

Thanet District Council

Thanet Local Plan

Stage 1 consultation:
Summary of Interim
Sustainability Appraisal Report

Contents

	Page
The Economy	3
Issue 1 - What level of employment growth should be planned for?	3
Issue 2 - How much employment land is needed and where?	3
Issue 3 - How can we promote our Economic Infrastructure Assets?	4
Issue 4 - How should Thanet's town centres develop?	5
Issue 5 - How can we support the rural economy?	7
Issue 6 - How can we support the visitor economy?	8
Issue 7 - How can we support communications infrastructure and home working?	10
Housing	10
Issue 8 - How many homes do we need to provide?	10
Issue 9 - Where should our new homes be provided?	11
Issue 10 - What types of new homes do we need to provide?	12
Environment and Quality of Life	14
Issue 11 - How do we maintain a physical separation of open countryside between the Thanet towns and prevent urban sprawl?	14
Issue 12 - How do we ensure that new development respects Thanet's important and valued views and landscapes?	15
Issue 13 - How do we protect, maintain and enhance Thanet's green infrastructure to better support wildlife and human health?	15
Issue 14 - How can we adapt to, and mitigate against, the effects of climate change?	15
Issue 15 - Which policies do we need to maintain a safe and healthy environment?	16
Issue 16 - How can we provide high quality homes, developments and neighbourhoods?	17
Issue 17 - How can we protect and enhance Thanet's heritage assets and their settings?	18
Issue 18 - How should we plan for community facilities?	19

The Economy

Issue 1 - What level of employment growth should be planned for?

Summary of initial Sustainability Appraisal (SA) assessment

The sustainability appraisal assessed three options, economic baseline situation and higher and lower growth alternatives. The sustainability appraisal concludes that all three options have the potential for beneficial economic effects.

All growth options are likely to generate waste, greenhouse gas emissions and increase the consumption of resources. The option for economic higher growth is likely to have the greatest benefits as it has indirect positive effects on climate change and resource use by highlighting the green economy as an area for potential growth.

The appraisal then went on to look at specific employment growth options associated with the airport. These were high growth, low growth and no growth.

The option for airport high growth resulted in the most positive and negative effects. It would support economic growth at the airport and would have positive effects for the wider economy of Thanet and East Kent. Negative effects are associated with the effects of large scale employment growth such as greenhouse gas emissions from the construction and operation of new facilities.

It is concluded that all of the negative effects can be mitigated against either by Local Plan development management policies, the site allocations assessment process and compliance with the NPPF.

Issue 2 - How much employment land is needed and where?

Summary of initial Sustainability Appraisal (SA) assessment

Amount of employment land

In relation to how much employment land is needed, the initial SA assessment looked at the following options:

- Employment growth forecasts (from Experian)
- Previous rates of take up of land
- Maintaining the existing supply of land
- Include contingency when determining the amount of land to allocate

It is difficult to assess the options in relation to the amount of employment land, due to uncertainties associated with the type of development, density and location. The only indicators where there were differences between the options were related to economic development. Maintaining the existing supply of employment land and allowing for additional land to ensure flexibility and choice, performed the best.

The difficulty in assessing these will be overcome at the site allocations stage and potential development management policies will also help to mitigate against potentially adverse effects.

Location and Type of Employment Land

In relation to the location and type of employment land the sustainability appraisal considered the following options:

- Relax the uses permitted on some of the allocated employment sites to allow other employment generating uses outside of the B classes.
- Maintain a variety of sites in a range of locations across the district
- Provide all employment land in a single location of cluster in the district
- Use of allocated supply to select sites

The option to use the existing allocated supply from which to select sites is less likely to result in adverse effects and has the greatest opportunity to deliver beneficial effects. Concentrating employment sites in one area (at the single site or cluster) could disadvantage the rest of the District. The single site option could also result in residents having to commute longer distances to get to work and therefore they would be more reliant on the private car.

All of the options are likely to have a beneficial effect on economic growth within Thanet. In most cases potentially adverse effects can be mitigated against during the assessment of allocations.

Protection of existing employment sites

The two options assessed were whether to continue with policy protection for identified employment sites from the 2006 Thanet Local Plan. The option to continue with policy protection was predicted as having the potential to result in a significant positive effect, particularly in terms of job creation and supporting economic growth. The option to cease the policy protection performed better in terms of its potential to have indirect benefits for housing by potentially allowing a greater area of land for housing and other types of development. Neither option resulted in a significant adverse effect.

Issue 3 - How can we promote our Economic Infrastructure Assets?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how we can provide for our economic infrastructure assets, the initial SA assessment concludes:

Airport

The options here were to continue to safeguard the operation of the airport (as is the approach taken in the 2006 Local Plan or to remove policy protection. Continuing to safeguard the operation of the airport was assessed as being likely to have benefits in terms of contributing towards job creation, economic growth, supporting the visitor economy and providing measures to avoid potentially significantly adverse effects such as impacts on landscape, noise and air quality. Removing this policy safeguard has less positive effects, but there was a lot of uncertainty with the option to remove policy safeguards.

Potentially adverse effects and uncertainties could be mitigated by the development of development management policies and national policy requirements (NPPF).

Rail Infrastructure

The three options for supporting rail infrastructure are:

- Provide a new station designed to serve commuters and the airport
- Increase the use of existing stations including supporting improvements at Ramsgate station
- No support for a new station

The option for a new station is likely to result in more significant beneficial effects in terms of contributing towards employment, economic growth (particularly the visitor economy) and providing infrastructure to support modal shift. Mitigation measures can be used to ameliorate adverse effects. The option to increase capacity at Ramsgate station is likely to have beneficial effects for the District and Ramsgate in particular.

Issue 4 - How should Thanet's town centres develop?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to the town centres, the initial SA assessment concludes the following:

Future role of the town centres

In terms of the role of the town centres the options identified are to maintain the retail hierarchy as it is, increase the role of the coastal town centres in convenience shopping and increase the market share of Westwood.

Maintaining the existing retail hierarchy and increasing the role of the coastal town centres in terms of convenience complement each other by helping to continue the current performance of the retail sector (e.g. minimising the leakage of retail spend outside of the District) whilst also supporting the role of the coastal towns, reducing the need to travel and the distance travelled. Maintaining the existing hierarchy would provide benefits for the town centres. Increasing the market share of Westwood would result in economic and job creation benefits at Westwood. However, these benefits are narrowly focussed and might, indirectly, result in adverse effects elsewhere in the Thanet.

Where potentially adverse effects have been predicted it is anticipated that they can be mitigated either by ensuring that development management policies counter or avoid adverse effects or by meeting the requirements of the NPPF.

It is also suggested that potentially adverse and uncertain effects could be mitigated by a hybrid of options that allow the benefits of the different options whilst potentially counteracting some of the adverse effects (e.g. potential effects on accessibility).

Leisure and other town centre development

The SA looked at whether we should be flexible in our town centres to enable leisure development. This option is particularly positive in terms of job creation, supporting the economy, sustainable travel and the tourist economy. Adverse effects were related to consuming resources to construct and operate new development. Uncertain potential effects were based around townscape, heritage, air quality and water resource impacts.

Another option looked at whether it would be beneficial to plan for additional floorspace to accommodate the need for restaurants/cafes, takeaways, drinking establishments and financial and professional services such as banks. This has the same sustainability impacts as the option above.

Where potentially adverse effects have been predicted it is anticipated that they can be mitigated both by ensuring that development management policies counter or avoid adverse effects and by meeting the requirements of the NPPF.

It is suggested that potentially adverse and uncertain effects could be mitigated by a hybrid of options that allow the benefits of the different options whilst potentially counteracting some of the adverse effects (e.g. potential effects on accessibility).

Accommodating town centre development

Ramsgate and Margate

The SA assessed a policy requirement to accommodate development in town centre units in Ramsgate and Margate. The option to accommodate the need for town centre development within existing vacant units was unlikely to have significant negative effects and was predicted as likely to have a positive effect on job creation, supporting the economy, sustainable travel and the tourist economy. Uncertain effects were those on townscape, heritage, air quality and water resource impacts.

Westwood

The two options considered for Westwood were to accommodate development within the existing commercial area or to accommodate development in a new adjacent site. The option to accommodate need on sites outside of existing commercial areas scores negatively as it would potentially require development on greenfield land whereas the option to accommodate need in existing commercial areas supports the sustainable use of land by directing development to areas of previously developed land. Both options had positive effects in terms of supporting job creation and economic growth.

Broadstairs

The options regarding Broadstairs involve accommodating town centre need close the existing commercial area or to accommodate the need at Westwood. This is due to the small amount of vacant units and the constrained nature of the town centre.

The option to accommodate growth close to the existing commercial area scored the best especially in terms of accessibility, job creation, economic growth and the sustainable distribution of development and supporting a shift away from private car use to access the commercial core.

The option to located growth at Westwood scores negatively against sustainability appraisal objectives as it draws away trade from Broadstairs detracting from the sense of place. Services would also be less accessible and cannot easily be accessed on foot or by bicycle thereby requiring people to use the private car.

All other adverse or uncertain effects can be avoided, or mitigated to a certain extent by development management policies, implementation of the NPPF and compliance with environmental legislation.

District and Local Centres and setting thresholds for impact assessments for town centre development

The appraisal assessed options around how we deal with town centre development outside of defined centres. One option is to allow retail development outside of town centres to support community needs, another is to set local thresholds for town centre development outside of town centres and the last is to use the NPPF threshold after which an impact test is required.

Having a policy that allows retail development in district and local centres to support community needs is likely to contribute towards sustainable economic growth, local sense of place and sustainable transport. This is on the basis that locating small convenience type shops in or close to residential areas would avoid larger retail units being developed that could detract and potentially weaken the market for larger retailers at main town centres.

Setting a local threshold for impact assessment is likely to result in more beneficial effects than using the thresholds set out in national policy. This is on the basis that locating small convenience type shops in or close to residential areas would avoid larger retail units being developed that could detract and potentially weaken the market for larger retailers at main town centres.

Issue 5 - How can we support the rural economy?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how we can support the rural economy, the initial SA assessment concludes the following:

Farm Diversification

The options are to support farm diversification where it complements the farm function subject to criteria and no policy support for farm diversification.

Supporting farm diversification is more likely to result in beneficial effects than no support because, by the use of criteria, it would allow the District to gain the benefits from agricultural diversification whilst avoiding many of the potential downsides (e.g. traffic impact, visual and landscape effects and adverse effects on nature conservation).

Location of rural development

The two options tested here are to locate new build development within settlements or to have a policy supporting rural economic development subject to design and sustainability criteria

Supporting new build economic development in settlements has beneficial effects on the local economy, the sense of place and sustainable transport (by locating development in settlements and thereby reducing reliance on private car use). However, the option may result in adverse effects without specific criteria or controls that limit the magnitude and extent of potentially adverse effects.

Village shops and services

The two options are to support new village shops and services and provide policy protection for existing village shops and services. Both options would have positive and negative effects and neither one appears to perform better than the other in sustainability terms. There are beneficial effects on the local economy, the sense of place and sustainable transport (by locating development in settlements and thereby reducing reliance on private car use). Potentially uncertain effects relate to the site specific issues that cannot be assessed as part of a generic district wide policy option.

Best and Most Versatile Agricultural Land

The two options here are either to protect best and most versatile agricultural land or to provide no policy support for this. Protecting best and most versatile agricultural land has the potential to contribute towards the economy, avoiding increases in flood risk and significant benefits for the protection of greenfield land from development. Not protecting best and most versatile agricultural land is not predicted as being likely to have any positive effects.

Agricultural related development and dwellings

The policy options are to support agricultural development including retail, support agricultural related dwellings and no specific policy on agricultural development. Supporting agricultural development, including dwellings and retail units are likely to have positive effects and the potential to contribute towards the economy, rural housing supply, job creation and reducing the need for people to travel to access jobs, services and local facilities. However because there are no specifics in relation to where development would occur, the effects on the built environment, landscape, heritage, ecology and the water environment are uncertain. Potentially adverse effects have also been predicted in terms of energy and resource consumption as well as waste generation because new development will result, to a lesser or greater extent, in these effects.

All of the negative and uncertain effects associated with these options can potentially be mitigated either by development management policies or the NPPF requirements.

Issue 6 - How can we support the visitor economy?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how we can support the visitor economy, the initial SA assessment concludes the following:

Hotel development

The options here are to allow for hotel development outside of town centres or not to. The effects of allowing hotel development outside town centres are slightly better than not because it is assumed that allowing out of town centre hotel development will provide the space for facilities that are often also provided with high end hotels (e.g. Spa, leisure facilities and golf courses). As a result it is predicted that allowing hotels outside of town centres would be likely to have significant beneficial effect on the tourism sector.

Both options have an uncertain effect because the options do not specific in any detail where development is likely to occur. This uncertainty can be addressed during the assessment of specific site allocations.

All of the other remaining negative and uncertain effects associated with both options can potentially be mitigated either by development management policies or the NPPF requirements.

Caravan and Self Catering Accommodation

The options here are to support self catering accommodation (subject to criteria except caravan accommodation at the coast), no policy restriction for caravan accommodation at the coast, and no support for self catered accommodation at all.

Supporting self catering accommodation except for caravans at the coast performs the best, when compared against not restricting caravan accommodation at the coast, or having no support for self catered accommodation. This is because it allows caravan and self-catering development to contribute toward the tourism sector, job creation and economic growth without some of the potential downsides (e.g. the visual effects of caravan accommodation on the coastline and the detrimental effect this can have natural environment as an important part of the visitor economy). Not restricting caravan accommodation at the coast performs the worst and is predicted as being likely to have a significant negative effect on landscape.

All options are likely to have uncertain effects. This is particularly because the options do not identify in any detail where development is likely to occur. This uncertainty can be addressed during the assessment of specific site allocations.

Provision of tourist facilities

A number of options were tested when considering tourist facilities, these are as follows:

- Policy support for new tourist facilities
- No policy support for new tourist facilities
- Blanket policy protection of existing tourism facilities
- Policy protecting existing tourism facilities except where it can be demonstrated that the facility is no longer viable
- Protect identified sites which are of particular importance to Thanet's visitor economy.
- No policy protection of existing tourism facilities

Support for new tourist facilities is likely to have a significant effect on job creation and economic growth in the tourist and visitor economy. A policy protecting existing tourism facilities except where it can be demonstrated that they are no longer viable also has the potential to have a positive effect on economic growth, the sense of place or identity within existing settlements and would also contribute towards retaining important historic and architectural features that are linked to the current and historic tourist and visitor economy of the District. However, blanket protection without the criteria that would allow alternative uses where existing facilities are vacant and not

used, would have potential adverse effects on townscape and a negative visual impact on visitors and their perception of the District as a destination.

Policy to protect specific sites that are of importance to the visitor economy are likely to have a positive effect, on job creation, economic growth and potentially the use of previously developed land. However, without this policy there would be a greater degree of uncertainty as to whether or not its effects would be positive or negative.

All options are likely to have uncertain effects. This is particularly because the options do not identify in any detail where development is likely to occur. This uncertainty can be addressed during the assessment of specific site allocations.

Language schools

The options tested here were to continue to support Language Schools subject to criteria or to remove policy support for Language Schools.

Supporting language schools is more likely to result in positive effects than not supporting them, particularly in terms of job creation and supporting economic growth. Any potentially negative effects of supporting new language schools can be mitigated by development management policies. Removing the policy could potentially over the long term have a negative effect on the economy, if opportunities to increase the provision in this sector are lost. There are uncertain effects associated with supporting and not supporting language schools. This is particularly because the options do not identify in any detail where development is likely to occur.

Amusement Uses

The three options assessed were supporting amusement centres only in certain areas of Margate and Ramsgate. Support amusement arcades in town centres, and no specific amusement use policy.

Options to support amusement arcades in certain areas of Margate and Ramsgate, and amusement arcades only in town centres are likely to have positive effects in terms of sense of place, minimising impacts on townscape, landscape, tourism and the efficient use of land. This is because of their criteria and safeguarding characteristics.

Having no policy would not offer any protection or safeguards and could result in amusement use development occurring anywhere in the District, particularly at locations where they would have an adverse effect on nearby features of interest (e.g. listed buildings) or sensitive receptors (e.g. residential areas).

All negative and uncertain effects associated with all options can potentially be mitigated either by development management policies or the NPPF requirements.

The Beaches

The options considered are to continue with the existing policy protection of beaches – three zones of beaches – major holiday, intermediate and undeveloped beaches or have no policy at all.

Zoning beaches has the potential to result in significant positive effects for the District as a result of ensuring that development only occurs near beaches that is appropriate to the type of beach. As a result the potential amenity, visual, landscape and ecological conflicts that might occur are avoided. Furthermore, it has the potential to indirectly support the character and sense of place associated with the different types of coastal area and beach environment.

Without policy protection there would be significant adverse effects, some of which could not be mitigated or avoided without a safeguarding policy or other policies in the (such as development management policies and the NPPF).

All negative and uncertain effects associated with all options can potentially be mitigated either by development management policies or the NPPF requirements.

Issue 7 - How can we support communications infrastructure and home working?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how can we support communications infrastructure and home working, the initial SA assessment concludes the following:

Communications Infrastructure

In order to support the communications infrastructure the options are to require all new developments to be provided with appropriate communications or no support. Requiring new developments to provide appropriate communications infrastructure has the potential to achieve a number of SA objectives by reducing the need to travel and supporting the creation of jobs and economic growth.

Home working

With regards to the issue of home working the two options are to provide policy support for home working or not to. A policy supporting homeworking would contribute to SA objectives by reducing the need to travel and indirectly helping to make residential areas more vibrant by increasing daytime activity.

It should be noted that the potential sustainability benefits of this option are only likely to be realised as part of wider sustainability interventions.

Workhubs

The final options for this section are to support workhubs or to make no provisions for work hubs. The option to provide allocations for workhubs would benefit rural areas as well as urban ones and would help distribute job creation and the economic benefits of business growth in rural areas. It also indirectly offers a sense of place and vibrancy to counteract the effects of commuter/dormitory settlements.

Any potential adverse or uncertain effects can be mitigated against through provisions of national policy and through development management policies.

Housing

Issue 8 - How many homes do we need to provide?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how many homes we need to provide, the initial SA assessment concludes the following:

The options considered a number of growth scenarios based on a range of demographic and housing growth assumptions

The Migration Trend scenario, which assumes higher housing growth than the Zero Migration scenario, has potential to place higher demand on key local facilities and affect more land including

greenfield land. Alternatively, however, it could facilitate regeneration of previously developed sites and result in higher employment benefits associated with additional housing construction.

The Baseline Economic Growth and Higher Economic Growth scenarios are likely to have more positive effects across a number of areas than would the Economic Lower Growth scenario as they would bring about more and better housing and employment and potentially “lift” people living in deprived areas. Considerations would include access to key facilities (affected by the degree to which job growth is taken up by the District’s resident workforce) and how far the green sector element associated with the economic higher growth scenario might help promote more green jobs and sustainable travel.

At this stage there are a number of unknowns as it is not yet possible to assess potential location-specific factors such as impact on designated sites, landscape, affordability and mix of types of homes and effects on the transport network.

Central to sustainability will be the need to ensure at strategic level that the new housing stock will match the needs of the existing and changing population.

Issue 9 - Where should our new homes be provided?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to where new homes should be provided, the initial SA assessment looked at a number of options and concludes the following:

Emphasis on previously developed land

Locating development in existing urban areas is likely to have more positive effects than developing on greenfield land, which has some negative effects.

Locating development in existing urban areas (as opposed to greenfield sites) will mean it is more likely to be served by existing public transport links and key facilities. Focusing on greenfield land is likely to have long term negative impact on the sustainability objective of protecting and enhancing the area’s natural, semi-natural environments and street scene to support the tourist economy. However, locating development in existing urban areas also pose some risk to existing urban habitats which would require protection measures.

Whatever the balance between provision of housing on previously developed land and greenfield land, there are likely to be negative effects, with development having potential to alter the landscape and/or townscape, create demand for scarce resources and generate a long term increase in greenhouse gas emissions. Negative impacts should be reduced through sensitive design and location of development and best practice to help minimise waste streams.

As options are currently at a strategic level it is not yet possible to factor in sustainability impacts in terms of the quantity, type or mix of development proposed or how specific locations may impact on communities.

How the greenfield element should be accommodated

Concentrating greenfield land at a single location, Developing across dispersed sites is likely to increase the risk of sprawling development and of negative impact on natural and semi-natural resources. Building on dispersed greenfield sites is also likely to require most alteration to public transport services or result in increased car use.

As options are of a strategic nature and not site specific it is not currently possible to factor in quantity of homes, development density, housing mix, potential to re-use of derelict land, impact on particular designated ecological and cultural assets, access to healthcare and education facilities

and impact on communities. However, the option relating to dispersed sites shows a significant number of negative effects against sustainability objectives compared with the alternative options of a single location or small number of locations.

Where the greenfield element should be accommodated.

Locating development adjacent to existing urban areas will (unless new facilities are provided within new developments) increase the likelihood of residents being better served by healthcare, education facilities and transport links. This is particularly so for locations adjoining the main urban area, and to a lesser degree adjoining the villages. Options for locating development at freestanding countryside sites, in the Green Wedges or by means of a new settlement are less likely to be served by existing transport links and therefore potentially more reliant on private vehicles.

All options risk negative impact on ecological assets across Thanet, but development across scattered sites is likely to increase that risk.

All options will have some effect on existing and new communities. The effect on existing communities is likely to be higher in options where development would adjoin existing built up areas.

As options are of a strategic nature and not site specific it is not currently possible to factor in the quantity, type and mix of homes or the detailed impact on communities

Issue 10 - What types of new homes do we need to provide?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to the type of homes which should be provided, the initial SA assessment concludes/indicates the following:

Affordable Housing

Targets reflecting the guideline split for affordable and market homes as recommended in the Strategic Housing Market Assessment are likely to have fairly limited effects but score positively against the sustainability objective of providing a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need. Ensuring that the size of housing matches the demand of future residents may reduce incidence of under-occupation of homes potentially reducing excessive use of energy.

Affordable housing is central to a sustainable supply of housing, and absence of a target affordable housing element would risk non-delivery and be undesirable in sustainability terms. While a target element of 30% may deliver much less than is needed, a higher target may have negative sustainability effects by undermining viability and delivery. Particular care is needed to ensure that the affordable element target will not undermine delivery on smaller housing sites (less than 15 new homes).

Mixed communities will be created when affordable housing is integrated with wider housing developments. However, policies that permit affordable homes to be provided offsite and located away from other developments may result in concentration of vulnerable people in certain areas with increasing levels of unemployment, crime and deprivation.

The option of policy allowing exceptional release of land adjoining the built up parts of the rural villages for affordable homes is more likely to involve greenfield land and thus may risk greater impact on biodiversity. It would also potentially result in people being located away from more

densely populated and better served areas. However, absence of such an “exceptions based” policy would give rise to a number of permanent long term disadvantages in terms of sustainability. The SA assumes that for any affordable housing placed away from other housing developments the need for accessibility to education, healthcare facilities and public transport would be addressed through the site selection process.

HMO/Student accommodation

The options here are to retain a criteria based policy for Homes in Multiple Occupation (HMOs), restrict HMOs in certain areas or identify a particular concentration of HMOs which would be unacceptable in an area and restrict through policy.

The options outlined in Issue 10 are strategic in nature. For this reason there are many unknowns in the appraisal. Understanding which areas are selected and the correct thresholds for any targets imposed will be crucial in understanding the effect of the options, particularly for the option identifying concentrations. The other options will both likely result continuation of the status quo with a potential to restrict growth in HMOs. This may have an impact on the supply of affordable and student housing.

As well as student housing, HMOs can provide a good standard of housing particularly for affordable housing. As such their development can contribute to the growth of supply. Problems can exist and persist in a number of areas when unsuitable properties or locations are selected, or if management standards are poor.

All options whether they restrict or concentrate HMO growth, should consider proximity to key facilities including healthcare. This should be a consideration in any policy. This is particularly the case for affordable housing and family homes which may house children or the elderly.

It is acknowledged that poorly managed HMOs can lead to increased fear of crime. It is also acknowledged that this is often a result of poor management. Policies which encourage or concentrate growth in certain areas should be criteria-based to ensure good management.

Effects on public transport from increasing density within existing housing stock will have a marginal impact on any local public transport services. This will entirely depend on the provision in the local area. Private car use should be discouraged in high density areas.

All decisions around HMOs should include extensive criteria to ensure proper management so that deprivation and poor living conditions do not result from HMOs. Decisions on these policies can have long term effects in these areas therefore these considerations should be central to any policy.

The option to identify problem concentrations and restrict them could potentially result in HMO integration in certain areas where it has not yet been located. If done correctly, this could result in some degree of integration and mixed communities. If managed correctly, this could have positive social effects. If managed incorrectly, communities could suffer. Data on the locations and long term management strategy are crucial to understanding the likely effect.

It is unlikely that these options will affect the tourist sector significantly. However, if HMOs are concentrated in tourist centres and they are poorly managed, there may be amenity and access effects which could have knock on effects on tourism.

It is assumed that HMO policy will be predominantly focussed on previously (or currently) developed areas and that greenfield land will not be affected. However, this is not made explicit in the options.

HMO development may increase waste generation in certain areas if density increases, but this will not increase on a household basis. Opportunities exist in HMOs for good management, best practice and behaviour change relating to waste

Gypsies and travellers

The policy Option for Gypsies and Travels seeks to employ a criteria based approach for proposed sites. The Option does not affect housing supply directly. The option does not represent a strategic approach to site selection, which may result in misplaced sites. However it does allow councils to respond to demand, when it arises, reducing the risk of over or under allocation of sites.

It has been assumed that once allocated, sites would not be developed. As such, in the event that greenfield or other sensitive sites are chosen, no development would take place.

Effects on crime and perception of crime would be affected by firstly, inappropriate site location and secondly, the operational management of the allocated site. Community tensions may result if sites are located in areas with significant opposition to gypsy and traveller sites or if information is not properly relayed to all stakeholders through consultation.

Allocating based on set site criteria allow the sites to be selected according to nearby facilities such as healthcare, education facilities and public transport links. It is assumed that site selection criteria would examine issues such as biodiversity, tourism and access, and sites which might cause harm in these (and other) areas would be rejected. For example, if sites are allocated near to or within AQMAs there may be congestion or traffic and transport impacts. Understanding and managing these types of issues will be crucial in ensuring sustainable site selection.

Environment and Quality of Life

Issue 11 - How do we maintain a physical separation of open countryside between the Thanet towns and prevent urban sprawl?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to maintaining a physical separation of open countryside between the Thanet towns and prevent urban sprawl, the initial SA assessment concludes/indicates the following:

The options maintaining protection of the green wedges and/or encouraging leisure use will restrict potential development sites in some areas. This could have a detrimental effect on the housing market by restricting potential supply. However, this could also encourage development towards previously developed land which would have a number of positive effects. Affording no policy protection may result in development being located away from the existing built up areas that are not well served by public transport links, and would encourage private car use.

Although maintaining protection will have no direct effect on employment, removal of policy protection could result in construction employment. Encouraging the development of leisure uses could support employment in the leisure and tourist sectors which could have positive marginal effects on GVA.

Maintaining protection of the Green Wedges and countryside would also maintain tourism and leisure uses in these areas. Encouraging the development of leisure uses would boost the tourism sector, whilst affording no policy protection to the green wedges may result in development that is detrimental to the tourism sector.

Encouraging alternative uses for the green wedges including provision of open space and creation of new wildlife habitats would have a positive impact on biodiversity resources. Maintaining protection would have a neutral impact, and removing policy protection could potentially result in damage to biodiversity in these areas.

Issue 12 - How do we ensure that new development respects Thanet's important and valued views and landscapes?

Summary of initial Sustainability Appraisal (SA) Assessment

In relation to landscape character areas, the initial SA assessment concludes/indicates the following:

Maintaining protection for Thanet's landscapes will have a positive impact and ensure that tourism remains constant, whereas no specific policy protection increases the risk and could bring about changes that may negatively affect tourism.

Maintaining protection for the landscapes will protect them for their historical and biodiversity values, whereas no policy protection would put them at risk from inappropriate development.

Issue 13 - How do we protect, maintain and enhance Thanet's green infrastructure to better support wildlife and human health?

Summary of initial Sustainability Appraisal (SA) Assessment

In relation to how to protect, maintain and enhance the districts green infrastructure to better support wildlife and human health, the initial SA assessment concludes/indicates the following:

There is a slight risk that a requirement for new development to contribute to green infrastructure may have implications on the viability of smaller housing developments.

The option to protect and enhance open spaces will improve sense of place by creating greener areas where people may be more satisfied with their surroundings, and would also increase the likelihood of tourism. The option to remove such protection would be detrimental to these areas. Removal of protection could also be detrimental to heritage assets.

Policy support for green infrastructure and open space will have major positive effects on open space provision, and can have positive effects on air quality. Certain types of green infrastructure and green space can also provide protection from flooding; encouraging their development and/or protection will have positive effects through flood attenuation. Removing protection may have the opposite effect, to varying degrees depending on location/ baseline environment.

Issue 14 - How can we adapt to, and mitigate against, the effects of climate change?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how we can adapt to, and mitigate against the effects of climate change, the initial SA assessment concludes/indicates the following:

There is a risk that adaptation measures could, if deemed expensive, affect the viability of smaller housing schemes. However, there may be an effect on the saleable value of new housing which is climate change resilient, compared to that which is not.

There may be some positive economic effects and job creation through the retrofitting option. However there may be risk to historic/cultural assets such as listed buildings or conservation

areas. If these assets undergo refurbishment to make them climate change resilient, works will need to be sensitive to design and the building fabric.

In terms of mitigation measures – the same implications of viability and saleable value of housing apply as with adaptation measures.

There are potential positive impacts on air quality.

Renewable energy options could have positive impacts as developers may be encouraged to build in their vicinity seeking to use the energy produced, and also may bring about some employment generation through new industry.

There should be a neutral effect from renewables on landscape impact, with the exception of wind farms.

Issue 15 - Which policies do we need to maintain a safe and healthy environment?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to which policies we need to maintain a safe and healthy environment, the initial SA assessment concludes/indicates the following:

Control Polluting Development

The options assessed for this issue are whether or not there should be a policy to control polluting development. Both options have positive and negative effects; however the option to have a policy is more likely to have neutral or beneficial effects by controlling polluting development through the planning system.

Development on contaminated land

The options assessed for this issue are whether or not there should be a policy to control and mitigate development on contaminated land. The option to have a policy could have indirect health benefits by removing potential pollutant pathways that could adversely affect people's health, and there might be greater risks to health without a policy. Both options could potentially deter the development or regeneration of previously developed land, particularly if a developer can build on a greenfield site that would be cheaper and quicker.

Development on unstable and derelict land

The options assessed for this issue are whether or not there should be a policy to control development on unstable and derelict land. A beneficial effect is predicted for having a policy to ensure that developers have a better understanding of the potential structural and design issues they will have to address during construction. This could help to make development of previously developed land more viable and less risky, and give confidence that instability issues have been considered. This is particularly important in an area with a dynamic coastline.

Air quality

The options assessed for this issue are whether or not there should be a policy to support improvements to air quality. A beneficial effect is predicted by having a policy as criteria can allow the control of development in AQMAs, therefore improving air quality and indirectly contributing towards improving the health of residents.

Noise

The options assessed for this issue are whether or not there should be a policy to control and mitigate against unacceptable noise. Having a policy can indirectly have a positive effect by

reducing stress and the other adverse effects unacceptable noise can have on quality of life. However, existing noise legislation would result in the same positive effect.

Light pollution

The options assessed for this issue are whether or not there should be a policy to control light pollution.

Potentially beneficial effects are identified for having a policy on how satisfied people are with where they live by reducing the level of nuisance light. It could also have visual and landscape benefits and help reduce light pollution effects on protected species.

Groundwater

The options assessed for this issue are whether or not there should be a policy restricting development that would detrimentally impact groundwater. A potential benefit is identified in having a policy since Thanet's groundwater is particularly susceptible to contamination. However groundwater quality is protected under other legislation.

Issue 16 - How can we provide high quality homes, developments and neighbourhoods?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how we can use design policies to help create homes and communities that people will be attracted to and want to live in, the initial SA assessment concludes/indicates the following:

Amenity value and character

The options assessed for this issue are for policies to consider the impact of development on residential amenity value, the character and appearance of the surrounding area and compatibility with and impact on neighbouring buildings. The SA identifies all three options as having positive effects, including indirect effects on a sense of place and the desirability of the area. The most significant positive effect would be the effects on townscape and landscape.

Movement and access in new development

The options assessed for this issue are for the provision of pedestrian/cyclist/vehicle movements in new development and provision for disabled access. Both options are considered to have a positive effect by enabling alternative use to the private car and improving access to new developments for vulnerable groups.

Open space and greenspace

The options assessed for this issue are providing open spaces and gaps in development; landscaping, planting and green infrastructure and wildlife habitats and corridors. The SA considers that all options will have a positive effect on the sense of place, quality of the natural and semi-natural environment for tourism and local landscape and townscape character. They will have a positive effect on health by providing opportunities for people to exercise and live healthier lifestyles, and a significant positive effect on biodiversity.

Crime prevention and contributing towards public art

The options assessed for this issue are measures to prevent crime and disorder and the integration of public art into new developments. Both options are likely to have a significant effect on sense of place and people's satisfaction with where they live, work and visit.

Other policy issues

Options assessed for this issue include provision for clothes drying facilities and refuse disposal/dustbin storage, incorporation of sustainable drainage systems and appropriate design and location of advertisements.

The appropriate design and location of advertisements would have a positive effect on the streetscape, townscape and visual amenity, which have potentially indirect benefits for the visitor and tourist economy. The provision of clothes drying facilities could contribute towards reducing greenhouse gas emissions and energy consumption by providing an alternative to energy intensive tumble dryers. Incorporating SUDs would have a positive effect in contributing towards reducing flood risk, climate change adaptation and could indirectly contribute towards habitat creation where they are in the form of ponds or water bodies.

Areas of High Townscape Value

The options here are to continue with the existing policy protection for AHTVs, remove the policy protection or identify areas that are of high townscape value and protect and enhance through policy

The two options protecting AHTVs are both predicted as being likely to have positive effects on townscape and indirectly the role that areas of high value townscape has on the sense of place, people's satisfaction with where they live and cultural heritage features within those areas.

However, without policy protection of any sort there is the potential for adverse effects on the sense of identity of towns with areas of high townscape value, it could potentially harm the visitor economy and result in adverse visual, townscape and heritage effects.

Housing Density

The options assessed for this issue include housing densities set in zones, decided by the density of the surroundings of the application site or continue the existing Local Plan density requirements.

All of the options have the potential to have a positive effect on sense of place, townscape, heritage features and the sustainable use of land resources i.e. by allowing higher densities of dwellings in locations where it is appropriate and can be accommodated. Furthermore, by allowing different densities of development there are indirect benefits for sustainable transport by increasing the numbers of people living close to town centres where public transport links can be accessed more easily.

Garden land development

The options for this issue are whether or not there should be a policy restriction on development on garden land. Positive effects are identified by having a policy in promoting the use of previously developed land by putting in place safeguards that require garden land development as a last resort. It also contributes indirectly towards biodiversity in helping to retain gardens and their importance as habitat areas within urban areas and towns. The SA considers there would be potentially adverse effects without a policy.

Issue 17 - How can we protect and enhance Thanet's heritage assets and their settings?

Summary of initial Sustainability Appraisal (SA) assessment

In relation to how we protect and enhance heritage assets and their settings, the initial SA assessment concludes/indicates the following:

Designated heritage assets

Options assessed include support for the preservation and enhancement of existing conservation areas, designation of new conservation areas, protection and enhancement of listed buildings, protection and enhancement of historic parks and gardens, protection and enhancement of scheduled ancient monuments and buildings of local interest and other heritage assets through the development of a local list.

All options are considered to have the same direct and indirect effects on the character and sense of place of settlements and have a positive effect in helping to support the economy and visitor economy. However for the effects to be realised all of the options would need to be implemented. Any negative or uncertain effects can potentially be mitigated by development management policies or NPPF requirements.

Protecting assets and criteria based policies

The options include support for identification and protection of archaeological heritage and heritage at risk, criteria based policies for locally listed buildings and renewable energy within the historic environment, site specific policies for heritage assets with development potential and no specific heritage policies.

All options, except for the no policy option, are considered to have the same direct and indirect effects on the character and sense of place of settlements and have a positive effect in helping to support the economy and visitor economy. However for the effects to be realised all of the options would need to be implemented. The effects of no specific policy are uncertain as the extent to which the NPPF on its own would protect heritage assets is unknown.

Any negative or uncertain effects can potentially be mitigated by development management policies or NPPF requirements.

Issue 18 - How should we plan for community facilities?

Summary of initial Sustainability Appraisal (SA) assessment

The sustainability appraisal (SA) is a key consideration in assessing and interpreting the options, and must be taken into account in deciding the most appropriate option in meeting the objectives.

In relation to how we can make sure there is sufficient provision of shared facilities for our communities, the initial SA assessment concludes/indicates the following:

Policy support for protecting existing or providing new community facilities have the same positive effect as they contribute towards addressing current and future shortages. The effects of no policy protection for exiting facilities is uncertain as it might be governed by other factors such as population growth, housing numbers and the needs of the population over the life of the plan. The effects of no policy support for new community facilities would be adverse as it would not allow the capacity of facilities to be increased.

If you would like a copy of this document in a different format such as Braille, audio or large print, or in another language please call
01843 577165

