

28 October 2019



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Dear Madam,

Representation To Independent Examination Of The Thanet Local Plan On Behalf Of Kent Property Management & Development Limited

Land Adjacent To The Former Manston Allotments, Manston Road, Ramsgate CT12 6AY

We write on behalf of our client Kent Property Management & Development Limited ('our client') in respect of the above land ('the site'), and on their behalf as freehold landowners, to formally submit further representations to the Local Plan Examination in respect of the additional information documents in relation to the 5-Year Housing Land Supply Position, The Audit Note Of Heritage Assessment Of Allocated Housing Sites and the Additional Sustainability Appraisal Work.

We previously submitted representations to Thanet District Council (TDC) "Call for Sites" on 3 September 2018, to the Draft Local Plan on 25 September 2018 and on 26 February 2019, in support of the site's allocation for new housing development under Policy HO1, in respect of Land adjacent to the former Manston Allotments, Manston Road, Ramsgate ('the site'). The site's SHLAA reference (July 2018) is SHLAA 087.

The site itself comprises former allotments, and whilst the majority of the site is greenfield land, part of the site is previously developed land comprising a hard-surfaced parking and servicing area. The total site area is approximately 2.2 hectares (5.4 acres).

Note for Inspector on Updated 5 year Land Supply (June 2019)

The Site's allocation is listed as 'Land adjacent to the former Manston Allotments Manston Road Ramsgate' with a notional dwelling capacity of 80-units. We confirm that the site is suitable, available and deliverable for housing development immediately (within the next 5-years).

Recent scheme proposals subject to pre-application discussions with TDC have indicated that the site is capable of delivering circa. 100 units by responding to the density of development on the neighbouring site to the east. We consider that in terms of planning for future housing land supply and delivery, we request the Inspectors consider increasing the notional housing capacity of this site to 100-units.

Sustainability Appraisal Addendum Report

The above Sustainability Report sets out an individual assessment of the site to provide further clarity for sites allocated for housing. This section of the representation seeks to address the points in Table 45: Summary of Site Assessment - Allotment Gardens, Manston Road, in respect of our site. We address these in turn below.

- SA Objective 1 – We agree with this objective that the site could accommodate a large amount of residential development that should contribute towards the overall number of dwellings in Thanet.
- SA Objective 2 – We agree that there may be a potential requirement to provide additional health care services through an appropriate legal agreement.
- SA Objective 3 – We agree that there may be a potential requirement to provide education training facilities through an appropriate legal agreement.

- SA Objective 4 – We agree that construction activity is likely to result in short term anxiety amongst residents however, the effects of this will be minor as the new housing will provide secure dwellings that reduce crime and increase public safety.
- SA Objective 5 – We support this objective and confirm that any future applications for housing will deliver high quality housing, contribute to housing provision, in a well-connected area to support vulnerable people and reduce the level of deprivation.
- SA Objective 6 – We support this objective. The development of the site will create a ‘sense of place’ and will have a positive impact.
- SA Objective 7 – We agree and support this objective as the site is strategically located with good access via car and bus to employment opportunities.
- SA Objective 8 – We agree that the allocation of this site has the potential to promote economic development in Thanet and housing on this site will contribute towards a vibrant and diverse work force.
- SA Objective 9 – Any future applications for housing will consider the opportunities for open spaces and habitat to support sustainable development.
- SA Objective 10(a) – Any future applications for housing will deliver an appropriate level of housing density to ensure the land is used effectively.
- SA Objective 10(b) – We support this objective that there is no loss of Best and Most Versatile agricultural land.
- SA Objective 11 – Any future applications for housing on the site will seek to be in keeping with local areas through high-quality sustainable design.
- SA Objective 12 – Any future applications for housing on the site will seek to enhance the character and quality of the area’s landscape and townscape.
- SA Objective 13 – We agree that there are unlikely to be any archaeological issues associated with the site.
- SA Objective 14 – Any future applications for housing will consider to provide bicycle storage and electric vehicle charging points to reduce the effect on the Thanet Urban Air Quality Management Area.
- SA Objective 15 – We support the statement that the proposed allocation is in close proximity to sustainable public transport networks.
- SA Objective 16 – Any future applications for housing will consider upgrades to the strategic road network as a result of development on this site.
- SA Objective 17 – Any future applications for housing will take into consideration waste generation and disposal to achieve sustainable management of waste.
- SA Objective 18 – Any future applications for housing will consider the requirement to respond to the challenge associated with climate change.
- SA Objective 19 – We agree that the site is not at risk from coastal or fluvial flooding.
- SA Objective 20 – We support the requirement to conserve and enhance biodiversity as a greenfield site. Any future applications for housing will provide measures to mitigate impacts on existing wildlife and biodiversity.
- SA Objective 21 – We agree that the site is not at risk from coastal or fluvial waters.
- SA Objective 22 – We support the requirement to use sustainably sourced and recycled building materials and the potential to secure this through a S106 agreement.

- SA Objective 23 – Any future applications for housing will consider opportunities for energy efficiency and contribute towards a reduction in energy consumption.

Overall, we support the above assessment of the site in the Sustainability Appraisal and continue to support the site's allocation for new housing development under draft Policy HO1.

Please would you kindly confirm receipt of this letter and provide any further correspondence in relation to the development site to Mark Thomson of these offices, together with any queries you may have. Thank you for your assistance.

Yours faithfully,



**Mark Thomson MRTPI
Associate**

cc: Amrit Shokar (KPMD)
Tim Thatcher (Calyx Architecture)