

## Comments on proposed modifications


Mod Number				Appendix B				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
Appendix B	N/A		Tesco Stores Limited	204	See attached file. I have also attached comments on the Policies Maps modifications as there is seemingly no separate opportunity to comment on those on this site.	<a href="#">Reps to MM Appendix B.docx</a> <a href="#">Reps to PMM007 and PMM015.docx</a>	<a href="#">View Comment</a>	<p>Some of the allocations in Appendix B also have planning permission and are listed in both tables (allocations and permissions) for completeness. Therefore to subtotal the columns would result in double counting which is stated in the paragraph before the table in appendix B. The delivery timescales and permissions are updated annually in the Council's AMR as part of the annual housing land supply.</p> <p>No change is required to Appendix B.</p>
Appendix B	Solly	C		358	Previous representation has been made on this.		<a href="#">View Comment</a>	<p>Noted. No change is required to MM/170</p>
Mod Number				MM/001				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/001	Miss P A Smith			142	Ref: Housing allocations in Cliffsend. Do not understand why not considered with Acol, Sarre and Manston on range of facilities. We do not have any, so why do we have large allocation.		<a href="#">View Comment</a>	The development strategy set out in the draft Plan was discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/001.
MM/001	Nagy	Marie	Teal Planning Ltd	200	MM001 is supported. The Westwood Extension Site (allocation SP17 within the New Local Plan) provides potential opportunities to be re-planned to provide additional new homes, above that which are currently approved and which can be increased under both the existing planning permission and the proposed wording of SP17. Any reconfiguration of the phases that are still to be developed that results in additional units will comprise slightly higher density development. This is appropriate in this location and will accord with the general principle set out in MM001: that intensification of development within the existing urban area and edge of urban sites is supported.		<a href="#">View Comment</a>	Support noted. No change is required to MM/001.
MM/001	Brown	Jacqueline		207	MM/001 In the development strategy for Thanet acknowledgement is made that there is Best and Most Versatile Agricultural land predominately Grade 1 agricultural land with lower grade land only existing in small isolated pockets. This being the case I do not understand why the local plan is permitting the fields around Westgate and Garlinge which contains such high grade fields being given over to build 2000 houses.		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/001.
MM/001	Gray	Gill	Westgate-on-Sea Town Council	219	MM001 Development strategy for Thanet The Westgate-on-sea Town Council (called Town Council in this document) agrees that the national and international wildlife designations and the flood risk areas in Thanet are reasonable and necessary constraints to the allocation of housing on the Isle of Thanet; housing should not be built		<a href="#">View Comment</a>	The development strategy was discussed during the examination hearing sessions and these discussions led to the main

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					<p>on flood risk areas or on wildlife designations. The Town Council also agrees that the rural hinterland beyond the urban area of Thanet is predominantly grade 1 and recognises that some small areas are grade 2 – both of which are considered the Best and Most versatile agricultural land. Other areas of farmland of lower quality are somewhat subject to flood risk and therefore possibly cannot be used for housing either. However, the Town Council does not agree that the spatial strategy for the housing allocations is correct and believes that it is completely unsound. MM001 states that the main towns of Thanet (Margate, Broadstairs and Ramsgate) form an almost continuous urban area, separated only by green wedges and therefore there is no need to use a settlement hierarchy for this continuous urban area. We completely disagree. Housing scale MM001 states that in areas such as Cliffsend, Monkton and St Nicholas housing allocations have been made on a proportionate basis. We would argue that all areas should be allocated on a proportional basis. Each town is unique and must be treated as such. We believe that the plan should set out a clear settlement hierarchy for each town, in the same way that a settlement hierarchy has been applied to the villages. The housing allocation should be proportional to the towns which it is abutting, not just the villages to which they are abutting. As a specific example, the allocation abutting the small town of Westgate and village of Garlinge are not proportional to their size and should be changed before the local plan is agreed. Form and character MMOO1 States that new developments in the villages should be consistent with each village's form and character and we agree, however, this rule should be applied to the individual character of the towns too. Each town in Thanet has a distinct character, having its own unique socioeconomic and environmental climate. The towns are not simply separated by green</p>			<p>modifications proposed. No change is required to MM/001.</p>

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					<p>wedges but they are separated by history, unique economies and particular niches of society that have grown up around historic buildings, churches or transport links. Westgate and Garlinge (a village in Margate) are two completely, distinct areas. The land between Garlinge and Westgate forms a green wedge, in function, but currently not agreed in law. The two areas also have a completely distinct history. Dent de Lion (at the edge of the newish housing area that is now called Garlinge) is a schedule ancient monument, previously comprising of a Gate House and Castle and lands that extended far and wide. This Gate House was painted by Turner who recognised its unique placement, and links with other sites associated with St Augustine. History shows that St Augustine brought Christianity to the UK and St Augustine's cross, where he landed, is near Minster in Thanet. St Augustine would have travelled up the Wantsum river and disembarked on the island. Turner's painting of the gate house looks very similar to his painting of the gate house to St Augustine's abbey in Canterbury. In summary, Thanet (the isle of Thanos – the isle of death) is a very ancient land and we forget this history to our detriment. Westgate on Sea was part of St Mildred's land (her history is associated with King Ethelbert who also had residence on the Isle of Thanet) and there were very few houses in the area until the building of railway. It then became a private gated community for the City of London's aristocracy and London's elite. Garlinge, on the other hand, originally a small farming community became an extension of extension Margate, one of the original day tripper destinations. These two completely distinct histories should be honoured and marked out clearly. The Town Council believes that the area between Westgate and Garlinge should be formally allocated a green wedge to preserve the individual character of the two areas. We suggested this to the Strategic Planning Manager four years ago but were</p>			

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					told the area cannot be a green wedge because it did not completely separate the two towns; the green wedge would not transect from the sea to the hinterland. However, further investigation proved that green wedges do not need to link from the sea to hinterland (see the green wedge in Ramsgate). If the 2000 houses at Westgate is agreed this will completely merge the two distinct areas and be contrary to numerous planning aims. We therefore respectfully request that a green wedge is allocated between Margate (Garlinge) and Westgate. We are requesting a designated area in line with the requirements to avoid this urban sprawl. Overall strategy Furthermore, the allocations have been unfairly distributed towards North Thanet and should be distributed more equally over the whole of the Island, in a sustainable manner. We believe that the proposal of "no settlement hierarchy" in the towns of Thanet is not appropriate and is being retro fitted into a plan that was directed by individuals five years ago, who allocated land in an unsustainable manner possibly due to the need to pay for the new "inner circuit" and also possibly due to the ease of agreements with prominent landowners in North Thanet. Other areas of potentially sustainable land towards the south of the Island put forward over the past five years have not been accepted by TDC. We believe that the decision to exclude these other sites could have been weighted by the fact that they will not contribute to this inner circuit road as well as expedient agreements by those in TDC five years ago. This approach is not a sound one, and now, with the funding for the new road coming partly from governmental funds, can be rethought.			
MM/001	Gray	Gill	Westgate-on-Sea Town Council	226	Comments continued		<a href="#">View Comment</a>	No response required.

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MM/001	Solly	C		260	This inclusion of this policy is welcomed as it was unclear on the effect of development on the rural area and small settlements. It is important Green wedges are included in this policy as protection should be strengthened and does form a basis for the lack of green infrastructure which to me was missing in the plan. However, I am concerned on how Westwood as been developed from the previous local plan (2006) and many issues have become because of this. Westwood does need more attention in this local plan (which is addressed in the modifications) and in forthcoming local plans. I do believe a common set of planning issues will become for the expanding urban areas for which Westwood can be used on what not to do if focus on good design and services are not fully considered. From what I have seen development has been piecemeal and lacking on cohesion for which has meant that certain consideration for services and infrastructure has been lost, and patched up at great cost to local authorities. For this I would welcome the council to try and promote a masterplan which could be further detailed in the local plan. It is certainly unclear on the logic of development at Westwood, for which it is for the developer only to design with limited input and authority in respect to community. As such the sense of community is lost at Westwood, It has no Civic centre as such, no new parish border (Manston Parish Council has had very little involvement, and for that an opportunity has been lost. It may be clearer to ensure that the boundary of Westwood to be established and to make clear, as it currently sits in the 3 large settlements and in parishes. A map of showing the council wards is below and certainly needs to be updated by the council. (**See Map attached**) The local plan sadly appears not to have looked at the full benefits of the Best and Most Versatile Land (BMV), but the inclusion of BMV in the policy is welcomed. The issue of Manston and the Airport will need	 SollyMap1.JPG	<a href="#">View Comment</a>	Comments noted. No change is required to MM/001.

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					to reconsider this policy in respect to the likely use of land on the outcome of the DCO. The Local Plan has been unclear over many consultations on this issue and the council will need to ensure that clarity is made in the local plan review. The planning issues surrounding this issue has complicated the ability to adopt a local plan.			
MM/001	Bellway Homes Ltd (Kent)			333	We are writing to you on behalf of the site promoter Bellway Homes Ltd (Kent) in support of the emerging designated housing site 'Part of Allotment Gardens, Manston Road' in response to the Council's consultation on the Main Modifications to the Thanet District Council Draft Local Plan to 2031. We have reviewed the Main Modifications and offer the following comments on behalf of the site promoter. Housing Delivery With regards to Main Modification MM/001 – Development Strategy for Thanet, we support the need for the new text, which places greater emphasis on the physical landscape constraints of the District, and the need to optimise housing sites within the urban area of the District and coastal towns. We also support Main Modification MM/028, which provides further clarity to Paragraph 3.12 in the Emerging Local Plan by adding the wording "principal housing growth has been directed towards the urban area". Conclusion Bellway Homes Ltd (Kent) will continue to work with the Council to bring the site forward for development within the next 5 years. However, in the meantime, we respectfully request that Policy 11 be amended omitting the reference to a 80 unit capacity for the 'Part of Allotment Gardens, Manston Road' site and replacing it with 109 unit capacity. This is therefore considered to support the Council's development strategy to accommodate further housing the urban areas of the district. We trust the above comments are helpful to your further consideration of the plan. If you have any further queries or require further information please contact me on 01903 248777.		<a href="#">View Comment</a>	Support noted. No change is required to MM/001.

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MM/001	Thompson	Andrew	Canterbury City Council	334	Thank you for consulting Canterbury City Council. We have no comments to make on the Thanet Local Plan Main Modifications		<a href="#">View Comment</a>	Comment noted.
MM/001	BLANKLEY	NICK		37	Comments submitted concerning the Sustainability Assessment conducted by Arup were consistent in their criticism of the lack of overall impact assessment and the piecemeal nature of the document. Several blatant errors and inconsistencies were reported. Furthermore, it was common across comments to note that much of the Assessment lacked evidence based analysis using generalised, often inappropriate, subjective comment instead which tended to favour development rather than objectivity. For instance, not all developments quantify the amount of 'Best and Most Versatile Land' lost to development (e.g. SP16 Westwood, SP18 Manston Court), the aggregate where stated is over 6% suggesting that towards 10% may be the full impact across the district yet each individual proposal is dismissed by the authors as 'insignificant'. None of this is reflected in the proposed modifications.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/001.
MM/001	Lamb	Kyla	Minster Parish Council	93	However, we are disappointed that the representations made by Minster about the over development of rural communities have had no impact on the Draft Thanet Local Plan.(MM/001)		<a href="#">View Comment</a>	The overall development strategy, including the rural communities, were discussed during the Examination and these discussions led to the main modifications proposed. No change is required to MM/001.
Mod Number				MM/002				



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MM/002	Miss P A Smith			143	Ref: Housing allocations in Cliffsend. Do not understand why not considered with Acol, Sarre and Manston on range of facilities. We do not have any, so why do we have large allocation.		<a href="#">View Comment</a>	The development strategy set out in the draft Plan was discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/002.
MM/002	Dawkins	Julia	1953	20	The Plan states that Thanet's urban areas shall be the focus for new housing. However, the Council have proposed new housing developments on large tracts of farmland which are not urban areas. In the interest of maintaining the touristic appeal and character of these coastal towns, Thanet's Local Plan should state that these characteristic are to be retained and not developed.		<a href="#">View Comment</a>	This Modification was intended to reflect the SA principles for development location. If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council: "...in Thanet is <u>within and adjacent to</u> the urban area...".
MM/002	Brown	Jacqueline		208	- MM/002 I question the new development in Westgate will fully meet the infrastructure requirements. Traffic and parking are already huge issues in the area. The addition of the new developments will only worsen the situation. Traffic and parking are huge issues across the whole of Thanet and I am I remain unconvinced the solutions proposed by Kent County Council, Thanet District Council and the Developer will solve this.		<a href="#">View Comment</a>	The development strategy and transport measures were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/002.
MM/002	Gray	Gill	Westgate-on-Sea Town Council	220	MM002 SPO1a Spatial Strategy Housing The Town Council does not agree with the statement that the main towns of Thanet (Margate, Broadstairs and Ramsgate) form an almost continuous urban area, separated only by green wedges. TDC states that the allocations in the Local Plan have been correctly allocated and do not need to use a settlement hierarchy. We		<a href="#">View Comment</a>	The development strategy was discussed during the Examination hearing sessions and these discussions led to the main modifications

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					disagree with this. Each town is unique and must be treated as such. We believe that the plan should set out a clear settlement hierarchy for each town, in the same way that a settlement hierarchy has been applied to the villages, where housing has been allocated on a proportional basis. The allocations have been unfairly distributed towards North Thanet and should be distributed more evenly over the whole of the Island in a sustainable manner. We believe that this idea of "no settlement hierarchy" in the towns of Thanet is being retro fitted to a plan previously put together in an unsustainable manner. As stated above, other areas of sustainable land, outside of Birchington and Westgate, put forward over the past five years were not accepted and the decision was possibly weighted by the fact that they will not contribute to this inner circuit road. MMOO2 States that new developments in the villages should be consistent with each village's size and scale and we agree, however, this rule should be applied to the size and scale of the towns too. Westgate is a small town of approximately four thousand dwelling and Garlinge is a neighbouring village to Margate. These areas have been allocated a housing development that is disproportionate in size and scale. We believe that the local plan is unsound for this reason. Please see other sections for further explanations of why we believe the plan to be unsound.			proposed. No change is required to MM/002.
MM/002	Solly	C		269	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/002
MM/002	BLANKLEY	NICK		38	It is untrue to state that '.....the primary focus for new housing development in Thanet is in the urban area.....'. The primary focus for development in Thanet is greenfield sites outside existing settlements. By far the largest proportion of development is on greenfield countryside, much of it prime agricultural land. The fields such as at Westwood, Westgate and Birchington are natural countryside, it is disingenuous to		<a href="#">View Comment</a>	This Modification was intended to reflect the SA principles for development location. If the Inspectors consider it necessary, in their final report, to recommend a

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					pretend that they are anything other. Whilst proposed developments may be adjacent to existing settlements I believe that the use of 'urban' in this context is a deliberate deception to try to conceal the overall loss of about 10% of Thanets' best agricultural land.			change to the proposed modification, the following change is considered appropriate by the Council: "...in Thanet is <u>within and adjacent to</u> the urban area..."
MM/002	Bown	Kevin	Highways Agency	50	We note the revised Spatial Strategy. To assist applicants and others, we consider either a cross reference to the relevant transport policy or a direct reference should be included to ensure that all are aware that Highways England must be consulted in connection with any proposals that, by virtue of their scale and/or location, may impact on the safety and/or efficient operation of the Strategic Road Network. Such applications could be for housing (for example, it is likely that a SRN TA will be required for all sites [individual and/or cumulative] for over 500 dwellings), employment, leisure or any other significant traffic generating/ attracting land uses.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/002.
MM/002	Scott	Jane	Finn's	98	The proposed new Policy SPO1A seeks to identify the focus for development within Thanet during the Plan period. The proposed policy as worded seeks to allow housing development in Sarre, Acol or Manston 'within village confines'. The Plan chooses to retain settlement confines and those proposed are drawn so tightly around parts of Sarre, Acol and Manston that there does not appear to be any land left available 'within village confines' where development could occur, bearing in mind the National Planning Policy Framework's requirement in paragraph 70 to 'resist inappropriate development of residential gardens' and therefore the proposed policy wording is unrealistic. The Framework also refers to 'settlements' and does not refer to 'confines'. Many 'settlement confines' are so tightly drawn they actually leave out original buildings within those settlements. As the local planning authority seems keen to retain 'confines', it is therefore suggested that the modification should be		<a href="#">View Comment</a>	The draft Local Plan was prepared under transition arrangements, in relation to NPPF 2012. Para 54 relates to exception sites for local housing need, which is addressed by draft Policy HO18 (as amended by Proposed Modification MM/121). Para 71 of the NPPF (2019) also refers to "exception sites" for entry-level housing, which would also be covered by Policy HO18. No change is required to MM/002.

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					amended to include 'or adjacent to' in respect of settlement confines as follows; 'The primary focus for new housing development in Thanet is the urban area as identified on the Policies Map. Within the Thanet villages, housing development is allocated primarily in Minster, with limited development at Cliffsend, Monkton and St Nicholas. No housing development is specifically allocated in Sarre, Acol or Manston, but housing development of a size and scale commensurate with the size of the relevant settlement will be permitted within or adjacent to village confines, subject to other policy requirements of the Plan.' This will bring the policy wording in line with the Framework, which supports new housing development 'within existing settlements' (paragraph 68) and 'adjacent to existing settlements' (paragraph 71) and will provide a more realistic opportunity of small sites within these settlements but outside the drawn 'confine' to be considered suitable for development.			

**Mod Number** MM/003

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MM/003	Burnett	Nicole	Gladman	132	Gladman note that a number of amendments are proposed to the wording of Policy SP01 to improve the effectiveness and clarity of the policy. Whilst generally supportive of the modifications, Gladman would suggest that where the policy refers to contributions that are necessary to secure off-site infrastructure there should be a follow on reference to relevant tests set out in Paragraph 204 of the Framework (2012). This is to ensure that where contributions are sought, they are not only necessary but also fairly and reasonably related in scale and kind to the development proposed.		<a href="#">View Comment</a>	The policy states that "All new development will be expected to fully meet <u>its</u> infrastructure requirements...". The relevant tests apply in any event, and do not need to be specifically referenced in policy. No change is required to MM/003.

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MM/003	Gray	Gill	Westgate-on-Sea Town Council	221	We welcome these comments.		<a href="#">View Comment</a>	Support noted. No change is required to MM/003.
MM/003	Solly	C		271	* Concern remains on the clarity of the Draft Infrastructure Development Plan July 2018 TDC (CD1.2). This should be re-reviewed in light of new information regarding Bethesda, and the provision of medical facilities of the plan. They are not clearly marked out and the recruitment position of GPs is unclear. Planning consideration should be made on whether medical services are sustainable to new development <a href="https://theisleofthanetnews.com/2019/10/17/northdown-surgery-merger-plans-with-bethesda-have-been-ditched/">https://theisleofthanetnews.com/2019/10/17/northdown-surgery-merger-plans-with-bethesda-have-been-ditched/</a> * Also the proposal of a secondary school at the former deaf school has also been ditched. Which also affects clarity in regards to education provision <a href="https://theisleofthanetnews.com/2019/10/24/plans-for-new-secondary-school-at-former-royal-school-for-deaf-children-site-ditched/">https://theisleofthanetnews.com/2019/10/24/plans-for-new-secondary-school-at-former-royal-school-for-deaf-children-site-ditched/</a> * No SA informs this modification * Some wording may need to be updated in the document as a result of Plan modifications		<a href="#">View Comment</a>	The IDP is a working document which will need to be updated from time to time. No change is required to MM/003.
MM/003	BLANKLEY	NICK		39	It is no good 'expecting' all new development to meet its infrastructure requirements, there should be an absolute requirement that all new development must fully meet its' infrastructure requirements. Furthermore there should be full enforcement of robust penalties for developers failing to meet requirements including legal action and prevention of any further development until agreed infrastructure requirements are delivered. In order to protect existing communities the policy should further state that where the Council has not obtained - as opposed to 'will seek' or 'expects' - funding for infrastructure provision before commencement of proposed development then the development will not be permitted to proceed.		<a href="#">View Comment</a>	Implementation issues were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/003.

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MM/003	Bown	Kevin	Highways Agency	51	We note the revised Implementation Policy. We are concerned that the requirement for off-site contributions, for example, towards Strategic Road Network schemes may not always be captured in the Infrastructure Delivery Plan. Therefore the text should make it clear that the IDP is not the only source/ generator of contributions.		<a href="#">View Comment</a>	The proposed Modification reflects the fact that the IDP is not the only source of infrastructure requirements. No change is required to MM/003.
MM/003	Bailey	Ruth		6	Stringent enforcement regarding agreed developer's contributions, be that infrastructure, affordable housing quota, community contributions etc., will require adequate staffing numbers and a zero tolerance approach to back-sliding.		<a href="#">View Comment</a>	Noted. No change is required to MM/003.
MM/003	Juggins	Phoebe	Department for Education	82	DfE welcomes reference already within the plan to support the development of appropriate social and community infrastructure at policy SP01, and the clarification made to this through MM/003 is welcomed.		<a href="#">View Comment</a>	Support noted. No change is required to MM/003.

<b>Mod Number</b>	<b>MM/004</b>							
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MM/004	Burnett	Nicole	Gladman	133	MM05 inserts new Policy SP01b that requires the Council to undertake a review of the Local Plan within six months of its adoption. Gladman support the inclusion of a review policy, but consider that new paragraph (MM04) would benefit from added detail as to the matters that would be considered as part of a review. For example, the first bullet point notes that the review would consider the implications of climate change, but does not detail which elements of the Plan would be subject to review nor the specific implications of climate change that would be being considered.		<a href="#">View Comment</a>	The purpose of the review (PPG "Plan-making", para 65) is to identify the need for, and scope of, any update to the Plan. No change is required to MM/004.

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MM/004	Dawkins	Julia	1953	21	Local Housing Need: The National Planning Framework is at fault in assigning high numbers of housing to a seaside tourist area with seasonal jobs, poor road network, high percentage of retirees, care homes and many residents with support needs. The policy should be opposed by Thanet Council and MP's. The Plan should target the need to renovate and return to market the existing empty properties. Hectares of new 2, 3 and 4 bed housing will not meet the needs of the local population. The Plan states that Thanet population is expected to grow significantly in the next 20 years, but who in Thanet will be able to afford to buy on our lower than average earnings and retirement pensions?		<a href="#">View Comment</a>	The submitted comment does not relate to the proposed Modification, which is regarding the review of the Plan. No change is required to MM/004.
MM/004	Gray	Gill	Westgate-on-Sea Town Council	222	MM004 Main modifications The Town Council completely disagrees with this approach. The Local Plan must be correct from the start and therefore if TDC needs an extra 6 months or longer to get it correct, then we would respectfully ask that it is granted this time. If this local plan is just signed off simply because we can "Get it done" and "we are fed up with it dragging on", then we risk unnecessary developments being agreed without proper policies attached. As an example of this is Thanet Earth. These are large greenhouses positioned at the entrance to Thanet and are a massive light polluter in the area. Despite recent changes in the law to stop light pollution, these laws cannot be applied retrospectively. However, this example is nothing in contrast to the impact of climate change, the biggest challenge that we are facing today. If we do not apply our current knowledge and change our behaviour NOW, this local plan will be a farce. We know that there have been two significant changes in the world since the Local Plan was initially drafted in 2015 and we will discuss the most important first. * The government declared a climate emergency. We are now aware that we are heading to climate disaster and that if we do not do something about it, our world will be a very hard place to live for our children and grandchildren. Please see the following text taken from	<a href="#">Pictures for MM 004.pdf</a>	<a href="#">View Comment</a>	The Modification relates to the requirement by the SoS, following the intervention process, and identifies some issues to consider in the review. No change is required to MM/004.

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					<p>evidence published by the Intergovernmental Panel on Climate Change reports last year: "On Oct. 8, the Intergovernmental Panel on Climate Change (IPCC) released the much anticipated Special Report on 1.5°C in Incheon, South Korea. The report shows that climate change has already caused global temperatures to rise about 1°C above pre-industrial levels. Unless emissions are rapidly reduced, temperatures could rise 1.5°C by 2040, 2°C by 2065 and 4°C by 2100. It's hard to be certain what this level of temperature rise will mean for the world's natural systems, economy and human society. In the past, it has taken thousands of years for temperature to rise by a few degrees, and big changes are already occurring as a result of a 1°C increase. Scientists say that the impacts will be much worse at even 2°C than previously projected. That means 2°C, let alone 3°C or 4°C, is no longer a safe goal to avoid the worst impacts of climate change. We can avoid much, but not all, of the loss and risk of climate change by limiting warming to 1.5°C."</p> <p><a href="https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/">https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/</a> quoting reports from: <a href="https://www.ipcc.ch/sr15/">https://www.ipcc.ch/sr15/</a> The Local Plan is unsound for the following reasons: Agricultural land The impact of climate change on food production could be severe and there could be wide ranging food shortages. We cannot accept a local plan that does not plan properly for our future and our children's futures with regards to food security. <a href="https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/">https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/</a> NPPF and agricultural land The NPPF is a framework to which we work, however, we must be clear, the idea that we can build on large areas of agricultural land is NOT promoted in the framework. The framework states that lower quality land should be used first, before higher grade agricultural land. The framework was aiming to prevent building on top quality agricultural land unless absolutely necessary. In the sustainability aspects of the framework, we</p>			



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>see further statements preserving the environment and farming. The over-arching idea of the framework is to be sensible in the use of agricultural land for economic purposes and housing, and to balance it with the need for self-sufficiency. We would suggest that the authors of the framework, did not envisage a district where there was only the best and most versatile agricultural land to build on, as is predominately the case in Thanet. The authors would not have been able to think of every unique scenario in which the framework needed to be applied. We cannot be sure, but we believe that the authors would be disappointed to find that the framework was being used to allow lawful destruction of great swaths of the best and most versatile agricultural land in the South East of England. We disagree that the plan should be signed off, as it is unsound with regards to its environmental sustainable credentials. The NPPF was not set up to be used to destroy large areas of grade 1 and 2 farmland, and, to try to twist it in this way is not sound application of planning law. Residents all over Thanet understand that some housing is needed but a very large proportion believe we should not use the prime agricultural land. They feel very disempowered by the lack of effective localism with their concerns and desires being continuously ignored. The table below has been collated from the new Sustainability Appraisal (December 2019) and shows that nearly eight thousand dwellings are intended for the best and most versatile agricultural land from the strategic and other larger sites. This list is not exhaustive and therefore there will likely be much more than 8000 dwellings. This level of destruction of agricultural land within one a district is unacceptable. Grade 1 agricultural land is an asset to the UK and should be protected. The Sustainability Appraisal also shows that the 2000 houses at Westgate will results in a direct loss of 3.17 % of total best and most versatile agricultural land used within Thanet and this will be a significant adverse effect (p62). Code Site number of dwellings SP13 Manston Green</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>785 SP14 Birchington 1600 SP15 Westgate 2000 SP16 Westwood 1450 SP18 Land at Manston Court Rd/Haine Rd 1400 SP18a Land North and South of Shottendane Rd 300 HO3 Westside of Haine Rd, Ramsgate 100 HO6 South side of Brooke Ave, Garlinge 34 HO12 Tothill Street, Minster 250 HO13 St Nicholas 36 Total planned sites (&gt;30 dwellings) on agricultural land 7955 The application of the NPPF We understand that the NPPF should be applied to planning in the UK as a whole, however we also realise that a framework is not a one size fits all solution. As we have stated before, the NPPF may work well with larger areas with a variety of land types, such in a Kent wide plan, however when we try to apply the framework to smaller and smaller areas it is not effective. This is the same with any rule applied to social or biological or even statistical systems. It may be statically correct that x number of people behave this way under X circumstances in the general population, however in taking a small sample of people these statistics and rules do not apply. They simply do not have enough statistical power. It is the same with the NPPF – it is being applied to a very unique, small island which has many geographical limitations. The framework does not apply and to force it is unreasonable. This does not mean that the framework needs completely revising, it simply requires, where necessary, a unique application in unique circumstances. The Isle of Thanet is one of those areas. Raising sea levels Across the world sea levels are rising displacing coastal communities and other low lying areas. As we know, the Isle of Thanet was originally an island accessed by the river Wantsum. It is possible that we will become an Island again. <a href="https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/">https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/</a> It is therefore imperative that housing is planned for with this in mind. This requires more than just taking into account the flood risk zones in the Local Plan map. The effect on housing, employment and transport on (and off) the Isle of Thanet</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>needs to be taken into account with this in mind. The local plan is therefore unsound as it does not do this fully. These issues need to be addressed now and not in 6 months or 12 months time. The map below shows the areas that could be flooded (in red) for our children's generation if we do not act now. Climate central. <a href="https://www.kentlive.news/news/kent-news/terrifying-new-climate-forecast-shows-3508822">https://www.kentlive.news/news/kent-news/terrifying-new-climate-forecast-shows-3508822</a> Thanet's water supply Across the world, the fresh water supply will become scare and there will be water shortages. As this is the most fundamental of all human needs this is exceptionally worrying. <a href="https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/">https://climatenexus.org/international/ipcc/comparing-climate-impacts-at-1-5c-2c-3c-and-4c/</a> The Local Plan makes it clear that the local water quality is very poor. Thanet's groundwater is contaminated from industry and poor agricultural practices. TDC needs to decontaminate the groundwater supply now and stop relying on water from elsewhere. The ancient people who used to live in Thanet settled here because we had a good water supply. It is abhorrent that we have polluted our own water when it is the most fundamental molecule needed for human habitation. There are some simple techniques to start to decontaminate water that can be employed and we must do this now. * Brexit – Leaving the EU, which has now been agreed, completely changes the population projections for the Isle of Thanet. The population projections calculated by the Office of National Statistics (ONS) were based on the assumption that population increase would continue on the trajectory as predicted from a specific five years in the last decade. We now know that these assumptions are not correct. Approximately a third of the population increase in Thanet each year came from International inward migration, and being close to Europe, a large proportion of the international migration to Thanet was from the EU. As this will decrease significantly due to Brexit, it needs to be fully re evaluated and the OAHN reduced accordingly. We need to address these issues BEFORE we</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					sign off a document which is based on unsound assumptions and population projections.			
MM/004	Schembri	Angela	RPS Planning & Development Ltd	230	The new paragraphs are welcomed as this will allow for a review of the Local Plan to incorporate the decision made by the Secretary of State on the Manston Airport DCO		<a href="#">View Comment</a>	Support noted. No change is required to MM/004.
MM/004	Solly	C		272	Additions: * Housing delivery should be tested if housing need is adjusted in the review * To ensure that the plan period should be a minimum of 15 years NPPF Paragraph 22 (2019). * That the transport policy and plan is the most appropriate, especially in regards to Manston airport land * A review of economic policy in light of an outcome of a DCO decision, as the employment land provision may need to be adjusted * A review of policy of the Best and Most Versatile Land in respect to the pending UK Agriculture bill and act (2020) * Policy changes in respect to the change of law in respect to Brexit		<a href="#">View Comment</a>	The Modification recognises that other issues may arise during the review process. No change is required to MM/004.
MM/004	BLANKLEY	NICK		40	A further issue for review should be an overall impact assessment of the proposed developments. The current piecemeal presentation masks major and serious implications for the existing communities in Thanet. Potentially 10% of best agricultural land could be lost, there is no overall assessment of traffic, public transport, health, education and social care needs. Law and order and the social impacts of such a large and rapid population change need to be meaningfully considered.		<a href="#">View Comment</a>	Any update of the Local Plan would include the relevant assessments, and consultation with statutory bodies on infrastructure provision and other matters. No change is required to MM/004.
MM/004	Bartlett	Trevor	Dover District Council	41	Support: Following on from the East Kent Local Plan Climate Change and Adaption Workshop that Dover District Council organised on the 28 November 2019, Dover District Council would very much welcome the opportunity for Local Planning Authorities from across the whole of Kent to work together in order to identify ways that the implications for climate change can be addressed in a holistic Kent wide manner.		<a href="#">View Comment</a>	Noted. No change is required to MM/004.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/004	Lorenzo	Peter	The Broadstairs Society	80	The Broadstairs Society understands the reason for the modification although it is symptomatic of the way the whole process has been undertaken that it is necessary for a review of the Local Plan within six months of it being published. A lot of work has been expended on planning and little, if anything on actual implementation.		<a href="#">View Comment</a>	Comment noted. No change is required to MM/004.

<b>Mod Number</b>	<b>MM/005</b>							
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/005	Burnett	Nicole	Gladman	134	Generally speaking any local plan review policy should be easy to understand and effective and, should aim to set achievable targets for the completion of the review, with any triggers written into policy being meaningful and having sufficient 'teeth'. With this in mind, whilst MM05 seeks to align the local plan review to an updated Local Development Scheme, for clarity and effectiveness, the policy would benefit from a final sentence that confirms when the Local Plan review will be submitted for examination e.g. within 3 years of the adoption of the plan and any consequences if this does not happen e.g. identified policies will be regarded as being out of date.		<a href="#">View Comment</a>	The purpose of the review (PPG "Plan-making", para 65) is to identify the need for, and scope of, any update to the Plan. The review process will also identify a work programme and timetable for any update. No change is required to MM/005.
MM/005	N/A		Tesco Stores Limited	206	Our representation to MM/012 refers		<a href="#">View Comment</a>	See response to MM/012 comments.
MM/005	Gray	Gill	Westgate-on-Sea Town Council	223	MM 005 Local Plan Review It is true that we need a cut-off date for the full completion of a document. However, we cannot use this as an excuse for an incomplete document that is not up to date and is not sound. The local plan is not sound as the OAHN is based on inaccurate assumptions and it also does not place enough weight on the fact that the UK will experience likely water shortages, flooding and food shortages		<a href="#">View Comment</a>	The Modification relates to the requirement by the SoS, following the intervention process. No change is required to MM/005.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					very soon. The NPPF should not be applied in a way that allows overarching climate change and food and water security policies to be ignored.			
MM/005	Schembri	Angela	RPS Planning & Development Ltd	231	New Policy SP01(b) is welcomed as this will allow for a review of the Local Plan to incorporate the decision made by the Secretary of State on the Manston Airport DCO		<a href="#">View Comment</a>	Support noted. No change is required to MM/005.
MM/005	Solly	C		273	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/005
MM/005	Simpson	Maddie	Iceni Projects	288	d. Early Review of the Local Plan: We welcome the Council's decision to undertake an early review of the Local Plan as set out in New Policy SP01b which states the following: Within six months of the adoption of the Local Plan, the Council shall undertake and complete a review of the Plan with information published as part of an updated Local Development Scheme setting out a timetable for the completion of the review and any update as may be required. There are several matters that need consideration, as a result of changing circumstances, however the most relevant for the Site are as follows: • To review the provisions of the Plan in relation to Manston Airport in the light of a decision on the Development Consent Order; • To assess the implications of the Local Housing Need Methodology on housing requirements for the district; • To ensure compatibility with the most recent National Planning Policy Framework. There may be other issues that arise that need to be addressed through the review of the Plan. Development Consent Order: The decision for the Manston Airport DCO has been delayed until May 2020 and the Secretary of State has requested further information. Given the location of the Manston Green site, CL have a particular interest in the future use of Manston Airport, especially should a DCO for continued aviation use be granted. As identified in		<a href="#">View Comment</a>	Support noted. No change is required to MM/005.




Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					previous representations, whilst CL are not against in principle the re-opening of the airport, the proposals must have due regard to the extant permissions for the development of the Manston Green site and any future development opportunities in this location. A strategy must therefore be put in place that ensures the interest of development sites for housing are reliably protected. Housing Needs: Upon review of the Local Plan, the Council is required to adopt the Standard Methodology for assessing housing need, therefore the Council's requirement will increase from 857 dpa in the Pre-Submission Local Plan to 1,118 dpa, seeing an increase of 30%. Considering a review of the Local Plan is planned within six months of adoption, the Council will need to consider additional sites to accommodate this inflated figure. Manston Green is suitable, deliverable and sustainable site which the Council should consider going forward for an additional 150 units.			
MM/005	BLANKLEY	NICK		43	This policy should be extended to commit to genuine community involvement and consultation which goes way beyond posting large volumes of printed material on line, largely out of sight of the people of Thanet. Officers and elected representative should be confident in their judgements and be able to demonstrate publicly that the strategy and associated developments are realistic, evidence based, beneficial, deliverable and in the interests of the people of Thanet.		<a href="#">View Comment</a>	Comment noted. The review/update of the Local Plan will involve significant engagement with local communities and other relevant bodies, as it has done with the development of this draft Plan ( <a href="https://www.thanet.gov.uk/wp-content/uploads/2018/11/CD7.10-Consultation-Statement-Report-and-Appendicies-1.pdf">https://www.thanet.gov.uk/wp-content/uploads/2018/11/CD7.10-Consultation-Statement-Report-and-Appendicies-1.pdf</a> ). No change is required to MM/005.
MM/005	Bown	Kevin	Highways Agency	52	We note the commitment to a review of the Local Plan within 6 months of its adoption. We look forward to early engagement with the Council to map out, in conjunction with Kent Highways, those elements relating to highways and transport and the timetable for any evidence/policy production and review. The review, in part under the Duty to		<a href="#">View Comment</a>	Noted. No change is required to MM/005.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Co-operate, will need to take into account the emerging Canterbury, Dover and Swale Local Plan reviews.			
MM/005	Bailey	Ruth		7	I agree with the necessity for an early review of the Plan in order to address these important issues.		<a href="#">View Comment</a>	Support noted. No change is required to MM/005.

**Mod Number** MM/006

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/006	Alan Byrne/ English Heritage			108	As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document. Historic England's comments on relevant matters are set out below in the order they appear in the Main Modifications Schedule: MM/006 – we support the inclusion of additional text relating to Ramsgate Heritage Action Zone.		<a href="#">View Comment</a>	Support noted. No change is required to MM/ 006.
MM/006	Friend	William	Friend Growers	122	I support this policy and would ask that East Northdown Garden and Business Centre , which largely lies within the Northdown conservation area and is adjacent to Northdown Park and the Green wedge is recognised as an	<a href="#">12 20 JT re strat hous l av ass 2010.pdf</a> <a href="#">TH_19_0748--713264.pdf</a> <a href="#">End google 2018.png</a> <a href="#">gen plan 19.jpg</a> <a href="#">End tunnels.jpg</a> <a href="#">TH_19_0748-DELEGATED_REPORT-739493.pdf</a>	<a href="#">View Comment</a>	Support noted. No change is



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					existing mixed use , enterprise centre , community hub , green tourist attraction etc. and its potential for the historic and and attractive environmental character of the site to act as such a catalyst and site provider for enterprise , by following my existing development plan should be recognised, welcomed and supported in accordance with this policy as now drafted - not fought against as in the past. As owner , I have chosen this path , not a residential re-development for 102 houses as identified in the 2007 housing land available study as the more sustainable route for the future of the 3.8ha site in the urban area , and to serve the adjoining 60ha of intensive arable land in the green wedge as a cohesive agricultural holding and green community hub . To implement Thanet's environmental strategies TDC needs to work with rural and other businesses and landowners who share common goals, such as myself , not against them, to deliver land management objectives in this plan on a co-operative basis. W.O.H.Friend MA (Oxon) Agricultural and Forest Sciences	 <a href="#">Egen plan 19 1 1250.jpg</a>  <a href="#">End units a-E 19.jpg</a>  <a href="#">TH_14_0759-POTENTIAL_MASTERPLAN-308230.pdf</a>		required to MM/006.
MM/006	Brown	Jacqueline		209	- MM/006 I do not see this rampant development creating any new jobs in the tourist industry. Thanet will become an urban sprawl with no fields		<a href="#">View Comment</a>	The comment

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					and green spaces. Visitors will not wish to come to Thanet. They want to get away from all the over development and pollution and to be greeted by green fields and beaches.			does not relate specifically to the Proposed Modification. No change is required to MM/006.
MM/006	Gray	Gill	Westgate-on-Sea Town Council	224	welcomed additions		<a href="#">View Comment</a>	Support noted. No change required to MM/006.
MM/006	Jones-Hall	Samara		229	Strongly support amendments particularly in light of a wealth of evidence reports from Historic England as part of the Ramsgate HAZ particularly the Colliers Report <a href="https://historicengland.org.uk/content/docs/research/creative-industries-summary-report/">https://historicengland.org.uk/content/docs/research/creative-industries-summary-report/</a> which lists Ramsgate as a case study Further, Ramsgate and Margate are both part of the Thames Estuary Production Corridor at point 27 and 28. <a href="https://www.london.gov.uk/sites/default/files/tepc_vision_to_action_2019.pdf">https://www.london.gov.uk/sites/default/files/tepc_vision_to_action_2019.pdf</a> Other supporting evidence can be found at: Thanet Visitor Economy research		<a href="#">View Comment</a>	Support noted. No change is required to MM/006.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Thanet Visitor Study 2018 The Value of Arts and Culture in Place Shaping by Wavehill August 2019 TDC Landscape Character Assessment August LUC 2017 Heritage Alliance Inspiring Creativity, Heritage and Creative Industries <a href="https://www.theheritagealliance.org.uk/wp-content/uploads/2019/09/InspiringCreativity_THAreport.pdf">https://www.theheritagealliance.org.uk/wp-content/uploads/2019/09/InspiringCreativity_THAreport.pdf</a> Heritage Lab report - Creative Ramsgate <a href="http://heritagelab.org.uk/wp-content/uploads/2019/11/RamsgateSurveywebspread.pdf">http://heritagelab.org.uk/wp-content/uploads/2019/11/RamsgateSurveywebspread.pdf</a>			
MM/006	Cooper	Barbara	Kent County Council (KCC)	241	The County Council is supportive of the proposed modification. It is important to recognise the contribution of the Heritage Action Zone work currently being carried out and to make sure that the historic environment is used as a catalyst for sustainable growth.		<a href="#">View Comment</a>	Support noted. No change is required to MM/006.
MM/006	Solly	C		274	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/006
MM/006	Bailey	Ruth		8	I support any measures to protect and encourage the growth of the creative hubs in Thanet's main towns and the preservation of our heritage assets.		<a href="#">View Comment</a>	Support noted. No

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					These heritage assets must be invested in and maintained so that they do not fall into disrepair. It is economically important for Thanet to supplement, and complement, the seasonal nature of it's tourist offering with this growing cultural and creative industry.			change is required to MM/006.

**Mod Number** MM/007

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/007	Friend	William	Friend Growers	129	I support this policy - for a flexible approach to identifying new and existing employments sites in the urban area as stated elsewhere , We welcome the last paragraph that implies that rural employment facilities , including open uses, and necessary ancillary infrastructure in the countryside and green wedges will be permitted as part of existing rural businesses and facilities for new employment and creative opportunities will be supported , where it can be shown not to conflict with SP21 and SP 22 . SP22 is intended to prevent the coalescence of Thanet's main towns -it should not be used by TDC as a policy to restrict the development of existing or new rural businesses located on land in the green wedges or restrict those businesses to agricultural -food production only . I refer to the recent refusal of permission of some glamping pods at Elmwood Farm , Broadstairs . These 'pods' are clearly a diversification of an existing rural business , already diversified into providing equestrian facilities for local people , along side the more highly intensive vegetable growing enterprise employing a considerable labour force. The grazing of horses on former intensive arable land provides for an improvement in habitat , landscape and farming sustainability		<a href="#">View Comment</a>	Support noted. Comments do not relate specifically to the proposed modification. No change required to MM/007.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					, including carbon capture through increased soil organic matter levels under pasture land. The project , cannot be said to be 'essential' but it otherwise accords with SP22 in increasing accessibility ,tourism facilities for on farm equestrian stays, does not contribute to coalescence of the urban areas (it forms part of the existing farm complex)- and so on. The use of habitat policies to oppose the scheme is wholly wrong . How can 5 pods in Broadstairs have a significant impact on roosting sea birds in Sandwich bay , when 1,000's new homes do not ?			
MM/007	Dawkins	Julia	1953	22	Economic Growth: "Development is supported that enhances the rural economy subject to protecting the character, quality and function of Thanet's rural settlements and natural environments" The housing development proposals do not protect the character, quality nor function of Thanet's rural settlements. Grade 1/2 farm land is proposed for development which will completely alter the character and function of Thanet both socially and environmentally. For example, 2000 new residences in Westgate will more than double the existing population, and Westgate has a small high street with little scope for business or retail expansion. New residents will need to travel to other centres, notably Westwood Cross, for their shopping needs and for employment: With the two main employees in Thanet being the NHS and Retail, average earnings are lower than the national average and unemployment is higher than average across Kent. I doubt that this development would enable economic growth.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/007.
MM/007	Gray	Gill	Westgate-on-Sea Town Council	225	MM 007 It is important that Ramsgate is considered more fully with regards to economic growth. The Discovery Science Park (Former Pfizers site, just outside of Thanet in Sandwich) and the Ramsgate port are a large part of Thanet's economy. The Town Council is very concerned with the reasoning why housing has been allocated in such an unbalanced way towards the north of the island, considering the large sum of		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/007.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					money that was spent improving the road system on the south side and the new improved and widened routes towards Ramsgate and the Ramsgate Port over the past two of decades. The Parkway station has been also been in planning for a long period of time. If the station is planned, then further viable, proportional housing allocations could arise around the site.			
MM/007	Cooper	Barbara	Kent County Council (KCC)	242	KCC is committed to working in partnership with Thanet District Council to achieve the aims contained within the County Council's Rights of Way Improvement Plan (ROWIP). KCC is committed to securing enhancements to the whole network of routes and paths available to the public, of which the PRoW network is an important but not exhaustive part. KCC looks forward to working with Thanet District Council to build upon the countryside access assets already identified. KCC would therefore request that the final paragraph that starts "Development is supported that enhances the rural economy..." includes a reference to KCC ROWIP, which can help contribute towards infrastructure that enables development and encourages economic growth leading to regeneration and attraction of new businesses.		<a href="#">View Comment</a>	This paragraph of the Policy is not subject to a main modification. No change is required to MM/007.
MM/007	Solly	C		275	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/007
MM/007	BLANKLEY	NICK		45	Thanet already has one of the highest unemployment rates in the country, 17,000 new homes could bring 20,000 more people of working age to the area, 5,000 jobs appears to be inadequate. Even Thanet District Council cannot create 5,000 new jobs by 2031 and it is misleading to suggest that somehow these jobs will simply materialise. The Council should be seeking to create conditions and incentives that make Thanet a prosperous community and an attractive place for business, then the jobs will follow.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/007.

Mod Number					MM/008			
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/008	Friend	William	Friend Growers	152	We support this policy and would ask that the 3.8 ha area in the urban area at East Northdown Farm , Garden and Business Centre be recognised as an existing such a 'flexible' mixed use site under this policy to accommodate affordable premises for existing and start up small businesses for B1, A and D , gallery , shop, studio, workshop premises. Such town centre spaces are beyond the budgets of most small start up businesses, as such spaces are lost to residential development. The businesses, individuals , charities and groups support and sustain each other and the community. As a whole, the site forms a 'community hub' , together with the listed buildings, open gardens , plant nursery and cafe providing providing a long established tourist attraction and accessible green space. The adjoining green belt land provides for facilities for complimentary open uses , on the urban boundary that are not appropriate or readily accommodated in the urban area , or would be too costly within an industrial area. We have horticultural growing areas , composting and materials storage and re-cycling areas, processing of logs/ wood fuel, and a motor cycle training school. We would also like to have a green camping site and extra parking for summer visitors to our gardens and our popular beaches - particular botany bay, with de minimis facilities - of shower, toilet, ecology study room and drying room. We would also like to accommodate small scale horticultural or husbandry enterprises for individuals or groups that have outgrown local allotments or facilities provided by the local council. We believe that such projects would accord with both these job strategies , and with rural and environmental policies SP21 and SP22 and would not cause coalescence of Thanet Settlements, but that New Paragraph 4.12a needs to be amended , as it is hard to see how such initiatives could be classed as essentially located in the Green wedge , even if they meets the overall environmental		<a href="#">View Comment</a>	Support noted. Comments do not relate specifically to the proposed modification. No change is required to MM/008.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					strategy of enhancing and diversifying the habitats, landscape and accessibility of the wedges for the benefit of the both tourists and the local community alike. ,			
MM/008	Solly	C		276	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/008

<b>Mod Number</b>	<b>MM/009</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/009	Peers	Anne	Mrs.	11	A transport assessment and travel plan should be in place before any development takes place. For business with movement of vehicles more than one charging point for every 10 spaces should be considered.		<a href="#">View Comment</a>	Requirements for transport assessments and travel plans are covered by Policy TP01 and need not be repeated in Policy SP03.. The policy states that development proposals must provide for "at least" one electric vehicle charging point for every 10 spaces provided.
MM/009	Friend	William	Friend Growers	123	East Northdown Farm, Garden and Business Centre should be identified and recognised as an existing mixed use site capable of making a greater contribution to the employment , facilities needs of the community , with 3.8ha in the urban area and 60 ha in the green wedge. in accordance with these policies . Such use should be supported not fought against - which continues to stifle our planned investment and improvement in facilities.	<a href="#">portacabin application 19.png</a> <a href="#">BT Yahoo Mail - Re_ET02_1743473_A&amp;G_EC.pdf</a> <a href="#">New Complaints final v 2.doc</a> <a href="#">Reply to enforcement containers WF v 4.doc</a>	<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/009.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/009	N/A		Tesco Stores Limited	184	Policy SP03 (MM/009) The Main Modifications do not clarify what approach should be taken to Thanet Reach Business Park. Policy SP07 as modified (MM/019) records that in accordance with Policy SP03, part of Thanet Reach is allocated for employment and education uses, with the southern part allocated for residential development. Paragraph 1.32 (MM/008) recognises that there is a need for "flexible" sites where alternative non Class B uses will be allowed to reflect the trend towards meeting all types of economic development. However, this is not reflected in the wording of Policy SP03 whereby only Eurokent (part) is seemingly subject to such flexible employment (marked by an asterisk). The rationale for the approach taken in respect of Eurokent was in part due to its proximity to Westwood Cross; Thanet Reach Business Park is in relatively closer proximity. As per previous submissions, it has also been allocated for 'Class B' employment uses for well over a decade (since at least 2006) and has not come forward for such uses. In accordance with NPPF 2012 paragraph 22 its longstanding allocation should therefore be reviewed. We maintain it should be allocated for flexible employment uses under modified Policy SP03 including provision for some residential development to reflect the approach taken to Thanet Reach Southern Part. This is particularly against a backdrop of an expressed need in the Submission Local Plan (paragraph 1.29) of "in the region of 15ha of employment land (B1, B2 and B8 uses) over the plan period" vs a supply in excess of 53ha, of which Thanet Reach Business	<a href="#">Reps to MM009.docx</a>	<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions. The comments do not relate specifically to the Proposed Modification. No change is required to MM/009.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Park would potentially contribute less than 7% (3.7ha).			
MM/009	Cooper	Barbara	Kent County Council (KCC)	243	It is recommended that this policy refers to charging points being active and providing a minimum of 7kw capacity per charging point. This would put the policy in line with recent central government guidance in relation to electric charging infrastructure (Paragraph 8 - Electric Vehicle Charging in Residential and Non-Residential Buildings July 2019)		<a href="#">View Comment</a>	
MM/009	Solly	C		278	There is a possible issue of car parking at these sites, as can be seen at Manston Business park on some days. Some assessment for parking facilities should be made, but also good connections reinforced by public transport and cycling. The assessment for parking may be different as different vehicle types may be required by employees and businesses, which could be different to the standard formula for parking spaces.		<a href="#">View Comment</a>	Development proposals that would have significant transport implications would require a transport assessment or travel plan in accordance with Policy TP01. No change is required to MM/009

<b>Mod Number</b>	<b>MM/010</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/010	Peers	Anne	Mrs.	12	A transport and travel plan should be a necessity before any improvements are implemented for 'Spitfire Junction and an extension of Columbus Avenue.		<a href="#">View Comment</a>	Requirements for transport assessments and travel plans are covered by Policy TP01 and need not be repeated in Policy SP04.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/010	Solly	C		280	* As stated in MM/009 "There is a possible issue of car parking at these sites, as can be seen at Manston Business park on some days. Some assessment for parking facilities should be made, but also good connections reinforced by public transport and cycling. The assessment for parking may be different as different vehicle types may be required by employees and businesses, which could be different to the standard formula for parking spaces." * Support for Green infrastructure is welcomed * Support for Transport contributions is welcomed		<a href="#">View Comment</a>	Development proposals that would have significant transport implications would require a transport assessment or travel plan in accordance with Policy TP01. Support noted. No change is required to MM/010

Mod Number	MM/011
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/011	Peers	Anne	Mrs.	13	Can the Council confirm that they have forwarded the results of the study by Avia Solutions to the DCO.		<a href="#">View Comment</a>	The Modification recognizes the DCO process and the need for the outcome to be addressed through the Local Plan Review. The comment does not relate specifically to the Proposed Modification. No change is required to MM/011.
MM/011	Friend	William	Friend Growers	140	We support the continued use of Manston as an airport and consider it is a strategic national asset, that should continue to form a key part of East Kent's Role as a transport corridor/link between the South East , Europe and beyond. Better utilisation of landing capacity at Manston for freight and aircraft servicing would free up landing capacity and air space closer to London and bring quality jobs to the area , lost through the loss of Sally Lines , Transeuropa and Phizers . The flight paths come in and out over the sea . New residential development in		<a href="#">View Comment</a>	Support noted. No change is required to MM/011.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					the flight path, such as at Manston Green should be avoided. The 'no night flight' lobby should not be allowed to jeopardise the future of this strategic asset of national importance in use as an airfield since WW1, with a very long runway and favourable weather conditions for diverted flights due to the local microclimate when other areas are snow or fogbound.			
MM/011	Bourne	R R		2	If the DCO for Airport use is granted, as I hope will be the case, the review of the Plan should take account of the need for a rail improvement ( a Ramsgate Parkway ), and new opportunities for Manston Business Park related to air freight, as well as one or more airport hotels -- Richard Bourne		<a href="#">View Comment</a>	Noted. No change is necessary to MM/011.
MM/011	Jones-Hall	Samara		218	Comment re Para 1.44 with MM/011 Strategic Environmental Assessment 1. The Council has not carried out a separate strategic environmental assessment (SEA) in respect of the new SP05. 2. The Sustainability Appraisal Addendum Report Issue 4, 3 October 2019 (SEA_2019) states that there are some inconsistencies between the "Appraisal Summary and Other Planning Considerations". This cannot be right and/or lawful. Viability * Riveroak Strategic Partners (RSP) submitted to the UK Planning Inspectorate draft Local Plan hearings the Azimuth Report authored by Dr Sally Dixon as its evidence to show viability of aviation at the Manston site. * However, it is a matter of public record that the Development Consent Order examination will not and did not test the viability of airport operations at Manston. * The following statements and recorded testimony of Dr Sally Dixon, author of RSP's Azimuth Report are now a matter of public record and clearly confirm that the Azimuth Report does not show or even attempt to show viability of aviation at the Manston site: "I wasn't asked to come up with a forecast that showed viability or not. I was asked to produce a forecast. Whether or not it was viable was not in my hands." Please see Dr Sally Dixon, UK Planning Inspectorate, Recording of ISH2 - Part 3, Need and Operations, [TR020002-003870] at timecode 1:17:28 " I was		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. Modifications to SP05 were assessed and published alongside the modifications consultation. No change is required to MM/011.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					asked to produce a forecast in terms of ATMs and tonnage. Whether or not that was viable was not part of the Azimuth Report." Please see Dr Sally Dixon, UK Planning Inspectorate, Recording of ISH2 - Part 3, Need and Operations, [TR020002-003870] at timecode 1:18:15 * Therefore the only evidence base for the draft Local Plan is Thanet District Council's viability report paid for by the public purse and known as the Commercial Viability of Manston Airport AviaSolutions Final Report for Thanet District Council September 2016 which determined that: "AviaSolutions concludes that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031". * It cannot be right or lawful that the Council does not rely on its own evidence base and in fact the only evidence base for the draft Local Plan to show viability (or lack thereof) of aviation at the Manston site.			
MM/011	Schembri	Angela	RPS Planning & Development Ltd	232	The new wording for these paragraphs is agreed and welcomed		<a href="#">View Comment</a>	Support noted. No change is required to MM/011
MM/011	Solly	C		282	Some consideration needs to be made if further delays are made to the DCO decision and that a 6 month review may not be appropriate. The DCO outcome is now due 18th May 2020		<a href="#">View Comment</a>	Noted.

#### Mod Number MM/012

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/012	Peers	Anne	Mrs.	14	It would appear that this policy is in direct opposition to the stated Avia Solutions study which confirms an airport at this site is not viable. At what time did this 'about turn' occur?		<a href="#">View Comment</a>	The Modification recognizes the DCO process and the need for the outcome to be addressed through the

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								Local Plan Review. No change is considered necessary to MM/012.
MM/012	N/A		Tesco Stores Limited	185	Policy SP05 (MM/012) Given the major bearing the future of Manston Airport will have on the development needs and planning policies of the district the need for an early review of the Local Plan is supported. Indeed, it is contended that it can only be found sound subject to such an early review. It is therefore imperative that this comprises not only a full (rather than partial) review but also a commitment to an early update of all policies of the Plan. It is therefore submitted that the timetable for completion of the review and any update should also be set out in new policy SP01b under MM/005 to ensure this critical stage does not slip.	<a href="#">Reps to MM012.docx</a>	<a href="#">View Comment</a>	The purpose of the review (PPG "Plan-making", para 65) is to identify the need for, and scope of, any update to the Plan. The review process will also identify a work programme and timetable for any update. No change is required to MM/012
MM/012	Jones-Hall	Samara		228	New Policy SP05 The drafting is not right as a DCO is not "confirmed" it is "granted" or "refused". The drafting is not correct and does not marry with the wording of paragraphs 1.38-1.45 nor with the Council's own evidence base. Accordingly the wording of the New Policy SP05 (without prejudice) be amended for example as follows- "Manston Airport as identified on the Policy Map is safeguarded for airport related uses and permission will not be granted for development until the early review of the Plan. If the current DCO is granted the future use and development of Manston Airport and/or other policies affected by the outcome of the current DCO process will be determined through the early review of the Plan. In the event the current DCO is refused or does not proceed (for whatever reason) Manston Airport will not be safeguarded for airport related uses". It cannot be right or lawful that the wording of the New Policy SP05 is included without at SEA or evidence supporting viability (see below). Strategic Environmental Assessment 1. The Council has not carried out a separate strategic environmental assessment (SEA) in respect of the		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. Modifications to SP05 were assessed and published alongside the modifications consultation. No change is required to MM/012.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>new SP05. 2. The Sustainability Appraisal Addendum Report Issue 4, 3 October 2019 (SEA_2019) states that there are some inconsistencies between the "Appraisal Summary and Other Planning Considerations". This cannot be right and/or lawful. Viability * Riveroak Strategic Partners (RSP) submitted to the UK Planning Inspectorate draft Local Plan hearings the Azimuth Report authored by Dr Sally Dixon as its evidence to show viability of aviation at the Manston site. * However, it is a matter of public record that the Development Consent Order examination will not and did not test the viability of airport operations at Manston. * The following statements and recorded testimony of Dr Sally Dixon, author of RSP's Azimuth Report are now a matter of public record and clearly confirm that the Azimuth Report does not show or even attempt to show viability of aviation at the Manston site: "I wasn't asked to come up with a forecast that showed viability or not. I was asked to produce a forecast. Whether or not it was viable was not in my hands." Please see Dr Sally Dixon, UK Planning Inspectorate, Recording of ISH2 - Part 3, Need and Operations, [TR020002-003870] at timecode 1:17:28 " I was asked to produce a forecast in terms of ATMs and tonnage. Whether or not that was viable was not part of the Azimuth Report." Please see Dr Sally Dixon, UK Planning Inspectorate, Recording of ISH2 - Part 3, Need and Operations, [TR020002-003870] at timecode 1:18:15 * Therefore the only evidence base for the draft Local Plan is Thanet District Council's viability report paid for by the public purse and known as the Commercial Viability of Manston Airport AviaSolutions Final Report for Thanet District Council September 2016 which determined that: "AviaSolutions concludes that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031".</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/012	Schembri	Angela	RPS Planning & Development Ltd	233	The wording for new Policy SP05 was discussed and agreed by TDC and RSP as part of the Local Plan Examination. The new wording for this policy reflects what was agreed and this is welcomed. Any decision on the Manston Airport DCO and the effect that this will have on Local Plan policies must be determined through the early review of the Plan		<a href="#">View Comment</a>	Support noted. No change is required to MM/012
MM/012	Solly	C		284	Some consideration needs to be made if further delays are made to the DCO decision and that a 6 month review may not be appropriate. The DCO outcome is now due 18th May 2020		<a href="#">View Comment</a>	Noted.
MM/012	Bartlett	Trevor	Dover District Council	42	Support: Dover District Council continues to very much welcome and offer our full support to RiverOak Strategic Partners (RSP) plans to re-open Manston as a fully operational airport as this would greatly assist with the regeneration of the East Kent economy and the UK aviation economy by making better use of regional airport capacity and the ability to create new markets post Brexit. We further consider that the geographical location of Manston airport to the Port of Dover provides a unique opportunity to foster and develop the existing logistical sector that has been developed at the Port of Dover.		<a href="#">View Comment</a>	Noted. No change is considered necessary to modification MM/012.
MM/012	Bown	Kevin	Highways Agency	53	We note and welcome the commitment to reviewing the Local Plan in light of the DCO decision on the future of Manston Airport. Highways England would wish to participate in the transport related elements of the review.		<a href="#">View Comment</a>	Support noted. No change is required to MM/012.
MM/012	Bailey	Ruth		9	An early review of the Plan, in light of the DCO decision, will certainly be necessary. Whichever way the DCO decision goes, it will have a major affect on the provision of infrastructure, employment and confidence going forward. Instead of the cloud of uncertainty and division of the last few years, Thanet really needs to move on from this paralysing issue in order to provide the reassurance of an economically viable blueprint for the future. I welcome this modification.		<a href="#">View Comment</a>	Comment noted. No change is required to MM/012.



Mod Number					MM/013				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/013	Solly	C		285	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/013	

Mod Number					MM/014				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/014	Peers	Anne	Mrs.	15	This whole section has been deleted and therefore does not have any clarity or effectiveness		<a href="#">View Comment</a>	The text deleted from this modification has been moved into Policy SP06 MM/017	
MM/014	Solly	C		287	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/014	

Mod Number					MM/015				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/015	Solly	C		289	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/015	

Mod Number					MM/016				
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/016	Solly	C		291	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/016

<b>Mod Number</b>	<b>MM/017</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/017	Jull	Peter	Deal & Walmer Chamber of Trade	1	It remains unclear whether this policy and associated ones will require relevant additional retail floorspace to be subject to passing the impact test or not. Whilst there appears to be an ambition to turn Westwood into a town centre it also identifies its current fragmented nature which clearly evidences it's current status as typical of out of town development. The local plan should clarify that retail development at Westwood remains subject to the impact test on genuine town centres including Deal. which already loses nearly 40% on its comparison shopping to Westwood.		<a href="#">View Comment</a>	Table 1 outlines the levels of growth planned for at Thanet's town centres, including Westwood. Policy E05 deals with the sequential and impact tests in accordance with the NPPF. No change is required to MM/017.
MM/017	Brown	Jacqueline		210	-MM/017 Cliftonville, Westgate and Garlinge, Birchington and Minster will no longer be deemed semi rural as there will be no green fields so I think this is now inaccurate to call them semi rural if all this development goes ahead.		<a href="#">View Comment</a>	Noted. No change is required to MM/017.
MM/017	Solly	C		292	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/017

<b>Mod Number</b>	<b>MM/018</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/018	Quashie	Lorna	Pavilion Property Trustees as Trustee of the Broadstairs Unit Trust	124	The Pavilion Property Trustees welcome the removal of reference (in Para 2.20) to 'Millennium Way' being the route for a link between Margate Road and Westwood Road. However, the Main Modification to Paragraph 2.21 is of concern to the Pavilion Property Trustees. As currently worded, this paragraph requires development that comes forward before the Westwood Area SPD is adopted to be consistent with three "aims" in the (yet to be published) SPD. These aims include "Phase 1 – Completion of the Westwood Relief Road Strategy/Improved Signage". As referred to in the Pavilion Property Trustees representations on MM/019, this approach is unacceptable since the Westwood Relief Road Strategy includes routes (to complete the relief road )across their land. Thus, as currently worded, Para 2.21 could be used (in association with Policy SP07) as a mechanism by the Council to reject proposals by the Pavilion Property Trustees to develop on their land (in advance of the SPD) on the grounds that they are not delivering the parts of the Westwood Relief Strategy (despite these routes now being removed from the Local Plan). As currently worded, this approach is unsound. Suggested Alteration: The Local Plan should clarify that where there is conflict between the Local Plan and Westwood Relief Strategy, the Local Plan should take precedence over the Westwood Relief Strategy (since the latter does not form part of the adopted Development Plan).		<a href="#">View Comment</a>	Comment noted. If the Inspectors consider it necessary, in their final report, to recommend a change to proposed modification MM/019, the following change is considered appropriate by the Council:  Development proposals in the Westwood area should have regard to the provisions of the Westwood Area SPD once adopted and also the Westwood Relief Strategy once adopted.
MM/018	N/A		Tesco Stores Limited	186	Paragraph 2.20/2.21 (MM/018) The proposed deletion of reference to 'Millennium Way' forming part of a link between Margate Road and Westwood Road in paragraph 2.20 is welcomed. However, the requirement in paragraph 2.21 for any new development to be consistent with the aims of a forthcoming SPD which is to consider short, medium and long term solutions in 3 phases is considered unduly onerous and needs to be reworded in order to be considered sound. Firstly, there is no clarity or certainty provided on the timing	<a href="#">Reps to MM018.docx</a>	<a href="#">View Comment</a>	Comment noted. If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification MM/019, the following change is considered appropriate by the Council:

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					of the Westwood Area SPD. To require development to have regard to the provisions of the SPD and also the Westwood Relief Strategy (under MM/019) has the potential to sterilise any development coming forward until the SPD is adopted, irrespective of whether it would have an impact on the content of the SPD or the delivery of the Relief Strategy. Secondly, Phase 1 refers to the 'Completion of Westwood Relief Strategy'. The Westwood Relief Strategy retains references to the extension of Millennium Way/routes across Tesco's land interests subject of duly made objections to the Submission Local Plan. Those stated concerns over the delivery and routing of this element of the potential link presumably led the Inspectors to recommend the proposed deletion of any direct reference to Millennium Way in these Main Modifications. Reference in the Local Plan to a Relief Strategy (without any amendment) which retains such aspirations therefore rather undermines these Main Modifications (including MM/077). It is therefore considered that reference to the SPD and Westwood Relief Strategy should either be removed and addressed in the early review of the Local Plan, or reworded to clarify that: developments may come forward in advance of the adoption of the SPD subject to satisfying issues of transport impact etc. the Westwood Relief Strategy is to be amended to remove direct reference to an extension to Millennium Way in the event of any conflict between the content of the Local Plan and the SPD/Relief Strategy the Local Plan takes precedence.			Development proposals in the Westwood area should have regard to the provisions of the Westwood Area SPD once adopted and also the Westwood Relief Strategy once adopted.
MM/018	Cooper	Barbara	Kent County Council (KCC)	244	The County Council raises a significant concern over the removal of the reference to the Millennium Way road link, as this is particularly important in the context of future highway access to Westwood Cross from Broadstairs. The implementation of this link will be one of the aims and objectives of the future Westwood Supplementary Planning Document (SPD) The County Council as Local Highway Authority is continuing to develop more detailed		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/018.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					microsimulation highway modelling, with initial outputs demonstrating that this link will provide journey time benefits and resilience to key retail and leisure destinations within Westwood Cross. It is strongly recommended that reference to this route is retained within the Local Plan.			
MM/018	Solly	C		294	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/018
MM/018	BLANKLEY	NICK		46	This a very weak entry, it highlights the problem of developments that are approached piecemeal and allowed to go forward without the necessary consideration or infrastructure being in place.TDC has and continues to fail to take a holistic view of development implications across Thanet or to enforce the necessary rigour to force developers to meet their obligations.The Council is in a hole here and is continuing to dig in the hope of finding a way out. The relief 'scheme' is now a 'strategy' - it has morphed from a practical deliverable to become a long term aspiration. The scheme/strategy is a gamble relying wholly on developers coming forward at some unspecified point in the future with sufficient funds to make it deliverable. In the meantime, local people will have to endure delays, congestion, inconvenience and more pollution.		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/018.

#### Mod Number MM/019

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/019	Quashie	Lorna	Pavilion Property Trustees as Trustee of the	125	Whilst the preparation of the 'Westwood Area SPD' will assist all parties understand the future planning strategy for Westwood Town Centre, it is imperative that the Local Plan provides a timetable for the preparation and adoption of the		<a href="#">View Comment</a>	Comment noted. If the Inspectors consider it necessary, in their final

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
			Broadstairs Unit Trust		<p>SPD. The Council's latest 'Local Development Scheme' (produced in March 2019) refers to consultation on the draft Westwood Area SPD taking place in 'Summer 2019' with adoption in 'Summer 2020'. The LDS also anticipated' that the Thanet Local Plan would be adopted in 'Spring 2020'. These timescales illustrate that Policy SP07 was originally drafted in the context of the Council expecting the Westwood Area SPD to have been published in draft (and subject to consultation) before the Local Plan is adopted. These timescales have not been realised and the Council now finds itself in the position that the Local Plan is likely to be adopted well before the Area SPD is drafted and ultimately adopted. This creates uncertainty for developers looking to bring forward proposals in Westwood town centre (such as the Pavilion Property Trustees), and has the potential to sterilise development in the town centre until the Area SPD is in place. This approach is 'unsound'. To provide greater certainty on this matter, adoption of the Local Plan should be delayed until a draft SPD has been published (and subject to consultation) and/or the Local Plan should include a timetable for preparing the SPD - thus removing uncertainty. Furthermore, the modified Policy SP07 requires development proposals to have regard to "the provisions of" the Westwood Relief Strategy. This wording (and approach) is unacceptable to the Pavilion Property Trustees, as the Westwood Relief Strategy includes diagrams (and text) showing Westwood Relief Road routes crossing their land, despite the removal of these routes from the Local Plan (as indicated in MM/077). Consequently, as currently worded, Policy SP07 creates a scenario whereby the Council could reject future development proposals on the Pavilion Property Trustees land which do not deliver (or would impede the delivery of) the routes identified in the Westwood Relief Strategy, despite the Council's acknowledgement (at the EiP) that these routes are not deliverable. As currently worded, this element of</p>			<p>report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:</p> <p>Development proposals in the Westwood area should have regard to the provisions of the Westwood Area SPD <del>once adopted</del> and also the Westwood Relief Strategy <u>once adopted</u>.</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Policy SP07 is unsound. Suggested Alteration: The Local Plan should be amended to refer to a timescale for the adoption of the Westwood Area SPD and/or adoption of the Local Plan should be delayed until a draft of the SPD has been consulted on – in line with the LDS strategy. The Local Plan should clarify that where there is conflict between the Local Plan and Westwood Relief Strategy, the Local Plan should take precedence over the Westwood Relief Strategy (since the latter does not form part of the adopted Development Plan).			
MM/019	Burnett Planning		Burnett Planning on behalf of CD10 Properties Limited	139	Regarding Westwood Town Centre, the proposed Modification makes it clear that Policy E04 presents the criteria against which the acceptability of proposed uses in the Town Centre will be assessed. The retention of the wording - "Any development proposals should ensure there is no net loss in overall commercial floorspace" - is unnecessary and is inconsistent with Policy E04 (as proposed to be modified) which supports residential use (i.e a non commercial use) without requiring there to be "no net loss of overall commercial floorspace." Furthermore, Policy SP07, in referring to "any development proposals" would require proposals for main town centre uses [which is presumably what "commercial floorspace" refers to] to ensure there was no net loss of commercial floorspace. The requirement that "any development proposals" (i.e. not just non-commercial development proposals) "should ensure there is no net loss of overall commercial floorspace" is solely a quantitative consideration. Where a proposal is for the replacement of one type of main town centre use with another, Policy SP07 would require the exact amount of commercial floorspace to be replaced. Different main town centre uses would have different floorspace requirements and the prohibition on net loss of commercial floorspace would be unworkable. For example, where a proposed A1 shop is to replace a D2 gym use, it would not be reasonable or necessary to apply this		<a href="#">View Comment</a>	The principle of "no net loss of commercial floorspace" is not subject to a main modification. No change is required to MM/019.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					quantitative requirement; and, for example, where a proposal involved replacing outdated Class A1 floorspace with modern more efficient shops, it would not be effective to apply this quantitative requirement as it ignores qualitative considerations (i.e. a smaller modern development could contribute more to vitality and viability than a larger existing development). There should also be no requirement for applicants to provide more commercial floorspace than is proposed in an application as this could affect viability, and could frustrate investment. The wording - "Any development proposals should ensure there is no net loss in overall commercial floorspace" should be deleted			
MM/019	Miss P A Smith			144	You refer to improvements to Lord of the Manor – nothing will alleviate major congestion until there is another access from say, the prospect to the north of the airport.		<a href="#">View Comment</a>	Noted. No change is required to M/019
MM/019	N/A		Tesco Stores Limited	188	Policy SP07 (MM/019) For the reasons set out in the representations on MM/018 Tesco object to the inclusion in Policy SP07 of reference to "Development proposals in the Westwood Area should have regard to the provisions of the Westwood Area SPD once adopted and also the Westwood Relief Strategy". In addition to the previously expressed concerns, it is unclear what the 'Westwood Area' comprises. There is also no timeframe set out for the adoption of the SPD; it is anticipated that the Local Plan will be adopted far in advance of the SPD being drafted and ultimately adopted. Reference to the SPD within the Local Plan therefore results in uncertainty for developers/applicants. Furthermore, the Westwood Relief Strategy is not an up to date evidence base document and should therefore be reviewed and amended. The policy wording in respect of Thanet Reach should be amended to refer specifically to flexible employment uses to reflect paragraph 1.32 (MM/008) of the Main Modifications. As per previous representations, it is further contended that Land North of Millennium Way should comprise a mixed use	<a href="#">Reps to MM019.docx</a>	<a href="#">View Comment</a>	Comment noted. If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:  Development proposals in the Westwood area should have regard to the provisions of the Westwood Area SPD once adopted and also the Westwood Relief Strategy once adopted.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					allocation, including residential development (for a total of 225 dwellings in combination with land to the south).			
MM/019	Cooper	Barbara	Kent County Council (KCC)	245	KCC welcomes the inclusion of text that promotes multi-modal access and would request that the Transport Assessment has specific consideration of the PRoW network including an assessment of the impact on the network. The County Council is supportive of the retention of the archaeological clauses within this policy. The County Council notes the paragraph within Policy SP07, which states: "Masterplanning will be informed by and address the following: The capacity of any utility services and infrastructure and any need (and provision of) improved or additional infrastructure (as may be advised or reasonably required by service providers);" The County Council recommends that "utility services and infrastructure" must include the consideration of waste management infrastructure and whether there is sufficient capacity to support growth for all strategic housing sites, including at Westwood.		<a href="#">View Comment</a>	Supports noted. The principle of meeting infrastructure needs is not subject to a main modification. No change is required to MM/019.
MM/019	Solly	C		297	As stated in MM/001, It needs to be clear and hope that the SPD will dictate how the improvements will be. The Westwood area has been blighted by a lack of planning by the planning authority itself. Community had little say on how Westwood has been developed and the area lacks any cohesive community as it stands. It also sits on different settlement areas and the council needs to make clear what Westwood will need to be for the future. Im sure we will look forward to the pending SPD process.		<a href="#">View Comment</a>	Noted. The aims of the SPD are stated in paragraph 2.21. No change is required to MM/019.
Mod Number				MM/020				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/020	Cooper	Barbara	Kent County Council (KCC)	246	The County Council welcomes the recognition that the potential impact on heritage assets will be a key issue considered for the development of new lifeboat facilities in Margate. The County Council recommends that this is also reflected in the wording of MM/021 (part 7).		<a href="#">View Comment</a>	Modification MM/020 states what policies apply. There is no need to repeat in modification MM/021.
MM/020	Solly	C		298	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/020

**Mod Number** MM/021

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/021	Chapman	Alan		157	The development proposed for the "Cottage Cark Park" is detrimental to Margate for the following reasons: * it does not enhance the area it sits in. It is a classic example of over development in such a restricted space with a severely restricted access. * The local businesses (in particular those that encircle this quadrant), are vehemently against this development. They cite that the development of this car park will result in the loss of valuable customers which will impact negatively on their businesses. The overall negative aesthetic appearance that a "modern" development will have is incongruous to Margate's old town character and heritage that has made Margate an irrefutable success as a tourist attraction. * This proposed development occupies prime land in central Margate. The housesl therefore proposed will be expensive and it is unlikely that local people will be able to afford them. * This land is better served as a car park. It is the only car park in Margate old town and it is therefore extremely important to local trade The car park is invaluable to people with reduced mobility as it makes the old town accessible to all and in		<a href="#">View Comment</a>	The principle of allocating sites as opportunity areas is not subject to a main modification. No change is required to MM/021

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					particular to those that are disabled. * This is the only "long term" car park in Margate old town which will severely impact negatively on the footfall of small local businesses.			
MM/021	Peers	Anne	Mrs.	16	Cheap parking and more of it would benefit visitors to Margate		<a href="#">View Comment</a>	The comment does not relate specifically to the proposed modification. No change is required to MM/021.
MM/021	Solly	C		300	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/021

<b>Mod Number</b>	<b>MM/022</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/022	Cooper	Barbara	Kent County Council (KCC)	247	The County Council recognises that reference is specifically made to the relevant safeguarding policies of the Kent Minerals and Waste Local Plan 2013-30 (KMWLP). This includes Policy CSM 6: Safeguarded Wharves and Rail Depots and Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure and the inclusion within the Thanet Local Plan of the safeguarding of the wharf for its mineral importation activity. The Main Modification is therefore supported by the County Council as Minerals and Waste Planning Authority.		<a href="#">View Comment</a>	Support noted. No change is required to MM/022
MM/022	Solly	C		320	The future of the Port at Ramsgate will need to be assessed by council in the future. The Port is an issue on the councils budgets at present and policy could change in the plan period.		<a href="#">View Comment</a>	Noted. Any future proposals for the Port can be picked up in the Local Plan Review if necessary. No change is required to MM/022.

Mod Number					MM/023				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/023	Peers	Anne	Mrs.	17	Sadly there are no marine experts within the Council which has contributed to serious mistakes being made. Ramsgate Port and Marina need to be under one qualified authority to work with all stakeholders within this area. Boat building, engineering and repair facilities for commercial and private sea goers are essential for expansion. Renovation of the Lift on the West Cliff would be an advantage to tourism giving access to both beaches and cliff tops as well as St. Augustines' Church		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/023	
MM/023	Cooper	Barbara	Kent County Council (KCC)	248	The County Council is supportive of the retention of the archaeological clauses within this policy.		<a href="#">View Comment</a>	Support noted. No change is required to MM/023	
MM/023	Solly	C		322	Comment is reserved in regards to opportunity areas, however The modification otherwise is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/023	

Mod Number					MM/024				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/024	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	159	The Town Council does not object in principle to the deletion of the reference to the High Street and Albion Street in Policy SP10 Broadstairs. However, it is important that the policy is in accordance with the examined Regulation 19 Broadstairs & St. Peter's Policy, BSPIO Shopping Areas. A reference to the emerging Broadstairs & St. Peter's Neighbourhood Plan would be welcomed here. The Town Council supports the removal of the text "the change of use of commercial buildings in this area will be resisted". The Town Council is mindful that the demands for different uses change over time and it important		<a href="#">View Comment</a>	Support noted. The comment regarding Broadstairs and St Peters Neighbourhood Plan does not relate specifically to a proposed modification. No change is required to M/024.	

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					that buildings are not left vacant. The Town Council welcomes the poliocy requirements- of proposals complying with policies SP25 and SP26.			
MM/024	Solly	C		323	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/024

<b>Mod Number</b>	<b>MM/025</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/025	Burnett	Nicole	Gladman	135	Gladman support the inclusion of the text 'at least' into Policy SP11. To ensure that otherwise sustainable development is not prevented from coming forward, any policy that relates to the provision of housing should avoid imposing a cap on the total quantum of residential development that is expected over the Plan period.		<a href="#">View Comment</a>	Support noted. No change is required to MM/025.
MM/025	N/A		Tesco Stores Limited	189	See attached file The reference to 'at least' 17,140 additional homes over the plan period to 2031 is welcomed in the context of the NPPF 2012 (paragraph 47) requirement to boost significantly the supply of housing. We are however concerned that the proposed 'stepped trajectory' is incompatible with this aim and also the emphasis on ensuring there is a supply of specific deliverable sites sufficient to provide five years worth of housing with an additional buffer (in this instance 20%). The PPG advises that "Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make." It remains our contention that there is an over-emphasis on large strategic allocations, many of which seek to serve the same local housing market area which will impact	<a href="#">Reps to MM025, 026, 027, 030.docx</a>	<a href="#">View Comment</a>	<p>The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The principle of allocating land North of Millenium Way for housing is not subject to a main modification</p> <p>No change is required to MM/025</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>speed of delivery of housing in the district. Indeed, it is noteworthy that part of the Council's justification (in CD 9.30) for addressing the substantial housing shortfall (651 units) over a longer period is that there are "infrastructure requirements associated with strategic sites" (paragraph 3.3). It is not clear where the figures contained within Table 3 (MM/030) are derived from. They do not tally with CD9.30. For example the 'Note for the Inspector on Updated 5 Year Land Supply (June 2019)' identified a total supply in Table 5 of 7,015 dwellings whereas Table 3 in the MMs calculates the Total allocations supply at 8,691 dwellings. As an aside, there are no totals provided in the trajectory within Appendix B. It is also not at all clear within the MMs what the Council's claimed 5 Year Housing Land Supply is. We contend this is a glaring omission and goes to the soundness of the Plan. Furthermore, we continue to consider that Table 3 is over reliant on Windfall Sites which are proposed to deliver 225 units per year across the plan period (2011-2031). We consider it would be more appropriate, under a plan-led system (as advocated by the NPPF), for the Council to identify and allocate additional smaller sites which are less reliant on delivery of key infrastructure rather than relying on windfalls. Under an effective plan-led system the level of windfalls should diminish over time. We therefore continue to question whether it is realistic for this level of windfalls to be delivered year on year across the Plan period. Evidence of previous levels of windfall should not automatically be deemed "compelling evidence" (as required in paragraph 48 of the NPPF 2012) or a reliable indicator of future trends. Approximately 26% of the total 857 dwellings required each year would be provided by windfall sites. We consider this represents an over-dependence on windfall sites being brought forward for development and the Council should instead be allocating additional housing sites such as Land North of Millennium Way.</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/025	Brown	Jacqueline		211	-MM/025 Thanet does not have the capability to absorb 17,140 new dwellings over the next 11 years. Thanet lacks the infrastructure, medical facilities and employment to sustain the existing level of population. I have no faith that the developers will put these things in place judging by the Westwood Cross development still waiting for it's new school and play area for children all they will do is set aside the land and then build on that too a few years later. I agree some new housing is required for affordable housing for local families. Which should be delivered by reusing existing empty properties residential and redundant business premises could be taken for new housing to be built on the land and other brown field sites.		<a href="#">View Comment</a>	The amount of housing allocated in the plan is not the subject of a modification.  No change is required to MM/025
MM/025	Fowler	Gary		262	The whole basis of the calculations for the local plan allocation of houses for Thanet is fundamentally flawed as the calculation is based on the expected immigration levels with our continued membership of the European Union. Now we are scheduled to leave on the 31st January 2020 the ONS should recalculate the numbers on which the local plan is based, this means any allocation done for Kent and THanet local plan is now completely inaccurate as the total should be lower as shown by the stats below EU immigration fell after the 2016 referendum EU immigration rose sharply in the years leading up to the EU referendum in June 2016, but declined since 2016 —a pattern supported by both the National Insurance Number (NINo) allocation data (Figure 6) and ONS data on longterm migration flows. In 2018, 419,000 NINos were allocated to EU nationals, down 34% from 2015. Long-term arrivals of EU citizens planning to spend at least 12 months in the country fell by 25% over the same period, reaching 202,000 in 2018. Because estimated emigration of EU nationals also increased, EU net migration fell more sharply – by 59% to 75,000 in 2018. (See the Migration Observatory briefing, Net migration in the UK for more detailed data.) <a href="https://migrationobservatory.ox.ac.uk/resources/briefings/eu-migration-to-and-from-the-uk/">https://migrationobservatory.ox.ac.uk/resources/briefings/eu-migration-to-and-from-the-uk/</a> On this basis the local plan should be scrapped and recalculated on the		<a href="#">View Comment</a>	The amount of housing allocated in the plan is not the subject of a modification. No change is required to MM/025

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					expected immigration based on the new arrangements that the government intend to put into place and the decreased migration from the European Union It is completely unacceptable to base the local plan on such inaccurate basic information when the fundamental circumstances have significantly changed.			
MM/025	Solly	C		324	Whilst a review will take place in 6 months, I am of the view that the housing will not be able to be delivered in the plan period to 2031, and representation so far has been made to show my view on this. Consideration should be made for housing developments that are not provisioned and if the site is deliverable in the phasing information at that time, it is possible that a proposal could affect viability or the delivery of a site allocated in the plan. It is also possible that a proposal does not follow the projection methodology such as the "Liverpool" approach.		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/025
MM/025	Bellway Homes Ltd (Kent)			337	We are writing to you on behalf of the site promoter Bellway Homes Ltd (Kent) in support of the emerging designated housing site 'Part of Allotment Gardens, Manston Road' in response to the Council's consultation on the Main Modifications to the Thanet District Council Draft Local Plan to 2031. We have reviewed the Main Modifications and offer the following comments on behalf of the site promoter. Housing Delivery Given the greater emphasis that has been placed by the Planning Inspector through the proposed Main Modifications on ensuring that the capacity of land in urban areas is maximised, we entirely support the proposed Main Modification MM/025 to the Emerging Planning Policy SP11 (Housing Strategy). The Modification provides amendments to the Policy wording "to allow for at least 17,140 additional homes in the period of 2031" rather than "a total of 17,140 homes". This modification by inserting the reference to a 'minimum' number of dwellings provides the added flexibility in the policy to allow for development above 17,140 dwellings.		<a href="#">View Comment</a>	Support noted. No change is required to MM/025.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					This is fully supported as it is considered to allow for suitable development sites to provide additional capacity within the District, ensuring the land is efficiently developed, which will help to provide sufficient housing provision. Conclusion Bellway Homes Ltd (Kent) will continue to work with the Council to bring the site forward for development within the next 5 years. However, in the meantime, we respectfully request that Policy 11 be amended omitting the reference to a 80 unit capacity for the 'Part of Allotment Gardens, Manston Road' site and replacing it with 109 unit capacity. This is therefore considered to support the Council's development strategy to accommodate further housing the urban areas of the district.			
MM/025	Davies	Julie	CPRE Kent	56	CPRE Kent is disappointed that land is to be allocated for "at least" 17,140 dwellings in Thanet. Our objections to this modification of Policy SP11 remains as previously cited. It is considered that the Council has not demonstrated that this level of housebuilding is viable and deliverable given the substantial infrastructure and environmental constraints in the district. In particular, the very high proportion of agricultural land designated as best and most versatile agricultural land (BMV) suggests that Thanet should be treated as an exception and that BMV should be safeguarded from development.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/025.
MM/025	Lamb	Kyla	Minster Parish Council	94	The loss of agricultural land, loss of community and the overwhelming of local services has been disregarded. The plan, reinforced by the Inspectors, seeks to build 17,140 homes in Thanet by 2031. In an area of high deprivation, high population and high unemployment there is no justification for this figure. In fact, many well evidenced calculations recommend that less than half this figure would be appropriate. Thus it would seem that the plan is set upon merging the many unique areas in Thanet into one large dormitory area, with most of the population travelling elsewhere for work. (SP11 MM/025) Furthermore, it does not take into account the impact		<a href="#">View Comment</a>	The points raised concerning the level of development were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/025.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					of the many developments taking place in and around the villages out with the Local Plan sites, a consequence of not having a 5 Year Housing supply in place.			

**Mod Number** MM/026

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/026	N/A		Tesco Stores Limited	191	See attached file Policy SP11 (MM/025, MM/026, MM/027 and MM/30) The reference to 'at least' 17,140 additional homes over the plan period to 2031 is welcomed in the context of the NPPF 2012 (paragraph 47) requirement to boost significantly the supply of housing. We are however concerned that the proposed 'stepped trajectory' is incompatible with this aim and also the emphasis on ensuring there is a supply of specific deliverable sites sufficient to provide five years worth of housing with an additional buffer (in this instance 20%). The PPG advises that "Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make." It remains our contention that there is an over-emphasis on large strategic allocations, many of which seek to serve the same local housing market area which will impact speed of delivery of housing in the district. Indeed, it is noteworthy that part of the Council's justification (in CD 9.30) for addressing the substantial housing shortfall (651 units) over a longer period is that there are "infrastructure requirements associated with strategic sites" (paragraph 3.3). It is not clear where the figures contained within Table 3 (MM/030) are derived from. They do not tally with CD9.30. For example the 'Note for the Inspector on Updated 5 Year Land Supply (June 2019)' identified a total supply in Table 5 of 7,015 dwellings whereas Table 3 in the MMs calculates the	<a href="#">Reps to MM025, 026, 027, 030.docx</a>	<a href="#">View Comment</a>	<p>The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The principle of allocating land North of Millenium Way for housing is not subject to a main modification</p> <p>No change is required to MM/026</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>Total allocations supply at 8,691 dwellings. As an aside, there are no totals provided in the trajectory within Appendix B. It is also not at all clear within the MMs what the Council's claimed 5 Year Housing Land Supply is. We contend this is a glaring omission and goes to the soundness of the Plan.</p> <p>Furthermore, we continue to consider that Table 3 is over reliant on Windfall Sites which are proposed to deliver 225 units per year across the plan period (2011-2031). We consider it would be more appropriate, under a plan-led system (as advocated by the NPPF), for the Council to identify and allocate additional smaller sites which are less reliant on delivery of key infrastructure rather than relying on windfalls. Under an effective plan-led system the level of windfalls should diminish over time. We therefore continue to question whether it is realistic for this level of windfalls to be delivered year on year across the Plan period. Evidence of previous levels of windfall should not automatically be deemed "compelling evidence" (as required in paragraph 48 of the NPPF 2012) or a reliable indicator of future trends.</p> <p>Approximately 26% of the total 857 dwellings required each year would be provided by windfall sites. We consider this represents an over-dependence on windfall sites being brought forward for development and the Council should instead be allocating additional housing sites such as Land North of Millennium Way.</p>			
MM/026	Solly	C		325	<p>Housing Delivery in this plan in my view has not been clear through the consultation processes and open to changes I have issues on whether delivery will be made as stated in the plan. I reserve my view on this matter as i have made a representation on this.</p>		<a href="#">View Comment</a>	<p>The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/026.</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/026	BLANKLEY	NICK		47	This should be amended to read '....the Council will ensure that developments are supported by the necessary services and infrastructure.....'. The Council already 'can' ensure that infrastructure and services are in place but the development at Westwood is clear evidence that it does not apply itself effectively to this task.		<a href="#">View Comment</a>	No change is required to MM/026

#### Mod Number MM/027

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/027	Mellor	Joshua	Barton Willmore LLP	172	As detailed in our representations in response to the Additional Information Consultation undertaken in October 2019, we welcome the Council and Inspectors' adoption of a modified housing trajectory for the District, which reflects when Strategic Sites are identified to begin delivery. The amended stepped trajectory continues to ensure the Council addresses its housing requirements over the Plan period whilst demonstrating a five -year supply of housing on adoption, on the basis of the expected delivery rates proposed through MM170 (Appendix B). We strongly support this modification as being necessary for the Plan to be considered "sound", aligning the requirements with the necessary step change in trajectory with the delivery of Strategic Sites from 2021 onwards		<a href="#">View Comment</a>	Support noted. No change is required to MM/027
MM/027	N/A		Tesco Stores Limited	192	See attached file The reference to 'at least' 17,140 additional homes over the plan period to 2031 is welcomed in the context of the NPPF 2012 (paragraph 47) requirement to boost significantly the supply of housing. We are however concerned that the proposed 'stepped trajectory' is incompatible with this aim and also the emphasis on ensuring there is a supply of specific deliverable sites sufficient to provide five years worth of housing with an additional buffer (in this instance 20%).	<a href="#">Reps to MM025, 026, 027, 030.docx</a>	<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>The PPG advises that "Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make." It remains our contention that there is an over-emphasis on large strategic allocations, many of which seek to serve the same local housing market area which will impact speed of delivery of housing in the district. Indeed, it is noteworthy that part of the Council's justification (in CD 9.30) for addressing the substantial housing shortfall (651 units) over a longer period is that there are "infrastructure requirements associated with strategic sites" (paragraph 3.3). It is not clear where the figures contained within Table 3 (MM/030) are derived from. They do not tally with CD9.30. For example the 'Note for the Inspector on Updated 5 Year Land Supply (June 2019)' identified a total supply in Table 5 of 7,015 dwellings whereas Table 3 in the MMs calculates the Total allocations supply at 8,691 dwellings. As an aside, there are no totals provided in the trajectory within Appendix B. It is also not at all clear within the MMs what the Council's claimed 5 Year Housing Land Supply is. We contend this is a glaring omission and goes to the soundness of the Plan. Furthermore, we continue to consider that Table 3 is over reliant on Windfall Sites which are proposed to deliver 225 units per year across the plan period (2011-2031). We consider it would be more appropriate, under a plan-led system (as advocated by the NPPF), for the Council to identify and allocate additional smaller sites which are less reliant on delivery of key infrastructure rather than relying on windfalls. Under an effective plan-led system the level of windfalls should diminish over time. We therefore continue to question whether it is realistic for this level of windfalls to be delivered year on year across the Plan period. Evidence of previous levels of windfall should not automatically be deemed "compelling evidence" (as required in paragraph 48 of the NPPF 2012) or a</p>			<p>The principle of allocating land North of Millenium Way for housing is not subject to a main modification</p> <p>No change is required to MM/027</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					reliable indicator of future trends. Approximately 26% of the total 857 dwellings required each year would be provided by windfall sites. We consider this represents an over-dependence on windfall sites being brought forward for development and the Council should instead be allocating additional housing sites such as Land North of Millennium Way.			
MM/027	Solly	C		326	The modification is supported to provide clarity at this time		<a href="#">View Comment</a>	Support noted. No change is required to MM/027
MM/027	Patchell	Emma	Gillings Planning	99	Other Main Modifications are supported, specifically MM27(the stepped trajectory), MM42 (policy SP19 - the mix of dwellings), and MM44 (policy SP20 – affordable housing).		<a href="#">View Comment</a>	Support noted. No change is required to MM/027.

<b>Mod Number</b>	<b>MM/028</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/028	Brown	Jacqueline		212	-MM/028 I dispute the principal housing growth has been directed towards urban areas. They have been plonked it on Grade 1 Agricultural land which we need to grow our own food and capture carbon in this increasingly uncertain world going through the start of climate change.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  No change is required to MM/028
MM/028	Dawkins	Julia	1953	23	The principal housing growth in Thanet has not been directed towards the urban areas as stated here. The Westgate/Garlinge development site is farmland which is green space between main settlements. This should be retained in order to prevent Thanet becoming an urban linear development such as the Medway Towns, which is stated in the Draft Local Plan itself.		<a href="#">View Comment</a>	This Modification should reference the text set out in MM/001 (following final renumbering ) rather than paragraph 45

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Thanet should seek to retain its charm and countryside to ensure its place as a pleasant tourist destination.			
MM/028	Solly	C		327	The modification is supported to provide clarity at this time		<a href="#">View Comment</a>	Support noted. No change is required to MM/028
MM/028	Bellway Homes Ltd (Kent)			336	We are writing to you on behalf of the site promoter Bellway Homes Ltd (Kent) in support of the emerging designated housing site 'Part of Allotment Gardens, Manston Road' in response to the Council's consultation on the Main Modifications to the Thanet District Council Draft Local Plan to 2031. We have reviewed the Main Modifications and offer the following comments on behalf of the site promoter. Housing Delivery We also support Main Modification MM/028, which provides further clarity to Paragraph 3.12 in the Emerging Local Plan by adding the wording "principal housing growth has been directed towards the urban area". Conclusion Bellway Homes Ltd (Kent) will continue to work with the Council to bring the site forward for development within the next 5 years. However, in the meantime, we respectfully request that Policy 11 be amended omitting the reference to a 80 unit capacity for the 'Part of Allotment Gardens, Manston Road' site and replacing it with 109 unit capacity. This is therefore considered to support the Council's development strategy to accommodate further housing the urban areas of the district.		<a href="#">View Comment</a>	Support noted. No change is required to MM/028
Mod Number				MM/029				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/029	Brown	Jacqueline		213	- MM/029 I rest my case Westgate on Sea and Garlinge and Birchington on Sea which are semi rural locations are taking the highest numbers of new housing developments.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification  No change is required to MM/029
MM/029	Solly	C		328	The modification is supported to provide clarity at this time		<a href="#">View Comment</a>	Support noted. No change is required to MM/029
MM/029	Harkins	Simon	SGN	4	The Manston Court area is at one of the weaker points of the gas infrastructure. The increase from 1200 to 1400 dwellings will put extra strain on the gas network in this area. The impact of Manston Court and the other development roundabout will likely trigger the requirement to reinforce the gas network between 2021-2025.		<a href="#">View Comment</a>	The proposed modification to increase the dwelling capacity from 1200 to 1400 was to reflect a recent planning application OL/TH/18/0261. The site boundary for the planning application included the northern part of an adjacent allocation under Policy HO3. The dwelling capacity for the remainder of the HO3 site has subsequently been reduced from 250 to 100 dwellings. The overall level of development for this area has not, therefore, increased significantly. The requirement to reinforce the gas network has been noted and will be included in the Infrastructure Delivery Plan. No change is required to MM/029.
<b>Mod Number</b>				<b>MM/030</b>				



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/030	N/A		Tesco Stores Limited	193	See attached file The reference to 'at least' 17,140 additional homes over the plan period to 2031 is welcomed in the context of the NPPF 2012 (paragraph 47) requirement to boost significantly the supply of housing. We are however concerned that the proposed 'stepped trajectory' is incompatible with this aim and also the emphasis on ensuring there is a supply of specific deliverable sites sufficient to provide five years worth of housing with an additional buffer (in this instance 20%). The PPG advises that "Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make." It remains our contention that there is an over-emphasis on large strategic allocations, many of which seek to serve the same local housing market area which will impact speed of delivery of housing in the district. Indeed, it is noteworthy that part of the Council's justification (in CD 9.30) for addressing the substantial housing shortfall (651 units) over a longer period is that there are "infrastructure requirements associated with strategic sites" (paragraph 3.3). It is not clear where the figures contained within Table 3 (MM/030) are derived from. They do not tally with CD9.30. For example the 'Note for the Inspector on Updated 5 Year Land Supply (June 2019)' identified a total supply in Table 5 of 7,015 dwellings whereas Table 3 in the MMs calculates the Total allocations supply at 8,691 dwellings. As an aside, there are no totals provided in the trajectory within Appendix B. It is also not at all clear within the MMs what the Council's claimed 5 Year Housing Land Supply is. We contend this is a glaring omission and goes to the soundness of the Plan. Furthermore, we continue to consider that Table 3 is over reliant on Windfall Sites which are proposed to deliver 225 units per year across the plan period (2011-2031). We consider it would be more appropriate, under a plan-led system (as advocated by the NPPF), for the Council to identify and allocate additional	<a href="#">Reps to MM025, 026, 027, 030.docx</a>	<a href="#">View Comment</a>	<p>The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The principle of allocating land North of Millenium Way for housing is not subject to a main modification</p> <p>No change is required to MM/030</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					smaller sites which are less reliant on delivery of key infrastructure rather than relying on windfalls. Under an effective plan-led system the level of windfalls should diminish over time. We therefore continue to question whether it is realistic for this level of windfalls to be delivered year on year across the Plan period. Evidence of previous levels of windfall should not automatically be deemed "compelling evidence" (as required in paragraph 48 of the NPPF 2012) or a reliable indicator of future trends. Approximately 26% of the total 857 dwellings required each year would be provided by windfall sites. We consider this represents an over-dependence on windfall sites being brought forward for development and the Council should instead be allocating additional housing sites such as Land North of Millennium Way.			
MM/030	Solly	C		329	The modification is supported to provide clarity at this time		<a href="#">View Comment</a>	Support noted. No change is required to MM/030

<b>Mod Number</b>	<b>MM/031</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/031	Burnett	Nicole	Gladman	136	The proposed modification inserts new paragraph 3.20(a) and relates to designing enterprise into communities. As drafted the MM implies that on all strategic housing allocations, there will be a requirement to provide community buildings for use by small businesses etc. Gladman considers that this is an overly onerous requirement, particularly in relation to the Plan's smaller strategic allocations. As such, Gladman suggests that the text should be amended to clarify that enterprise buildings would be required where there is an identified market and need for such uses.		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/031

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/031	Solly	C		330	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/031
MM/031	BLANKLEY	NICK		48	This provision (working space, high speed broadband etc) must be mandatory in delivery of all strategic allocations not just window dressing or an 'intention' at the design stage which goes missing later in the scheme.		<a href="#">View Comment</a>	The provision of community business space and broadband is addressed in Policy SP12. No change is required to MM/031.

<b>Mod Number</b>	<b>MM/032</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/032	-		St John's College	104	(See attached) St John's College continues to support the proposed strategic allocation at Westwood (Policy SP16) to which the requirements of SP12 apply. Whilst we welcome the intentions behind the new penultimate paragraph it is unclear what community facilities will be necessary. Some community facilities are already specified in the strategic policies for the housing sites including SP16 such as a convenience retail store. It is likely that there will be a community building to serve the site and therefore there is no need for this paragraph to be included in the Policy. In relation to community business space, this can be provided in a multi-purpose community building which serves the proposed strategic housing site. Consequently we believe this paragraph should be deleted from the Plan.	<a href="#">MM_032_MH.pdf</a>	<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/032.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/032	Burnett	Nicole	Gladman	137	2.5.1 MM032 states that proposals for 10 or more units must include an element of self-build properties, where there is a demonstrable demand from persons included in the self-build register. 2.5.2 Gladman welcome this modification to the policy, which is in line with current government thinking and objectives in relation to self-build. However, Gladman would note that even where a need is identified, there is no guarantee such units would be delivered, resulting in the non-delivery of otherwise sustainable land for housing. Gladman therefore recommend that the policy SP12 should also include a mechanism that states where self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. This would provide flexibility and help to ensure that the required housing is delivered onsite.		<a href="#">View Comment</a>	The Council will encourage developers to contact those on the Councils self build register to determine the interest for provision of self build plots. The council is also required to provide suitable serviced self build plots to accommodate those on the register. The register can be added to at any time so there should not be a time limit on any self build plots granted permission as part of a larger development. No change is required to MM/032.
MM/032	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	160	Support		<a href="#">View Comment</a>	Support Noted. No change is required to MM/032
MM/032	Mellor	Joshua	Barton Willmore LLP	173	A number of modifications are proposed to Policy S12, all of which seek to provide clarity and ensure the policy is effective. Generally, these changes are supported, including the removal of the requirement for a Statement of Social Impacts which is substituted for the need to undertake an assessment of need for community facilities as part of the masterplanning process for the Strategic Sites. We acknowledge the Council's obligations to make provision for self-build demand but still question whether a specific policy requirement for self-build is necessary or justified. Whilst the Council's Self Build Register is not publicly available, we are aware the demand for self-build		<a href="#">View Comment</a>	The council will be publishing the demand for self build plots in each part of the district on its website in due course. Developers will be able to see the demand for self build plots on their site, and can be put in touch with the relevant people on the register.  No change is required to MM/032

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					is very low across the District (circa. 25 plots). In light of this, a requirement for an element of self-build to be provided for all sites in excess of 10 dwelling is unreasonable and, for the Strategic Sites, is difficult to masterplan successfully for. The Council should support proposals which come forward for or make provision for self-build plots, but the specific policy requirement under SP12 is not justified and not effective. We recommend this be removed to ensure Policy SP12 is "sound".			
MM/032	Dawkins	Julia	1953	24	2) "Retain existing boundary features where possible": This should be priority, for example in the Westgate development proposal: A functional green space between the new and existing urban edge should be retained as a green link to other green spaces. It would serve as a public footway, a visual enhancement for existing residents, and a wildlife corridor. This would go some way to retaining wildlife habitat and biodiversity which will be lost to development. It would also contribute to soil water retention and the carbon sink which all to be lost if farmland were developed.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/032.
MM/032	Cooper	Barbara	Kent County Council (KCC)	249	The County Council recommends that reference should be made to the PRow network, including the provision of safe and convenient pedestrian and cycle access connecting community facilities safely. The County Council also requests that reference is made to the incorporation, and provision for, connections and improvements to the existing PRow network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians. As the Waste Disposal Authority, the County Council would like to see the inclusion of waste in this policy, as highlighted below: "In addition to the timely delivery of education,		<a href="#">View Comment</a>	If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:  <b>'In addition to the timely delivery of education, health, <u>waste</u> and transport infrastructure.....'</b>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					health, waste and transport infrastructure, proposals for the development of strategic sites under Policies SP13 - SP18a must include an assessment of the need for community facilities as part of the masterplanning process."			
MM/032	Solly	C		331	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/032
MM/032	Davies	Julie	CPRE Kent	57	In the interests of clarity and effectiveness it is considered that reference should be made to density aspirations. A letter from the Rt Hon Sajid Javid MP to Crispin Blunt MP in April 2018 set out that where there is a shortage of land for meeting housing needs, local planning authorities will be expected to use minimum density standards to make the most of the land available. This approach has been taken forward in the updated NPPF. It would be helpful for the plan to include a policy encouraging higher density where appropriate to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Paragraph 47 of the 2012 NPPF allows Councils to set their own approach to housing density to reflect local circumstances. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/032.
MM/032	Juggins	Phoebe	Department for Education	84	DfE notes the proposed amendments to housing allocations which include the provision of schools (Policy SP13/MM/033; Policy SP14/MM034; Policy SP15/MM035; Policy SP16/MM036; SP17/MM038; Policy SP18/MM039 ) and would propose the following addition in relation to securing land and contributions for the provision of schools: * Free transfer of land to the Council	<a href="#">Thanet Local Plan Main Mods DfE.pdf</a>	<a href="#">View Comment</a>	Provision of schools has been set out in the draft IDP in agreement with Kent County Council as Education authority. No change is required to MM/032.


Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					and construction costs to be met by the development where onsite schools are required, subject to updated viability assessment. * Policy requirement for offsite contributions from all development sites that do not provide an onsite school, where there will be insufficient school capacity to absorb the demand for school places generated by the development. * In addition, more generally, we would also propose including a policy requirement for offsite contributions from all development sites that do not provide an onsite school, where there will be insufficient school capacity to absorb the demand for school places generated by the development, as well as clear references to the funding mechanism to be applied, whether Section 106 or CIL, and cross-references to the relevant evidence that justifies this approach. See further detail in full letter attached.			
MM/032	Janes	Tamzyn	Southern Water	87	From 1 April 2018, a new set of rules covering the charging for new connections and requisitions for companies wholly or mainly in England come into force. These new rules include requirements for water and sewerage companies to provide upfront charges for most connections services and make the charges for offsite reinforcement works more transparent and cost reflective, rather than requiring the developer to connect to the point of nearest adequate capacity. Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, details can be found on our website <a href="https://www.southernwater.co.uk/developingbuilding/connection-charging-arrangements">https://www.southernwater.co.uk/developingbuilding/connection-charging-arrangements</a> . NB charges are reviewed annually. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not		<a href="#">View Comment</a>	The Council consult Southern Water as part of the planning application process and this requirement would be added as Condition to planning permission granted rather than a policy requirement. No change is required to MM/032.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019). Having regard to the issues set out above, Southern Water propose the following amendment (additional text underlined) to Policy SP12 3) Provide a connection to the sewerage system ensuring occupation is phased to align with the delivery of infrastructure at the nearest point of adequate capacity, in collaboration with the service provider.			

<b>Mod Number</b>	<b>MM/033</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/033	Alan Byrne/ English Heritage			109	MM/033, MM/034, MM/035, MM/036, MM/040 – while we welcome the additional and more specific references to heritage (archaeology and listed buildings) we maintain our view, as previously stated, that a heritage impact assessment is required prior to allocation of the sites in view of the likely harmful impacts that will result from development of these sites. Allocation of these without prior assessment is liable to leave the heritage assets vulnerable to detrimental change to the character and setting.		<a href="#">View Comment</a>	These comments were raised during the Reg 19 Stage. During the Examination the 'Audit note of heritage assessment of allocated housing sites' (CD9.31) was prepared to address these concerns.  No change is required to MM/033
MM/033	Miss P A Smith			146	Concern at the reduction of provision of open space. This applies across the majority of housing provisions when we are being urged to increase – down by 8.42ha		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/033



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/033	Schembri	Angela	RPS Planning & Development Ltd	235	The policy wording should include for an additional requirement for the Masterplan as follows: "Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include: - A scheme for protecting the development from aircraft noise This would be consistent with the terms established by the outline planning permission for 785 dwellings granted on the site (namely Condition 35 of OL/TH/14/0050).		<a href="#">View Comment</a>	This issue has already been addressed in the planning application. Any future applications will consider the most up to date information available relating to any airport related uses. The need for more specific policies regarding aircraft noise will be considered in the Local Plan Review once the outcome of the DCO is known. No change is required to MM/033
MM/033	Cooper	Barbara	Kent County Council (KCC)	250	The County Council supports the requirement that any masterplan for Manston Green must take into account "a pre-design archaeological assessment taking into account the presence of any significant and sensitive remains", as well as "the preservation of listed buildings at Ozengell".		<a href="#">View Comment</a>	Support noted. No change is required to MM/033.
MM/033	Cooper	Barbara	Kent County Council (KCC)	251	The Transport Assessment should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The PRoW Network can support public transport and the wider highway network, by providing opportunities for recreation and commuting, especially short distance journeys.		<a href="#">View Comment</a>	Noted. No change is required to MM/033.
MM/033	Simpson	Maddie	Iceni Projects	279	On behalf of our client, Cogent Land LLP (CL), Iceni Projects is writing in response to Thanet District Council's Man Modifications to the Local Plan. The submission relates to the land known as Manston Green located to the east and west of Haine Road, Ramsgate (the Site). In order to inform this	 <a href="#">simpson Maddie Iceni projects</a>	<a href="#">View Comment</a>	The issues raised in comment b) were discussed during the examination hearing sessions and these discussions

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>submission, please also find enclosed a copy of the site location plan attached as appendix A1. a. The site: By way of background, CL were granted outline planning permission on the Site, including details of the access, on 13th July 2016, for the erection of 785 dwellings, highways infrastructure works (including single carriageway link road), primary school, community hall and public open space on the land to the east and west of Haine Road (Manston Green) (LPA ref: OL/TH/14/0050). Subsequent reserved matters for outstanding matters on layout, scale, appearance and landscaping for 220 units was granted permission on 18 October 2019 (LPA ref: R/TH/19/0499). b. Main Modifications to the Pre-Submission Publication Local Plan: The Council are currently consulting on the Main Modifications to the Pre-Submission Publication Thanet Local Plan (July 2018), that was submitted for examination on 30 October 2018. Under Policy SP13 (Strategic Housing Sites) the Site (Ref: MM/034) known as Manston Green is currently allocated for up to 785 new dwellings and the Council have proposed several amendments to the policy in order to make the Plan sound. Whilst we consider the majority of amendments to policy SP13 to be acceptable, we request that greater clarity is needed on the following modification: All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan. The Council stated that this has been added in order to apply a consistent approach to strategic housing policies. Although this is a requirement for all the allocated strategic sites, there is firstly no justification for its inclusion, and it's unclear whether it is down to the applicant or the Local Planning Authority to provide this. Policy SP01 – Implementation of the draft Local Plan states: All new development will be expected to fully meet its infrastructure requirements, whether directly on site or by contribution to that provision elsewhere, and to comply with the provisions of the Infrastructure Delivery Plan, in</p>	<a href="#">OBO of Cogent Land LLP plan.pdf</a>		<p>led to the main modifications proposed.</p> <p>The principle of allocating this site for 935 dwellings is not subject to a main modification. No change is required to MM/033</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>terms of provision of physical and social infrastructure. This provision should be made within the phasing programme set out in the draft Local Plan and draft Infrastructure Delivery Plan. Any such requirements will be secured by means of conditions, legal agreements, Community Infrastructure Levy or other appropriate mechanisms. This existing policy suggests that any development must comply with the Infrastructure Delivery Plan rather than applicants being required to submit one as part of any application. Notwithstanding this the Site benefits from outline planning permission, therefore the developer's contributions have already been established through the Section 106 Agreement. Further to this, the provision of services on site such as the school are reliant on support from infrastructure providers. We therefore anticipate that this requirement could have implications for the delivery of the site, with subsequent effects on the Council's housing delivery. With this considered, we request that the Council provides more clarity on the governance process for this requirement if it is to be taken forward and adopted as part of Policy SP13. Considering the site already benefits from an agreed S106 agreement, the Council should consider removing this from the Manston Green allocation to avoid hindering the delivery of much needed housing. c. Further Allocation: CL have been promoting the remaining area of developable land to the west of Haine Road, expressing that by allowing a slightly higher density and incorporating all developable land included within CL's option agreement, outlined in red on the enclosed Site Location Plan (appendix A1), the Site could accommodate an additional circa 150 units above that which has already been consented under Outline Planning Permission OL/TH/14/0050. Since the Reg 19 Local Plan consultation, CL have secured reserved matters approval for 220 units (Phase 1) (LPA ref: R/TH/19/0499), further up this area as a sustainable option for development. Sustainability Appraisal Assessment (2019) Following the Local Plan hearing sessions, the Council</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					published an update in October 2019, including an addendum to the Sustainability Appraisal (SA) prepared by Arup, consisting of assessments for each individual Strategic Housing Site. The SA assesses the Site based on an uplift to the existing allocation from 785 units to 935 units. The appraisal summary states that the site is in close proximity to local retail, employment and service provision, as well as the nearby bus and rail transport links, which provide access to the rest of Thanet and the wider South East Region, highlighting the inherent sustainability of the site. In the context of the existing allocation and planning permissions, the Council should allocate the site for an additional 150 dwellings. This would ensure the most efficient use of the site, which is known for being suitable, achievable and deliverable for housing. The land should therefore be allocated for a total of c. 935 dwellings. e. Conclusion: The Council should consider allocating all developable land included within CL's option agreement, the land at Manston Green which could accommodate an additional 150 dwellings (total of 935 dwellings) as identified in the Sustainability Appraisal (October 2019), on a sustainable site that benefits from planning permission.			
MM/033	Solly	C		332	Consideration should be made to aircraft noise if an airport is likely to be operating in the plan period, and based on the outcome of the DCO.		<a href="#">View Comment</a>	This has been addressed in the recent planning application. The need for more specific policies relating to aircraft noise will be considered as part of the review once the outcome of the DCO is known. No change is required to MM/033
MM/033	Davies	Julie	CPRE Kent	58	Land is allocated for up to 785 new dwellings "with an approximate average density of 35 dwellings per hectare (net)". This is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing

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					the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.			sessions and these discussions led to the main modifications proposed. No change is required to MM/033.

<b>Mod Number</b>	<b>MM/034</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/034	Fowler	Gary		103	petition against the building of 1,600 houses on grade 1 agricultural land in Birchington i attended the public consultation event run by Ptarmigan Land and Millwood Homes on the 04th October 2019. They presented this to my mind as a done deal, this is before the final consultation for the local plan is finalised and without any planning permission being applied for. There are numerous reasons why this development should be rejected that are listed in the petition header as below This will mean an additional 4,800 residents in a village of 10,000 residents, we would lose all the characteristics of a village. Reasons i am against this development There are over 800 empty houses in thanet, these should refurbish first. The land is grade 1 agricultural land when further to the west is grade 2 and 3. Birchington primary school has an intake of 90 and is one of the most oversubscribed schools in thanet with 152 application's 21 % of birchington is over 65 and that means an already stretched medical service with birchington medical centre already defined by CQC as requiring		<a href="#">View Comment</a>	The principle of allocating this site as a strategic development site is not subject to a main modification. No change is required to MM/034.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					improvement. The population of birchington is already 10,000 people with an average of 3 people per household we would estimate 4800 more people living here, this is almost a 50% increase with no infrastructure improvements. Promises 13 hectares of parkland when its already miles of countryside and paths which are used for recreation purposes. The unemployment rate in thanet is 5.4% thats double the kent rate of 2.7%.where are all these extra jobs coming from ? The petition has been running since mid October 2019 and is still open and attracting a lot of support as of this morning there are 3391 signatures collected via Change.org and door to door signatures. The link to the petition is below <a href="https://www.change.org/p/ptarmigan-land-and-millwood-designer-homes-no-to-1-600-houses-on-grade-1-agricultural-land-on-birchington">https://www.change.org/p/ptarmigan-land-and-millwood-designer-homes-no-to-1-600-houses-on-grade-1-agricultural-land-on-birchington</a> I have also attached a pdf of the signatories and their comments, it would be appreciated if you could take time to review the comments and take them into consideration for the local plan development due to strength of feeling against this development that would be fundamentally detrimental to Birchington for the reasons outlined above and as you will see from the comments made by your voters.			
MM/034	Alan Byrne/ English Heritage			110	MM/033, MM/034, MM/035, MM/036, MM/040 – while we welcome the additional and more specific references to heritage (archaeology and listed buildings) we maintain our view, as previously stated, that a heritage impact assessment is required prior to allocation of the sites in view of the likely harmful impacts that will result from development of these sites. Allocation of these without prior assessment is liable to leave the heritage assets vulnerable to detrimental change to the character and setting.		<a href="#">View Comment</a>	These comments were raised during the Reg 19 Stage. During the Examination the 'Audit note of heritage assessment of allocated housing sites' (CD9.31) was prepared to address these concerns.  No change is required to MM/034

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/034	Corsby	Dave		145	Parts of the Local Plan have been overtaken by the Government recognition of the need to mitigate the effects of Global Warming. The Government are supporting replanting of woodland and are embarking on environmental issues which include the preservation of agricultural land. The overwhelming objection by local residents to allowing house building on precious agricultural land has been ignored. The present draft local plan undervalues best and most versatile agricultural land and ignores the fact that agricultural land is lost forever if it is built on. With the UK importing 40% of our food the present draft local plan allows housebuilding on farmland without taking any account of the need for future targets for self sufficiency. The present draft plan will ruin Thanet and destroy farmland and overstretch education, healthcare, roads and parking.		<a href="#">View Comment</a>	The principle of allocating this site as a strategic housing site is not subject to a main modification. No change is required to MM/034.
MM/034	Miss P A Smith			147	Concern at the reduction of provision of open space. This applies across the majority of housing provisions when we are being urged to increase – down by 8.42ha		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  No change is required to MM/034
MM/034	Mellor	Joshua	Barton Willmore LLP	174	We welcome the changes to the Strategic Site policies, including Policy SP14, which provide a consistent approach to the strategic housing policies. The modifications proposed across these policies, including identifying an approximate average density and removing the requirement for a development brief, will assist in enabling efficient use of the site and the prompt delivery of housing. Taken together, the modifications proposed to Policy S14 ensure the policy is "sound".		<a href="#">View Comment</a>	Support noted. No change is required to MM/034

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/034	N/A		Tesco Stores Limited	194	See attached file For the reasons set out in our duly made representations to the Submission Local Plan we continue to have concerns over the Local Plan's reliance on a handful of strategic sites to deliver a substantial proportion of the district's housing needs over the plan period. Following the deletion of a mixed use development at Manston Airport from the Proposed Revisions to the Local Plan these large sites were proposed to accommodate additional housing development to make up the shortfall as follows: SP14 Birchington – increased from 1,000 to 1,600 dwellings SP15 Westgate – increased from 1,000 to 2,000 dwellings SP18 Manston Court/Haine Road – increased from 700 to 1,200 dwellings (now 1,400 in the Main Modifications MM/039) HO2 North and South of Shottendane Road – increased from 250 to 550 dwellings (now Policy SP18A in the Main Modifications MM/040) The Council has reworked the trajectory following submission of the Local Plan such that these sites are now not expected to start delivering units until 2020/2021 at the earliest. If indeed these sites do deliver houses in line with the trajectory in 2020/2021 (a total of 105 across 3 of the above 4 sites) this will be 10 years into the 20 year plan period. The high level of historic shortfall in the housing supply and the reliance on a stepped trajectory is partly a consequence of an over emphasis on a handful of strategic sites. The Local Plan should therefore look to allocate a wider range of smaller housing sites in sustainable locations which are able to be delivered relatively more quickly, such as Land North of Millennium Way. The spatial strategy will also need to be revisited in the early review of the Local Plan irrespective of the outcome of the DCO for Manston Airport.	<a href="#">Reps to MM034, 035, 039, 040.docx</a>	<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed  The principle of allocating land North of Millenium Way for housing is not subject to a main modification  No change is required to MM/034
MM/034	Repsch	John		240	While spending hours petitioning on Birchington's doorsteps, it became clear to me that carrying out Thanet's proposed Local Plan would be considered the height of irresponsibility. Many reasons were pointed out: * Grade 1		<a href="#">View Comment</a>	The principle of allocating this site as a strategic housing site is not



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					<p>land should be regarded as special. The country's home-grown produce is currently at 60% and falling. If we are going to treat our best farmland in such a cavalier manner, how will we cope if the Brexit bargaining goes against us? And what's the point of rating it Grade 1 when it's treated with no more respect than for pouring concrete and tarmac over it? * Brexit may lessen demand for immigration, in which case Thanet's Local Plan will be obsolete. * Infrastructure is already inadequate to the task, and extra people will load more horror stories onto the NHS, the police force, schools, social services, water suppliers (flood and drought), etc. * Thanet's unemployment is the highest in Kent. What sense is there in adding more with all the negative repercussions? * All development should now be on brownfield sites, not greenbelt. * London boroughs should not be allowed to use our local countryside as a dumping ground. * The fears of violence and intimidation being experienced by numerous local residents, are shocking. Elderly people, especially those living beside the proposed huge building sites, should be consulted about the expected influx. New cultures and religions would change Birchington's character. * Birchington's character would also be altered by the expected increase of some 5,000 to its current population of 10,000. * Our farmland should not be allowed to play host to cheap second homes for the rich. * Derelict properties should be restored. * Climate Change screams out the need to protect this soil. Yet the Plan exhibits a lack of foresight that is unbelievable! Generations of people not yet born will have less and less land to feed themselves. So much for food security! * Thanet's endangered wildlife - such as bats, brown hares, hen harriers and sky-larks - will be even more at risk if their habitats are destroyed. * Our fragile archaeological heritage should not be demolished for commercial reasons or any other ones. If TDC's wretched Local Plan is allowed to go ahead, it will be</p>			subject to a main modification. No change is required to MM/034.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					dead against the wishes of the isle's residents. They know that when these acres have gone, they will be gone forever - no turning back. Conversely, if at this 11th hour the acres are indeed regarded as special, you will have earned the praise of everyone on the Isle of Thanet plus those of future generations.			
MM/034	Cooper	Barbara	Kent County Council (KCC)	252	The County Council strongly recommends the wording for requirement 3 "Masterplanning will be informed by and address the following: ...3) pre-design archaeological evaluation" is modified to: pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains. In addition, the inclusion of a requirement such as that set out at 2) in MM0/35 should be included in the MM/034 to help preserve and enhance the setting of Scheduled Monuments.		<a href="#">View Comment</a>	Archaeology and policy wording were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/034 or MM/035
MM/034	Fowler	Gary		265	I have a major objection to the 1,600 houses proposed the grade 1 agricultural land located to the southwest of Birchington. Firstly there are three scheduled monuments in close proximity to the land proposed for this housing which would result in catastrophic damage to the archeology in the vicinity and make any context or future investigation practically impossible if the surrounding fields are build on. The three scheduled monument links are listed below https://historicengland.org.uk/listing/the-list/list-entry/1004207 https://historicengland.org.uk/listing/the-list/list-entry/1005489 https://historicengland.org.uk/listing/the-list/list-entry/1005137 There is also evidence of crop marking indicating important archeological sites of interest over all of the fields proposed for the location of this housing, it would be a major concern for these sites which could help in the context of the historic monuments was built over as it would be lost forever and thanet in one of the most important sites for neolithic and roman remains in the country on this basis it should be removed from the local		<a href="#">View Comment</a>	The principle of allocating this site for residential development is not subject to a main modification.  No change is required to MM/034

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					plan. The link to the ariel photos of possible archeological sites of interest flagged by Cambridge University Ariel photography unit is below and it plainly shows the fields proposed for the local plan are rich in ancient archeology <a href="https://www.cambridgeairphotos.com/map/?lat=51.374664&amp;lon=1.291878&amp;zoom=14&amp;id=aaw97">https://www.cambridgeairphotos.com/map/?lat=51.374664&amp;lon=1.291878&amp;zoom=14&amp;id=aaw97</a> This should be noted with the upmost importance			
MM/034	Solly	C		339	Response by policy shown in "italics" and my comments in "bold" shown below: "Land is allocated for up to 1,600 new dwellings with an approximate average density of 35 dwellings per hectare (net) at Birchington." This part of policy understands that mixed development may incur a mixture of housing and I can accept this. I do contend with the level of housing (1600 dwellings) and the sites selection process, and will refer back to my previous representations on this. "Proposals will be judged and permitted only in accordance with masterplan for the whole site which should include:" I would ensure that any development irrespective of size will need to submit the masterplan in those applications, as hybrid and piecemeal applications are not acceptable to bite off land on part of the sites allocation. "1) a minimum of 12.8 ha of open space;" The change is supported "2) a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school and its construction in a location and in a form agreed with the County Council;" The county council should consult with the Parish council (and neighbourhood plan group) and local residents as part of this process "3) a range of community facilities in accordance with Policy SP12, including small scale convenience retail provision to serve the day-to-day needs of the residents;" The change is supported "4) provision for the expansion of medical services at the Birchington Medical Centre to cater for the additional needs created by the development;" The CCG should also decide if recruitment of staff is able to be	<a href="#">Sollymap2.JPG</a> <a href="#">Sollymap3.JPG</a>	<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/034

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					met for the demands of the development. '5) linkages to new and existing public transport infrastructure, including bus and rail services;' The change is supported '6) a new link road to serve the development and extending from Minnis Road and the A28, and A28 to Manston Road (including new junctions on A28/Minnis Road and Acol Hill/ Manston Road;' This accepted but I do question the suitability of the Shottendane junction in its current state as this can be a place for car accidents, and will only magnify this problem with more traffic. These roads should be programmed early in the development schedule. "7) access on to Park Lane and a footway connection to the entire frontage to connect to the existing footway in Park Lane near to the access with Brunswick Road and" The change is supported "8) a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47" Ensuring that item 6 above is funded first and phased early in the development schedule. "Masterplanning will be informed by and address the following: measures to preserve the listed buildings Gore End Barn and Upper Gore End Farmhouse and their setting ,including the setting of QuexPark;" This is welcomed and supported "2) measures to integrate the development within the landscape to enable a soft edge between the site and the open countryside;" This is welcomed and supported "3) pre-design archaeological evaluation;" This is welcomed and supported "4) noise mitigation for any development near the northern edge of the site which is adjacent to the railway line" This is welcomed and supported "5) The capacity of any utility services and infrastructure and any need (and provision of) improved or additional infrastructure (as may be advised or reasonably required by service providers);" The change is supported "All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan. " As stated			

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					<p>earlier the infrastructure plan could be clearer on when this will be phased in line with the plan and policy. I am keen to ensure that the delivery of road infrastructure to be delivered as a early as possible "Proposals will be accompanied by a Transport Assessment which shall: "1) assess the impact of development on the local road network" In particular Traffic modeling and assessment to ensure reasonable road conditions at : Essex Gardens Minnis Road + Bridge Alpha Road and junctions Station Road and roundabout Park Lane Junction/Canterbury Road Junction Essex Gardens/Mill Row/Park Avenue to Canterbury Road Junction Station Approach Bridge "2) identify measures to promote multi-modal access, including footway and cycleway connections and an extended bus service accessible to the residential development and rail linkages" And Rail Parking need, which could be expanded at the station. This would encourage better use of rail services Other comments: Surface water may need some local assessment as there is some information which may indicate surface water areas, which appear not to be in the evidence Map of SP14 and around <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk/map">https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</a> (**Map 2 attached sits here in original rep**) And at my location: <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk/risk?address=100061104616">https://flood-warning-information.service.gov.uk/long-term-flood-risk/risk?address=100061104616</a> (**Map 3 attached sits here in original rep) <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk/risk?address=100061104616">https://flood-warning-information.service.gov.uk/long-term-flood-risk/risk?address=100061104616</a></p>			
MM/034	Harkins	Simon	SGN	5	<p>The Birchington development is one where SGN will require to keep a close eye on. If gas is to play a major role in supplying homes for this development, then there is a good chance that the development will trigger the requirement to reinforce the Medium Pressure gas network. The extra commercial facilities associated with the</p>		<a href="#">View Comment</a>	<p>Comment already noted and included in draft Infrastructure Delivery Plan. No change is required to MM/034.</p>

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					development will only increase the likelihood that the reinforcement will be needed.			
MM/034	Davies	Julie	CPRE Kent	59	Land is allocated for up to 1,600 new dwellings "with an approximate average density of 35 dwellings per hectare (net)". This is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," – and in recognition of the Birchington being a district retail centre - it is considered that density could be further increased in the interests of sustainable development. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/034.

#### Mod Number MM/035

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/035	Patchell	Emma	Gillings Planning	102	On behalf of Millwood Designer Homes Limited, please find below comments on the Proposed Main Modifications (MM) to the Local Plan. Our comments relate to land at Westgate, which is proposed for 2000 homes under strategic policy SP15, in which Millwood have a Land Interest. Other Main Modifications are supported, specifically MM27(the stepped trajectory), MM42 (policy SP19 - the mix of dwellings), and MM44 (policy SP20 – affordable housing). These representations therefore relate solely to MM/035 relating to Policy SP15. The majority of the modifications		<a href="#">View Comment</a>	Point 1 - The policy as reworded refers to functional green space which could be singular or plural. However, if the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is

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					are supported, with the exception of the following: • Point 1 has removed reference to a green 'corridor' and replaced this with green 'space' (singular) between existing urban edge and new development. This could be interpreted to still require continual green space between the urban edge despite the removal of the requirement for a corridor. It should therefore be made clearer that green spaces should be provided but need not necessarily be connected. As currently worded it remains unsound in this respect. The wording of the MM should be amended to include reference to 'spaces' (plural) to ensure it is not interpreted as a corridor only. Such an amendment would ensure the Plan wording was justified and effective, and therefore sound. • Point 4 includes new wording to require 'provision of serviced 1ha of land suitable for a new medical centre to cater for the additional needs created by the development'. The principle of this continues to be accepted, but we refer to the attached correspondence at appendix 1 from the Clinical Commissioning Group confirming that 0.5ha of land would be sufficient at the site. The wording of MM should be amended to refer to '0.5ha of land' instead of '1ha of land'. Such an amendment would ensure the Plan wording was justified and effective, and therefore sound. • Point 7 now specifically requires 'the provision of a link road between Dent de Lion Road and Minster Road'. While a route from Minster Road it is intended, it will not form a direct 'link road' to Dent de Lion Road as further masterplanning has indicated that a new spine road is proposed from Dent to Lion Road to Shottendane Road in the south, which is considered the more logical and appropriate connection across the site. However, there will still be linkages from Minster Road in the west and Dent De Lion in the east, just not a direct road. Amending the policy to delete the word 'road' will still ensure the policy delivers the aspiration, but in a more flexible manner. The wording of the MM should			considered appropriate by the Council:  <b>'.....to include functional green spaces.....'</b>  Points 4 and 7 were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/035 in respect to Points 4 and 7.

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					therefore be amended to read 'the provision of a link road between Dent de Lion and Minster Road'. Such an amendment would ensure the Plan wording was justified and effective, and therefore sound. In summary, the MMs in respect of this policy are largely welcomed and supported, albeit further minor amendment is required to ensure the plan is sound.			
MM/035	Alan Byrne/English Heritage			111	MM/033, MM/034, MM/035, MM/036, MM/040 – while we welcome the additional and more specific references to heritage (archaeology and listed buildings) we maintain our view, as previously stated, that a heritage impact assessment is required prior to allocation of the sites in view of the likely harmful impacts that will result from development of these sites. Allocation of these without prior assessment is liable to leave the heritage assets vulnerable to detrimental change to the character and setting.		<a href="#">View Comment</a>	These comments were raised during the Reg 19 Stage. During the Examination the 'Audit note of heritage assessment of allocated housing sites' (CD9.31) was prepared to address these concerns.  No change is required to MM/035
MM/035	Miss P A Smith			148	Concern at the reduction of provision of open space. This applies across the majority of housing provisions when we are being urged to increase – down by 8.42ha		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed  No change is required to MM/035
MM/035	N/A		Tesco Stores Limited	195	See attached file For the reasons set out in our duly made representations to the Submission Local Plan we continue to have concerns over the Local Plan's reliance on a handful of strategic sites to deliver a substantial proportion of the district's housing needs over the plan period. Following the deletion of a mixed use development at Manston Airport from the Proposed Revisions to the Local Plan these large sites were proposed to accommodate additional housing development to make up the shortfall as follows: SP14	<a href="#">Reps to MM034, 035, 039, 040.docx</a>	<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  The principle of allocating land North of Millenium Way for housing is not subject to a main modification



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					Birchington – increased from 1,000 to 1,600 dwellings SP15 Westgate – increased from 1,000 to 2,000 dwellings SP18 Manston Court/Haine Road – increased from 700 to 1,200 dwellings (now 1,400 in the Main Modifications MM/039) HO2 North and South of Shottendane Road – increased from 250 to 550 dwellings (now Policy SP18A in the Main Modifications MM/040) The Council has reworked the trajectory following submission of the Local Plan such that these sites are now not expected to start delivering units until 2020/2021 at the earliest. If indeed these sites do deliver houses in line with the trajectory in 2020/2021 (a total of 105 across 3 of the above 4 sites) this will be 10 years into the 20 year plan period. The high level of historic shortfall in the housing supply and the reliance on a stepped trajectory is partly a consequence of an over emphasis on a handful of strategic sites. The Local Plan should therefore look to allocate a wider range of smaller housing sites in sustainable locations which are able to be delivered relatively more quickly, such as Land North of Millennium Way. The spatial strategy will also need to be revisited in the early review of the Local Plan irrespective of the outcome of the DCO for Manston Airport.			No change is required to MM/035
MM/035	Brown	Jacqueline		215	-MM/035 Please refer to MM/001 The fields to the east and west of Minster Road and along the Shottendane Road in Garlinge are Grade 1 agricultural land which should be used for food not building houses. The roads in that area are already under immense pressure from traffic jams and parking. Minster Road is not an appropriate road for even higher volumes of traffic it is hardly wide enough to take 2 cars in stretches.		<a href="#">View Comment</a>	The principle of allocating this site for residential is not subject to a main modification.  No change is required to MM/035
MM/035	Brown	Jacqueline		216	GP surgeries and dentists, schools and the local hospital are already struggling to cope with the current population level. With proposals to close the Stroke Unit and Accident and Emergency units are Margate hospital it seems ludicrous to		<a href="#">View Comment</a>	The comments do not relate specifically to the Proposed Modification

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					<p>develop apparently every available field. My husband has a heart condition that leaves him at a higher risk of stroke so this greatly concerns me. I have no faith the necessary new surgeries and schools will be built in the time frame required and Westgate and Birchington would require a new secondary school as well as 2 new primary schools.</p> <p>Westgate has flooded in the past with loss of life, the land helps absorb water to prevent flooding. Given we are at the beginning of a drastic change in our climate which promises more extreme wedding events like flooding I am not convinced the developers Millwood are allowing for this they are planning for 1 in 100 year risk of flooding we are now at 3 potential flooding events in a 100 years. This past year has seen some the of the longest and heaviest rain events on record. We need our fields to absorb carbon and preserve biodiversity all of which helps reverse climate change along with locally produced food that reduces the carbon footprint in it's production. We can't do this if we build on our prime grade 1 agricultural land. At the meeting Millwood the developer hosted I discovered they plan to use air pump heating systems. I was disappointed no one was there who could explain how the system works. I have since found out the system can circulate viruses and bad smells around the home. Surely this is not advisable as it would create a higher risk of the spread of illnesses to the residents and the wider community. I still do not think this local plan is fit for purpose and should not be implemented it is allowing for over development of our beautiful at present semi rural and seaside area.</p>			No change is required to MM/035
MM/035	Tapp	Jonathan		217	<p>I farm the land around this site, and I grow potatoes every few years on this actual land. It is some of the very best land in the country for growing crops. It seems to me that the negative externalities are very large, for me and for those living nearby. The stock of capital assets will not be raised in line with this very large development, resulting in more</p>		<a href="#">View Comment</a>	The principle of this allocation was discussed at Examination and is not subject to a modification.

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					crowding of our hospitals, roads, schools etc. Indeed I am supposed to provide land to improve the roads around this development, at agricultural rates but how can I replace this land? I cannot simply buy more nearby. Farming, which has been carried out here since the bronze age, is becoming more difficult, yet Thanet has for centuries been famous for its farming. This is being thrown away too lightly. This proposal is far too large; in order to meet a target sensible ideas have bloated and common sense has been eliminated. I object.			No change is required to MM/035
MM/035	Dawkins	Julia	1953	25	1) A density of 35 dwellings per hectare (net) is noted in the Plan, but the Millwood Homes exhibition stated that only part of the development would be that density, and in other parts there would be densities of up to 48 dwellings per hectare. This does not comply with the Local Plan. Why has the minimum requirement of 17.5ha of open space been reduced to 16ha? The functional green space/corridor between the existing urban edge and new development at Westgate was deleted on the Millwood Homes plan apparently due to safety concerns. The Plan should state that local residents' opinions should be taken into account on this matter. See my comments on MM/032 4) A new medical centre is to be built to serve the needs of the new residents. (It is important that existing medical centre in Westgate is retained because it is wholly impractical for aged residents and the many care home residents to travel to a new location some distance away, and unknown to them. That would be a totally unsustainable outcome.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/035
MM/035	Cooper	Barbara	Kent County Council (KCC)	253	The County Council strongly recommends the wording for the proposed requirement 1) "an archaeological evaluation" is amended to a pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains. The County Council		<a href="#">View Comment</a>	Archaeology and policy wording were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. Support

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					welcomes requirement 2 concerning the Scheduled Monuments and Dent de Lion gateway.			noted. No change is required to MM/035.
MM/035	Solly	C		341	Response by policy shown in "italics" and my comments in "bold" shown below: "Policy SP15 - Strategic Housing Site - Westgate-on-Sea Land to the east and west of Minster Road, Westgate is allocated for up to 2,000 new dwellings with an approximate average amaximum density of 35 dwellings per hectare(net) at land to the east and west of Minster Road, Westgate-on-Sea." This part of policy understands that mixed development may incur a mixture of housing and I can accept this. I do contend with the level of housing (2000 dwellings) and the sites selection process, and will refer back to my previous representations on this. "Proposals will be judged and permitted only in accordance with masterplan for the whole site which should include:" I would ensure that any development irrespective of size will need to submit the masterplan in those applications, as hybrid and piecemeal applications are not acceptable to bite off land on part of the sites allocation. "1) a minimum of 17.5 16ha of open space to include a functional green space corridor between existing urban edge and new development; t o preserve the more rural characteristics of existing urban edgedwellings" This is welcomed and supported "2) a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school and its construction in a location and in a form agreed with the County Council;" The county council should consult with the Town council (and neighbourhood plan group) and local residents as part of the process "3) a range of community facilities in accordance with Policy SP12, including small scale convenience retail provision to serve the day-to-day needs of the residents;" This is welcomed and supported 4) provision of serviced 1 ha of land suitable for a	<a href="#">Sollymap4.JPG</a>	<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/035

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					new medical centre to cater for the additionalneeds created by the development;" This is welcomed and supported "5) linkages to new and existing public transport infrastructure, including bus and rail services;" This is welcomed and supported "6) Vehicular access from Minster Road and Dent-de-Lion Road;" This is welcomed and supported "7) the provision of link road between Dent de Lion Road and Minster Road (including necessaryj unctions) and the provision of a new signal controlled junction at High Street Garlinge/A28;" This is welcomed and supported, however the road at high street and A28 should consider that this is a local shopping area for residents and that traffic control and capacity should be reasonable. "8) improvements at Dent-de-Lion Road/High Street, Garlinge junction;" This is welcomed and supported, however the road at high street and A28 should consider that this is a local shopping area for residents and that traffic control and capacity should be reasonable. "9) an assessment to identify necessary measures to manage on-street car parking in Dent-de-Lion Road and Garlinge High Street, between the site and the A28, and potential methods of delivery ;" This should not be at the detriment of the existing homeowners who live in this area. "10) the upgrade of Shottendane Road to Local Distributor standard; and" This is supported, if there is adequate funding for the transport plan "11) a proportionate contribution to necessary off-site highway improvements in accordance withPolicy SP47" As stated earlier the infrastructure plan could be clearer on when this will be phased in line with the plan and policy. I am keen to ensure that the delivery of road infrastructure to be delivered as a early as possible "Masterplanning will be informed by and address ) an archaeological evaluation;" This is welcomed and supported ) the preservation and/or enhancement of the setting of scheduled ancient monuments and the l isted Dent de Lion Gateway, and the measures to be undertaken; This			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>is welcomed and supported ) The capacity of any utility services and infrastructure and any need (and provision of) improved or additional infrastructure (as may be advised or reasonably required by service providers); This is welcomed and supported ) appropriate arrangements for surface water management/sustainable drainage schemes in line with Margate Surface Water Management Plan; This is welcomed and supported, more information below ) a Landscape and Visual Impact Assessment to address any visual impact on views to and from the adjacent Green Wedge and protecting wide open landscapes and strategic views and This is welcomed and supported ) the integration of development and landscaping to take account of public rights of way and the provision of a soft edge between the site and open countryside This is welcomed and supported All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan. Proposals will be accompanied by a Transport Assessment which shall: ) assess the impact of development on the local road network and address any implications for on-street car parking arrangements in Dent-de-Lion Road and Garlinge High Street, between the site and the A28; and This is welcomed and supported * ) identify measures to promote multi-modal access, including footway and cycleway connections, and an extended bus service accessible to the residential development and rail linkages. This is welcomed and supported Other comments (****Map 4 attached sits here in original rep***) Other comments: * Surface water may need some local assessment as there is some information which may indicate surface water areas, which appear not to be in the evidence Map of SP15 and around <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk/map">https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</a></p>			

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MM/035	Dawkins	Julia	1953	35	TRANSPORT STRATEGY 7) New link road: I cannot find a map of this in the Policies Map Modifications.		<a href="#">View Comment</a>	The link road would be included as part of the site layout, the detail of which will be part of the planning application so is not shown on the policies map. No change is required to MM/035
MM/035	Davies	Julie	CPRE Kent	60	Land is allocated for up to 2,000 new dwellings "with an approximate average density of 35 dwellings per hectare (net)". This is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," – and in recognition of Westgate being a district retail centre - it is considered that density could be further increased in the interests of sustainable development. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/035.
MM/035	Janes	Tamzyn	Southern Water	88	From 1 April 2018, a new set of rules covering the charging for new connections and requisitions for companies wholly or mainly in England come into force. These new rules include requirements for water and sewerage companies to provide upfront charges for most connections services and make the charges for offsite reinforcement works more transparent and cost reflective, rather than requiring the developer to connect to the point of nearest adequate capacity. Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, details can be found on our website		<a href="#">View Comment</a>	See response to Comment ID 87. No change is required to MM/035.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					https://www.southernwater.co.uk/developing-building/connection-chargingarrangements. NB charges are reviewed annually. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019). Having regard to the issues set out above, Southern Water propose the following amendment (additional text underlined) to 3) The capacity of any utility services and infrastructure and any need (and provision of) improved or additional infrastructure ahead of occupation (as may be advised or reasonably required by service providers);			

<b>Mod Number</b>	<b>MM/036</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/036	-		St John's College	105	(See attached) St John's College continues to support the proposed strategic allocation at Westwood (Policy SP16). The majority of the changes proposed to Policy SP16 are as a consequence of the discussions at the Examination hearings. We specifically support the deletion of the reference to a development brief and that only a Masterplan is required for the site. We also support the deletion of the Green Wedge to the east of the site. In conjunction with our representations on Policy SP12 we have concerns about criterion 3 which requires a range of community facilities without specifying what they might be. We believe this criterion should be amended to simply require a community building together with the small scale	<a href="#">MM_036_MH.pdf</a>	<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/036



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					convenience retail provision. Finally regarding criterion 5 which states that: Highway improvements including widening of Nash Road and links to Nash Road and Manston Road, to local distributor standard between the southern extent of the site and Star Lane. As the scheme will be subject to a detailed Transport Assessment we are of the opinion that to make this criterion 'sound' the criterion should be amended to state: Highway improvements including widening of Nash Road and links to Nash Road and Manston Road, to local distributor standard between the southern extent of the site and Star Lane subject to the detailed Transport Assessment required by this policy			
MM/036	Alan Byrne/ English Heritage			112	MM/033, MM/034, MM/035, MM/036, MM/040 – while we welcome the additional and more specific references to heritage (archaeology and listed buildings) we maintain our view, as previously stated, that a heritage impact assessment is required prior to allocation of the sites in view of the likely harmful impacts that will result from development of these sites. Allocation of these without prior assessment is liable to leave the heritage assets vulnerable to detrimental change to the character and setting.		<a href="#">View Comment</a>	These comments were raised during the Reg 19 Stage. During the Examination the 'Audit note of heritage assessment of allocated housing sites' (CD9.31) was prepared to address these concerns.  No change is required to MM/036
MM/036	Miss P A Smith			149	Concern at the reduction of provision of open space. This applies across the majority of housing provisions when we are being urged to increase – down by 8.42ha		<a href="#">View Comment</a>	The point raised was discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/036
MM/036	Cooper	Barbara	Kent County Council (KCC)	254	The County Council notes that this strategic site is within 250m of a safeguarded waste facility. Therefore, an Infrastructure Assessment will be required to determine whether the proposed strategic sites are in accordance with		<a href="#">View Comment</a>	The presence of the safeguarded waste facility was discussed during

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					the safeguarding policies of the KMLWP. Therefore, an Infrastructure Assessment must be carried out to inform the masterplanning of a strategic housing site. The County Council strongly recommends the wording for requirement 1 "Masterplanning will be informed by and address: 1) pre-design archaeological assessment" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.			the examination hearing sessions and concluded that the site had sufficient space to comply with KMLWP policies. No change is required to MM/036.
MM/036	Solly	C		342	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/036
MM/036	Davies	Julie	CPRE Kent	61	Land is allocated for up to 1,450 new dwellings "with an approximate average density of 40 dwellings per hectare (net)". This is a medium density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," – and in recognition of Westwood sitting at the top of the District's retail centre hierarchy - it is considered that density could be further increased in the interests of sustainable development. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/036.
MM/036	Janes	Tamzyn	Southern Water	89	From 1 April 2018, a new set of rules covering the charging for new connections and requisitions for companies wholly or mainly in England come into force. These new rules include requirements for water and		<a href="#">View Comment</a>	See response to Comment ID 87. No change is required to MM/036.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					sewerage companies to provide upfront charges for most connections services and make the charges for offsite reinforcement works more transparent and cost reflective, rather than requiring the developer to connect to the point of nearest adequate capacity. Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, details can be found on our website <a href="https://www.southernwater.co.uk/developing-building/connection-chargingarrangements">https://www.southernwater.co.uk/developing-building/connection-chargingarrangements</a> . NB charges are reviewed annually. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019). Having regard to the issues set out above, Southern Water propose the following amendment (additional text underlined) to 3) the capacity of any utility services and infrastructure and the provision for any necessary improvements or additional infrastructure ahead of occupation (as may be advised or reasonably required by service providers);			

**Mod Number** MM/037

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/037	Solly	C		343	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/037

Mod Number					MM/038			
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/038	Nagy	Marie	Teal Planning Ltd	203	<p>Maximum Number of New Homes Allowing for additional units to be provided, above that currently permitted through the reserved matter approvals, is supported and is allowed within the existing planning provisions for the development. Additional flexibility however is requested to enable the total number of units to be more than 1020 units if demonstrated to be appropriate through any future re-planning of the areas that have not yet started and in the interest of the good planning of these spaces. We accordingly request that the policy is amended to read 'in the region of' or 'around 1020 units'. This follows the extant provisions for the development that set out the release of commercial and community spaces, if the marketing of these confirms they are not required in full or in part. If these spaces are released, they will provide opportunities for additional new housing. Also, possible re-planning of existing approved housing areas, which have not yet started within the development, may provide opportunities to deliver additional new homes. It is not currently envisaged that the total number of new residential units within the development will go above 1,020 units, but flexibility in the wording of the policy will enable any re-plan areas to be reconsidered based on sound design and masterplanning principals rather than being constrained by a specified rigid maximum number. Medical Facility The extant planning approval for the development includes provision of two buildings which are (part) available for a medical facility. These were approved based on (1) the obligations set out within the outline planning approval for a much smaller medical facility of 0.2ha and (2) the understanding of the NHS's potential requirements when the detailed site plans were approved. The approved spaces do not equate to 2ha and no re-plan areas exist within the development to provide for such a large facility. Keeping this requirement in the site allocation</p>		<a href="#">View Comment</a>	<p>The principle of the sites capacity is not subject to a main modification.</p> <p>The principle of the size of the area to be provided for a medical centre/ community assembly facility is not subject to a main modification</p> <p>No change is required to MM/038</p> <p>(Representations from this respondent were last received during the Preferred Options consultation in 2015)</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					policy will not ensure it is provided, as there is no basis for this to be revisited in space planning terms. Representations to this effect have been made previously and the background and circumstances here remain unchanged. Continued reference to a 2ha medical facility is undeliverable and contrary to the requirements of the new Local Plan to be effective. If must be removed.			
MM/038	Cooper	Barbara	Kent County Council (KCC)	255	This strategic site is within 250m of a safeguarded waste facility. Therefore, an Infrastructure Assessment will be required to determine whether the proposed strategic sites are in accordance with the safeguarding policies of the KMLWP. Therefore, an Infrastructure Assessment must be carried out to inform the masterplanning of a strategic housing site. The County Council is concerned that the proposed modifications do not include any requirement for archaeological assessment to be included in the masterplan requirements. The County Council therefore recommends the inclusion of the following: 4) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains		<a href="#">View Comment</a>	This site was allocated in the 2006 local plan, is fully consented and partially built out. No change is required to MM/038.
MM/038	Solly	C		344	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/038
MM/038	Davies	Julie	CPRE Kent	62	Land is allocated for up to 1020 dwellings. It is noted that Main Modifications are proposed to this policy "for clarity and effectiveness and (to) apply a consistent approach to strategic housing policies." Unlike the other policies no indication is given to density aspirations. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required accompanying Transport Assessment will "incorporate and provide for connections and improvements to ... public transport" it is considered that density could be		<a href="#">View Comment</a>	This policy relates to the site allocated in the 2006 Local Plan - the whole site is fully permissioned and is largely built out. No change is required to MM/038.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					further increased in the interests of sustainable development. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.			

**Mod Number** MM/039

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/039	Greenacre (Thanet) Ltd		Greenacre (Thanet) Ltd	155	Please find enclosed on behalf of our clients Greenacre (Thanet) Ltd representations to the Draft Local Plan Schedule of Main Modifications (December 2019) and Policies Map. The Main Modifications comprise a number of changes which are proposed to the previous 'Pre-Submission Publication Regulation 19' version of the Local Plan, in order to make the Plan sound. Greenacre (Thanet) Ltd are the option holders in respect of Land at Manston Court Road / Haine Road (Policy SP18). For completeness, approximately half of the allocation area has been subject to a planning application (reference OL/TH/18/0261) which was determined by the planning committee in February 2019, with a resolution to grant subject to a Section 106 agreement. The applicant is in the process of agreeing the Section 106 agreement in conjunction with Thanet District Council and Kent County Council. Overview We wish to confirm our support for the proposed allocation of the land at Manston Court Road / Haine Road. Main Modification reference MM/039 sets out the proposed alterations to Policy SP18 Local Plan alteration (Policy SP18) The Main modifications at reference MM/039 seeks to provide a clear and consistent approach to strategic housing policies. We wish to confirm our support for the majority of the proposed changes to the wording of Policy SP18. The proposed		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/039

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>alteration to the allocation to increase the number of dwellings from 1200 to 1400 is supported. It is acknowledged that this increase reflects the change to the allocation boundary, and bring it into alignment with the planning application for 'Phase 1' of the allocation, which received a resolution to grant from the planning committee in February 2019 (subject to S106). We wish to also confirm our support for the proposed increase to the approximate average density, which ensures there is a consistent approach to all strategic housing sites across the district. The requirement for a masterplan to be produced is an appropriate approach, and we support the removal of the need to include a development brief. The proposed text in respect of master planning, open space, infrastructure delivery and phasing plans, and the requirement for a transport assessment are all acceptable and reasonable. We would query the requirement at SP18 (2) for 2) Provision on site of a serviced site of no less than 8ha for a 6-form entry secondary school and its construction in a location and in a form agreed with the County Council. The policy as currently drafted infers that construction of the school is to be funded and/or even undertaken by the developer. Greenacre (Thanet) Ltd are in the process of agreeing a financial contribution towards the delivery of the secondary school as part of the Section 106 linked to Phase 1 of the masterplan. At this time the process for delivering the school remains unknown. The wording of the policy in our opinion is too restrictive and could unduly burden the delivery of housing on the remainder of the site allocation. In our opinion, the policy as worded is not justified and is therefore unsound as it would appear to provide no flexibility with regards to the delivery route of the secondary school. Furthermore, the policy expressly states a minimum area of 8ha for the school. We have not been provided with any justification for this site area and suggest that in order to maintain flexibility that reference to a site area is removed. In order to render the policy sound we recommend that it is</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					amended as follows: "provision on site of a serviced site for up to a 6-form entry secondary school in a location and form to be agreed with the County Council" Conclusion In summary, we are supportive of the proposed alterations to Policy SP18 and the allocation boundary, as set out in the Main Modifications (December 2019). Further clarity is required particularly in respect of the secondary school provision and related financial contributions. We therefore recommend that the draft policy is amended as set out above in order to render the Plan sound.			
MM/039	N/A		Tesco Stores Limited	196	See attached file For the reasons set out in our duly made representations to the Submission Local Plan we continue to have concerns over the Local Plan's reliance on a handful of strategic sites to deliver a substantial proportion of the district's housing needs over the plan period. Following the deletion of a mixed use development at Manston Airport from the Proposed Revisions to the Local Plan these large sites were proposed to accommodate additional housing development to make up the shortfall as follows: SP14 Birchington – increased from 1,000 to 1,600 dwellings SP15 Westgate – increased from 1,000 to 2,000 dwellings SP18 Manston Court/Haine Road – increased from 700 to 1,200 dwellings (now 1,400 in the Main Modifications MM/039) HO2 North and South of Shottendane Road – increased from 250 to 550 dwellings (now Policy SP18A in the Main Modifications MM/040) The Council has reworked the trajectory following submission of the Local Plan such that these sites are now not expected to start delivering units until 2020/2021 at the earliest. If indeed these sites do deliver houses in line with the trajectory in 2020/2021 (a total of 105 across 3 of the above 4 sites) this will be 10 years into the 20 year plan period. The high level of historic shortfall in the housing supply and the reliance on a stepped trajectory is partly a consequence of an over emphasis on a handful of strategic sites. The Local Plan should therefore look to allocate a wider range of smaller housing sites in sustainable locations which are able to be delivered relatively more quickly, such as	<a href="#">Reps to MM034, 035, 039, 040.docx</a>	<a href="#">View Comment</a>	<p>The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The principle of allocating land North of Millenium Way for housing is not subject to a main modification</p> <p>No change is required to MM/039</p>



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Land North of Millennium Way. The spatial strategy will also need to be revisited in the early review of the Local Plan irrespective of the outcome of the DCO for Manston Airport.			
MM/039	Cooper	Barbara	Kent County Council (KCC)	256	Bullet 5 should be altered as follows: "junction improvement at A256 Old Haine Road/New Haine Road and Star Lane/Haine Road (including a dual lane link between them)". This change is required to ensure that the correct reference to the junction is made within the policy. The County Council strongly recommends the wording for requirement 1) "Masterplanning will be informed by and address: 1) pre-design archaeological evaluation" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.		<a href="#">View Comment</a>	If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:  <b>'junction improvement at A256 <del>Old</del> Haine Road/<u>New</u> Haine Road and Star Lane/Haine Road (including a dual lane link between them)'</b>
MM/039	Solly	C		345	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/039
MM/039	Davies	Julie	CPRE Kent	63	Land is allocated for up to 1400 new dwellings "with an approximate average density of 35 dwellings per hectare (net)". This is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development. This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/039.

Mod Number					MM/040			
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/040	Alan Byrne/ English Heritage			113	MM/033, MM/034, MM/035, MM/036, MM/040 – while we welcome the additional and more specific references to heritage (archaeology and listed buildings) we maintain our view, as previously stated, that a heritage impact assessment is required prior to allocation of the sites in view of the likely harmful impacts that will result from development of these sites. Allocation of these without prior assessment is liable to leave the heritage assets vulnerable to detrimental change to the character and setting.		<a href="#">View Comment</a>	These comments were raised during the Reg 19 Stage. During the Examination the 'Audit note of heritage assessment of allocated housing sites' (CD9.31) was prepared to address these concerns.  No change is required to MM/040
MM/040	Burnett	Nicole	Gladman	138	Gladman note that the policy replaces former Policy HO2 and essentially 'upgrades' the allocation at land north and south of Shottendane Road to a strategic housing allocation. Gladman support this change in policy, but has the following comments about the MM as it has been drafted. 2.6.2 In the first instance, Gladman notes that the policy divides the residential elements so that up to 300 units can be provided on the northern field parcel and up to 250 units on the southern parcel. To ensure there is sufficient flexibility in delivery, Gladman suggest that the policy is amended to state that the number of residential dwellings expected in each field parcel can be varied if it is in the best interest of on-site masterplanning and on the proviso that the total number of dwellings delivered between both parcels does not exceed 550 units. Referring next to Clause one of the policy, this states that a minimum of 4.4 ha of open space will be required, which may be spread across both the north and south parcels. In comparison to the submission Local Plan it is acknowledged this quantum has been reduced from 6.23 ha. Whilst the importance of sufficient on site open space is not disputed, the allocation also expects the delivery of a local distributor link road between Shottendane Road and Manston Road, along with new roundabouts on Shottendane Road, Manston Road and Hartsdown Road. Given that the		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/040

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>site's existing topography is undulating, the creation of a link road and roundabouts will lead to land take over and above what would be expected by standard residential estate roads.</p> <p>2.6.4 In view of this, and in order to prevent any potential competing policy demands, Gladman suggest that the reference to a minimum requirement of 4.4 ha in the policy is removed and replaced by an overall requirement to provide an appropriate amount of onsite open space of up to 4.4 ha that's suitability is to be assessed as part masterplanning exercise. This approach will ensure that the Council retains control over how much open space is accommodated, without imposing minimum requirements that could stifle other on-site development coming forward.</p> <p>2.6.5 With reference to Clause two of the policy, this states that the masterplan should include linkages to new existing public transport infrastructure. To provide some degree of flexibility Gladman would suggest that the clause is amended to state, where feasible, linkages to new and existing public transport infrastructure should be included in any masterplan for the site.</p> <p>2.6.6 Whilst fully supportive of the allocation, Gladman suggest that the above amendments are required to ensure the policy is effective and the site remains deliverable over the plan period.</p>			
MM/040	N/A		Tesco Stores Limited	197	<p>See attached file For the reasons set out in our duly made representations to the Submission Local Plan we continue to have concerns over the Local Plan's reliance on a handful of strategic sites to deliver a substantial proportion of the district's housing needs over the plan period. Following the deletion of a mixed use development at Manston Airport from the Proposed Revisions to the Local Plan these large sites were proposed to accommodate additional housing development to make up the shortfall as follows: SP14 Birchington – increased from 1,000 to 1,600 dwellings SP15 Westgate – increased from 1,000 to 2,000 dwellings SP18 Manston Court/Haine Road – increased from 700 to 1,200 dwellings (now 1,400 in the Main Modifications MM/039) HO2 North and South of Shottendane</p>	<a href="#">Reps to MM034, 035, 039, 040.docx</a>	<a href="#">View Comment</a>	<p>The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The principle of allocating land North of Millenium Way for housing is not subject to a main modification</p> <p>No change is required to MM/040</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Road – increased from 250 to 550 dwellings (now Policy SP18A in the Main Modifications MM/040) The Council has reworked the trajectory following submission of the Local Plan such that these sites are now not expected to start delivering units until 2020/2021 at the earliest. If indeed these sites do deliver houses in line with the trajectory in 2020/2021 (a total of 105 across 3 of the above 4 sites) this will be 10 years into the 20 year plan period. The high level of historic shortfall in the housing supply and the reliance on a stepped trajectory is partly a consequence of an over emphasis on a handful of strategic sites. The Local Plan should therefore look to allocate a wider range of smaller housing sites in sustainable locations which are able to be delivered relatively more quickly, such as Land North of Millennium Way. The spatial strategy will also need to be revisited in the early review of the Local Plan irrespective of the outcome of the DCO for Manston Airport.			
MM/040	Tapp	Jonathan		227	"Appropriate landscape treatment in order to provide an appropriate transition between the development and the adjacent open countryside" - what does this mean, "appropriate" used twice in a sentence? I own the adjacent open countryside and it is farmed, it is not an asset for the developers. Similarly, the retention and/or upgrading of designated bridleways refers to my land; TM 14 is NOT a bridleway it is a footpath. Am I supposed to just give it up to increase the developer's assets? TM13 is also a footpath. There is a big difference.		<a href="#">View Comment</a>	<p>This is a factual correction.</p> <p>If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:</p> <p>Amend Clause 5 to read: <b>Provision for the retention and/or upgrading of designated <u>bridleways</u> <u>footpath</u> <u>TM14</u> (<del>TM13, TM14, TM23, TM28</del>)</b></p>
MM/040	Cooper	Barbara	Kent County Council (KCC)	257	Paragraph 3, Point 3 - The revised text now refers to new roundabout junctions on Shottendane Road, Manston Road and Hartsdown Road. However, this should be altered to enable flexibility over the form of the junction on Hartsdown Road. The County Council therefore recommends that this policy is		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					altered to require new roundabout junctions on Shottendane Road, Manston Road and an 'appropriate form of junction at Hartsdown Road'. The Transport Assessment should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The PRow Network can support public transport and the wider highway network, by providing opportunities for recreation and commuting, especially short distance journeys. The County Council strongly recommends that this policy includes a requirement for archaeological assessment to be included in the masterplan requirements. The County Council recommends the inclusion of the following: 6) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains			<p>sessions and these discussions led to the main modifications proposed.</p> <p>If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:</p> <p><b>'.....new roundabout <u>junctions</u> on Shottendane Road, <u>and</u> Manston Road and <u>an appropriate form of junction at Hartsdown Road</u>'</b></p>
MM/040	Solly	C		346	Traffic Modelling in respect to the outcome of the DCO should be made, as I have concerns on Manstons roads capacity as it is linked to spitfire junction which will be radically redesigned. Coffin house corner is known as a pinch point for traffic and can be heavily hit especially during tourist season (especially if shottendane road is used as a main connection to margate). I don't see much evidence on the capacity of this road in respect to an operating airport and the inner road circuit.		<a href="#">View Comment</a>	The outcome of the DCO will be included in the Local Plan Review. No change is required to MM/040

Mod Number

MM/041

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/041	Solly	C		347	The paragraph should reference additional wording to look at rural areas, in that rural areas will have small development proposals and will attract houses which are 4 bedroom and above. There was a case in Monkton where 9, 4 bedroom houses were approved. There is a need for affordable housing in rural areas and should be encouraged.		<a href="#">View Comment</a>	No change is required to MM/041

**Mod Number** MM/042

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/042	Patchell	Emma	Gillings Planning	100	Other Main Modifications are supported, specifically MM27(the stepped trajectory), MM42 (policy SP19 - the mix of dwellings), and MM44 (policy SP20 – affordable housing).		<a href="#">View Comment</a>	Support noted. No change is required to MM/042.
MM/042	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	161	Omission, it is essential that a mix of dwellings, types and sizes are delivered across the district.		<a href="#">View Comment</a>	No change is required to MM/042.
MM/042	Mellor	Joshua	Barton Willmore LLP	175	We support the modification to Policy SP19 which supports the provision of an appropriate mix of dwellings having regard to the SHMA recommendations as may be reviewed or superseded. The policy now acknowledges that the appropriate mix could change throughout the Plan period. The Policy, subject to the proposed modifications, is considered to now be effective and therefore "sound".		<a href="#">View Comment</a>	Support noted. No change is required to MM/042
MM/042	Solly	C		348	There is concern on the effectiveness of the policy if the LPA cannot demonstrate a 5 year land supply and that proposals are open to "sustainable development" This does not resolve the issue of housing affordability in this area in letting large		<a href="#">View Comment</a>	No change is required to MM/042

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					housing to go over allocation in a mix. It should be strongly encouraged that housing mixes are an important factor and a priority to the LPA.			

**Mod Number** MM/043

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/043	Solly	C		349	There is a balance again when this is at a rural site, and different factors for affordable housing the rural area which may not apply as such to the urban area. The rural areas in Thanet does need support to promote sustainability		<a href="#">View Comment</a>	No change is required to MM/043

**Mod Number** MM/044

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/044	Patchell	Emma	Gillings Planning	101	Other Main Modifications are supported, specifically MM27(the stepped trajectory), MM42 (policy SP19 - the mix of dwellings), and MM44 (policy SP20 – affordable housing).		<a href="#">View Comment</a>	Support noted. No change is required to MM/044
MM/044	Burnett	Nicole	Gladman	150	This Modification relates to Policy SP20 – affordable housing and in part, has resulted in the removal of explicit affordable housing tenure splits that would have been expected to be provided on site. In its place the MM states affordable housing should be provided in the proportions set out in the Strategic Housing Market Assessment (or successive documents). Whilst the added flexibility is welcomed, Gladman considers the policy should go one step further to state, unless other justified affordable housing shall be provided in proportions set out in SHMA. 2.7.2 There may be genuine conditions on		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed  No change is required to MM/044

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					site that may prevent affordable housing being provided strictly in accordance with the splits set out in the SHMA and this amendment would allow such conditions to be captured and assessed as part of the planning application process.			
MM/044	Mellor	Joshua	Barton Willmore LLP	176	Whilst we recognise the importance of affordable housing delivery, as set out in our Matter 9 Hearing Statement the Plan viability work is underpinned by testing of 30% affordable housing delivery. We therefore welcome the modification to Policy SP20 removing reference to "at least" 30% affordable housing being delivered. As modified the Policy supports the justified target of 30% affordable housing, which is only to be reduced where demonstrated to be unviable. We consider Policy SP20 as amended is "sound".		<a href="#">View Comment</a>	Support noted. No change required to MM/044
MM/044	Bellway Homes Ltd (Kent)			340	We are writing to you on behalf of the site promoter Bellway Homes Ltd (Kent) in support of the emerging designated housing site 'Part of Allotment Gardens, Manston Road' in response to the Council's consultation on the Main Modifications to the Thanet District Council Draft Local Plan to 2031. We have reviewed the Main Modifications and offer the following comments on behalf of the site promoter. Additionally, in support of the Proposed Main Modification MM/044 we are fully supportive of the principle of Emerging Policy SP20 (Affordable Housing) however, as with any development, the site specific circumstances (such as land contamination remediation works) should be considered on their individual merits, to ensure the deliverability and viability of the site development. Conclusion Bellway Homes Ltd (Kent) will continue to work with the Council to bring the site forward for development within the next 5 years. However, in the meantime, we respectfully request that Policy 11 be amended omitting the reference to a 80 unit capacity for the 'Part of Allotment Gardens, Manston Road' site and replacing it with 109 unit capacity. This is therefore considered to support the Council's development strategy to accommodate		<a href="#">View Comment</a>	Support noted. No change is required to MM/044.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					further housing the urban areas of the district. We trust the above comments are helpful to your further consideration of the plan. If you have any further queries or require further information please contact me on 01903 248777.			
MM/044	Solly	C		350	It should be considered that the planning application has a viability statement for planning officers and councillors to guide if a site is viable or not at that time. There have been instances where viability issues arose after a planning application was granted and affordable housing was lost. Affordable housing should be a priority in the plan.		<a href="#">View Comment</a>	Viability statements are requested as part of the planning application process. No change is required to MM/044

<b>Mod Number</b>	<b>MM/045</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/045	Friend	William	Friend Growers	127	I support the amendments to this policy		<a href="#">View Comment</a>	Support noted. No change is required to MM/045.
MM/045	Convent Road ACP Ltd		Convent Road ACP Ltd	18	My client supports Main Modification MM/045, which proposes a change to the wording of Policy SP21 – Development in the Countryside. My client considers that the amended wording provides greater clarity, flexibility and effectiveness, as well as being compatible with the NPPF. In particular my client supports the introduction of sub-category 5, which would allow the redevelopment of brownfield sites for a use compatible with its setting and surroundings.		<a href="#">View Comment</a>	Noted. No change is required to MM/045.
MM/045	Schembri	Angela	RPS Planning & Development Ltd	236	RSP generally welcome the new wording for Policy SP21 but feel that the wording for Item (5) in the policy should be reworded to better reflect paragraph 121 of the NPPF as follows (add in text underlined and in bold below): 5. the redevelopment of brownfield sites for a use which would help		<a href="#">View Comment</a>	The policy was discussed during the examination hearing sessions and these discussions led to the main

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					to meet identified development needs which reflect the character of the countryside that is compatible with its countryside setting and surroundings			modifications proposed. No change is required to MM/045.
MM/045	Dawkins	Julia	1953	26	"All development proposals to which this policy applies should be of a form, scale and size which is compatible with, and respects the character of, the local area and the surrounding countryside and its defining characteristics. Any environmental impact should be avoided or mitigated". This statement should read All development should be of a form.....ie. and the statement would then rule out development of farmland which represents Thanet's sustainable food production for the post Brexit period. Furthermore, this is the Green Wedge between our coastal settlements which safeguards the identity of each place preventing them coalescing into one urban sprawl. (MM046). "Masterplanning also to include an archaeological survey:" Since the early Medaeval period the farmland has been either farmed or pasture or possible settled upon by our predecessors. The lower soil levels have never been disturbed. With significant ancient remains already present in the locality, there is a high probability that ancient artefacts, remains or settlements would be unearthed. Both surface and invasive archaeological surveys are required prior to planning approval. What is the schedule of this work?		<a href="#">View Comment</a>	Development on farmland was discussed in detail at the examination. General housing policy SP12 MM/033 requires a Heritage Impact Assessment, this together with existing policies HE01, HE03 address archaeological issues in detail. No change is required to MM/045.
MM/045	Solly	C		351	In respect to environmental, light pollution should be included especially when lighting is open to a large constraint in the countryside, and should be avoided.		<a href="#">View Comment</a>	This is addressed by other policies in the plan. The comment does not relate specifically to the Proposed Modification. No change is required to MM/045.
Mod Number				MM/046				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/046	Friend	William	Friend Growers	128	I am still very worried that this paragraph will be used to override the stated aims of the policy as now set out in SP22 - to maintain separation between Thanet's built up areas - and used instead to preclude all development and diversification , even those supported by SP21 and SP22 as now worded. The first word 'essential' should be changed to 'necessary' . ,the final paragraph should start with the word 'or'.. in the case of agricultural.... not 'and' .. .If this is not now amended , in line with the amendments already made to SP21 and SP22, It will be otherwise impossible for applicants to demonstrate that developments such as rural diversification schemes and new farm developments that otherwise meet with the wording of policies SP21 and 22 are 'essential' , rather than just 'necessary' . It must be recognised that the wider environmental policy aims of this chapter of the local plan, and the economic aims of the 1st Chapter, will need engagement with rural businesses , site providers and landowners . Policies must be flexible to allow land and business owners to provide land use facilities for green tourism , community hubs , allotments , leisure areas, open uses such as training etc. according to their own business objectives. It should be recognised, also that as the local authority divests itself of saleable assets where ever possible it rests on private landowners to provide space for community hubs , habitat improvement , leisure access , community allotments and so on, set out in the following sections of the policy , and national policies of land management to provide green energy, carbon capture and improve ground water qualityand so on. Many of these aims can be integrated at semi rural mixed use sites as at East Northdown Farm , Garden and Business centre , Quex park and gardens , and formerly at Hartsdown park - not just Town Centre sites . The LPA must support the provision of facilities and initiatives in the green wedge that accord with SP21 and SP22 , and other general local and national policies - not seek to fight them with a blanket ban on all changes of use to suitable open land uses or		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/046.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					small scale ancillary buildings - as, in my experience, it has been up to now. . W.O.H.Friend , (MA) Oxon agricultural and forest sciences			
MM/046	Solly	C		352	Green infrastructure policy should also be considered in green wedges		<a href="#">View Comment</a>	The policy on green infrastructure applies to all development proposals. No change is required to MM/046.
MM/046	Dawkins	Julia	1953	49	By allowing development of the so called Green Wedges of Thanet this plan is flying in the face of progress and recent revelations and scientific knowledge about climate change. Thanet particularly Birchington, Westgate and Garlinge have no need of new housing, rather it is just the roads which need upgrading for our safety. The so called Green Wedges act as the following:- * Green areas absorb rainfall allowing percolation into groundwater. What is the probability that flooding will become more likely and that the structure of the shore chalk cliffs will be affected due to altered water table and percolation? Has a study been done? * they offer field edge habitat, biodiversity and act as a carbon sink. If developed the land would prevented from holding carbon and would contribute to climate change. * Much needed farmland for crop production at a time when we are being encouraged to eat less meat. * Green fields give character and identity to each Thanet town. By developing them we shall become one large linear development pretty much like the Medway Towns but without the advantages of proximity to London and quick transport links, nor any industry to support the population. * The archaeological content of these field is unknown as I am not aware that any invasive surveys have been carried out. The fields have never been developed. This area was one of the first to be landed by the Saxons, and therefore will have been settled upon and will probably offer many archaeological remains. These should not be lost to a housing development		<a href="#">View Comment</a>	This modification recognises that there may be circumstances where development in the green wedges may be essential. The comments raised are addressed by other policies. These comments do not specifically relate to the modification. The approach to development in the green wedges were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/046.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					which has no advantage to local people nor to Thanet. Furthermore, their development would reduce the ability for tourists to travel around and to appreciate this area and we shall lose the seasonal appeal. Roads will be log jammed and air quality will be significantly reduced. I have previously commented by email in a comprehensive way and look forward to your response and to the Council and M P s fighting against this housing development proposal. Thanet needs finance to upgrade the roads but not to double the population of Westgate with it's aging population and little industry to give forth jobs. We are bounded on 3 sides by beautiful seaside. TDC must work to retain what assets we have.			

<b>Mod Number</b>	<b>MM/047</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/047	Friend	William	Friend Growers	153	We strongly support this policy and ask that projects that both improve the green infrastructure , and the accessibility of the land for amenity purposes should be encouraged New paragraph 4.12a needs to be amended, in the way explained, such that TDC no longer persists in trying to impose a blanket ban on all business development in the green wedge, even when this is supported by the job growth strategy policies , would enhance the habitats , and biodiversity of the green wedge , and safeguards , not threatens the integrity of the islands settlements in accordance with the policy.		<a href="#">View Comment</a>	Support noted. No change is required to MM/ 047.
MM/047	Solly	C		353	The modification is welcomed and supported in principle. However, development from Westwood should consider green wedges to help with separation from adjoining towns and avoiding coalescence. Separation by the use of green wedges		<a href="#">View Comment</a>	Support noted. The comment does not relate specifically to the Proposed

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					should be considered with Westwood/Margate/Garlinge/Westgate			Modification. No change is required to MM/047.

<b>Mod Number</b>	<b>MM/048</b>							
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/048	Friend	William	Friend Growers	154	We support this policy		<a href="#">View Comment</a>	Support noted. No change is required to MM/048.
MM/048	Cooper	Barbara	Kent County Council (KCC)	258	An improved and enhanced PRoW network will offer good public transport and active travel links with green infrastructure and open spaces so that the public are not dependent on private vehicle use for visiting these sites. Opportunities should be taken to work with KCC PRoW to improved connectivity across Thanet's green infrastructure.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/048.
MM/048	Solly	C		354	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/048
MM/048	Lamb	Kyla	Minster Parish Council	92	Minster Parish Council welcome the recognition of the many sites of special interest in Thanet, the support of the assets which encourage tourism and the acknowledgement of the presence of the 'best and most versatile agricultural land'. (SP22.MM/048)		<a href="#">View Comment</a>	Support noted. No changes is required to MM/048.

<b>Mod Number</b>	<b>MM/049</b>							
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/049	Friend	William	Friend Growers	156	We support this policy as far as it goes , however it should be recognised that rural landowners will be key to achieving environmental strategies in general and improvements in green infrastructure in particular. TDC should refrain from adopting a hostile attitude to rural landowners such as myself , and should work with such landowners , with a positive history of providing such infrastructure voluntarily on their holdings and should look favourably and preferentially on initiatives from those rural landowners, rather than speculative developers who are not long term employers trying to continue long established family businesses on the land. A case in point is the recent refusal of the application for 5 glamping pods at Elmwood Farm , Broadstairs. The pods are proposed adjacent to the main farm yard area- part of an existing farm settlement - so no threat to the SP22 objectives - to maintain the spacial separation of Thanet's settlements. The equestrian centre provides a facility for local residents in Broadstairs and visitors alike -providing a valued community facility within an easy walk or bicycle ride for adults and children alike , wanting to ride and care for horses and other animals. The farm employs large numbers in the intensive vegetable sector. The conversion of intensive arable land to grassland has improved the habitat diversity of the green wedge in the way supported by this policy. Farm subsidies are being reduced and farmers encouraged to diversify in such a way. It is particularly outrageous that one reason for refusal given is that these 5 pods would create addition disturbance of roosting sites for protected sea birds in Sandwich bay. - While 1,000's of new homes in Thanet's , and Thanets burgeoning population would not/ does not !?.		<a href="#">View Comment</a>	Support noted. No change is required to MM/049.
MM/049	Solly	C		355	The modification is welcomed and supported. I am glad that extra consideration has been made to consider further support for the environment.		<a href="#">View Comment</a>	Support noted. No change is required to MM/049

Mod Number					MM/050			
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/050	Friend	William	Friend Growers	158	We support this policy as far as it goes - To achieve these objectives the LPA will need to co-operate with , not fight against, rural farmers and landowners in the way explained elsewhere . A much more flexible approach needs to be taken to allow initiatives that maintain the economic viability of holdings AND provide green infrastructure enhancement. No recognition is given to those landowners, and their families who have done all these things voluntarily and philanthropically in the past. The shelterbelts and bridlepaths in the Northdown area are precisely the type of green corridors being advocated now. Northdown park gifted to Margate Borough provides a valued open space and wildlife habitat, likewise 'Taddy's allotment provides a valued space for the community to engage in horticulture and engage with nature. No 'credit' is given for any of these legacies. Environmental protection measures are instead enforced rigorously against persons those persons such as myself, who tries hardest to provide additional environmental enhancement voluntarily and willingly. I face high costs of roadside tree management , at the same time as having to manage the same trees in accordance with TPO's - I am caught in an intolerable catch 22 position , between the two agencies with conflicting demands. Likewise for 35 years any attempt to amend any existing footpaths by landowners to provide a more up to date, connective and easy to manage footpath network have been refused. There is no mechanism or funding in place for new permissive paths, or mechanism for compensation/ management fee to be paid for the creation of such paths - walkers do not stay on the existing networks of paths in any event but wander freely , and landowners face the risk of new rights being established over their land 'adversely' if they do not seek to limit such access.		<a href="#">View Comment</a>	Support noted. No change is required to MM/050.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/050	Cooper	Barbara	Kent County Council (KCC)	259	The County Council notes that these paragraphs provide a list of green infrastructure suggestions; however, it is also recommended that the policy make reference to the mitigation hierarchy, detailed below. The need to retain biodiversity is particularly important given the provisions within the Environmental Bill introducing mandatory net gain. The 'mitigation hierarchy' described in British Standard BS 42020:2013, involves the following step-wise process: • Avoidance – avoiding adverse effects through good design; • Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects; • Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; • Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.		<a href="#">View Comment</a>	The mitigation hierarchy is set out in NPPF. The comment does not relate specifically to the Proposed Modification. Discussions during the examination led to the main modifications proposed. No change is required to MM/050.
MM/050	Dawkins	Julia	1953	27	"Maintaining and enhancing biodiversity and the natural environment and creating a coherent network of Green Infrastructure" (See my comments on MM/32) The Plan acknowledges a need to use existing green infrastructure to contribute to the network of wildlife habitat. In Westgate retainment of the green space between new and existing housing would be planted with trees/shrubs to offset lost carbon sink, provide a public right of way, and a wildlife corridor. Its width should be sufficient (public bridleway width) to ensure it would not be an enclosed space and would not pose a threat to personal safety. Furthermore it would assist in soil/water retention lost by farmland development. The Surface Water Management Plan should be revised to take into account the substantial impact on surface water drainage and the substantial changes to groundwater levels. Has this been undertaken?		<a href="#">View Comment</a>	This is adequately covered by MM/137 Policy GI06 would need to be met in any new development. This makes provision for creating new wildlife corridors and stepping stones; establishing a sense of enclosure with hedges and trees and creating wildlife habitats and improve biodiversity including the integration with surface water management. This is also MM/140 QD02 - general design principles.  No change is required to MM/050.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/050	Solly	C		356	* The modification is welcomed and supported. However, I would have wished that council made a more robust evidence base on this area as there is a lack of understanding in how Green Infrastructure will be made, will more trees be required, if so where. Where are there opportunities to enhance biodiversity, and how will this be funded? * There is no mention of the provision of green infrastructure in the infrastructure delivery plan. Is the infrastructure delivery plan only applicable to the built environment and not to the natural environment? It has been seen that trees are felled but no compensation for this in current planning applications, which concerns me on whether we are applying net * Wording on Strategic Priority 4 may need to be revised "Protect, maintain and enhance the district's biodiversity and natural environment, including open and recreational space to create a coherent network of Green Infrastructure that can better support wildlife and human health." There is no wording to increase biodiversity and the natural environment. With increasing pressure from the built development a loss will undoubtedly be made especially on the land which has been taken from farmland areas.		<a href="#">View Comment</a>	Support noted. Rest of comment The comment does not relate specifically to the Proposed Modification. No change is required to MM/050.

<b>Mod Number</b>	<b>MM/051</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/051	Environment Agency			179	The changes that have been made incorporate the essence our recommendations by including specific reference to rivers and waterbodies.		<a href="#">View Comment</a>	Support noted. No change is required to MM/051

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/051	Cooper	Barbara	Kent County Council (KCC)	261	An improved and enhanced PROW network will offer good public transport and active travel links with green infrastructure and open spaces so that members of the public are not dependent on private vehicle use for visiting these sites.		<a href="#">View Comment</a>	Noted. No change is required to MM/051.
MM/051	Solly	C		357	The modification is welcomed and supported in Principle. The policy should consider the wider aspect of providing new green infrastructure assets to the Thanet area as there may be other areas which will need to be created, enhanced and maintained to ensure that the district has a net gain		<a href="#">View Comment</a>	Support noted. Net gain is covered by other policies in the plan. No change is required to MM/051.

<b>Mod Number</b>	<b>MM/052</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/052	Environment Agency			205	Compensatory Habitat Sites It appears that the request to reference the protection afforded to sites identified as being provided for compensation in the National Planning Policy Framework (176 c)) for harm to international sites has been overlooked. 176. The following should be given the same protection as habitats sites: c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. We reiterate the point made in our previous submission that the Environment Agency might construct such sites in the district and we will expect them to be protected in accordance with the requirement of the NPPF.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/052.
MM/052	Solly	C		359	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/052

Mod Number					MM/053				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/053	Cooper	Barbara	Kent County Council (KCC)	263	The County Council recommends that the District Council ensures the Local Plan does not unduly restrict the application of the Strategic Access Management and Monitoring Strategy (SAMMS) tariff as the Local Plan currently states that residents from all new housing must contribute to the SAMMS and this must include places such as static caravan parks which are open in winter.		<a href="#">View Comment</a>	The recreational impact of other uses is already covered by the policy. The comment does not relate specifically to the Proposed Modification. No change is required to MM/053.	
MM/053	Solly	C		360	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/053	

Mod Number					MM/054				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/054	Child	T	Thanet Coast Project	234	The Policy regarding recreational pressure on the Thanet Coast SPA and Ramsar site relates to bird disturbance but needs to include a wider policy to include the increase human recreational pressures (such as shellfish harvesting, bait collecting etc) as identified within the NE Kent European marine sites (Marine Protected Area) for the SAC features/SSSI/MCZ/NNR too.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. The SAMM has to relate to the impact on the designation's qualifying feature which relate to bird species particularly Turnstones and European Golden Plover. The strategy particularly identified dog walking as the most common form of disturbance and the policy sets the requirement for a financial contribution to address potential future impact arising the	

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								<p>increase in housing. The strategy does mention bait digging and other recreational activities such as kite surfing but this is controlled via other measures in the Pegwell Bay area such as 'No Bait Digging Zone'. There may be more appropriate management and educational measures to address the impacts from other recreational pressures which are included in the work programme for the SAMM officer. the existing policy does make provision for other developments that would increase recreational activity causing disturbance, on a case by case basis.</p> <p>No change is required to MM/054.</p>
MM/054	Solly	C		362	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/054

<b>Mod Number</b>	<b>MM/055</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/055	Cooper	Barbara	Kent County Council (KCC)	264	The County Council recommends that the District Council has consideration of the provisions of the Environment Bill, particularly regarding net gain.		<a href="#">View Comment</a>	The issue raised was discussed during the examination hearing sessions and these discussions led to the main

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								modifications proposed. No change is required to MM/055.
MM/055	Solly	C		363	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/055
MM/055	Solly	C		364	The modification is welcomed and supported, especially the inclusion of soils and bird habitats.		<a href="#">View Comment</a>	Support noted. No change is required to MM/056

<b>Mod Number</b>	<b>MM/056</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/056	Environment Agency			180	We support the proposed amended wording.		<a href="#">View Comment</a>	Support noted. No change is required to MM/056.
MM/056	Dawkins	Julia	1953	28	Development of open farmland neither enhances nor creates biodiversity, nor does it protect and enhance valued soils. What will be done to mitigate against the loss of farmland birds, other wildlife species and field edge vegetation? The Plan should state that if management of any remaining or new green infrastructure is subcontracted out then work shall be monitored and controlled by Council to maintain performance and financial accountability.		<a href="#">View Comment</a>	Appropriate mitigation measures will be sought based on the ecological advice received from the County Council Ecological Service. No change is required to MM/056.

<b>Mod Number</b>	<b>MM/057</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/057	Solly	C		365	<p>* The map is not particularly clear and there is information on what the BOA should be on the upcoming KENT BIODIVERSITY STRATEGY 2019 to 2044. Maybe some reference to this strategy should be made h</p> <p>ttp://www.kentnature.org.uk/kent-biodiversity-strategy2.htmlhttp://www.kentnature.org.uk/uploads/files/Opportunity_Area_Statement_-_Thanet_Cliffs_Shore_FINAL_.pdf</p> <p>* * Targets: * Ensure the protection and enhancement of important cliff, intertidal and marine habitats, and monitor the extent and quality of intertidal and subtidal * Maintain and enhance the quality of existing littoral and sub-littoral chalk: • As far as possible, allow natural coastal processes to determine the geomorphology of the littoral and sub-littoral environment; and the carefully plan of any coastal defense work in order to maintain these naturally dynamic habitats through the Shoreline Management Plan. • Develop an action plan for managing the impact of non-native species of concern; • Implement appropriate management of Marine Protected Areas to allow marine habitats to * Restore, improve management of, and extend or create areas of cliff-top 4 Maintain and enhance saline lagoon habitats, ensuring no net loss. Biodiversity Opportunity Area Statement 5 Action for naturally widely dispersed habitats (ponds, traditional orchards), wildlife associated with arable farmland, and widely dispersed species such as great crested newt will need to focus across the whole of the area and not just within the Biodiversity Opportunity Area boundary Target 5 (above) does suggest that "Action for naturally widely dispersed habitats (ponds, traditional orchards), wildlife associated with arable farmland, and widely dispersed species such as great crested newt will need to focus across the whole of the area and not just within the Biodiversity Opportunity Area boundary" The map does not show clearly where this could be and could be misinterpreted</p>		<a href="#">View Comment</a>	the biodiversity strategy consultation has recently closed and has yet to be finalised. No change is required to MM/057.

Mod Number					MM/058			
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/058	Styles	Richard	Ramsgate Town Council	3	I have received the letter about the main modifications to the Thanet Local plan. I am mulling over whether this needs a special council meeting or can be taken as part of the agenda of the next RTC Planning + environment meeting. I will be consulting with the RTC Chairman of Planning for his view. It means that we will have to look at the original text and make some kind of sense of what remains. There are an awful lot of redactions and to make sense of the entire document it means looking at it section by section. MM/058 has been altered substantially and I am pleased to see it now is more in conformity with the law. However, where it says 'Allotment sites are a statutory requirement for the Council but are usually managed by town or parish councils'. It should read 'The provision of allotment sites is a statutory requirement for the Council in Margate, but where there is a Town or Parish Council in other parts of Thanet, that statutory duty is carried out by that Council and not Thanet District Council'. Parish and Town Councils do not mainly manage allotments, they are the owner and operators of those allotments. In Ramsgate there are still two kinds of allotment: Statutory owned by RTC and Non -Statutory owned by TDC but managed in the public interest by RTC. We hope that will change very soon. May I suggest that your planning staff refer to me or other clerks in Thanet, for advice, before they write any more words about allotments.		<a href="#">View Comment</a>	Proposed amendment adequately addresses the points raised. The comment does not affect the application of the policy. No change is required to MM/058.
MM/058	Solly	C		366	The modification is welcomed and supported in Principle, However Some increase to allotments should be made in the plan, as there is a shortage on the amount of allotments available. Is the need able to be demonstrated.		<a href="#">View Comment</a>	New provision is addressed by other policies in the plan. No change is required to MM/058.
Mod Number					MM/059			



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/059	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	162	The Town Council supports the inclusion of allotments in this policy. Broadstairs and St. Peter's is lucky enough to benefit from a number of Town Council and privately owned allotments, all of which provide considerable benefit to the community. The Town Council objects to the removal of the phrase 'overriding' in point 2. The removal of this word waters down the policy and leaves it more likely to be open to interpretation by developers.		<a href="#">View Comment</a>	Support noted. This policy was discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  No change is required to MM/059.
MM/059	Solly	C		368	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/059

<b>Mod Number</b>	<b>MM/060</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/060	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	163	Object- the policy should include reference to the possibility of Local Green Spaces being allocated in Neighbourhood Development Plans.		<a href="#">View Comment</a>	This does not need to be in the policy as it is in the NPPG and the comment does not relate specifically to the Proposed Modification. No change is required to MM/060.
MM/060	Solly	C		370	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/060

<b>Mod Number</b>	<b>MM/061</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/061	Solly	C		372	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/061

**Mod Number** MM/062

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/062	Solly	C		374	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/062

**Mod Number** MM/063

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/063	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	164	Object to the removal of the term 'sites of 50 dwellings' in SP31. As this would mean that any windfalls over 50 dwellings would not have to meet the requirements of policy SP31.		<a href="#">View Comment</a>	Other policies in the plan address the need for green infrastructure and open space requirements. This policy was discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/063.
MM/063	Cooper	Barbara	Kent County Council (KCC)	266	An improved and enhanced PRoW network will offer good public transport and active travel links with green infrastructure and open spaces so that members of the public are not dependent on private vehicle use when visiting these		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					sites. The District Council is encouraged to explore opportunities to work with KCC PRoW to improved connectivity across the District's green infrastructure.			Modification. No change is required to MM/063.
MM/063	Solly	C		375	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/063
MM/063	Solly	C		377	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/064


<b>Mod Number</b>	<b>MM/065</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/065	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	165	The Town Council supports these changes		<a href="#">View Comment</a>	Support noted. No change is required to MM/065.
MM/065	Solly	C		379	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/065

<b>Mod Number</b>	<b>MM/066</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/066	Solly	C		380	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/066

**Mod Number** MM/067

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/067	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	166	The Town Council supports these changes.		<a href="#">View Comment</a>	Support noted. No change is required to MM/067.
MM/067	Cooper	Barbara	Kent County Council (KCC)	267	Policy should ensure that new developments incorporate good sustainable transport connections, with high quality walking and cycling infrastructure available, which can link local amenities. Replacing private vehicle journeys with active travel should help to address low carbon targets, reducing emissions and improve air quality and public health.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/067.
MM/067	Solly	C		384	The modification is welcomed and supported. Some additional points which could make the policy more effective: * Improvement to ventilation and shading on buildings would reduce the use of cooling systems such as air * From the Government report: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf</a> There are Risks of shortages in the public water supply, and for agriculture, energy generation and industry, with impacts on freshwater ecology. Also there are Risks to natural capital, including		<a href="#">View Comment</a>	Support noted. The additional comments do not relate specifically to the Proposed Modification, and are addressed elsewhere in the plan. No change is required to MM/067.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity * Also consideration should be made to road and rail infrastructure in the event of flooding and what mitigation measures will need to be made. It is possible that essential links would be affected by flooding due to the effect of climate change. New development should include the effect of climate change in its proposals especially for transport (roads and rail). Flood risk map (**Map 5 attached sits here in original rep**) * A recent report from the committee for climate change has advised the government on the points below: * Low-carbon heat strategy and plans to phase out fossil fuels in the 2020s from buildings not connected to the gas grid * Policies to improve energy efficiency for all buildings * New build standards to ensure new homes are ultra-efficient and use low-carbon heating from 2025 * Closure of the performance and compliance gaps * This policy should reflect that it is open for the 6 month Local Plan			

**Mod Number** MM/068

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/068	Solly	C		387	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/068

**Mod Number** MM/069

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/069	Solly	C		388	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/069

Mod Number				MM/070				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/070	-		St John's College	106	(See attached) This policy seeks to support the delivery of primary and secondary schools. The policy now proposed to be modified for Westwood states that as a result of identified future growth, provision is made in the plan for additional schools at: Westwood: equivalent 6FE primary school; 6FE secondary school (Policies SP16, SP17 and SP18). This policy would seem to suggest that a secondary school is required solely as a result of the three strategic sites SP16, 17 and 18. Whilst it is accepted that site SP16 at Westwood will result in a need for secondary education contributions, it is our understanding that there is already a need for additional secondary school provision in the area. There is also no identified need for a secondary school within Policy SP16. Consequently we consider that this part of Policy SP40 should be amended to state: Westwood: a 6FE entry secondary school is required and proportionate contributions will be sought from those sites identified in Policies SP16, 17 and 18 as well as other housing sites in the Westwood area. This will make the policy sound as it will allow proportionate contributions to be made from all qualifying residential sites.	<a href="#">MM_070_MH.pdf</a>	<a href="#">View Comment</a>	<p>If the Inspectors consider it necessary in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council for clarification.</p> <p>Westwood: equivalent 6FE primary school (<u>Policies SP16, SP17 and SP18</u>); 6FE secondary school (<u>Policies SP16, SP17 and Policy SP18</u>)</p> <p>No other changes required.</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/070	BLANKLEY	NICK		36	It is inconsistent for there to be proposals for such major expansion of primary school places without corresponding expansion of secondary school places, such folly needs full explanation.		<a href="#">View Comment</a>	Policy requirements are based on the advice from and need identified by the Education Authority. Provision is being made for a new secondary school at Westwood. No change is required to MM/070.
MM/070	Solly	C		390	Some clarity should be made on what secondary school provisions for Margate and the North Thanet area (Birchington, Westgate and Garlinge) As noted on MM/003 A proposed secondary school has now been ditched at Margate. There are currently challenges in providing secondary education in these areas currently. The infrastructure will also need to be clearer in respect to education provision. h <a href="https://theisleofthanetnews.com/2019/10/24/plans-for-new-secondary-school-at-former-royal-school-for-deaf-children-site-ditched/">https://theisleofthanetnews.com/2019/10/24/plans-for-new-secondary-school-at-former-royal-school-for-deaf-children-site-ditched/</a>		<a href="#">View Comment</a>	This modification refers to working with KCC in identifying other sites. No change is required to MM/070.
MM/070	Juggins	Phoebe	Department for Education	83	DfE also supports the amendments made to Policy SP40/MM070 in relation to education development. It may be of relevance to additionally reference the need to secure developer contributions (further detail provided in the attached letter).	<a href="#">Thanet Local Plan Main Mods DfE.pdf</a>	<a href="#">View Comment</a>	Developer contributions are addressed in policy SP01 MM/003 which refers to the Infrastructure Delivery Plan which the County Council, as education authority has contributed to. No change is required necessary to MM/070.
<b>Mod Number</b>				<b>MM/071</b>				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/071	Cooper	Barbara	Kent County Council (KCC)	268	The County Council (PRoW) recommends specific mention of the PRoW network - emphasising the benefits to development of providing high quality walking and cycling routes, which, together with accessible land, should be appropriately protected and improved through development proposals.		<a href="#">View Comment</a>	he comment does not relate specifically to the Proposed Modification. No change is required to MM/071.
MM/071	Solly	C		391	Concern is still made on whether funding for the Inner road circuit can be made. A funding bid has been made but no outcome on this until 2021. Development will need to be mindful on mitigating the transport demands for all of Thanet, especially in regards to AQMA areas. Hybrid applications (SP15) for some strategic sites are concerning in that piecemeal development could be made without infrastructure to support it. Masterplans will need to be fully planned on any of the strategic sites in that proportional contributions will need to be calculated.		<a href="#">View Comment</a>	Comment noted. No change is required to MM/071.

Mod Number				MM/072				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/072	Cooper	Barbara	Kent County Council (KCC)	270	The County Council recommends specific mention of the PRoW network - emphasising the benefits to development of providing high quality walking and cycling routes, which, together with accessible land, should be appropriately protected and improved through development proposals.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/072.
MM/072	Solly	C		392	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/072
Mod Number				MM/073				



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/073	Solly	C		393	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/073

**Mod Number** MM/074

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/074	Wilson	Andrew		10	Thanet Parkway Station, (Cliffsend) Application No. TH/19/1696 (KCC/TH/0256/2019) This station is an ill-conceived idea that mustn't go ahead as it does not offer anything worthwhile to the travelling public over and above what the existing stations already provide. Thanet Parkway will only provide a vast amount of concrete parking space with associated traffic congestion in the surrounding area. Thanet Parkway; This station facility will be a new build version of Chestfield station which is located between Herne Bay and Whitstable – a fact that in days gone by this design would have been called a "Halt" as it only provided minimal facilities for the traveling public. Below are the "proposed facilities for Thanet Parkway; * 2 station platforms with disabled access * disabled access ramps/lifts with footbridge * ticket vending machine, waiting area and journey information point * CCTV and passenger help points * car park and associated facilities with disabled access to platforms * drop off/ pick up point for buses, taxis and park and ride * access to the new East Kent Access Road * Pedestrian and cycle access. Therefore; No staff, No toilets, No café, No comfortable waiting rooms, Just the very basic 2 platforms with access to them. What an inhospitable place to wait for a train in weather that is not always warm and dry. The location of the station positioned atop of an embankment that will offer little shelter from the elements. The construction of this station will remove from the		<a href="#">View Comment</a>	Comment does not relate to the Proposed Modification. No change is required to MM/074.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>landscape valuable Grade 1 agricultural land, (A sustainable industry in its own right. Something which is constantly being expounded as fundamental to our wellbeing in these times of carbon emissions and the carbon freight footprint). The surrounding area 3km radius) will be built on to meet housing targets. The station will have to attract a sizable footfall to repay its construction and continual maintenance. This will in turn reduce the footfall at our existing 7 stations in Thanet and I leave you to draw your own conclusions as to what could happen to some of those stations if their financial takings diminish. Consider the now known effects of the "out of town" shopping centres on the sustainability of the old high streets. Infrastructure; Knowing something about railway infrastructure as I do, building this station at this location high on an embankment could cause long term problems to the stability of the railway line itself. The embankment at present is populated by a host of trees and vegetation; obviously this mass of foliage etc. will be removed prior to the construction starting. But by removing the trees and their roots could lead to the possibility of destabilising the embankment, something the railway infrastructure owners are not unfamiliar with and the hefty costs associated with rectification. Old railway embankments built over a 100 years ago are costly liabilities to monitor and maintain, many of these embankments do not meet today's standards of engineering knowledge, including soil and environment dynamics etc. To construct a station at this location the question has to be asked "Are the proposers fully aware of the dangers and costs that may arise from this build"? Then there are the two level crossings, Cliffsend and Sevenscore, located either side of the proposed new station; the operation of these road crossings will be affected as the trains will be required to stop between them at the station platforms, the mechanisms that operate the crossings and associated signalling will be affected and changes will have to be made. Signalling alterations and renewals on the railway are</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					notoriously expensive. Have these costs been factored in? The unknown costs of the building and the on-going running costs do not represent a good investment. The journey time savings are not good enough to warrant this investment. The monies would be better spent on Ramsgate Station to bring its facilities into the 21st Century. A recent headline regarding an embankment; This refers to an embankment that has failed Tonbridge landslip 'too dangerous' to work on, Redhill line remains shut (24/12/2019) .Studies and investigations into embankment failures; Ref; <a href="https://www.sciencedirect.com/science/article/abs/pii/S0013795216302320">https://www.sciencedirect.com/science/article/abs/pii/S0013795216302320</a> <a href="https://cdn.networkrail.co.uk/wp-content/uploads/2017/02/RSSB-report-The-effects-of-railway-traffic-on-embankment-stability.pdf">https://cdn.networkrail.co.uk/wp-content/uploads/2017/02/RSSB-report-The-effects-of-railway-traffic-on-embankment-stability.pdf</a> Local Road Infrastructure: The design of the road traffic infrastructure associated with this proposed station will cause enormous congestion in an already congested area, especially at peak flow times. The location of this station is not environmentally responsible.			
MM/074	Cooper	Barbara	Kent County Council (KCC)	277	The County Council is supportive of the proposed changes to this policy. Point 3 – "Integration with wider public transport services" should include mention of PRoW network. KCC is looking to provide active travel links to proposed developments from the new railway station.		<a href="#">View Comment</a>	The comment regarding point 3 does not relate specifically to the Proposed Modification. No change is required to MM/074.
MM/074	Solly	C		395	A decision of funding has been deferred and a consultation has been made to take on views of local residents. <a href="https://kccmediahub.net/resident-survey-for-proposed-thanel-parkway-station745">https://kccmediahub.net/resident-survey-for-proposed-thanel-parkway-station745</a> I hold reservation on this policy at the present time.		<a href="#">View Comment</a>	Comment noted. No change is required to MM/074.
MM/074	Bartlett	Trevor	Dover District Council	44	Support: Dover District Council continues to support the proposals for a railway station at Cliffsend as this will facilitate improved accessibility for the future growth and development of the Discovery Park Enterprise Zone alongside other opportunities that may emerge in the locality.		<a href="#">View Comment</a>	Noted. No change is required to MM/074.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/074	Lamb	Kyla	Minster Parish Council	96	Yet the plan continues to include the costly and unjustified construction of the Parkway Station, widely considered unnecessary by many local people. (SP45)		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/074.

<b>Mod Number</b>	<b>MM/075</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/075	Solly	C		397	The SRN should be considered in respect to the freight movements on the outcome of the Manston Airport decision on a DCO. It is not clear to me if the freight movements and added traffic from Thanet will add more load to the SRN. Also is this a policy to revisit after a DCO being granted?		<a href="#">View Comment</a>	This is a matter for the Local Plan review. No change is required to MM/075.
MM/075	Bown	Kevin	Highways Agency	54	We note that necessary transport assessment work has been completed so far as the production of the current Local Plan. However, there will be an on-going requirement under the general Duty to Co-operate and under the requirements to monitor and manage the delivery of local plans and other local growth to ensure that the transport evidence base is kept up-to-date. Therefore, we consider that text to this effect should be included in the plan in lieu of the deleted policy.		<a href="#">View Comment</a>	This is a matter for the review of the Local Plan. No change is required to MM/075.

<b>Mod Number</b>	<b>MM/076</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/076	Schembri	Angela	RPS Planning & Development Ltd	237	The wording for the new paragraph is welcomed as any decision on the Manston Airport DCO may result in a variation of the alignment identified in relation to the B2050 Manston Road (from Manston Court Road to Spitfire Junction) and this should be picked up as part of the Local Plan Review required by new Policy SP01(b)		<a href="#">View Comment</a>	Support noted. No change is required to MM/076.
MM/076	Solly	C		399	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/076

<b>Mod Number</b>	<b>MM/077</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/077	Quashie	Lorna	Pavilion Property Trustees as Trustee of the Broadstairs Unit Trust	126	The Pavilion Property Trustees welcome and support the Council's decision to remove the safeguarded routes (described in the Submission Local Plan as "12. Land between A254 Margate Road and A256 Westwood Road (including Millennium Way)") from across their land. However, the Local Plan should also make it clear that by removing these routes from development plan, they are also removed from the Westwood Relief Strategy		<a href="#">View Comment</a>	Support noted. No further change is required to MM/077.
MM/077	Mellor	Joshua	Barton Willmore LLP	177	We support the requirement added to Policy SP47 which obliges the Council and County Council, in the event there is delay in site acquisition or assembly in relation to the Strategic Routes, to make interim highway arrangements to enable allocated development to proceed. This ensures there is no delay to the delivery of the Strategic Sites on account of Strategic Routes not within the control of those sites. The modification to Policy SP47 ensures the Plan is effective in delivering its growth requirements and enables it to be "sound".		<a href="#">View Comment</a>	Support noted. No change is required to MM/077

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/077	N/A		Tesco Stores Limited	199	(See attached file) We support the proposed deletion of reference to 'Land between A254 Margate Road and A256 Westwood Road (including Millennium Way), Broadstairs' from policy SP47 for the reasons set out in our representations to MM/018 and MM/019 and reflective of previous duly made objections to the draft Local Plan.	<a href="#">Reps to MM077.docx</a>	<a href="#">View Comment</a>	Support noted. No change is required to MM/077.
MM/077	Schembri	Angela	RPS Planning & Development Ltd	238	Paragraph 2 of the new wording for Policy SP47 should be amended to read as follows (add in text underlined and in bold below): "The following strategic routes are sufficient in their existing form to provide for the growth envisaged in the Plan (subject to the Local Plan review process set out in Policy SP01(b). However if further development is permitted, including further development at Manston Airport not envisaged by the DCO, which has a demonstrable material detrimental impact on the capacity or operation of these routes, the Council will require alternative on-site highway provision where appropriate and/or proportionate contributions towards any improvements or changes to the existing routes which is thereby necessitated: 1) B2050 Manston Road (from Manston Court Road to Spitfire Junction) 2) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction)		<a href="#">View Comment</a>	These issues were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/077.
MM/077	Solly	C		400	I support that a review will need to be taken in respect to the DCO decision (now delayed to June 2020). There is a question on funding in that there is a £50 million bid to the government which will be announced i believe in 2021. h <a href="https://thisisleofthanetnews.com/2019/10/02/49-8million-a28-relief-road-plan-receives-government-backing-for-next-stage/">https://thisisleofthanetnews.com/2019/10/02/49-8million-a28-relief-road-plan-receives-government-backing-for-next-stage/</a> Concern remains on the effect of development and delivery of the Inner Road Circuit.		<a href="#">View Comment</a>	Support and comments noted. No change is required to MM/077.
Mod Number				MM/078				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/078	Dawkins	Julia	1953	29	The Inner Circuit Road and the upgrades to roads and junction should be carried out in the first stages and concurrently with the development. The wording "alongside" and "reasonably" are weak and allow delay to road improvements. Road upgrades and improvements would be essential to prevent log jams on the minor road network of Thanet during development works.		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/078.
MM/078	Solly	C		401	No comment given		<a href="#">View Comment</a>	No change is required to MM/078

<b>Mod Number</b>	<b>MM/079</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/079	N/A		Tesco Stores Limited	201	Policy E01 (MM/079) We continue to consider that a flexible approach to employment uses at Thanet Reach Business Park should be clearly reflected in Policy E01. In the event that the Local Plan is to continue to include a separate reference to flexible employment uses for particular sites, rather than a 'catch all' policy, then Thanet Reach Business Park should also be marked with an asterisk to denote where wider employment generating uses will be allowed in addition to B1, B2 and B8 uses. As drafted, it is not clear whether this more flexible approach is meant to apply to all sites or a select few. MM/079 contains rewording which places a different emphasis on B class uses on employment sites, namely that B1, B2 and B8 will be supported where they would not harm amenity; other employment generating uses would be more appropriate in cases where amenity is an issue. It is noted that the policy now includes criteria where proposals for alternative uses may be permitted. In principle, this is to be welcomed but we have concerns over the	<a href="#">Reps to MM079.docx</a>	<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/079.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					potentially onerous nature of the marketing requirement. The policy as proposed to be modified states that alternative uses will only be permitted where "it has been demonstrated that the site is no longer suitable or viable for employment purposes following an active and exhaustive marketing process for a minimum of 12 months." This appears to be a more onerous requirement than the majority of Thanet's neighbouring authorities and could mean that positive regeneration of sites no longer fit for their intended purpose does not take place as investment is instead targeted to other districts. For example, the recently adopted Ashford Borough Council Local Plan contains a requirement in supporting text to "appropriate marketing of at least 6 months" and that each proposal will need to be treated on its merits within the context of prevailing market conditions. We would advocate a similar level of flexibility/pragmatism be incorporated into Policy E01 and/or its supporting text. In particular, we would seek a reduction in the marketing period to a minimum of 6 months and deletion of the word 'exhaustive'. If necessary inclusion of a reference to 'thorough marketing to the satisfaction of the LPA' would be more proportionate.			
MM/079	Solly	C		402	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/079

Mod Number

MM/080



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/080	Solly	C		403	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/080

**Mod Number** MM/081

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/081	Solly	C		404	There has been applications for large masts which have caused objections especially in landscape areas. Some consideration should be made on the height of communication masts, such as GSM networks, High Frequency Trading platforms and microwave links.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. Telecommunications development is dealt with in Policy QD07. No change is required to MM/081

**Mod Number** MM/082

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/082	Alan Byrne/ English Heritage			114	MM082 – support changes.		<a href="#">View Comment</a>	Support noted. No change is required to MM/082
MM/082	Solly	C		405	There has been applications for large masts which have caused objections especially in landscape areas. Some consideration should be made on the height of communication masts, such as GSM networks, High Frequency Trading platforms and microwave links.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. Telecommunications is

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								dealt with in Policy QD07.No change is required to MM/082.

**Mod Number** MM/083

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/083	Burnett Planning		Burnett Planning on behalf of CD10 Properties Limited	141	The proposed Modification does not reflect the intention of the Policy in respect of the uses that will be permitted in the Secondary Frontage at Westwood, i.e. as discussed at the Hearing session, the intention is that all main town centre uses and residential use will be permitted at ground and upper floor level in the Secondary Frontages, and where uses outside Use Classes A1, A2, A3, A4 and A5 are proposed the Policy is intended to seek to ensure that this would not fragment or erode the active commercial frontages to a degree that would undermine the function of the centre. The proposed Modification does not express support for residential use (which is not a Main Town centre use) in the Secondary Frontages. The proposed Modification also implies that proposals for Use Classes A1, A2, A3, A4 and A5 in Secondary Frontages will be subject to consideration of whether active frontages will be fragmented or eroded. This would be inconsistent with the approach taken to these uses in the Primary Frontages where the Policy provides unqualified support for Class A uses at ground floor level. The following amendments should be made to the final paragraph of the Policy; "Within the Secondary Frontages all main town centre uses (as defined in the National Planning Policy Framework) and residential uses will be permitted at ground and upper floor level. Where non Class A uses are proposed this should not fragment or erode the active commercial frontages to a degree		<a href="#">View Comment</a>	<p>Agree, modification MM/083 does not fully reflect discussions at the hearing. Modification should read as follows:</p> <p>Within the Primary Frontages the following development will be permitted:</p> <ol style="list-style-type: none"> <li>1. Use Classes falling within A1, A2, A3, A4 and A5 (see glossary – Appendix D)</li> <li>2. Residential and <u>other main town centre uses</u> Class B1 (a) offices will be permitted above ground floor level only.</li> </ol> <p>Within the Secondary Frontages the uses referred to in the preceding clauses will be permitted <u>at ground and upper floor level</u> as well as all other town centre uses stated in the National Planning Policy Framework</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					that would compromise footfall or otherwise undermine the function of the centre."			including hotels and residential where this would not fragment or erode the <u>active</u> commercial frontages to a degree that <u>would</u> compromises footfall or otherwise undermines the function of the centre.
MM/083	Solly	C		406	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/083

#### Mod Number MM/084

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/084	Solly	C		407	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/084

#### Mod Number MM/085

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/085	Solly	C		408	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/085

#### Mod Number MM/086

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/086	Cooper	Barbara	Kent County Council (KCC)	281	Sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services. The PRoW network and the ROWIP has a critical role in this, and as such, there should be specific mention of the need to support improvements to walking and cycling routes where they can assist the Council's tourism objectives.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. Walking and cycling is covered in policies TP02 and TP03. No change is required to MM/086.
MM/086	Solly	C		409	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/086

<b>Mod Number</b>	<b>MM/087</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/087	Cooper	Barbara	Kent County Council (KCC)	283	Sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services. The PRoW network and the ROWIP has a critical role in this, and as such, there should be specific mention of the need to support improvements to walking and cycling routes where they can assist the Council's tourism objectives.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/087.
MM/087	Solly	C		410	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/087

<b>Mod Number</b>	<b>MM/088</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/088	Solly	C		411	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/088

**Mod Number** MM/089

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/089	Solly	C		412	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/089

**Mod Number** MM/090

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/090	Solly	C		413	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/090

**Mod Number** MM/091

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/091	Solly	C		414	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/091

Mod Number					MM/092				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/092	Cooper	Barbara	Kent County Council (KCC)	286	An improved and enhanced PROW network will offer good public transport and active travel links with the undeveloped beaches identified so that the public are not dependent on private vehicle use for visiting these sites. Development proposals should therefore explore these opportunities.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/092	
MM/092	Solly	C		415	Consideration should be made for transport options, many people in the peak season use a car and parking can be an issue in some of the areas listed. Public transport could be used to help with this problem.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/092.	

Mod Number					MM/093				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/093	Solly	C		416	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/093	

Mod Number					MM/094				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/094	Alan Byrne/ English Heritage			115	MM094 – support additional reference to setting of heritage assets.		<a href="#">View Comment</a>	Support noted. No change is required to MM/094	

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/094	Cooper	Barbara	Kent County Council (KCC)	290	The County Council is supportive of the retention of the archaeological clauses within this policy.		<a href="#">View Comment</a>	Support noted. No change is required to MM/094.
MM/094	Solly	C		417	Some of the road junctions at Quex park are not to modern standards and visibility can be an issue. Improvements on this would be welcomed.		<a href="#">View Comment</a>	Applications that are likely to have a significant impact must be accompanied by a Transport Assessment and in other cases a transport statement may be required. No change is required to MM/094.

**Mod Number** MM/095

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/095	Schembri	Angela	RPS Planning & Development Ltd	239	The policy wording should be revised to better reflect paragraph 121 of the NPPF as follows (add in text underlined and in bold below): "Well-designed new development for economic development purposes for new businesses will be permitted in sustainable locations, at a scale and form which reflects the character of the countryside." compatible with their rural location.		<a href="#">View Comment</a>	The modification is not materially different to the wording proposed. The Plan was examined on the 2012 NPPF.
MM/095	Cooper	Barbara	Kent County Council (KCC)	293	The County Council requests specific mention of the impact on the PRoW network to reflect the extent to which an enhanced PRoW network meets the likely future public need to contribute towards more sustainable rural development.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/097.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/095	Solly	C		418	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/095

#### Mod Number MM/096

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/096	Solly	C		419	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/096

#### Mod Number MM/097

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/097	Alan Byrne/ English Heritage			116	MM097 – object; the removal and replacement of bullet 4 will weaken the protection of heritage assets, a number of which are likely to be impacted by this policy		<a href="#">View Comment</a>	This policy was modified in response to an MIQ. Heritage assets are protected by Policy HE03.
MM/097	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	167	Object to the removal of the reference to a building's distinctive features or listing has been removed. The wording is markedly milder and does not provide enough protection to these important rural buildings.		<a href="#">View Comment</a>	Issues of listed buildings and heritage assets are covered by other policies in the Plan. No change is required to MM/097.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/097	Cooper	Barbara	Kent County Council (KCC)	295	The County Council is not supportive of the removal of the former clause 4, which stipulated that any alterations should be sympathetic to the existing character of the building or its historic fabric or features. Many of Thanet's rural buildings have a heritage interest either individually or as part of complexes. Where this is so, interest should be safeguarded through careful and sympathetic alteration and the requirement for this is entirely appropriate to this policy. KCC recommends that the former clause 4) is reinstated.		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/097.
MM/097	Solly	C		420	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/097

#### Mod Number MM/098

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/098	Solly	C		421	Clarity would be welcomed if the local of the best and most versatile land if the work minimised is by area or by the maintenance or degradation of activities on the land proposed.		<a href="#">View Comment</a>	Comment noted. No change is required to MM/098.

#### Mod Number MM/099

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/099	Solly	C		422	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/099

Mod Number				MM/100					
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/100	Dawkins	Julia	1953	30	How can this Plan make an exception to allow development of Best and Most Versatile Agricultural Land? The proposed developments on farmland will result in irreversible loss of significant high quality agricultural land at a time when the country needs to be more dependant upon its own food productivity. What research has been done to show the likely impact on Thanet's water supply, and impact upon loss of rainwater percolation to underlying soils, to Thanet's coastal geology and impact on its permeable chalk cliffs?		<a href="#">View Comment</a>	The Policy is consistent with the National Planning Policy Framework. The comment does not relate specifically to the Proposed Modification. No change is required to MM/100.	
MM/100	Solly	C		423	* Planning proposals should consider the issues of climate change (as crops can be a source of bio-energy) and the need for supporting agriculture to the UK economy and Food security. The Agriculture Bill 2019-20 is currently being read in parliament * An environmental and habitat survey should also be included to understand the effect of development and if net gains can be made. Light pollution should be a consideration as BMV is situated in dark areas and is open to more rigorous protection		<a href="#">View Comment</a>	These issues are dealt with by other policies in the plan and do not relate specifically to the proposed modification. No change is required to MM/100.	
MM/100	Davies	Julie	CPRE Kent	64	It is noted that this policy is to be amended "for clarity and effectiveness". However, it is not clear what will constitute "significant development" for the purposes of applying this policy and how the national resource of best and most versatile agricultural land will be safeguarded going forward. Over time, cumulative loss of small scale parcels of land will be as damaging as "significant" development. This policy should be further amended to define "significant" development and to take cumulative impacts into account.		<a href="#">View Comment</a>	Paragraph 10.10 MM/099 defines significant development for the purposes of applying Policy E18. No change is required to MM/0100.	
Mod Number				MM/101					

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/101	Solly	C		424	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/101

**Mod Number** MM/102

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/102	Dawkins	Julia	1953	31	This note has been deleted! The scale of these developments should not be acceptable to the Council as it will more than double the population of, for example, in Westgate.		<a href="#">View Comment</a>	Policy E19 was deleted to avoid duplication of Policy SP02. No change is required to modification MM/102.
MM/102	Solly	C		425	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/102

**Mod Number** MM/103

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/103	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	168	The reference to residential gardens has now been removed and although this in principle is not objected to. It is important that gardens that provide distinct settings to the conservation area and listed buildings are not developed.		<a href="#">View Comment</a>	Comment noted. Development in Conservation Areas and affecting Listed Buildings is addressed in detail in other policies and in Government guidance. No change is required to MM/103.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/103	N/A		Tesco Stores Limited	202	(See attached file) As per previous representations, we consider the separate references to the two adjacent sites 'Land off Northwood Road, Ramsgate' and 'Thanet Reach southern part, Broadstairs' is misleading. Consistent referencing would be helpful to better understanding allocations in the draft Local Plan. Similar comments apply to Appendix B. We support the allocation of Thanet Reach southern part for residential development of 80 units but consider that land to the North of Millennium Way should also be allocated for residential development to enable a combined 225 units to be delivered on these sites under Tesco's control.	<a href="#">Reps to MM103.docx</a>	<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. The principle of allocating this site for employment uses is not subject to a main modification. No change is required to MM/103.
MM/103	N/A		Tesco Stores Limited	214	See attached file As per previous representations, we consider the separate references to the two adjacent sites 'Land off Northwood Road, Ramsgate' and 'Thanet Reach southern part, Broadstairs' is misleading. Consistent referencing would be helpful to better understanding allocations in the draft Local Plan. Similar comments apply to Appendix B. We support the allocation of Thanet Reach southern part for residential development of 80 units but consider that land to the North of Millennium Way should also be allocated for residential development to enable a combined 225 units to be delivered on these sites under Tesco's control.	<a href="#">Reps to MM103.docx</a>	<a href="#">View Comment</a>	The principle of allocating land to the north of Millenium Way for housing is not subject to a main modification. No change is required to MM/103
MM/103	Moss	Penny	Planning Potential	296	Representations on behalf of Aldi Stores Limited to the Proposed Main Modifications to the Thanet Local Plan These representations are submitted on behalf of Aldi Stores Limited (Aldi) to the Proposed Main Modifications to the Thanet Local Plan. These representations follow representations that were submitted on behalf of Aldi in October 2018 to the Regulation 19 Consultation. Planning Application Background Aldi currently have a live planning application on part of the former gas works on Boundary Road in Ramsgate (application reference F/TH/19/0709). This site is allocated under emerging Policy HO1 (Housing		<a href="#">View Comment</a>	The principle of allocating this site for housing is not subject to a main modification. No change is required to MM/103.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>Development) as part of a site for residential development with an indicative capacity of 96 units. The Local Authority has recently approved (application reference F/TH/19/0644) a planning application for residential development on the remainder of the site. Redevelopment of the entire former gasworks for residential accommodation is not viable. In approving the residential application the Local Authority has recognised that due to high decontamination costs the whole site will not come forward for residential development. Therefore, there should be sufficient flexibility in the plan to allow alternative development to come forward which will support the delivery of housing. Planning Policy Background The entire former gasworks site was allocated in the adopted 2006 Local Plan for residential development with an indicative capacity of 67 units following a 2004 outline planning permission for redevelopment of the site. The adopted policy (Policy H1: Residential Development Sites) recognises that alternative development could come forwards on the site "Alternative development on sites allocated for residential purposes will not be permitted unless there is an overriding local need which cannot be met on an alternative site. " There is clear recognition in the adopted policy that alternative development on allocated sites is permissible in certain circumstances. Main Modification Policy HO1: Housing Development This site is allocated under Policy HO1 as a site for Housing Development. These allocations are considered to comprise the lower tier in the Council's identified housing sites as set out in the table below. Site Type Policy Strategic SP13,SP14,SP15,SP16,SP17,SP18,H02 Non-Strategic H03,H04,H06,H07,H08,H09 Other H01 The strategic and non-strategic allocations relate to specific sites and provide guidance on a site-by-site basis with regard to appropriate development. Whilst the lowest tier (HO1) have more general guidance, as would be expected given the differing contributions of these sites in delivering the</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Council's housing figures. Modification MM/103 recommends: "Alternative development on non-strategic sites allocated for residential development will not be permitted. " This change has been made for clarity and effectiveness. It is considered that the reference to "non-strategic"sites is confusing within the context of Policy HO1 as non-strategic sites are identified elsewhere in the plan and provided with specific guidance with regard to their development, Policy HO1 does not allocate non-strategic sites. A correct reading of this policy taking into account all of the other policies in the plan implies that alternative development on sites allocated under Policy HO1 are permitted as the amendment has been made to specifically refer to those non-strategic sites identified by the policies set out in Table 1. The ability to deliver alternative development on sites allocated under Policy HO1 is supported. In the absence of viability assessments having been undertaken on these sites, there is a real risk that by not permitting alternative development on these sites that no residential development will be brought forward. Each site should be considered on an individual basis. Alternative development on sites allocated under Policy HO1 must be allowed in order to recognise the potential of mixed-use development being a tool to deliver much needed housing. Summary Modification MM/103 has been undertaken in the interest of providing clarity and for effectiveness. This modification does not achieve either of these objectives. Alternative developments subject to meeting certain criteria should be permitted on sites allocated under Policy HO1 and the policy should be amended to clarify this point.			
MM/103	Bellway Homes Ltd (Kent)			338	We are writing to you on behalf of the site promoter Bellway Homes Ltd (Kent) in support of the emerging designated housing site 'Part of Allotment Gardens, Manston Road' in response to the Council's consultation on the Main Modifications to the Thanet District Council Draft Local Plan		<a href="#">View Comment</a>	The principle of allocating this site for a capacity of 109 dwellings is not subject to a main modification.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>to 2031. We have reviewed the Main Modifications and offer the following comments on behalf of the site promoter.</p> <p>Emerging Policy HO1 (Housing Development) The site (part of Allotment Gardens, Manston Road) is designated within the Emerging Local Plan as a non-strategic housing allocation site for 80 units at the edge of Ramsgate and within Thanet District Council urban area. Main Modifications have been proposed to Policy 11 (Housing Development) (reference MM/103) for wording clarity reasons, which we support. We wish however to inform the Council that since the site was initially promoted as part of the Local Plan process, a number of feasibility reports have been undertaken and it is apparent that the site can accommodate additional housing numbers of approximately 109 units. The site has been subject to pre-application advice and the Officers have indicated support for the principle of development for the site to offer around 109 residential units, which is fully consistent with the objectives in the National Planning Policy Framework (NPPF). This density is considered to not be significantly detrimental to the visual amenities of the locality. It is therefore our view that the allocated number could be amended to the updated number of 109 units to reflect the feasibility work that has been undertaken to date. This will in turn support the proposed Main Modification changes such as MM/025 to allow for further housing growth in the District. Conclusion Bellway Homes Ltd (Kent) will continue to work with the Council to bring the site forward for development within the next 5 years. However, in the meantime, we respectfully request that Policy 11 be amended omitting the reference to a 80 unit capacity for the 'Part of Allotment Gardens, Manston Road' site and replacing it with 109 unit capacity. This is therefore considered to support the Council's development strategy to accommodate further housing the urban areas of the district. We trust the above comments are helpful to your further consideration of the plan. If you have any further</p>			<p>However the proposed capacity is an estimate and can be negotiated during the planning application process. No change is required to MM/103.</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					queries or require further information please contact me on 01903 248777.			
MM/103	Solly	C		426	I refer to my previous representation that has been made on the deliverability of some sites.		<a href="#">View Comment</a>	The principle of allocating these sites for housing is not subject to a main modification. No change is required to MM/103.
MM/103	Davies	Julie	CPRE Kent	65	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke		<a href="#">View Comment</a>	The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. The capacities listed in HO11 are as listed in Appendix B and reflect the most recent capacities as a result of recent planning applications. No change is required to MM/103



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottingham Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottingham Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottingham Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

<b>Mod Number</b>	<b>MM/104</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/104	Solly	C		427	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/104

**Mod Number** MM/105

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/105	Cooper	Barbara	Kent County Council (KCC)	299	The County Council strongly recommends the wording for requirement 1) "Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include: 1) pre-design archaeological evaluation" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.		<a href="#">View Comment</a>	The detailed approach to archaeological assessment is not subject to a main modification. No change is required to MM/105.
MM/105	Solly	C		428	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/105
MM/105	Davies	Julie	CPRE Kent	69	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required		<a href="#">View Comment</a>	The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/105.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253,</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

**Mod Number** MM/106

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/106	Cooper	Barbara	Kent County Council (KCC)	301	The Transport Assessments should aim to encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The County Council strongly recommends the wording for requirement 2), "Masterplanning will be informed by and address: ... 2) pre-design archaeological assessment" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.		<a href="#">View Comment</a>	Transport issues were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  No change is required to MM/106.
MM/106	Solly	C		429	This application has been granted, but would urge the roundabouts location to be in a reasonable place maybe within the development itself. There are houses adjacent to the roundabouts position at present on Manston road and this was rejected by the salmestones residents association as well as local residents. Air quality assessments should also be made to		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/106

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					ensure that existing residents are not exposed to poor air quality standards			
MM/106	Davies	Julie	CPRE Kent	67	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per		<a href="#">View Comment</a>	The points regarding density raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/106

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			
MM/106	Janes	Tamzyn	Southern Water	90	From 1 April 2018, a new set of rules covering the charging for new connections and requisitions for companies wholly or mainly in England come into force. These new rules include requirements for water and sewerage companies to provide upfront charges for most connections services and make the charges for offsite reinforcement works more transparent and cost reflective, rather than requiring the developer to connect to the point of nearest adequate capacity. Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, details can be found on our website <a href="https://www.southernwater.co.uk/developing-building/connection-charging-arrangements">https://www.southernwater.co.uk/developing-building/connection-charging-arrangements</a> . NB charges are reviewed annually. Southern Water has limited		<a href="#">View Comment</a>	See response to Comment ID 87. No change is required to MM/106

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019). Having regard to the issues set out above, Southern Water propose the following amendment (additional text underlined) to 1) any necessary upgrade of utility servicesin liaison with the utility provider ahead of occupation;			

**Mod Number** MM/107

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/107	Cooper	Barbara	Kent County Council (KCC)	302	The Transport Assessments for all the policies above should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The County Council strongly recommends the wording for requirement 1) "Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains		<a href="#">View Comment</a>	Transport issues were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. The requirement for archaeological evaluation is not subject to a main modification. No change is required to MM/107.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/107	Solly	C		430	This application has been granted but An ecology and reptile assessment should also be made as slow worms was found at the site and is known to the area.		<a href="#">View Comment</a>	Natural England are consulted during the planning application process. No change is required to MM/107
MM/107	Davies	Julie	CPRE Kent	70	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an		<a href="#">View Comment</a>	The points about density raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/107.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

**Mod Number** MM/108

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/108	Cooper	Barbara	Kent County Council (KCC)	303	The County Council recommends that the policy includes a requirement for archaeological assessment to be included in the masterplan requirements. KCC therefore recommends the following addition: 5) pre-design archaeological assessment		<a href="#">View Comment</a>	The approach to archaeological assessment is not subject to a main

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					and evaluation and provision, if necessary, for the preservation of significant archaeological remains			modification. No change is required to MM/108.
MM/108	Solly	C		431	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/108
MM/108	Davies	Julie	CPRE Kent	71	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke		<a href="#">View Comment</a>	The points/ regarding density raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/108.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottingham Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottingham Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottingham Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			
MM/108	Janes	Tamzyn	Southern Water	91	From 1 April 2018, a new set of rules covering the charging for new connections and requisitions for companies wholly or mainly in England come into force. These new rules include requirements for water and sewerage companies to provide upfront charges for most connections services and make the charges for offsite reinforcement works more transparent and cost reflective, rather than requiring the developer to connect		<a href="#">View Comment</a>	See response to Comment ID 87. No change is required to MM/108

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					to the point of nearest adequate capacity. Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, details can be found on our website <a href="https://www.southernwater.co.uk/developing-building/connection-charging-arrangements">https://www.southernwater.co.uk/developing-building/connection-charging-arrangements</a> . NB charges are reviewed annually. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 170(e) of the revised National Planning Policy Framework (NPPF) (2019). Having regard to the issues set out above, Southern Water propose the following amendment (additional text underlined) to 4) any necessary upgrade of utility services on the site in liaison with the utility provider ahead of occupation;			

<b>Mod Number</b>	<b>MM/109</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/109	Cooper	Barbara	Kent County Council (KCC)	304	The County Council strongly recommends the wording for requirement 1) "Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.		<a href="#">View Comment</a>	The requirement for an archaeological evaluation is not subject to a main modification. No change is required to MM/109.
MM/109	Solly	C		432	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/109

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/109	Davies	Julie	CPRE Kent	72	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per		<a href="#">View Comment</a>	The points regarding density raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/109

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

<b>Mod Number</b>	<b>MM/110</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/110	Solly	C		433	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/110
MM/110	Davies	Julie	CPRE Kent	73	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and		<a href="#">View Comment</a>	The points regarding density raised were discussed during the examination

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road,			hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/110

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

**Mod Number** MM/111

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/111	Solly	C		434	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/111

**Mod Number** MM/112



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/112	Solly	C		435	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/112
MM/112	Davies	Julie	CPRE Kent	74	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net)		<a href="#">View Comment</a>	Policy HO10 is not a site specific policy. No change is required to MM/112

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

**Mod Number** MM/113

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/113	Alan Byrne/ English Heritage			117	MM113 – object to removal of references 'historic' character and scale.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								<p>sessions and these discussions led to the main modifications proposed.</p> <p>No change is required to MM/113</p>
MM/113	Environment Agency			181	Table 9 Regarding site allocations we would only question the 56 houses proposed at Jentex site, Canterbury Rd. We understand the Jentex site is now linked to the proposed Airport development and fuelling location. So this allocation for housing may need to be removed, contingent on Development Consent Order (DCO) outcome. Other allocations on sites which need assessment re contamination in the main seem to address this. Groundwater protection and land contamination would be covered for all relevant sites by policies 3 and 4 as above. There is indication that on large scale development that relevant infrastructure would be implemented in a timely fashion. As long as infrastructure includes foul sewage provisions we agree with this approach. However we would recommend a policy similar to the proposed Folkestone and Hythe local plan on this issue.		<a href="#">View Comment</a>	The principle of allocating this site for housing is not subject to a main modification. No change is required to MM/113.
MM/113	Solly	C		436	I refer to my previous representation that has been made on the deliverability of some sites.		<a href="#">View Comment</a>	Noted. No change is required to MM/113
MM/113	Davies	Julie	CPRE Kent	66	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35		<a href="#">View Comment</a>	<p>The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The capacities listed in HO11 are as listed in Appendix B and reflect the</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>dwelling per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottingham Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an</p>			<p>most recent capacities as a result of recent planning applications. No change is required to MM/113</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

Mod Number	MM/114
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/114	Alan Byrne/ English Heritage			118	MM114 - object to removal of archaeological evaluation requirement in bullet 1.		<a href="#">View Comment</a>	If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council: Re-instate ' <b>Be informed by and archaeological pre-design evaluation</b> ' as Clause 1) of the policy
MM/114	Cooper	Barbara	Kent County Council (KCC)	305	The Transport Assessment should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car		<a href="#">View Comment</a>	Transport issues were discussed during the examination hearing sessions and these discussions led

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The County Council recommends that the policy includes a requirement for the masterplan to be informed by archaeological constraints that have been identified through assessments and evaluation.			to the main modifications proposed. No change is required to MM/114.
MM/114	Solly	C		437	I refer to my previous representation that has been made on this policy		<a href="#">View Comment</a>	Noted. No change is required to MM/114
MM/114	Davies	Julie	CPRE Kent	68	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 -		<a href="#">View Comment</a>	The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council: ' <b>....allocated for up to 250 dwellings at an approximate average density of 35 dwellings per hectare (net)...</b> '

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?</p>			

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/114	-		St John's College	85	(See attached response.) Savills acts on behalf of St John's College who own the northern extent of allocation HO12 and these comments are consequently made in relation to this interest. As discussed during the Hearing Sessions, the need for consistency in policy phrasing for strategic allocations is supported to avoid unintended inferences being made should there be differences in approach to wording. The Local Plan must be read as a whole and it is agreed that all those points deleted are covered within other policies within the Plan and therefore do not require specific reference within HO12 and so avoids unnecessary duplication. As such MM/114 is broadly supported. However, there are two remaining issues as follows: - Point 3 in relation to the emergency access should not be separated from point 2 but instead form an integral part of the same criterion, as noted in the Regulation 19 representations. Detailed technical work as part of a currently pending outline planning application (with access submitted for detailed approval) indicates the intended emergency access connecting onto Greenhill Gardens, as has also been indicated on consultation material during community engagement and in liaison with the local highways authority. This detailed plan indicates the incorporation of a retractable bollard to ensure that the access is used solely in the case of an emergency and so avoiding the creation of an informal or unauthorised vehicular through-route. Separating the need for an emergency access into a separate standalone criterion, risks inferring that it cannot be achieved through a southwards connection without conflicting with the preceding criteria. Such interpretation causes unnecessary uncertainty and risks the deliverability of the allocation. It is consequently suggested that point 2) of draft policy HO12 should be modified as follows in order to make the policy sound: 'provide vehicular access to Tothill Street	<a href="#">MM_114_CM.pdf</a>	<a href="#">View Comment</a>	Clause 4 was added at the Inspectors request during the Hearings. The requirement is not overly prescriptive and refers to a proportionate contribution. No change is required to MM/114.



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					and links southwards with existing development restricted to emergency access, pedestrian and cycle routes in order to limit additional traffic movement in the vicinity of Monkton Road and High Street'. Point 3 'provide an emergency access' can then be deleted in its entirety to avoid unnecessary duplication. - Point 4 in relation to improvements at the roundabout and contributions towards Spitfire Way/Manston Road junction are too specific and reliant on consultation feedback from the local highways authority to a pending outline planning application. However, it is reiterated that this pending application is for 214 dwellings as opposed to the estimated capacity of 250 dwellings for the site. Furthermore, it is an application at a specific point in time. Surrounding developments such as what occurs at Manston Airport will inevitably have implications on what may or may not be justified highways mitigation associated with allocation HO12. Any mitigation may be influenced by the timing and relationship relative to proximate schemes. As such it is considered that point 4 should be deleted in its entirety and policy SP43 is instead relied upon to provide assurance that relevant highways mitigation will be secured.			

**Mod Number** MM/115

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/115	Cooper	Barbara	Kent County Council (KCC)	306	The County Council recommends that the policy includes a requirement for an archaeological assessment to be included in the masterplan requirements. KCC therefore recommends the following addition: 1) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains		<a href="#">View Comment</a>	Archaeological assessment is not subject to a main modification. No change is required to MM/115.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/115	Solly	C		438	I refer to my previous representation that has been made on this policy		<a href="#">View Comment</a>	Noted. No change is required to MM/115
MM/115	Davies	Julie	CPRE Kent	75	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net)		<a href="#">View Comment</a>	<p>The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The capacities listed in HO11 are as listed in Appendix B and reflect the most recent capacities as a result of recent planning applications.</p> <p>If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council '<b>....allocated for up to 10 dwellings at an approximate average density of 35 dwellings per hectare (net)...</b>'</p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			

**Mod Number** MM/116

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/116	Cooper	Barbara	Kent County Council (KCC)	307	The County Council strongly recommends the wording for requirement 1) "Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation" is modified to: pre-design archaeological evaluation		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					assessment and provision, if necessary, for the preservation of significant archaeological remains.			Modification. No change is required to MM/116.
MM/116	Solly	C		439	No comment		<a href="#">View Comment</a>	No change is required to MM/116
MM/116	Davies	Julie	CPRE Kent	76	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average		<a href="#">View Comment</a>	The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  The capacities listed in HO11 are as listed in Appendix B and reflect the most recent capacities as a result of recent planning applications.  If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council :' <b>....allocated for up to 20 dwellings at an approximate average density of 35 dwellings per hectare (net)...</b> '

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottingham Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottingham Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottingham Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?</p>			
Mod Number				MM/117				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/117	Cooper	Barbara	Kent County Council (KCC)	308	The County Council strongly recommends the wording for requirement 1) "Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation" is modified to: pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.		<a href="#">View Comment</a>	The detailed approach to archaeological assessment is not subject to a main modification. No change is required to MM/117.
MM/117	Solly	C		440	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/117
MM/117	Davies	Julie	CPRE Kent	77	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate		<a href="#">View Comment</a>	The points regarding density raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council: <b>...allocated for up to 62 dwellings at an approximate average density of 35 dwellings per hectare (net)...</b>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			
Mod Number				MM/118				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/118	Cooper	Barbara	Kent County Council (KCC)	309	Point 3 – the proposed Transport Statement should include reference to PRoW. The KCC PRoW and Access Service is engaging with partners including Thanet District Council regarding the enhancements and improvements to provide connectivity to the proposed Parkway station.		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/118.
MM/118	Solly	C		441	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/118
MM/118	Davies	Julie	CPRE Kent	78	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net)		<a href="#">View Comment</a>	<p>The points regarding density were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.</p> <p>The capacities listed in HO11 are as listed in Appendix B and reflect the most recent capacities as a result of recent planning applications.</p> <p>If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council: <b>....allocated for up to 41 dwellings at an approximate average density of 35 dwellings per hectare (net)...'</b></p>



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?			
Mod Number				MM/119				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/119	Cooper	Barbara	Kent County Council (KCC)	310	The proposed Transport Statement should include specific reference to PRoW, rather than just footpaths and cycleways. For requirement 1, KCC recommends the following addition: Development should avoid impact on the prehistoric monument identified in the pre-allocation evaluation.		<a href="#">View Comment</a>	The points/issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/119.
MM/119	Solly	C		442	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/119
MM/119	Davies	Julie	CPRE Kent	79	Main modifications have been made to the non-strategic housing allocations "for clarity and effectiveness and consistency with the format of the strategic housing policies" – densities have not been referred to in policies HO1, HO11 and HO12. It is also not clear whether the density in policies HO12, HO13, HO14, HO15, HO16 and HO17 are net or gross. Some capacities listed in policy HO11 are not consistent with detailed policies for same sites. Where specified density aspirations are cited as an "approximate average of 35 dwellings per hectare", this is a very low density of development. As a matter of principle, higher densities should be encouraged to reduce the need for loss of best and most versatile agricultural land. In addition, where the required masterplan will be providing details of "linkages to new and existing public transport infrastructure, including bus and rail services," it is considered that density could be further increased in the interests of sustainable development (policy HO4). This approach has been taken forward in the updated NPPF. The plan should include a policy encouraging higher density development to reduce the need for loss of best and most versatile agricultural land, and sustain public transport infrastructure. Policy Capacity Density HO3 - Land on west side of Old Haine Road, Ramsgate Up to 100 with an		<a href="#">View Comment</a>	The points regarding density raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council: <b>...allocated for up to 23 dwellings at an approximate average density of 35 dwellings per hectare (net)....</b>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					<p>approximate average density of 35 dwellings per hectare (net) HO4 - Land fronting Nash Road and Manston Road, Margate Up to 250 with an approximate average density of 35 dwellings per hectare (net) HO6 - Land south of Brooke Avenue Garlinge Up to 34 with an approximate average density of 35 dwellings per hectare (net) HO7 - Land at Haine Road and Spratling Street, Ramsgate Up to 100 with an approximate average density of 35 dwellings per hectare (net) HO8 - Land south of Canterbury Road East, Ramsgate Up to 27 with an approximate average density of 35 dwellings per hectare (net) HO9 - Land at Melbourne Avenue, Ramsgate Up to 49 with an approximate average density of 35 dwellings per hectare (net) HO10 - Cliftonville West and Margate Central Density not specified HO11 - Housing in Rural Settlements Range from 10-250 Density not specified Capacities not consistent with site specific allocations: Land at Manor Road, St Nicholas at Wade Land at Walter's Hall Farm, Monkton Land north of Cottington Road, Cliffsend HO12 - Land at Tothill Street, Minster Up to 250 with an approximate average density of 35 dwellings per hectare – is this net? HO13 - Land at Manor Road, St Nicholas at Wade Up to 36 with an approximate average density of 35 dwellings per hectare – is this net? HO14 - Land at Walter's Hall Farm, Monkton Up to 18 with an approximate average density of 35 dwellings per hectare – is this net? HO15 - Land south side of A253, Cliffsend Up to 62 with an approximate average density of 35 dwellings per hectare – is this net? HO16 - Land north of Cottington Rd, Cliffsend Up to 40 with an approximate average density of 35 dwellings per hectare – is this net? HO17 - Land south side of Cottington Rd, Cliffsend Up to 23 with an approximate average density of 35 dwellings per hectare – is this net?</p>			
Mod Number				MM/120				

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/120	Solly	C		443	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/120

#### Mod Number MM/121

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/121	Solly	C		444	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/121

#### Mod Number MM/122

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/122	Solly	C		445	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/122

#### Mod Number MM/123

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/123	Solly	C		446	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/123

Mod Number					MM/124				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/124	Solly	C		447	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/124	

Mod Number					MM/125				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/125	Solly	C		448	The modification is welcomed and supported		<a href="#">View Comment</a>	Support noted. No change is required to MM/125	

Mod Number					MM/126				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/126	Solly	C		449	The modification is supported to provide clarity, and will wait for the 6 month review to comment.		<a href="#">View Comment</a>	Support noted. No change is required to MM/126	

Mod Number					MM/127				
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/127	Solly	C		450	The modification is supported to provide clarity, and will wait for the 6 month review to comment.		<a href="#">View Comment</a>	Support noted. No change is required to MM/127

#### Mod Number MM/128

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/128	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	169	Omission this policy needs to provide clear guidance as to how long a property has to be empty before it is considered suitable for a change of use. With the removal of the terms 'within the confines'. There is clear opening for people to be develop empty sheds etc throughout the district, with little policy restriction. The intent of this policy is not the same of the GPDO part Q which allows for the change of use of vacant agricultural buildings without the requirement for planning permission. This is only allowed for property under official agricultural ownership.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.  No change is required to MM/128
MM/128	Solly	C		451	The modification is welcomed and supported. .		<a href="#">View Comment</a>	Support noted. No change is required to MM/128

#### Mod Number MM/129

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/129	Cooper	Barbara	Kent County Council (KCC)	311	The County Council is supportive of the inclusion of the new clause 4) that stipulates proposals will only be permitted subject to the heritage policies of the local plan.		<a href="#">View Comment</a>	Support noted. No change is required to MM/129.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/129	Solly	C		452	The modification is welcomed and supported. .		<a href="#">View Comment</a>	Support noted. No change is required to MM/129

**Mod Number** MM/130

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/130	Solly	C		453	The modification is welcomed and supported. .		<a href="#">View Comment</a>	Support noted. No change is required to MM/130

**Mod Number** MM/131

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/131	Solly	C		454	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/131

**Mod Number** MM/132

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/132	Solly	C		455	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/132

Mod Number					MM/133				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/133	Solly	C		456	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/133	

Mod Number					MM/134				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/134	Dawkins	Julia	1953	32	It is stated that where there is detrimental loss of wildlife habitat "An equivalent area of habitat will be created elsewhere .....well related to other existing habitats". It follows then that field margins should be retained and would go some way to mitigating the vast loss of wildlife habitat and biodiversity of the field systems..		<a href="#">View Comment</a>	Comment noted. Any appropriate mitigation for the creation of new habitats would be based on the advice provided by the County Council Ecological Service. No change is required to MM/134.	
MM/134	Solly	C		457	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/134	

Mod Number					MM/135				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/135	Solly	C		458	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/135	



Mod Number					MM/136				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/136	Edwards	Jo	Sport England	130	Sport England supports the modification to bring the policy into line with the NPPF		<a href="#">View Comment</a>	Support noted. No change is required to MM/136	
MM/136	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	170	Broadstairs & St. Peter's Town Council objects to the removal of point 6 in the policy as it weakens the policy. Many playing fields provide distinct visual contributions to the visual amenity of an area.		<a href="#">View Comment</a>	The policy has in fact been strengthened as the visual contribution applies in all cases.  No change is required to MM/136.	
MM/136	Solly	C		459	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/136	

Mod Number					MM/137				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/137	Cooper	Barbara	Kent County Council (KCC)	312	The County Council recommends that reference is made to the ROWIP and the Kent Design Guide.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/137.	
MM/137	Solly	C		460	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/137	

Mod Number					MM/138				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/138	Edwards	Jo	Sport England	131	Sport England supports the detail inserted into this policy		<a href="#">View Comment</a>	Support noted. No change is required to MM/138.	
MM/138	Solly	C		461	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/138	

Mod Number					MM/139				
Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response	
MM/139	Behrendt	Mark	Home Builders Federation	151	Thank you for consulting the Home Builders Federation (HBF) on the Draft Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. MM/139 - In order to provide the necessary clarity and consistency with the approach set out in the written ministerial statement from March 2015, we would suggest this policy is amended to remove reference to the Code for Sustainable Homes. Instead it should refer to the improvement in energy efficiency above current building regulations that would be achieved if level 4 of the CSH were to be achieved. We would therefore suggest part 1 of this policy be amended to read: 1) Where viable achieve a higher standard of energy efficiency the equivalent to a 19% improvement on current building regulations. We		<a href="#">View Comment</a>	Paragraph: 012 Reference ID: 6-012-20190315 of the NPPG permits the use of energy efficient standards up to the equivalent of level 4 of the code for sustainable homes. This level of efficiency has been tested through the viability assessment. The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/139.	

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.			
MM/139	Mellor	Joshua	Barton Willmore LLP	178	Policy QDOI, alongside QD02, sets out design considerations for good quality development. Whilst we support the general approach taken in this respect, including the need for buildings to be designed to have resilience and be sustainable, we consider the modification to Policy QDOI is inconsistent with national policy. The Code for Sustainable Homes was withdrawn in May 2015, replaced by optional technical standards for water efficiency, access and space standards. These are proposed for inclusion within the Plan under policies QD04 and QDOS. The energy efficiency measures of the Code for Sustainable Homes are no longer up-to-date and instead development should be required to meet the most up-to-date government guidance and building regulations. We therefore recommend policy bullet 1 revert to the version contained within the draft Local Plan submission version to ensure the Plan is "sound".		<a href="#">View Comment</a>	Paragraph: 012 Reference ID: 6-012-20190315 of the NPPG permits the use of energy efficient standards up to the equivalent of level 4 of the code for sustainable homes. This level of efficiency has been tested through the viability assessment. The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/139.
MM/139	Cooper	Barbara	Kent County Council (KCC)	313	Point 3 – KCC requests specific mention of the PRoW network and ROWIP to encourage early engagement which would enable provision of safe and attractive cycling and walking opportunities to reduce the need to travel by car.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/139.
MM/139	Solly	C		462	Thanet council declared a Climate emergency (July 2019) and a commitment to be carbon neutral by 2030. Planning policy by the council should be led by ensuring that Zero Carbon Homes are part of policy or at least stated in the local plan. There is widespread support for Zero Carbon homes and it is disappointing that the government axed the zero carbon home policy. The policy should consider referencing the National Model Design Code which is referenced in the National Design Guide which was published in October 2019. Also		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/139.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					some reference to the recommendations from the Building Better, Building Beautiful Commission which was due in December 2019. <a href="https://www.gov.uk/government/publications/national-design-guide">https://www.gov.uk/government/publications/national-design-guide</a> <a href="https://www.gov.uk/government/groups/building-better-building-beautiful-commission">https://www.gov.uk/government/groups/building-better-building-beautiful-commission</a>			

<b>Mod Number</b>	<b>MM/140</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/140	Cooper	Barbara	Kent County Council (KCC)	314	The County Council recommends that reference is made to the ROWIP and the Kent Design Guide to provide safe and convenient pedestrian and cycle access, connecting communities safely and designed to create a sense of place and ownership.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/140.
MM/140	Dawkins	Julia	1953	33	5) The Plan states that existing features should be retained, including trees, natural habitats, boundary treatments and should be enhanced and protected. See my comments in MM/134.		<a href="#">View Comment</a>	Comment addressed under MM/134. No change is required to MM/140.
MM/140	Solly	C		463	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change is required to MM/140

<b>Mod Number</b>	<b>MM/141</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/141	Solly	C		464	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change is required to MM/141

**Mod Number** MM/142

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/142	Solly	C		465	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change is required to MM/142

**Mod Number** MM/143

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/143	Alan Byrne/ English Heritage			119	MM143 – the removal of 'Local' and insertion of 'listed' confuses the purpose of this policy – is it intended to apply to designated (i.e. statutorily listed) or non-designated (i.e. locally listed) buildings? Including the reference to being "in accordance with the criteria in the NPPF" undermines the purpose of a locally specific policy and this wording should not be added to the policy.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/143.
MM/143	Dunn	Danielle	Broadstairs and St Peter's Town Council: Town Councillors	171	Object- the removal of "Proposals will only be permitted where they retain the significance, appearance, local distinctiveness, character or setting of a local heritage asset.". Weakens the policy.		<a href="#">View Comment</a>	The proposed amendment is to ensure consistency with the NPPF. The points/issues raised were discussed during the examination hearing sessions and these discussions led to

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								the main modifications proposed. No change is required to MM/143
MM/143	Cooper	Barbara	Kent County Council (KCC)	315	The County Council is supportive of the revised text in this policy as it now includes all heritage assets whether statutorily protected, locally listed or non-designated. However, KCC would recommend that the opening paragraph "The Council supports the retention of local heritage assets, including listed buildings, structures, features and gardens of local interest. Local heritage assets will be identified in a local list as part of the Heritage Strategy" be expanded to include archaeological sites.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/143.
MM/143	Solly	C		466	The modification is welcomed and supported. However I cannot see any Heritage strategy or local list to support, does this not make the policy ineffective?		<a href="#">View Comment</a>	Support noted. No change is required to MM/143.
MM/143	Lorenzo	Peter	The Broadstairs Society	81	The Broadstairs Society welcomes the modification and will work with the District Council on any Heritage Strategy that is to be drafted. To this end, please note the Draft Broadstairs and St. Peter's Neighbourhood Plan already has a schedule of locally listed buildings.		<a href="#">View Comment</a>	Noted. No change is required to MM/143.

<b>Mod Number</b>	<b>MM/144</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/144	Alan Byrne/ English Heritage			120	MM144 – object; the revised wording does not improve or clarify the original policy.		<a href="#">View Comment</a>	The points raised were discussed during the examination hearing sessions and these discussions led to

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								the main modifications proposed. No change is required to MM/144.
MM/144	Cooper	Barbara	Kent County Council (KCC)	316	The text should be corrected to: Proposals that affect historic parks and gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to the significance of the park or garden.		<a href="#">View Comment</a>	The issues raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed. No change is required to MM/144.
MM/144	Solly	C		467	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/144

<b>Mod Number</b>	<b>MM/145</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/145	Environment Agency			182	We support re-wording of both Policies CC01 and CC03.		<a href="#">View Comment</a>	Support noted. No change is required to MM/145.
MM/145	Solly	C		468	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/145

<b>Mod Number</b>	<b>MM/146</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/146	Cooper	Barbara	Kent County Council (KCC)	317	The County Council as Lead Local Flood Authority welcomes the revisions of the text to bring it in line with the National Planning Policy Framework (NPPF), whilst providing greater clarity on requirements.		<a href="#">View Comment</a>	Support noted. No change is required to MM/146.
MM/146	Solly	C		469	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/146

<b>Mod Number</b>	<b>MM/147</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/147	Solly	C		470	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/147

<b>Mod Number</b>	<b>MM/148</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/148	Environment Agency			183	We support re-wording of both Policies CC01 and CC03.		<a href="#">View Comment</a>	Support noted. No change is required to MM/148.
MM/148	Pavitt	Tom	Marine Management Organisation	19	Thank you for your email regarding your Local Plan Main Modifications Consultation. I have reviewed the "Submission Draft including Proposed Main Modifications and Additional Modifications December 2019" and the Main and Additional Modifications reports. Despite the MMO-Thanet Duty to		<a href="#">View Comment</a>	This is referring to legislation and could be considered as a factual amendment. Therefore, if the



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Cooperate meeting in Nov 2017 and our consultation response in September 2018 (evidence in attached emails) the MMO sees no evidence of the inclusion or consideration of the statutory marine planning documents in the emerging Thanet Local Plan from the documents I have reviewed. Please inform me if it is included in another document as part of the local plan suite of documents elsewhere. One example in the main modification report alone is regarding the addition of the following text for Ramsgate Port. "Development will only be permitted under this policy where it can be demonstrated that it will not adversely affect any designated nature conservation sites". The Port of Ramsgate is within the South East Marine Plan Area and authorisations below the high water mark here and authorisations above the water mark that are capable of affecting the UK marine area must be in accordance with the SE marine plan or UK marine policy statement (Section 58 of Marine and Coastal Access Act). There are many more examples of this for the coastal council of Thanet. The MMO response therefore is the same as our Sep 2018 response: After reading the Thanet local plan for the local plan to be sound there should be a clear inclusion of marine planning in line with the NPPF and Marine and Coastal Access Act. NPPF: 166. In coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes. The PAS soundness self-assessment checklist also states a recommended requirement to "take account of marine planning". The marine planning remit is directly for coastal and marine waters up to the mean high water spring mark where Thanet council extends to the mean low water spring mark (we can supply a GIS layer of the spatial extent for any policy maps if you wish). The MMO would like to see the inclusion of the MMO consenting regime, UK marine policy statement and the			<p>Inspectors consider it necessary in their final report, to recommend a change to the proposed modification, the council considers that it may be more appropriate to include a reference to South East Marine Plan or UK Marine Policy Statement in MM/ 147 paragraph 15.22 rather than policy as the SE Marine Plan has just been published for consultation and has yet to be adopted.</p> <p>Adding the following additional text to paragraph 15.22 is considered appropriate by the Council:</p> <p><u>The Marine Management Organisation (MMO) will deliver UK marine policy objectives for English waters through statutory Marine Plans and other measures. Thanet is within the South East Marine Plan area and a marine plan for this area is under development (draft plan expected early 2020). Until a Marine Plan has been published, the UK Marine Policy Statement should be used for guidance and licensing on any planning activity that includes a section of coastline or tidal river. A marine licence from the MMO may be required for coastal developments and early consultation with the MMO is advised</u></p>

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					emerging South East Marine Plan in the Thanet Local Plan. An example of how Thanet could reference the Marine plans and the UK Marine policy statement in the absence of a South East Marine Plan (draft plan expected early 2020) in a section such as CC03 Coastal Development is given below. "3)..where appropriate, conflict with the aims of the South East Marine Plan or UK Marine Policy Statement. The Marine Management Organisation (MMO) will deliver UK marine policy objectives for English waters through statutory Marine Plans and other measures. Thanet is within the South East Marine Plan area and a marine plan for this area is under development (draft plan expected early 2020). Until a Marine Plan has been published, the UK Marine Policy Statement should be used for guidance and licensing on any planning activity that includes a section of coastline or tidal river. A marine licence from the MMO may be required for coastal developments and early consultation with the MMO is advised."			
MM/148	Cooper	Barbara	Kent County Council (KCC)	318	KCC requests inclusion of details regarding the England Coast Path and the existence of Coastal Access rights in the District. Following the introduction of the Marine and Coastal Access Act 2009, the County Council has been working in partnership with Natural England to establish the Kent stretches of the England Coast Path. This is a new National Trail walking route that will eventually circumnavigate the entire English coastline, securing access rights for the public to explore the coast. In addition to the creation of a continuous walking route around the whole of the English Coast, the project secures public rights to explore adjacent beaches and headlands – known as the coastal margin. When the trail is complete, the path will be approximately 2,800 miles long, making it one of the longest promoted coastal walking routes in the world. Due to the scale of the project, the coast path is being developed in 'Stretches' around the country. With regards to Thanet, the Ramsgate to Folkestone stretch of the coast path was opened		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/148.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					to the public on the 19 July 2016. The Ramsgate to Whitstable stretch of the coast path has been approved by the Secretary of State and is currently being established on the ground. This stretch is expected to be open late 2020. Efforts to improve public access and enjoyment of the coast should be encouraged where possible, and KCC would welcome future engagement with Thanet District Council to ensure that development plans and proposals consider coastal access. The District Council should be aware that coastal access rights do not prevent land from being developed or redeveloped in the future, though consideration should be given to the potential impacts on the Coast Path. If necessary, Natural England may need to submit a variation report to the Secretary of State recommending a change to the trail alignment, to ensure the route is not obstructed by development. When development proposals are being considered, the planning authority should look to include provision for the England Coast Path on the seaward side of development where possible.			
MM/148	Solly	C		471	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/148

**Mod Number** MM/149

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/149	Alan Byrne/ English Heritage			121	MM149 – support the change to new bullet point 4 regarding setting of heritage assets. These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan		<a href="#">View Comment</a>	Support noted. No change is required to MM/149.

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					and which may, in our view, have adverse effects on the historic environment.			
MM/149	Solly	C		472	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/149

<b>Mod Number</b>	<b>MM/150</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/150	Solly	C		473	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/150

<b>Mod Number</b>	<b>MM/151</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/151	Solly	C		474	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/151

<b>Mod Number</b>	<b>MM/152</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/152	Solly	C		475	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/152

#### Mod Number MM/153

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/153	Solly	C		476	The modification is welcomed and supported.		<a href="#">View Comment</a>	Support noted. No change required to MM/153

#### Mod Number MM/154

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/154	Solly	C		398	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change is required to MM/154

#### Mod Number MM/155

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/155	Environment Agency			187	We agree the amended wording in policies SE03 and SE04. Other allocations on sites which need assessment re contamination in the main seem to address this. Groundwater		<a href="#">View Comment</a>	Support noted. No change is required to MM/155

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					protection and land contamination would be covered for all relevant sites by polices 3 and 4 as above.			
MM/155	Solly	C		396	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change is required to MM/155

<b>Mod Number</b>	<b>MM/156</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/156	Solly	C		394	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change is required to MM/156

<b>Mod Number</b>	<b>MM/157</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/157	Environment Agency			190	We agree the amended wording in policies SE03 and SE04. Other allocations on sites which need assessment re contamination in the main seem to address this. Groundwater protection and land contamination would be covered for all relevant sites by polices 3 and 4 as above.		<a href="#">View Comment</a>	Support noted. No change is required to MM/157.
MM/157	Solly	C		389	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change required to MM/157

<b>Mod Number</b>	<b>MM/158</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/158	Solly	C		386	The modification is welcomed and supported. Correct Hyperlink below, as the link quoted in the modification is not accessible. h ttps://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/		<a href="#">View Comment</a>	Factual change as hyperlink has changed slightly. If the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council  <a href="https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/">https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/</a>

<b>Mod Number</b>	<b>MM/159</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/159	Environment Agency			198	We support the proposed amended wording.		<a href="#">View Comment</a>	Support noted. No change is required to MM/159.
MM/159	Solly	C		385	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change is required to MM/159

<b>Mod Number</b>	<b>MM/160</b>
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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/160	Cooper	Barbara	Kent County Council (KCC)	319	The County Council recommends specific mention of the Public Rights of Way Network to access local community facilities encouraging active travel.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. No change is required to MM/160.
MM/160	Dawkins	Julia	1953	34	Provision of New Community Facilities: The Plan states that community facilities should be permitted provided they are of a scale to meet the needs of the local community. The Plan should state that existing facilities for existing residents will be retained, in particular the local Medical Centre in Westgate. (See my comments on MM/035.) If hospital facilities are included in the category of Community Facilities then I wish to ask a further question. How will QEQM Hospital cope with a vast influx of new population and their associated ailments, when it is already known to be close to breaking point? There is no mention of provision of further secondary places for new residents, nor do the modifications reference to this need.		<a href="#">View Comment</a>	The protection of existing community facilities is addressed in MM/161 policy CM02. future needs of QEQM hospital is dealt with in policy SP37 MM/068. No change is required to MM/160.
MM/160	Solly	C		383	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change is required to MM/160

#### Mod Number MM/161

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/161	Solly	C		382	The modification is welcomed and supported.		<a href="#">View Comment</a>	Noted. No change is necessary to MM/161

#### Mod Number MM/162



Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/162	-		St John's College	107	(See attached) Further to the discussions at the Examination we concur that the size of the cemetery extension should be reduced in size. We therefore support this proposed modification. However, we are also of the view that the land adjacent to the cemetery extension should be included in the housing allocation under Policy SP16 to allow for comprehensive masterplanning as stated in our Regulation 19 representations.	<a href="#">MM_162_MH.pdf</a>	<a href="#">View Comment</a>	Support noted. The points raised were discussed during the examination hearing sessions and these discussions led to the main modifications proposed.
MM/162	Solly	C		381	No comment		<a href="#">View Comment</a>	Noted. No change is necessary to MM/162

#### Mod Number MM/163

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/163	Solly	C		378	No comment		<a href="#">View Comment</a>	Noted. No change is necessary to MM/163
MM/163	-		St John's College	86	(See attached response.) Savills acts on behalf of St John's College who own the northern extent of allocation HO12 and these comments are consequently made in relation to this interest. The deletion of this policy is supported. As apparent at the Hearing Sessions, insufficient evidence on need for a cemetery expansion is available to warrant a policy or a requirement for the extension to form part of housing allocation HO12. St John's College is not opposed to offering land for a cemetery extension but this would be on the basis of offering a community benefit and not through being a policy requirement.	<a href="#">MM_163_CM.pdf</a>	<a href="#">View Comment</a>	Support for modification noted. No change is required to MM/163

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/163	Lamb	Kyla	Minster Parish Council	97	Finally, the deletion of Policy CM04, setting out the need to expand Minster Cemetery is short sighted and ignores an existing and expanding need for our residents to have a final resting place in the community. In conclusion, after taking the opportunity to respond to consultations on the Draft Thanet Local Plan at every stage, Minster Parish Council must conclude that the process has no value other than to comply with legislation. This is just another example of decision and policy makers not listening to the people who are affected, which leads to the reasonable conclusion that the plan is far from 'Local' in its formation and application.		<a href="#">View Comment</a>	<p>The issue of the expansion of Minster Cemetery was discussed at the examination after which it was concluded that a need for the expansion had not been proven. Therefore in order to ensure that the policies in the plan are justified and effective upon adoption, it was concluded that this policy should be deleted and resulted in the main modifications proposed.</p> <p>No change is required to MM/163.</p>

#### Mod Number

MM/164

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/164	Solly	C		376	This paragraph should distinguish that small sites could be part of a larger masterplan for the area especially with strategic sites. In this case a full masterplan and transport assessment for the site should be required if only part of the strategic site has a planning proposal applied for (no matter what size it is). Strategic sites may be developed by different builders and developers in a piecemeal fashion which could affect the whole masterplan.		<a href="#">View Comment</a>	The Modification addresses the potential impact of smaller site, and this issue is also addressed by the strategic site policies in the Plan. No change is required to MM/164.
MM/164	Bown	Kevin	Highways Agency	55	We consider that the new paragraph should refer to the need, in cases where the development may impact on the Strategic Road Network, for the Council to also work in conjunction with Highways England.		<a href="#">View Comment</a>	The Council, with KCC, commissioned a report (methodology agreed with Highways England)

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
								<p>assessing the potential impact of development in the Plan on the strategic route network.</p> <p>This report was submitted to the Examination (CD6.7 - <a href="https://www.thanet.gov.uk/wp-content/uploads/2018/08/SRN-Impact-Report-1.pdf">https://www.thanet.gov.uk/wp-content/uploads/2018/08/SRN-Impact-Report-1.pdf</a>), and clearly indicates that the cumulative development within the Thanet Local Plan will have a "negligible impact" at the SRN junctions.</p> <p>However, if the Inspectors consider it necessary, in their final report, to recommend a change to the proposed modification, the following change is considered appropriate by the Council:</p> <p>"The Council, in conjunction with KCC Highways, and Highways England (where it relates to the strategic route network), will consider each proposal on its own merits and provide advice to applicants accordingly."</p>
MM/164	Lamb	Kyla	Minster Parish Council	95	In addition, it is a matter of great concern that the transport plan does not ensure that road networks will be in place prior to the significant increase in population and vehicles, which will have a particular impact on Minster as it is located on one of the 3 main routes into the Isle of Thanet. (SP43. MM/164)		<a href="#">View Comment</a>	Transport issues were discussed during the examination hearing sessions and these discussions led to

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								the main modifications proposed. No change is required to MM/164.

#### Mod Number MM/165

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/165	Cooper	Barbara	Kent County Council (KCC)	321	Transport Assessments and Statements should consider multimodal transport options and be produced with consideration of the ROWIP as statutory KCC policy.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. However, Policy TP01 already addresses the consideration of multi-modal transport options. No change is required to MM/165.
MM/165	Solly	C		373	The modification is welcomed and supported		<a href="#">View Comment</a>	Noted. No change is required to MM/165

#### Mod Number MM/166

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/166	Solly	C		371	The modification is welcomed and supported		<a href="#">View Comment</a>	Noted. No change is required to MM/166

#### Mod Number MM/167

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/167	Solly	C		369	The modification is welcomed and supported		<a href="#">View Comment</a>	Noted. No change is required to MM/167

**Mod Number** MM/168

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/168	Solly	C		367	The modification is welcomed and supported		<a href="#">View Comment</a>	Noted. No change is required to MM/168

**Mod Number** MM/169

Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
MM/169	Solly	C		361	The promotion of walking and cycling should be made here. Would encouraging secure cycle park areas promote sustainable transport? Also to encourage better walking connections to the whole Westwood site (a walkway may be beneficial through an application site). It's possible that multi level parking could be a more effective use of land area if area is to be reclaimed in a proposal. An issue with Westwood is that car parks are scattered around the area, it could be more beneficial to have a central parking area and that road management could possibly be better managed. There is also no promotion of electric car charging in this policy, for air quality issues this should also be encouraged and could reduce car parking in that more carbon efficient vehicles will have better accessibility to park displacing standard car spaces.		<a href="#">View Comment</a>	The comment does not relate specifically to the Proposed Modification. However, Policy TP09 specifically new proposals in the area "to demonstrate specific measures to encourage customers to arrive at the site by means other than car...". No change is required to MM/169.

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Mod Number	Respondent Surname	Respondent First Name	Respondent Organisation Name	Comment ID	Comment	Attached documents	Link to comment	Draft Officer's Formatted Response
					Reclamation of parking space for commercial development could be another measure and could be encouraged. A loss of disabled parking could be an issue.			

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