is aiming to encourage the trust to consider rationalising uses on their existing site before expansion onto the greenfield allocation. It may be more suitable to amend criteria 1) to refer to maximise the efficient use of land rather than “minimum take of fresh land”. The Council would not want to see any allocation over and above that allocated in the plan as this would encroach on the Green Wedge.

**Q3. Is Policy SP37 deliverable within the plan period? Does it adequately allow for the continued improvement, expansion, reconfiguration and consolidation of the hospital?**

The delivery programme for this site is a matter for the NHS. The policy is designed to endure beyond the Plan period to 2013, if needed and is in part a safeguarding policy designed to cater for possible future need in a rational manner.

Yes. 2.2ha is allocated for future hospital use. The Trust has previously confirmed that this allocation is sufficient for their future needs up to 2031.

**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?**

At the time of writing the policy, the need for a new medical centre had been identified by the Clinical Commissioning Group to meet the needs of development in the Westwood area.. The CCG Estates Strategy (revision November 2018) recommends that the CCG develops an integrated community hub in the Westwood Cross area. Section 9 of the Strategy (Next Steps) states that for the Westwood Cross Hub facility, the programme should be:

- Procurement method to be established Summer 2018
- Public engagement to commence asap
- Construction potentially to start Summer 2019
- Possible completion Autumn/Winter 2020
- Resulting relocation of practices

A specific site has not yet been identified by the CCG. The Council and CCG are working with developers in the Westwood area to identify a suitable location.

A contribution towards the provision of a medical facility at Westwood has been sought from the SP18 site at Manston Court Road/Haine Road as part of the planning application 18/0261 for the first phase.

**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?**

At the time of writing the policy, the need for a secondary school had been identified by the Education authority (KCC) however, the precise location was unknown. Since this time it has been agreed that the 6FE secondary school will be provided on land within the second phase of SP18 which is outside of the current application. The school is identified in the Draft Infrastructure Delivery Plan CD1.2 page 19 as being provided on the SP18 strategic allocation during phase 2.

Funding will be achieved through KCC funding streams and through developer contributions for provision later in the plan period. For earlier in the plan period KCC are in the process of purchasing another site for secondary provision.

The policy could be amended to reflect the changed position of Policy SP40:

The Council will support the expansion of existing and development of new primary and secondary schools in Thanet to meet identified needs and will work with Kent County Council in identifying, allocating and safeguarding land as appropriate.

To meet the requirement for a secondary school at Westwood, **land is safeguarded within the housing allocation SP18 Manston Court Road / Haine Road for a secondary school as part of the second phase of the development.** ~~the Council will work with Kent County Council and developers to identify a suitable site.~~

### **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?**

Policy CM01 allows for provision for new, extended or improved community facilities and is consistent with paragraph 70 of the NPPF. This policy needs to be read in conjunction with the general housing policy SP12 which requires new development of 50 or more dwellings to address any needs for community facilities. The policy may benefit from some minor rewording to cross reference to policy SP12 either in the policy or the text which addresses future community needs.

Following on from the discussion on day 3 of the hearings relating to flexible community business space it has been suggested that policy CM01 could be amended to include a cross reference to flexible community business space.

Policy CM01:

**New major developments will be required to provide new community facilities in line with policy SP12 where the need for such facilities has been identified through the planning process.**

Proposals for new, or extensions of, or improvements to existing community facilities will be permitted provided they:

- 1) are of a scale to meet the needs of the local community and in keeping with the character of the area **including the potential to provide flexible community business space;**
- 2) are provided with adequate parking and operational space;
- 3) are accessible by walking or cycling to the local community;
- 4) are located within or adjacent to the community or settlement they serve;
- 5) would not significantly impact upon the amenity of neighbouring residents;
- 6) either provide or have the ability in the future, to make provision for broadband to facilitate the creation of a community hub network **and/or flexible community business space where a need is identified through the planning application process**

#### **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?**

Policy CM02 is consistent with paragraph 70 of the Framework which only permits the loss of community facilities in certain circumstances i.e. ranging from where there is no need for the use, no alternative use is available to alternative provision. However, to better reflect the wording in paragraph 70 a slight amendment to the policy could improve its effectiveness.

#### **Policy CM02 - Protection of Existing Community Facilities**

Proposals which would result in the loss of a community facility as defined in this plan will not be permitted unless:

- 1) ~~it can be demonstrated that there is insufficient viable need for the community use or there is alternative local provision which is accessible to the local community to~~ **maintain the current community use of the building would not be financially viable and it can be demonstrated that every reasonable attempt has been made to secure an alternative community use for the building; or**  
~~2) it can be demonstrated that every reasonable attempt has been made to secure an alternative community use before non-community uses will be permitted, and~~
- 2) ~~3) alternative provision of at least equivalent, or where possible, improved community benefit is provided in a convenient accessible location to serve the existing community~~

**Q2. What is the justification for requiring proposals for new development to meet criteria 1) to 3) inclusive?**

Please see amended policy above.

**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?**

The text will be modified to reflect the requirements of the modified policy if considered acceptable. The text does not need to, and ought not, repeat the terms of the policy, but it should provide guidance to ensure that every possible opportunity to retain the community use has been explored. The text suggests alternative ways of retaining the facility which is, to this extent, appropriate.

**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?**

As part of the Local Plan technical consultations with service providers and Council colleagues, a need for the expansion of the Margate and Minster cemeteries was identified.

Thanet District Council has powers and duties under the *Local Government Act 1972*, the *Local Authorities' Cemeteries Order 1977* and *Local Authorities' Cemeteries (Amendment) Order 1986*, in respect of provision and regulation of cemeteries. St. John's Cemetery (Margate) is one of two local burial grounds owned and administered by the Council; the other being at Cecilia Road, Ramsgate. The Margate location is the only site with potential for expansion – it has been enlarged several times since 1856 but now has a limited amount of ground available.

Despite the opening of Thanet Crematorium, in 1966, there is still a constant demand for burial as well as the need to provide areas for Thanet's growing multi-faith population. The Margate cemetery has been recommended for expansion due to its favourable position in respect of the existing cemetery, and the potential for additional certain burial areas (such as the Infants' plot) which are now limited.

The Minster cemetery allocation is the only other cemetery that has the potential to expand to provide choice and to accommodate future need arising from the new development. This has been agreed in principle with the developer.

The Council will part fund the cemetery expansions together with the land promoters whose sites abut or are within the allocations.

The Council's Bereavement Services Manager and Registrar has calculated, on the basis of predicted death rates, that over the next 50 years, there will be a need for approximately 2,400 grave spaces. The standard calculation for grave spaces which also allows for the infrastructure, open spaces and pathways is 4.1 sqm. This means that a total area of 9,840sqm would be required to meet the projected need. The potential need for the Plan period would be some 470 grave spaces, or approximately 1,927sqm. However, it is sensible to plan for the longer term. Therefore the allocation could be reduced to 1ha and the policies map amended accordingly.